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Vice President and General Counsel, Southeast
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April 15, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 990649B-TP
Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and 15 copies of Verizon Florida Inc.'s Response to AT&T Communications of the Southern States, Inc.'s and MCI WorldCom, Inc.'s Second Motion to Compel Discovery. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

KC:tas
Enclosures

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC _____
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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled) Docket No. 990649B-TP
network elements (Sprint/Verizon track)) Filed: April 12, 2002

**VERIZON FLORIDA INC.'S RESPONSE TO AT&T AND WORLDCOM'S
SECOND MOTION TO COMPEL DISCOVERY FROM VERIZON FLORIDA INC.**

Verizon Florida Inc. ("Verizon"), by and through its undersigned counsel and pursuant to Rules 28-106.204 and 28-106.206 of the Florida Administrative Code, hereby responds to AT&T Communications of the Southern States, LLC ("AT&T") and MCI WorldCom, Inc.'s ("WorldCom") (collectively, "AT&T/WorldCom") Second Motion to Compel Discovery from Verizon Florida Inc. ("Motion to Compel"). For the reasons stated herein, AT&T/WorldCom's Motion to Compel should be denied.

On March 20, 2002, AT&T/WorldCom filed their Second Set of Interrogatories (Nos. 48-51), seeking information about UNE rates that Verizon had offered Florida Competitive Local Exchange Carriers ("CLECs") in a letter dated December 31, 2001 ("December 31 Letter," a copy of which is attached hereto as Exhibit 1). As Verizon explained in that letter, the rates were originally offered to CLECs because Verizon could not bill CLECs different rates for particular UNE products and services in its territory. All CLECs were thus billed at the same rate -- typically, the lowest rate available to any CLEC in the territory. Although Verizon has eliminated these billing limitations, the December 31 Letter offered CLECs the opportunity to continue to take service under these existing rates until their respective contracts expire, rather than initiate billing changes for the remainder of the contract term.¹

¹ Notwithstanding the foregoing, the December 31 Letter made clear that each UNE rate was subject to change and/or modification by a state regulatory body of competent jurisdiction. December 31 Letter at 1.

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On April 1, 2002, Verizon filed its objections to AT&T/WorldCom's Second Set of Interrogatories, noting that the questions contained therein sought information that is not relevant to any issue in this proceeding, nor could they lead to the discovery of relevant information. The purpose of this proceeding is to set UNE rates for Verizon, based on the cost studies submitted by Verizon. Contrary to AT&T/WorldCom's contentions, the only reason the UNE rates in Verizon's December 31 Letter were offered in the first place was to account for limitations in Verizon's billing systems -- the fact that those limitations were later removed does not change this fact. Rates based on billing limitations are not relevant to the Commission's estimation of Verizon's forward-looking costs of providing UNEs in Florida.

Verizon maintains its objection that detailed information about the development of the rates in the December 31 Letter is not relevant to any issue in this proceeding or calculated to lead to the discovery of relevant and otherwise admissible information. Moreover, the interrogatories are burdensome and oppressive because they seek *all* of the inputs used to develop the offered rates.

Subject to the foregoing objections, without waiver of same, and in order to dispose of AT&T/WorldCom's motion, Verizon responds as follows:

As the December 31 Letter states, the rates offered were typically "the lowest rate available in any particular CLEC agreement" in Verizon's territory. December 31 Letter at 1. The rates in these agreements were derived principally from the following sources: (1) the Stipulation on Interim Deaveraging approved by the Commission in this docket by Order No. PSC-00-0380-S-TP, issued February 22, 2000 (AT&T/WorldCom were both parties to the Stipulation); (2) the Commission's Order in Verizon's 1996

arbitration with AT&T/WorldCom (Order No. PSC-97-0064-FOF-TP, Jan. 17, 1997); (3) Interconnection Agreements (multiple contracts); (4) ICM-FL cost study (May 2001 filing); (5) Florida Wholesale UNE Non-recurring Study, Model 4.3 (May 2000 filing); and (6) Verizon's National NRC EEL cost study. To the extent there were lower contract or previously proposed rates identified, Verizon obtained the rates in the December 31 Letter from various interconnection contracts or from the rates it proposed in its May 18, 2001 filing in this case. As the Commission will recall, that filing was withdrawn by mutual agreement of the parties and all parties agreed not to pursue discovery on this withdrawn filing.²

