

DT 05-083



**CONFIDENTIAL
MATERIAL
IN COMM FILE**

Victor D. Del Vecchio
Assistant General Counsel

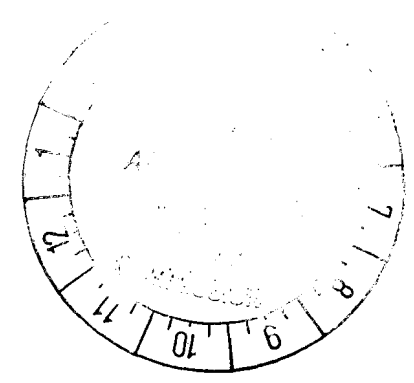
185 Franklin Street, 13th Floor
Boston, MA 02110-1585

Phone 617 743-2323
Fax 617 737-0648
victor.delvecchio@verizon.com

April 17, 2006

VIA HAND DELIVERY

Ms. Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301



**Re: Verizon's Objection to BayRing Communications, Inc. and
SegTel, Inc.'s Motion for Rehearing;
Dockets DT 05-083 – Wire Center Investigation and
DT 06-012 – Proposed Revisions to NHPUC Tariff No. 84**

Dear Ms. Howland:

Enclosed for filing in the above-referenced matter are an original and eight copies of Verizon New Hampshire's Objection to BayRing Communications, Inc.'s and segTel, Inc.'s Motion for Rehearing.

Verizon considers the wire center-level data contained in the Attachment to be proprietary and competitively sensitive. The Attachment, which has been marked "confidential," pertains to the provision of competitive services; sets forth trade secrets or other confidential information falling within the scope of RSA 378:43, II(b); and contains information that is not general public knowledge or published elsewhere, Verizon New Hampshire having taken measures to prevent dissemination of the information in the ordinary course of business.

Thank you for your attention to this matter.

Very truly yours,

Victor D. Del Vecchio
Victor Del Vecchio

cc: Service List

**BEFORE THE
STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

<u>Verizon New Hampshire's Proposed</u>)	
<u>Revisions to NH PUC Tariff No. 84</u>)	Docket No. DT 06-012
)	
)	
<u>Verizon New Hampshire</u>)	
<u>Wire Center Investigation</u>)	Docket No. DT 05-083

**VERIZON NEW HAMPSHIRE'S OBJECTION
TO BAYRING COMMUNICATIONS INC. AND SEGTEL, INC.'S
MOTION FOR REHEARING**

Verizon New Hampshire ("Verizon NH") hereby objects to the motion for rehearing filed by BayRing Communications, Inc. and segTel, Inc. (the "CLECs"). As explained below, no "good reason for the rehearing is stated in the motion," and their motion should be denied. *See Connecticut Valley Electric Company/Public Service Company New Hampshire*, DE 03-030, Order No. 24,189 dated July 3, 2003 at 2.

DISCUSSION

1. The CLECs assert that the "issue of line count was never argued or litigated" and that the business line data was not "independently verified by Staff or any party" (¶ 5). This is incorrect. Verizon NH provided 18 discovery responses directed to the issue of business line counts during the course of the proceeding. Appended as Attachment 1 are copies of the relevant responses, including certain proprietary material.¹ In fact, Staff made reference to many of the Verizon NH discovery responses in its first set of requests in the current wire center investigation, Docket DT 06-020, and asked Verizon NH to

¹ Attached are Verizon NH's responses to Staff 1-1 through 1-18 filed in DT 05-083. The responses to Staff 1-1, 1-8, 1-9 and 1-10 contain material that is considered proprietary and competitively sensitive.

verify that the information provided in these responses continues to apply to the Concord wire center investigation.²

2. In its Order No. 24,598 dated March 10, 2006 (the “March 10 Order”), the Commission found that Conversent raised the issue of business line counts at the prehearing conference of May 25, 2005 (March 10 Order at 32-33).

