

CoreComm4

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Joint Application of)
Bell Atlantic Corporation and GTE)
Corporation For Consent and Approval) Case No. 98-1398-TP-AMT
of a Change of Control)

**RESPONSES OF GTE CORPORATION AND BELL ATLANTIC CORPORATION TO
CORECOMM, INC. INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
FIRST SET**

TO: Sally W. Bloomfield Eric J. Branfman
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GTE Corporation and Bell Atlantic Corporation, Joint Applicants herein ("GTE" and "Bell Atlantic"), hereby submit their Responses to CoreComm, Inc.'s Interrogatories and Requests for Production of Documents (First Set) served March 1, 1999 ("CoreComm's First Set"). By agreement of the parties, these Responses are served March 11, 1999.

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DEFINITIONS

- A. The word "Company" refers to GTE Corporation and/or Bell Atlantic Corporation, and each of its subsidiaries, their officers, agents, employees, consultants or others acting on their behalf.
- B. "Document" includes any written or recorded or graphic matter, however produced or reproduced, including but not limited to: correspondence, telegrams, or other written, typed or printed communications; electronic mail (E-mail); contracts, agreements; notes in any form; memoranda; diaries; voice recording tapes; microfilms or microfiches; pictures, data processing cards or discs, computer tapes or disks and other computer generated and stored information or data bases; calendars; minutes of meetings of the shareholders or directors of the Company or any affiliated or acquired Company or of any committee appointed by or reportable to them; or any writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession.
- C. "Identify," "Identity," or "Identification" when used in reference to an individual person, means to state that person's full name and residence address, including zip code, and phone number, if known, and present or last-known business position and duties, and business address, if known.
- D. "Identify," "Identity," or "Identification" when used in reference to a document, means to state the type of document (e.g., computer stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, its present location and custodian, a description and the date on which it was made, prepared, or received. If any such document was but is no longer in the Company's possession or subject to the Company's control, state what disposition was made of it, and if destroyed or disposed of by operation of a retention policy, state the retention policy.
- E. "Identify," "Identity," or "Identification" when used in reference to a business organization means to state the corporate name or other names under which said organization does business, and the location of its principal place of business.
- F. "Person" or "Persons" include natural persons, corporations, partnerships, ventures, incorporated associations, and all other entities.
- G. "Affiliate" or "Affiliated Company" includes any parent corporation, sister corporation, partner, joint venture, and any other person or business association with whom the Company

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has a similar business relationship.

H. "Commission" or "PUCO" means the Public Utilities Commission of Ohio

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GENERAL OBJECTIONS

Joint Applicants hereby object to CoreComm's First Set on the following grounds, each of which is incorporated by reference to the responses provided below.

- (1) Joint Applicants object to each and every Interrogatory and Request for Production of Documents ("Request") to the extent that it seeks information or documents subject to the attorney-client privilege, the attorney work product doctrine, or any other such privilege. Joint Applicant's responses below shall not be deemed to be a waiver of any such privilege.
- (2) Joint Applicants object to each and every Request to the extent that it seeks information or documents without regard for the date on which such information was generated, or seeks information generated before January 1, 1997, on the grounds that the Request is overbroad, unduly burdensome and irrelevant. Joint Applicants will produce responsive information and documents for the time period beginning January 1, 1997.
- (3) Joint Applicants object to each and every Request to the extent it seeks information that was not generated by, or maintained in the files of, an employee of Joint Applicants at the Director level or above who is responsible for making the decisions regarding matters within the scope of the Request on the grounds that it is overbroad, unduly burdensome and irrelevant.
- (4) Joint Applicants object to each and every Request to the extent it seeks information not directly concerning the market for telecommunications services in the State of Ohio on the grounds that it is overbroad, unduly burdensome and irrelevant. In addition, Joint Applicants object to such Requests to the extent that they go beyond the jurisdiction of the Ohio Public Utilities Commission. The Federal Communications Commission and the United States Department of Justice are the appropriate forums for those concerns.
- (5) Joint Applicants object to each and every Request to the extent it seeks information about states other than Ohio on the grounds that it is irrelevant and that it is beyond the scope of the Commission's jurisdiction.
- (6) Joint Applicants object to each and every Request to the extent it seeks information "relating to" a specified subject matter on the grounds that it is overbroad, unduly burdensome, irrelevant and vague. Joint Applicants will produce information and documents that directly discuss and were generated for the purpose of considering the specified subject matter.
- (7) Joint Applicants object to each and every Request to the extent it seeks documents that were initially created by parties not affiliated with Joint Applicants or who were not acting at Joint Applicant's direction or on its behalf (e.g. news articles, investment analysts reports, agency or court filings by other parties).
- (8) Joint Applicants object to each and every Request to the extent that they seek "any and all documents" concerning a given policy or approach on the grounds that such requests are overbroad and unduly burdensome. Joint Applicants will provide an answer and/or produce documents sufficient to explain the policy or approach.