Much of the information AT&T/WorldCom seek is contained in Appendix A to the December 31 Letter. AT&T/WorldCom are, or should be, familiar with the rates to which they stipulated and which they obtained in the 1996-1997 arbitration proceeding with Verizon. To the extent AT&T/WorldCom seek additional information, the information sought is already in their possession, and, indeed, publicly available. Accordingly, there is simply no need for Verizon to identify the cost model it used to produce the rates reflected in the December 31 Letter or to identify any inputs. AT&T/WorldCom, of course, participated in their own arbitration, and thus are aware of the cost model used to produce Verizon's proposed rates and the inputs related thereto. In any event, the basis for Verizon's proposed rates is reflected in Commission's Order itself. AT&T/WorldCom are also aware of the fact that the deaveraged rates to which they


² See Order No. PSC-01-1407-PCO-TP, Docket 990649-TP (issued June 29, 2001); Letter from Verizon to all parties in Docket No. 990649-TP, Investigation into Pricing of Unbundled Network Elements (July 25, 2001). To the extent AT&T and WorldCom seek details on Verizon's withdrawn cost study, then Verizon further objects to such discovery because AT&T and WorldCom explicitly agreed not to pursue such discovery.

stipulated in 2000 were derived from the rates ordered in their 1996 arbitration with Verizon.

Because the rates were derived from publicly-available Commission Orders and, in some cases, existing contracts or rates proposed earlier in this docket, there was no "person or persons responsible for the development of the rate identified in Appendix A to the December 31, 2001 letter" (AT&T/WorldCom Interrogatory No. 50). There was no "rate development" process to derive the rates in the letter; it was simply a matter of determining the existing rates, identifying the lowest rate, and offering to continue billing at that rate. There are no other "factors that lead to the difference between the rates" in the December 31 Letter and the rates Verizon proposed in this proceeding. AT&T/WorldCom Interrogatory No. 51. Put simply, AT&T/WorldCom are already in possession of, and nevertheless have ready access to, the information they seek.

As the foregoing demonstrates, Verizon answered AT&T/WorldCom's Second Set of Interrogatories in full; AT&T/WorldCom's Motion to Compel is moot.

Respectfully submitted on April 15, 2002.

By: 
for Kimberly Caswell
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Attorney for Verizon Florida Inc.

EXHIBIT 1

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December 31, 2001

To: UNE CLEC Customers - Verizon (former GTE territories)

Re: VERIZON (former GTE territories):
UNE Rates for Existing Interconnection Agreements

As you may have been aware, due to limitations in the former GTE's billing systems, Verizon previously was unable to bill CLECs different rates for a particular UNE product/service in a single GTE service territory. As a result of this limitation, Verizon generally billed all CLECs in a service territory the same rate for such UNE product/service, and such rate typically was the lowest rate available in any particular CLEC agreement in that territory. Thus, in many instances, Verizon billed a CLEC a rate for a certain UNE product/service that was lower than the applicable rate contained in the CLEC's agreement. As the above-reference limitation no longer exists in Verizon's billing system, Verizon now has the capability to bill the specific rates for UNE products/services contained in each CLEC's respective agreement.

Rather than initiating a billing change to increase billed monthly recurring and non-recurring UNE rates to the levels set forth in the interconnection agreements of many CLECs, Verizon is willing to continue to bill and, thereby, offers each CLEC the same monthly recurring and non-recurring UNE rates that Verizon has been billing, subject to the following.

These UNE rates will continue to apply until the expiration of your current Interconnection Agreement with Verizon. Notwithstanding the foregoing, each UNE rate is subject to change and/or modification during this time by a state regulatory body of competent jurisdiction. For example, if such state regulatory body orders Verizon to provide a particular UNE product/service to all customers for a certain rate, such rate shall apply and shall supersede the current rate for that product/service set forth in the Pricing Attachment.

