

Verizon Virginia Inc.
Responses to
AT&T Communications of Virginia, LLC
Interrogatories and Requests For Production of Documents
FIRST SET
Case No. PUC020046

REQUEST NO. 62:

Provide all capacity planning documents for TISOCs/NMCs that work on CLEC orders that are submitted via the Virginia OSS. (Competitive Checklist items 1 and 2).

RESPONSE:

Verizon VA objects to this request on the grounds of general objection 7. Without waiving this objection Verizon VA will provide an answer.

4/24/02 RESPONSE:

Verizon utilizes several sources of data to plan for necessary capacity. One source is the semi-annual forecast sent to customers (available on the Verizon Wholesale web site at <http://128.11.40.241/east/wholesale/resources/resources.htm#FORECASTING>) which gives customers the opportunity to confidentially share with Verizon their plans for the next 6 months. Another source is information shared with Verizon during meetings. Finally, Verizon has put together a force model that aids in the capacity planning exercise. The force model is proprietary to Verizon. In addition to proper force planning, Verizon has several alternatives to ensure that it meets customer expectations for timeliness such as overtime, outsourcing, and work distribution. A copy of the force model will be provided to parties that execute the proprietary agreement in this proceeding.