3. The Commission specifically addressed the issue of Manchester business line counts on page 44 of its March 10 Order, stating: “Finally, we consider the number of business lines in Manchester.” The Commission observed that “CLECs did not raise issues of business lines in their briefs.” *Id.*

4. The CLECs are barred from seeking to further litigate on reconsideration a matter that had been expressly raised during the course of the year-long investigation, which they had ample opportunity to challenge, and which the Commission addressed in its Order. *See, e.g. Petition for Approval of Statement of Generally Available Terms Pursuant to the Telecommunications Act of 1996*, DE 97-171, Order No. 24, 392 dated October 29, 2004 at 5 (“Furthermore, evidence was Verizon’s to develop, and it did not do so. Verizon, therefore, has not demonstrated good cause for introduction of evidence that it could have, but failed, to present. *Appeal of Gas Service*, 121 N.H. 797 (1981) (Utility that failed to show why it did not raise issue in hearings did not demonstrate good cause to rehear”).

² In its discovery request no. Staff 1-1 dated March 31, 2005, Staff asked: “Regarding Concord wire center line counts, please affirm that Verizon’s answers to Questions STAFF 1-2 through 1-5, STAFF 1-7, and STAFF 1-12 through 1-18 provided on August 22, 2005, in Docket DT 05-083 are current as to the count of business lines in Concord. If Verizon would answer any of those questions differently for Concord today, please provide those answers here.”

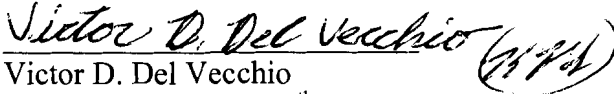
CONCLUSION

The CLECs fail to direct the Commission's attention to matters "overlooked or mistakenly conceived" in the original decision that "require an examination of the record already before the fact finder." *Investigation as to Whether Certain Calls Are Local*, DT 00-223/054, Order No. 24, 218 dated October 17, 2003 at 8. For the foregoing reasons, the Commission should deny the CLECs' motion for rehearing.

Respectfully submitted,

VERIZON NEW HAMPSHIRE

By its attorney,


Victor D. Del Vecchio
185 Franklin Street, 13th Floor
Boston, Massachusetts 02110
617-743-2323 (tel.)
617-737-0648 (fax)

Dated: April 17, 2006

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-1 Please provide a breakdown, and copies of all documents supporting each breakdown, of the total number of business access lines Verizon reported for each wire center, by wire center CLLI code, according to the following categories:

- a. business analog switched access lines counted under ARMIS 43-08
- b. business digital switched access line equivalents counted under ARMIS 43-08
- c. business Centrex extensions counted under ARMIS 43-08
- d. Centrex trunks counted under ARMIS 43-08, PBX trunks counted under ARMIS 43-08
- e. business UNE DS0, DS1 and DS3 loops not in combination with other network elements, and
- f. business UNE DS0, DS1 and DS3 loops provided in combination with other network elements.

REPLY: As of 2001, FCC access line filing requirements for ARMIS 43-08 require that access lines be reported on a single and multi-line basis, rather than on an analog and digital switched access line basis. Therefore, in response to requests (a) and (b) above, Verizon is providing the business single and multi-line equivalents counted under ARMIS 43-08 for December, 2003. All Centrex lines are counted as Centrex extensions. Data is provided for the five wire centers cited in the order per agreement of Staff and parties.

Verizon New Hampshire considers certain information requested to be proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly executed protective agreement.

REPLY: Staff 1-1
ctd.

-2-

Please see Proprietary Attachments NH 05-083 Staff 1-1(a-d), (f) and Staff 1-1(e).

VZ # 1

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-2 Please describe, in reasonable detail, the criteria Verizon applied to determine which lines were appropriate to include as business lines on the list provided to the FCC on February 18, 2005. Additionally, please supply the following information with respect to the criteria identified:

- a. The source of the data or information along with all supporting documents used to determine whether a particular business line fulfilled the applicable criteria.
- b. When the data or information used to determine whether a particular business line fulfilled the applicable criteria was gathered.