Should a UNE rate(s) in the Pricing Attachment reflect a lower rate(s) than the rate(s) you currently are being billed, the lower rate(s) will be effective prospectively upon Verizon's implementation of the new Pricing Attachment.

Attached with this letter is an example of the new Pricing Attachment for the state(s) in which you have a signed Interconnection Agreement with Verizon. Following your receipt of this notification, payment of your first invoice in which Verizon has incorporated the new UNE rates will signify your acceptance of Verizon's UNE rate offer, as set forth herein, and will result in the new UNE rates being incorporated into your interconnection agreement on a going forward basis. Should you choose not to accept Verizon's offer, you should promptly contact your Verizon Account Manager.

APPENDIX A

III. Prices for Unbundled Network Elements

Monthly Recurring Charges

Local Loop¹

2 Wire Analog Loop (inclusive of NID)	\$	
Zone 1 - High	\$	16.41*
Zone 2 - Medium	\$	23.33*
Zone 3 - Low	\$	40.41*
4 Wire Analog Loop (inclusive of NID)	\$	
Zone 1 - High	\$	20.52*
Zone 2 - Medium	\$	29.17*
Zone 3 - Low	\$	50.51*
2 Wire Digital Loop (inclusive of NID)	\$	
Zone 1 - High	\$	16.41*
Zone 2 - Medium	\$	23.33*
Zone 3 - Low	\$	40.41*
4 Wire Digital Loop (inclusive of NID)	\$	
Zone 1 - High	\$	20.52*
Zone 2 - Medium	\$	29.17*
Zone 3 - Low	\$	50.51*

DS-1 Loop	\$	124.40*
DS-3 Loop	\$	1051.26*
Supplemental Features:		
ISDN-BRI Line Loop Extender		6.92*
DS1 Clear Channel Capability		\$16.00*

Subloop

2-Wire Feeder	\$	3.00 *
2-Wire Distribution	\$	7.50 *
4-Wire Feeder	\$	32.51*
4-Wire Distribution	\$	32.64*
2-Wire Drop	\$	2.73*
4-Wire Drop	\$	3.14*
Inside Wire		BFR

Network Interface Device (leased separately)

Basic NID:	\$	1.45 *
Complex (12 x) NID	\$	2.10 *

¹ In compliance with the FCC order approving the merger of GTE Corporation and Bell Atlantic (CC Docket No. 98-1840), Verizon will offer limited duration promotional discounts on residential LINE Loops and LINE Advance Services Loops. The terms and conditions on which these promotional discounts are being made available can be found on <http://www.verizon.com/wire> for former GTE service areas and <http://www.bell-atl.com/wholesale/html/resources.htm> for former Bell Atlantic service areas.

APPENDIX A

Switching

Port	
Basic Analog Line Side Port	\$ 4.75 *
Coin Line Side Port	\$ 8.89*
ISDN BRI Digital Line Side Port	\$ 12.87*
DS-1 Digital Trunk Side Port	\$ 71.16*
ISDN PRI Digital Trunk Side Port	\$ 248.30*
Usage Charges (must purchase Port)	
Local Central Office Switching (Overall Average MOU)	\$ 0.002903*
Common Shared Transport Transport Facility (Average MOU/ALM)	\$ 0.000001*
Transport Termination (Average MOU/Term)	\$ 0.000103*
Tandem Switching (Average MOU)	\$ 0.001892*
Terminating to Originating Rate	1.00*

