

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission	:	
On Its Own Motion	:	
	:	
Implementation of the Federal	:	
Communications Commission's	:	03-0595
Triennial Review Order with respect	:	
to Potential Non-Impairment	:	
Determinations Regarding Unbundled	:	
Local Switching for Mass Market	:	
Customers In Specific Markets	:	

ATTACHMENT 1 TO SUBPOENA FOR DEPOSITION

DIRECT QUESTIONS PROPOUNDED BY STAFF

Introduction

As used in the following questions, the terms set forth below shall be defined as follows:

The term "Company" refers to the specific entity to whom the subpoena is directed. The term "Company" does not include related entities such as parent, subsidiary or affiliated companies.

The term "Wire Center" means the location of one or more local switching systems or a point at which End User's loops within a defined geographic area converge, and refers to wire centers defined for SBC Illinois switching systems and only those wire centers located within the SBC Illinois incumbent serving area portion of Illinois LATA 358. Such local loops may be served by one or more switches within such defined geographic area. Attachment A contains a list of all wire centers defined for SBC Illinois switching systems located within the SBC Illinois incumbent serving area portion of Illinois LATA 358.

The term "Rate Exchange Area" means the specific geographic area that has been designated by a given Local Exchange Carrier ("LEC") as being associated with a particular NPA-NXX code that has been assigned to the LEC for its provision of Telephone Exchange Service. The Rate Exchange Area is the geographic area used by that LEC to measure, for billing purposes, distance sensitive transmission services associated with the specific Rate Exchange Area. The term "Rate Exchange Area" is further limited to Telcordia Technologies, Inc. defined rate exchange areas contained in the Local Exchange Routing Guide

("LERG") and only those rate exchange areas located within the SBC Illinois incumbent serving area portion of Illinois LATA 358. Attachment B contains a list of all rate exchange areas defined in the LERG and located within the SBC Illinois incumbent serving area portion of Illinois LATA 358.

Questions

Question MS JZ 2.01. Please state your name.

Question MS JZ 2.02. Please state the name of the Company on whose behalf you are testifying.

Question MS JZ 2.03. Please state your business address and job title with the Company. If you are employed by someone other than the Company, please state the name of your employer, your job title with that employer, and explain the basis upon which you have been designated to answer these questions on behalf of the Company.

Question MS JZ 2.04. Does the Company own one or more switches (1) that perform the basic switching functions of connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks, (2) that are not used exclusively for the provision of mobile wireless telecommunications and (3) that the Company uses either to serve local telecommunications end users that are physically located in the SBC Illinois incumbent serving area portion of Illinois LATA 358 (a/k/a the Chicago LATA) or to offer wholesale local switching service to other providers serving local telecommunications end users physically located in the SBC Illinois incumbent serving area portion of Illinois LATA 358.

Additional Instructions: If your answer to Question MS JZ 2.04 was yes, then answer the following questions. If your answer to Question MS JZ 2.04 was no, then do not answer any of the following questions.

Question MS JZ 2.05. For purposes of this question, please consider an affiliate to be a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For these purposes, the term "own" means to own an equity interest (or the equivalent thereof) of more than 10 percent. Please provide a list of affiliates of the Company, and list each affiliate (i) by the name under which it is certificated in Illinois if the affiliate holds a certificate to provide local telephone service in Illinois or (ii) by the affiliates legal name if the affiliate does not hold a certificate to provide local telephone service in Illinois. Also, if known, please indicate whether the affiliate would answer Question MS JZ 2.04 in the affirmative (i.e., would answer "yes").

Additional Instructions: The following questions are intended to elicit the geographic footprint of the Company's switch or switching equipment identified in

your answer to Question MS JZ 2.04 with a relatively high degree of granularity. That is, Staff is attempting to determine the geographic locations of local telecommunications customers being served directly or indirectly by your switch or switching equipment by either exchange (specifically by Telcordia Technologies defined rate exchange areas) or wire center (specifically by SBC wire centers). If you have information of a comparable granular nature that is in a more readily accessible form, please contact counsel for Staff (in a timely manner) as Staff is willing to consider revising the following questions in such circumstances to ease the burdens associated with responding to these questions.