REPLY: 47 C.F.R. § 51.5 of the FCC's *Triennial Review Remand Order* ("TRRO") rules, provides that "[t]he number of business lines in a wire center shall equal the sum of all incumbent LEC business switched access lines, plus the sum of all UNE loops connected to that wire center, including UNE loops provisioned in combination with other unbundled elements." The same rule defines "wire center" as "the location of an incumbent LEC local switching facility containing one or more central offices...." *Id.* The TRRO similarly defines wire center (at footnote 251) as "any incumbent LEC switching office that terminates and aggregates loop facilities." Thus, line counts derived on a wire center basis include all loops that terminate in that location, even if they terminate on separate switches.

Paragraph 105 and footnote 303 of the TRRO both reference the ARMIS 43-08 Report as the source of the data the FCC used to analyze the Bell Operating Company ("BOC") wire center data and to establish the impairment threshold in the TRRO; therefore, Verizon used the same source to prepare the wire center analysis. The December 2003 ARMIS

REPLY: Staff 1-2
ctd.

-2-

report was used because it is the most recent report on file with the FCC as of the March 11, 2005 effective date ordered by the FCC. To the Switched Business Access Lines included in the ARMIS 43-08 report, which includes Verizon retail business lines, resold business lines, and UNE-P business lines, Verizon added the count of UNE Loops and EEL Loops as provided in 47 C.F.R. § 51.5 of the FCC's Rules.

VZ # 2

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-3 Please identify any criteria Verizon applied to determine which lines were appropriate to include as business lines on the CLLI list provided to the FCC on February 18, 2005 that were different from the criteria used to create the list Verizon provided to the FCC on December 7, 2004. In responding to this question, please be sure to explain:

- a. If the business line counts provided to the FCC on December 7, 2004 were all based on VGE?
- b. Did Verizon count each ISDN, DS1 and DS3 UNE loop, and other digital access lines based on its VGE? For example, did Verizon count a UNE DS1 as 24 business lines and a UNE DS3 as 672 business lines?

REPLY: 47 C.F.R. § 51.5 of the FCC's TRRO rules provides that "[t]he number of business lines in a wire center shall equal the sum of all incumbent LEC business switched access lines, plus the sum of all UNE loops connected to that wire center, including UNE loops provisioned in combination with other unbundled elements." The same rule defines "wire center" as "the location of an incumbent LEC local switching facility containing one or more central offices...." *Id.* Footnote 251 of the TRRO Order similarly defines the term "wire center" as "any incumbent LEC switching office that terminates and aggregates loop facilities." Thus, line counts derived on a wire center basis include all loops that terminate in that location, even if they terminate on separate switches.

Paragraph 105 and Footnote 303 of the TRRO reference the ARMIS 43-08 Report as the source of the data the FCC used to analyze the BOC wire center data; therefore, Verizon used the same source document to prepare the wire center analysis. The December 2003 ARMIS report

REPLY: Staff 1-3
ctd.

-2-

was used because it is the most recent report on file with the FCC as of the March 11, 2005 effective date ordered by the FCC. To the Switched Business Access Lines included in the ARMIS 43-08 report, which includes Verizon retail business lines, resold business lines, and UNE-P business lines, Verizon added the count of UNE Loops and EEL Loops as provided in 47 C.F.R. § 51.5 of the FCC's Rules.

In its February 18, 2005 submission, Verizon included EEL loops in the quantity of UNE loops reported because § 51.5 of the FCC's regulation provides that the count of business lines shall include "...UNE loops provisioned in combination with other unbundled elements."
All Switched Business Access line counts and all UNE line counts reported to the FCC on December 7, 2004 were reported as voice-grade equivalents.

See Chart below for Verizon's conversion matrix used as of December, 2003.

Description	Systems to Channels (VGE) Conversion Factor(s)
BRI	2
PRI	23
Cyber DS1	24
Cyber DS3	672
UNE-P PRI	23
UNE-P DS1	24
UNE-P BRI	2

VZ # 3

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-4 If applicable, given the information requested in questions 1-3, what steps did Verizon take to confirm that high-capacity facilities (or some portion of high-capacity facilities) included in the business access line counts were used to provide switched-access services?