Dedicated Transport Facilities

CLEC Dedicated Transport	
CDT 2 Wire	\$ 23.00 *
CDT 4 Wire	\$ 33.00 *
CDT DS1	
- First System	\$ 135.00 *
- Additional System	\$ 125.00 *
CDT DS3 Optical Interface	\$ 937.50 *
CDT DS3 Electrical Interface	\$ 960.00 *
Interoffice Dedicated Transport	
IDT DS0 Transport Facility per ALM	\$.02 *
IDT DS0 Transport Termination	\$ 12.49 *
IDT DS1 Transport Facility per ALM	\$.39 *
IDT DS1 Transport Termination	\$ 25.78 *
IDT DS3 Transport Facility per ALM	\$ 4.44 *
IDT DS3 Transport Termination	\$ 133.29 *
Multiplexing	
DS1 to Voice Multiplexing	\$ 187.86 *
DS3 to DS1 Multiplexing	\$ 305.00 *
DS1 Clear Channel Capability	\$ 16.00*

Unbundled Dark Fiber

Unbundled Dark Fiber Loops/Subloops	
Dark Fiber Loop	\$ 67.13*
Dark Fiber Subloop - Feeder	\$ 53.17*
Dark Fiber Subloop - Distribution	\$ 13.96*
Unbundled Dark Fiber Dedicated Transport	
Dark Fiber IDT -Facility	\$ 24.80*
Dark Fiber IDT -Termination	\$ 6.34*

APPENDIX A

UNE-P Pricing

MRCs. The MRC for a UNE-P will generally be equal to the sum of the MRCs for the combined UNEs (e.g. the total of the UNE loop charge plus the UNE port charges in the Agreement) (see Note A) plus: UNE local switching (per minute originating usage plus T/O factor to determine terminating minutes) based on UNE local switching rates in the Agreement plus UNE shared transport and tandem switching (based on factors for percent interoffice and tandem switch usage, plus assumed transport mileage of 10 miles and 2 terms) based on UNE shared transport rates in the Agreement plus UNE Vertical Services charges (optional per line charges, if allowed by the Agreement).

(Note A): UNE platforms are available in four loop/port configurations as shown below. If the price for any component of these platforms is not set forth herein, Verizon will use the ICB process to determine the appropriate price and TBD pricing shall apply.

UNE Basic Analog Voice Grade Platform consists of the following components:

UNE 2-wire Analog loop; and
UNE Basic Analog Line Side port

UNE ISDN BRI Platform consists of the following components:

UNE 2-wire Digital loop; and
UNE ISDN BRI Digital Line Side port

UNE ISDN PRI Platform consists of the following components:

UNE DS1 loop; and
UNE ISDN PRI Digital Trunk Side port

UNE DS1 Platform consists of the following components:

UNE DS1 loop; and
UNE DS1 Digital Trunk Side port

NRCs.

Optional NRCs will apply as ordered by the CLEC including such charges as Expedites, Coordinated Conversions, loop Conditioning, etc.

Operator Services and Directory Assistance Services (OS/DA). If ***CLEC Acronym TXT*** does not initially utilize available customized routing services to re-route OS/DA calls to its own or another party's operator services platform, Verizon will bill the CLEC for OS/DA calls at a market-based ICB rate pending ***CLEC Acronym TXT***'s completion of a separate OS/DA agreement.

APPENDIX A

NON-RECURRING CHARGES - LOOP AND PORT

Service Ordering (Loop or Port)	
Initial Service Order, per order	\$47.25*
Transfer of Service Charge, per order	\$16.00*
Subsequent Service Order, per order	\$24.00*
Installation	
Unbundled Loop, per loop	\$ 10.50*
Unbundled Port, per port	\$ 10.50*
Loop Facility Charge, per order (See Note 1)	\$ 62.50*
Customer Service Record Search	\$ 4.21*

CUSTOM HANDLING

Coordinated Conversions:

ISO	\$18.69*
Central Office Connection	\$9.43*
Outside Facility Connection	\$8.09*

Hot Coordinated Conversions First Hour:

ISO	\$23.91*
Central Office Connection	\$37.72*
Outside Facility Connection	\$32.36*

Hot Coordinated Conversions per Additional Quarter Hour:

ISO	\$ 4.88*
Central Office Connection	\$ 9.43*
Outside Facility Connection	\$ 8.37*

Note 1: The Loop Facility Charge will apply when field work is required for establishment of a new unbundled loop service.