Question MS JZ 2.06. For each switch (1) that the Company owns (2) that performs the basic switching functions of connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks, (3) that is not used exclusively for the provision of mobile wireless telecommunications and (4) that the company uses either (a) to serve local telecommunications customers that are physically located in the SBC Illinois incumbent serving area portion of Illinois LATA 358 (a/k/a the Chicago LATA) or (b) to offer wholesale local switching service to other providers serving local telecommunications customers physically located in the SBC Illinois incumbent serving area portion of Illinois LATA 358, please provide the following information:

- A. The 11 Digit CLLI (Common Language Location Identifier) Code for the switch
- B. The street address of the switch
- C. Whether the Company provides local telecommunications service to one or more end-user customers at less than 4 DS0 capacity at a single location using the switch?
 - 1. If yes, then please provide a list of either rate exchange areas or SBC Illinois wire centers where the Company provides local telecommunications service to one or more end-user customers at less than 4 DS0 capacity using the switch. Please provide the information as of September 30 2003, June 30 2003, or, if information is not available as of either of those dates, as of the most recent date for which such information is available. Please identify the time period of the information provided (e.g., "current as of September 30, 2003").
- D. Whether the Company provides local telecommunications service to one or more end-user customers at 4 DS0 or greater capacity at a single location using the switch?
 - 1. If yes, please provide a list of either rate exchange areas or SBC Illinois wire centers where the Company provides local telecommunications service to one or more end-user customers at 4 DS0 or greater capacity using the switch. Please provide the information as of September 30 2003, June 30 2003, or, if information is not available as of either of those dates, as of the

most recent date for which such information is available. Please identify the time period of the information provided (e.g., "current as of September 30, 2003").

- E. Whether the Company offers wholesale local switching service to other providers serving local telecommunications end-user customers at less than 4 DS0 capacity at a single location using the switch?
 - 1. If yes, please provide a list of either rate exchange areas or SBC Illinois wire centers where the Company offers wholesale local switching service to other providers serving local telecommunications end-user customers at less than 4 DS0 capacity using the switch. Please provide the information as of September 30 2003, June 30 2003, or, if information is not available as of either of those dates, as of the most recent date for which such information is available. Please identify the time period of the information provided (e.g., "current as of September 30, 2003").
- F. Whether the Company offers wholesale local switching service to other providers serving local telecommunications end-user customers at 4 DS0 or greater capacity at a single location using the switch?
 - 1. If yes, please provide a list of either rate exchange areas or SBC Illinois wire centers where the Company offers wholesale local switching service to other providers serving local telecommunications end-user customers at 4 DS0 or greater capacity using the switch. Please provide the information as of September 30 2003, June 30 2003, or, if information is not available as of either of those dates, as of the most recent date for which such information is available. Please identify the time period of the information provided (e.g., "current as of September 30, 2003").
- G. A count of either the total number of end-user customers or DS0 equivalent local telecommunications lines provided to customers either directly by the Company or by another provider using this switch. For this question, count only customers at locations served by less than 4 DS0 lines or only include lines provided to customer locations served by less than 4 DS0 lines. Please specify whether you are reporting customer counts or DS0 equivalent line counts.
- H. A count of either the total number of end-user customers or DS0 equivalent local telecommunications lines provided to customers either directly by the Company or by another provider using this switch. For this question, count only customers at locations served by 4 or more DS0 lines or only include lines provided to customer locations served by 4 or more DS0 lines. Please specify whether you are reporting customer counts or DS0 equivalent line counts.

Additional Instructions: The following set of questions is intended to elicit certain operational characteristics of your switches.

Question MS JZ 2.07. For each switch (1) that the Company owns (2) that performs the basic switching functions of connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks, (3) that is not used exclusively for the provision of mobile wireless telecommunications and (4) that the Company uses either (a) to serve local telecommunications customers that are physically located in the SBC Illinois incumbent serving area portion of Illinois LATA 358 (a/k/a the Chicago LATA) or (b) to offer wholesale local switching service to other providers serving local telecommunications customers physically located in the SBC Illinois incumbent serving area portion of Illinois LATA 358, please provide the following information:

- A. The 11 Digit CLLI (Common Language Location Identifier) Code for the switch
- B. The switch manufacturer, make and model of the switch
- C. Whether the switch is currently operationally capable of providing service to end-user customers at a single location at less than 4 DS0 capacity using SBC Illinois UNE loops?
 - a. If no, then is the switch technologically compatible with SBC Illinois loop technology used to serve end-user customers at a single location at less than 4 DS0 capacity?
- D. Whether the switch is currently operationally capable of providing service to end-user customers at a single location at 4 DS0 or greater using SBC Illinois UNE loops?
 - a. If no, then is the switch technologically compatible with SBC Illinois loop technology used to serve end-user customers at a single location at 4 DS0 or greater capacity?
- E. Indicate whether the switch is best described as a local “voice” switch, local “data” switch, local “mixed voice and data” switch or “other” local telecommunications switch? If this switch is best described as “other” local telecommunications switch, then please provide a brief explanation of the functionality of this switch.