REPLY: Verizon followed the FCC's TRRO regulations. 47 C.F.R § 51.5 , provides that "[t]he number of business lines in a wire center shall equal the sum of all incumbent LEC business switched access lines, plus the sum of all UNE loops connected to that wire center, including UNE loops provisioned in combination with other unbundled elements." The same rule defines "wire center" as "the location of an incumbent LEC local switching facility containing one or more central offices...." *Id.* Footnote 251 of the TRRO Order similarly defines the term "wire center" as "any incumbent LEC switching office that terminates and aggregates loop facilities." Thus, line counts derived on a wire center basis include all loops that terminate in that location, even if they terminate on separate switches.

Paragraph 105 and Footnote 303 of the TRRO reference the ARMIS 43-08 Report as the source of the data the FCC used to analyze the BOC wire center data; therefore, Verizon used the same source document to prepare the wire center analysis. The December 2003 ARMIS report was used because it is the most recent report on file with the FCC as of the March 11, 2005 effective date ordered by the FCC. To the Switched Business Access Lines included in the ARMIS 43-08 report, which includes Verizon retail business lines, resold business lines, and UNE-P business lines, Verizon added the count of UNE Loops and EEL Loops as provided in § 51.5 of the FCC's Rules.

REPLY: Staff 1-4
ctd.

-2-

Verizon's internal access line reporting system distinguishes between business switched access lines and business non-switched access lines, and only business switched access lines were counted.

The business line counts are in agreement with line counts as reported on financial statements. The access line reporting system recently passed an internal audit in Spring 2005.

VZ # 4

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-5 Were any dedicated or shared transport facilities counted as business lines?
a. If so, why?
b. If so, please identify each wire center, by CLLI code, for which dedicated or shared transport facilities were counted as business lines and the number of business lines counted as a result.

REPLY: No dedicated or shared transport facilities were counted as business lines.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-6 Were any lines connecting Verizon facilities to Internet Service Providers counted as business lines?

- a. If so, why?
- b. If so, please identify each wire center, by CLLI code, for which lines connecting Verizon facilities to Internet Service Providers were counted as business lines and the number of business lines counted as a result.

REPLY: Verizon NH objects to this request as unduly burdensome since it calls for the production of information that is not maintained at the level of detail requested or in the requested format, and would consequently require a special study to produce, at substantial time and effort.

Subject to the foregoing objections and without waiving any of its rights, Verizon states as follows: To the extent switched lines can access the Internet, Verizon concluded that all business lines can connect Verizon facilities to Internet Service Providers. However, Verizon did not distinguish these lines from all other lines.

Verizon New Hampshire considers certain information requested to be proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly executed protective agreement.

Please see Proprietary Attachments NH 05-083 Staff 1-1(a-d), (f) and Staff 1-1(e). Data is provided for the five wire centers cited in the order per agreement of Staff and parties.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-7 Were any UNE loops ordered by CLECs counted as business lines?

- a. If so, why?
- b. If so, please identify each wire center, by CLLI code, for which UNE loops ordered by CLECs were counted as business lines and, by CLEC, the number of business lines counted as a result.

REPLY: Verizon followed 47 C.F.R. § 51.5, which provides: "The number of business lines in a wire center shall equal the sum of all incumbent LEC business switched access lines, **plus the sum of all UNE loops** connected to that wire center, including UNE loops provisioned in combination with other unbundled elements" (emphasis added).

Therefore, all UNE-loops purchased by CLECs as of December, 2003 were included in the business UNE-loop count.

Verizon New Hampshire considers certain information requested to be proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly executed protective agreement.

Please see Proprietary Attachment NH 05-083 Staff 1-1(e). Data is provided for the five wire centers cited in the order per agreement of Staff and parties.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-8 Were any lines serving your subsidiaries or affiliates counted as business lines?