APPENDIX A

NON-RECURRING CHARGES - OTHER UNE's *

LOCAL WHOLESALE SERVICES	Ordering 100% Manual	Ordering Semi- Mech.	Provisioning Initial Unit	Add'l Unit
UNBUNDLED NID*				
Exchange - Basic	\$ 55.08	\$ 43.74	\$ 43.74	N/A
SUBLOOP*				
Exchange - FDI Feeder Interconnection - Initial	\$ 36.32	\$ 26.88	\$ 46.20	\$ 24.97
Exchange - FDI Feeder Interconnection - Subsequent	\$ 15.01	\$ 11.83	\$ 16.99	\$ 7.22
Exchange - FDI Distribution Interconnection - Initial	\$ 36.32	\$ 26.88	\$ 61.90	\$ 30.36
Exchange - FDI Distribution Interconnection - Subsequent	\$ 15.01	\$ 11.83	\$ 16.99	\$ 7.22
Exchange - Serving Terminal Interconnection - Initial	\$ 36.32	\$ 26.88	\$ 28.99	\$ 15.51
Exchange - Serving Terminal Interconnection - Subsequent	\$ 15.01	\$ 11.83	\$ 13.23	\$ 6.41
DARK FIBER*				
Advanced - Service Inquiry Charge	\$249.82	\$249.82	N/A	N/A
Advanced - Interoffice Dedicated Transport - Initial	\$ 63.85	\$ 63.85	\$153.14	\$110.28
Advanced - Unbundled Loop - Initial	\$ 63.85	\$ 63.85	\$148.37	\$106.54
Advanced - Subloop Feeder - Initial	\$ 63.85	\$ 63.85	\$148.37	\$106.54
Advanced - Subloop Distribution - Initial	\$ 63.85	\$ 63.85	\$151.78	\$102.80
ENHANCED EXTENDED LINK*				
Advanced - Basic - Initial ok	\$ 88.39	\$ 56.13	\$397.31	N/A
Advanced - Basic - Subsequent ok	\$ 38.02	\$ 21.89	\$ 49.53	N/A
DS0 - Initial ok	\$ 88.39	\$ 56.13	\$482.99	N/A
DS0 - Subsequent ok	\$ 38.02	\$ 21.89	\$ -	N/A
DS1/DS3 - Initial ok	\$ 97.94	\$ 65.68	\$384.08	N/A
DS1/DS3 - Subsequent ok	\$ 38.02	\$ 21.89	\$ 9.90	N/A

APPENDIX A

LOOP CONDITIONING²

(No charge for loops 12,000 feet or less)

Loop Conditioning - Bridged Tap	N/A	N/A	\$318.71	\$ 34.88
Loop Conditioning - Load Coils	N/A	N/A	\$249.91	\$ -
Loop Conditioning - Load Coils / Bridged Tap	N/A	N/A	\$568.62	\$ 34.88
Loop Conditioning - Feeder - Bridged Tap	TBD	TBD	TBD	TBD
Loop Conditioning - Feeder - Load Coils	TBD	TBD	TBD	TBD
Loop Conditioning - Feeder - Load Coils / Bridged Tap	TBD	TBD	TBD	TBD
Loop Conditioning - Distribution - Bridged Tap	TBD	TBD	TBD	TBD
Loop Conditioning - Distribution - Load Coils	TBD	TBD	TBD	TBD
Loop Conditioning - Distribution - Load Coils / Bridged Tap	TBD	TBD	TBD	TBD

LINE PLATFORM*

Exchange - Basic - Initial	\$ 31.57	\$ 22.13	\$ 28.23	\$ 26.58
Exchange - Basic - Subsequent	\$ 16.44	\$ 13.26	\$ 1.08	\$ 1.08
Exchange - Basic - Changeover	\$ 19.93	\$ 15.54	\$ 0.90	\$ 0.90
Exchange - Complex Nondigital - Initial	\$ 41.35	\$ 27.53	\$162.41	\$ 31.70
Exchange - Complex Nondigital - Subsequent (Port Feature)	\$ 16.44	\$ 13.26	\$ 5.89	\$ 5.89
Exchange - Complex Nondigital - Subsequent (Switch Feature Group)	\$ 20.82	\$ 13.26	\$ 22.73	\$ 22.73
Exchange - Complex Nondigital - Changeover (As Is)	\$ 22.35	\$ 17.96	\$ 3.61	\$ 3.61
Exchange - Complex Nondigital - Changeover (As Specified)	\$ 30.08	\$ 21.31	\$ 20.97	\$ 3.61
Exchange - Complex Digital - Initial	\$ 41.35	\$ 27.53	\$205.75	\$ 28.18
Exchange - Complex Digital - Subsequent (Port Feature)	\$ 16.44	\$ 13.26	\$ 5.15	\$ 5.15
Exchange - Complex Digital - Subsequent (Switch Feature Group)	\$ 20.82	\$ 13.26	\$ 22.73	\$ 22.73
Exchange - Complex Digital - Changeover (As Is)	\$ 22.35	\$ 17.96	\$ 4.18	\$ 4.18
Exchange - Complex Digital - Changeover (As Specified)	\$ 30.08	\$ 21.31	\$ 80.98	\$ 4.18
Advanced - Complex - Initial	\$ 48.35	\$ 34.53	\$881.24	\$303.66
Advanced - Complex - Subsequent	\$ 20.82	\$ 13.26	\$ 65.81	\$ 48.47
Advanced - Complex - Changeover (As Is)	\$ 24.06	\$ 19.67	\$ 51.51	\$ 34.17
Advanced - Complex - Changeover (As Specified)	\$ 37.08	\$ 28.31	\$ 82.31	\$ 64.97

DEDICATED TRANSPORT*

Advanced - Basic - Initial	\$ 127.99	\$ 93.43	\$ 93.43	N/A
Advanced - Basic - Subsequent	\$ 66.59	\$ 48.49	\$ 48.49	N/A
Advanced - Complex - Initial	\$ 140.52	\$ 105.96	\$ 105.96	N/A
Advanced - Complex - Subsequent	\$ 66.59	\$ 48.49	\$ 48.49	N/A

² These charges are interim and subject to retroactive true-up back to the Effective Date of this Agreement.

APPENDIX A

SIGNALING SYSTEM 7 (SS7)*

Facilities and Trunks - Initial	\$237.67	\$205.19	\$568.54	N/A
Facilities and Trunks - Subsequent (with Engineering Review)	\$ 71.58	\$ 55.23	\$213.12	N/A
Facilities and Trunks - Subsequent (w/o Engineering Review)	\$ 71.58	\$ 55.23	\$ 67.28	N/A
Trunks Only - Initial	\$126.13	\$ 93.65	\$505.41	N/A
Trunks Only - Subsequent (with Engineering Review)	\$ 49.46	\$ 33.11	\$202.03	N/A
Trunks Only - Subsequent (w/o Engineering Review)	\$ 49.46	\$ 33.11	\$ 67.28	N/A
STP Ports (SS7 Links)	\$237.67	\$205.19	\$438.81	N/A
Entrance Facility/Dedicated Transport DS0 - Initial	\$ 95.49	\$ 63.01	\$390.08	N/A
Entrance Facility/Dedicated Transport DS0 - Subsequent	\$ 45.12	\$ 28.77	\$ 58.20	N/A
Entrance Facility/Dedicated Transport DS1/DS3 - Initial	\$105.04	\$ 72.56	\$515.03	N/A
Entrance Facility/Dedicated Transport DS1/DS3 - Subsequent	\$ 45.12	\$ 28.77	\$ 86.80	N/A
CUSTOMIZED ROUTING	BFR	BFR	BFR	BFR
EXPEDITES - Other*				
UNE Loop/Port	4.57	4.57	4.57	
Network Wholesale Products - Dedicated Transport/SS7/Dark Fiber	\$65.16	\$65.16	\$65.16	N/A
OTHER*				
CLEC Account Establishment (per CLEC)	\$166.32	\$166.32	N/A	N/A
LINE SHARING - CLEC OWNED SPLITTER*				
CLEC Splitter Connection - Initial	\$ 32.19	\$ 22.52	\$ 53.04	\$ 47.29
CLEC Splitter Connection - Subsequent	\$ 13.24	\$ 9.83	\$ 14.49	\$ 13.53

APPENDIX A

Application of NRCs

Preordering:

CLEC Account Establishment is a one-time charge applied the first time that ***CLEC Acronym TXT*** orders any service from this Agreement.