- a. If so, why?
- b. If so, please identify each wire center, by CLLI code, for which lines serving your subsidiaries or affiliates counted as business lines and the number of business lines counted as a result.

REPLY: Verizon New Hampshire considers the information requested to be proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly executed protective agreement.

Please see Proprietary Attachment NH 05-083 Staff 1-8 for any lines serving Verizon's subsidiaries or affiliates counted as business lines. Data is provided for the five wire centers cited in the order per agreement of Staff and parties.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-9 Regarding MCI:

- a. Please provide the number of MCI "business lines" that are included in the total business line count for each wire center that Verizon has identified as qualifying for relief from unbundled services.
- b. Please provide the number and type of UNEs (i.e., DS0s, DS1s, & DS3s) MCI ordered that support the total MCI business line count for each wire center.

REPLY: Verizon New Hampshire considers the information requested to be proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly executed protective agreement.

Please see Proprietary Attachment NH 05-083 Staff 1-9. Data is provided for the five wire centers cited in the order per agreement of Staff and parties.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-10 Were any data loops (e.g. xDSL-capable loops, T-1 loops, etc.) or portions of data loops not providing switched services counted as business lines?

- a. If so, why?
- b. If so, please identify each wire center, by CLLI code, for which data loops or portions of data loops not providing switched services were counted as business lines and the number of business lines counted as a result.

REPLY: Verizon followed 47 C.F.R. § 51.5, which provides: "The number of business lines in a wire center shall equal the sum of all incumbent LEC business switched access lines, **plus the sum of all UNE loops** connected to that wire center, including UNE loops provisioned in combination with other unbundled elements" (emphasis added). Therefore, all UNE-loops, including DSLs, DS1s, and DS3s, purchased by CLECs as of December, 2003 were included in the business UNE-loop count.

Verizon New Hampshire considers certain information requested to be proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly executed protective agreement.

Please see Proprietary Attachment NH 05-083 Staff 1-10 for DSL, DS1, and DS3 volumes that were included in the business UNE-loop count. Data is provided for the five wire centers cited in the order per agreement of Staff and parties.

VZ # 10

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-11 If not covered by the information Verizon provided in response to question 10, was bandwidth on channelized high capacity loops that was not being used for voice service counted as business lines?

- a. If so, why?
- b. If so, please identify each wire center, by CLLI code, for which bandwidth on channelized high capacity loops that was not being used for voice services was counted as business lines and the number of business lines counted as a result.

REPLY: Please see Verizon's response to Staff 1-10.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-12 In situations where Verizon counted high capacity loops as business lines, did Verizon “round up” or down when calculating VGE for high capacity loops where the loop speed was not divisible by 64 (i.e., was a 144 Kbps line providing switched access services counted as two business lines or three)?

- a. If so, why?
- b. If so, please identify each wire center, by CLLI code, for which “rounded-up” lines were counted as business lines and the number of business lines counted as a result.

REPLY: Verizon did not round up or down when calculating VGE for high capacity loops where the loop speed was not divisible by 64.

Calculations of voice-grade equivalents (VGE) for high capacity loops were based on channels not Kbps. See Chart below for Verizon’s conversion matrix used as of December, 2003.

Description	Systems to Channels (VGE) Conversion Factor(s)
BRI	2
PRI	23
Cyber DS1	24
Cyber DS3	672
UNE-P PRI	23
UNE-P DS1	24
UNE-P BRI	2

VZ # 12

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-13 To the extent that it is possible for Verizon to identify this information, were any lines used to provide voice services using Voice-over-Internet-Protocol (VoIP) services counted as business lines?

- a. If so, why?
- b. If so, please identify each wire center, by CLLI code, for which lines used to provide voice services using VoIP were counted as business lines and the number of business lines counted as a result.

REPLY: Verizon NH objects to this request as unduly burdensome since it calls for the production of information that is not maintained at the level of detail requested or in the requested format, and would consequently require a special study to produce, at substantial time and effort.