Customer Record Search applies when ***CLEC Acronym TXT*** requests a summary of the services currently subscribed to by the end-user.

Ordering and Provisioning:

Initial Service Order (ISO) applies to each Local Service Request (LSR) and Access Service Request (ASR) for new service. Charge is Manual (e.g. for a faxed order) or Semi-Mechanized (e.g. for an electronically transmitted order) based upon the method of submission used by the CLEC.

Subsequent Service Order applies to each LSR/ASR for modifications to an existing service. Charge is Manual or Semi-Mechanized based upon the method of submission used by the CLEC.

Advanced ISO applies per LSR/ASR when engineering work activity is required to complete the order.

Exchange ISO applies per LSR/ASR when no engineering work activity is required to complete the order.

Provisioning – Initial Unit applies per ISO for the first unit installed. The Additional Unit applies for each additional unit installed on the same ISO.

Basic Provisioning applies to services that can be provisioned using standard network components maintained in inventory without specialized instructions for switch translations, routing, and service arrangements.

Complex Provisioning applies to services that require special instruction for the provisioning of the service to meet the customer's needs.

Examples of services and their Ordering/Provisioning category that applies:

Exchange-Basic: 2-Wire Analog, 4-Wire Analog, Standard Subloop Distribution, Standard Subloop Feeder, Drop and NID.

Exchange-Complex: Non-loaded Subloop Distribution, Non-load Subloop Feeder, Loop Conditioning, Customized Routing, ISDN BRI Digital Line Side Port and Line Sharing.

Advanced-Basic: 2-Wire Digital Loop, 4-Wire Digital Loop

Advanced-Complex: DS1 Loop, DS3 Loop, Dark Fiber, EELs, and ISDN PRI Digital Trunk Side Port

Conditioning applies in addition to the ISO, for each Loop or Subloop UNE for the installation and grooming of Conditioning requests.

APPENDIX A

DS1 Clear Channel Capability applies in addition to the ISO, per DS1 for the installation and grooming of DS1 Clear Channel Capability requests.

Changeover Charge applies to UNE-P and EEL orders when an existing retail, resale, or special access service is already in place.

Service Inquiry – Dark Fiber applies per service inquiry when a CLEC requests – Verizon to determine the availability of dark fiber on a specific route.

Custom Handling (These NRCs are in addition to any Preordering or Ordering and Provisioning NRCs):

Service Order Expedite applies if ***CLEC Acronym TXT*** requests service prior to the standard due date intervals and the expedite request can be met by Verizon.

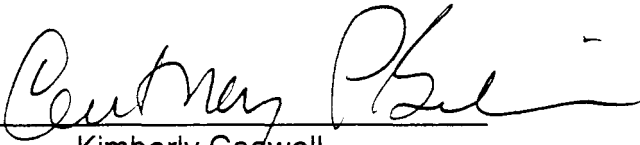
Coordinated Conversion applies if ***CLEC Acronym TXT*** requests notification and coordination of service cut-over prior to the service becoming effective.

- Hot Coordinated Conversion First Hour applies if ***CLEC Acronym TXT*** requests real-time coordination of a service cut-over that takes one hour or less.

Hot Coordinated Conversion Per Additional Quarter Hour applies, in addition to the Hot Coordinated Conversion First Hour, for every 15-minute segment of real-time coordination of a service cut-over that takes more than one hour.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Response to AT&T Communications of the Southern States, Inc.'s and MCI WorldCom, Inc.'s Second Motion to Compel Discovery in Docket No. 990649B-TP were sent via electronic mail and/or U.S. mail on April 15, 2002 to the parties on the attached list.



Kimberly Caswell

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