Subject to the foregoing objections and without waiving any of its rights, Verizon states as follows: To the extent switched lines can access the Internet, Verizon concluded that all business lines can provide voice services using Voice-over-Internet-Protocol (VoIP). However, Verizon did not distinguish these lines from all other lines.

Verizon New Hampshire considers certain information requested to be proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly executed protective agreement.

Please see Proprietary Attachments NH 05-083 Staff 1-1(a-d), (f) and Staff 1-1(e). Data is provided for the five wire centers cited in the order per agreement of Staff and parties.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-14 When calculating data speeds for purposes of determining 64 Kbps equivalents, what speed did Verizon use for this calculation on lines with asymmetrical upstream and downstream speeds; the slower speed, the higher speed, the upstream speed, or the downstream speed? If your answer depends on the type of line, please explain what speed was used for each type of line and why.

REPLY: Calculations of voice-grade equivalents (VGE) for high capacity loops were based on channels not Kbps. See Chart below for Verizon's conversion matrix used as of December, 2003.

Description	Systems to Channels (VGE) Conversion Factor(s)
BRI	2
PRI	23
Cyber DS1	24
Cyber DS3	672
UNE-P PRI	23
UNE-P DS1	24
UNE-P BRI	2

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-15 When calculating the total number of business access lines, did Verizon exclude residential lines from the business line count? If so, how? If not, why not? Please provide all supporting documentation.

REPLY: Residence lines were excluded from the retail, resale and UNE-P business switched access line count. Verizon's internal access line reporting system distinguishes between business, residence, and switched access lines, and only business switched access lines were counted. The total business lines for each wire center were based on switched business access lines plus December 2003 UNE Loops and EEL Loops totals.

The business line counts are in agreement with line counts as reported on financial statements. The access line reporting system recently passed an internal audit in Spring 2005.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-16 When calculating the total number of UNE-P business lines, did Verizon exclude residential UNE-P lines from the business UNE-P line count? If so, how? If not, why not? Please provide all supporting documentation.

REPLY: Yes, residence UNE-P lines were excluded from the business UNE-P line count. Verizon's internal access line reporting system distinguishes between business and residence UNE-P switched lines, and only business UNE-P switched lines were counted. The total business lines for each wire center were based on switched access lines plus December 2003 UNE Loops and EEL Loops totals.

The business line counts are in agreement with line counts as reported on financial statements. The access line reporting system recently passed an internal audit in Spring 2005.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-17 When calculating the total number of UNE-loop business lines, did Verizon exclude residential UNE-loops from the business UNE-loop count? If so, how? If not, why not? Please provide all supporting documentation.

REPLY: Verizon followed 47 C.F.R. § 51.5, which provides: “The number of business lines in a wire center shall equal the sum of all incumbent LEC business switched access lines, plus the sum of all UNE loops connected to that wire center, including UNE loops provisioned in combination with other unbundled elements.”

Residence UNE-loops, to the extent such exist, were not excluded from the business UNE-loop count. Verizon’s systems do not distinguish between residence and business UNE loops.

Verizon New Hampshire considers certain information requested to be proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly executed protective agreement.

Please see Proprietary Attachment 05-083 Staff 1-1(e). Data is provided for the five wire centers cited in the order per agreement of Staff and parties.

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. 05-083

Respondent: Robert D. Meehan
Title: Director-State Regulatory
Planning

REQUEST: New Hampshire Utilities Commission Staff, Set 1

DATED: August 22, 2005

ITEM: Staff 1-18 When calculating the total number of business access lines, did Verizon count each Centrex extension as a full business line?

- a. If so, why?
- b. If so, please identify each wire center, by CLLI code, for which Centrex extensions were counted as full business lines and the number of business lines counted as a result.

REPLY: Yes, Verizon counted each Centrex extension as a full business line as reported in ARMIS.

Verizon New Hampshire considers certain information requested to be proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly executed protective agreement.

Please see Proprietary Attachment NH 05-083 Staff 1-1(a-d), (f). Data is provided for the five wire centers cited in the order per agreement of Staff and parties.