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INTERROGATORY NO. 1

Operations Support Systems

Since Bell Atlantic has committed to completing third-party testing of its Operations Support Systems ("OSS") in New York, are Bell Atlantic and GTE willing to submit to the same third-party verification process in Ohio both prior to and following the merger?

RESPONSE TO INTERROGATORY NO. 1

Joint Applicants hereby incorporate their general objections stated above. In addition, Joint Applicants object to the implication that existing responsibility and expertise of GTE and its employees would be replaced by Bell Atlantic. The proposed merger is a merger of equals that will have no immediate impact on operations, as explained more fully in the Application. Subject to and without waiver of the foregoing objections, Joint Applicants state that they do not support performing third-party verification in Ohio, consistent with GTE North's current policies with respect to this issue.

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INTERROGATORY NO. 2

Operations Support systems

State whether the merged company plans to deploy in Ohio the single common OSS interface recently deployed in all 14 states in the Bell Atlantic service area (see, e.g. *Report of Bell Atlantic on Compliance with Merger Conditions* at 4 (Feb. 1, 1999)).

RESPONSE TO INTERROGATORY NO. 2

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants state that it would be premature to respond to this Request at this time. Merger Integration Teams have recently been formed, planning is still in the formative stages and no specific plans have been determined or submitted for review or approval.

The merger of Bell Atlantic and GTE is not expected to have an immediate impact on GTE's OSS or access thereto. Integration of systems and best practices, if any, will not be done until after the merger closes if there is a need for any modification, removal or addition of interface types, GTE will make the transition as seamless as possible to its customers and provide appropriate notification. In the meantime, GTE will continue to develop, update, and operate its own OSS systems.

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INTERROGATORY NO. 3

Operations Support Systems

Please describe which of GTE's OSS interfaces will be modified after the merger, how they will be modified, and on what schedule the modifications will occur.

RESPONSE TO INTERROGATORY NO.3

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE refers CoreComm, Inc. to the response provided to Request No. 2.

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INTERROGATORY NO. 4

Quality of Service

Please state by what percentage service quality complaints have increased or decreased in each of the states in the Bell Atlantic service area since completion of the Bell Atlantic/NYNEX merger. Please provide all documents that support your calculations.

RESPONSE TO INTERROGATORY NO. 4

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of these general and specific objections, Bell Atlantic states that it files annually with the FCC service quality results for each of its states and that it also provides in most states regular reports concerning service quality performance. The FCC reports are publicly available as are the majority of the state reports.

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INTERROGATORY NO. 5

Quality of Service

Please describe the performance reporting process that will apply to the merged company's provision of service to competitive local exchange carriers ("CLECs") post-merger. Include in your description any explanation of whether GTE's performance reports will continue in the same format and how frequently performance reports will be provided.

RESPONSE TO INTERROGATORY NO. 5

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants state that it would be premature to respond to this Request at this time. Merger Integration Teams have recently been formed, planning is still in the formative stages, and no specific plans have been determined or submitted for review or approval.

GTE further states that there will be no immediate impact on the performance reports that GTE currently prepares and provides related to the provision of service to competitive local exchange carriers ("CLECs"). These reporting requirements are driven by provisions contained in the interconnection agreements between GTE and any CLEC, and their interconnection agreements will continue in full force and effect according to their terms and conditions, regardless of the merger.

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INTERROGATORY NO. 6

Quality of Service

Please state whether Bell Atlantic and GTE are willing to use the "New York State Carrier to Carrier Guidelines Performance Standards and Reports – Bell Atlantic Reports" as a starting point for carrier-to-carrier service quality monitoring in the State of Ohio? If not, why not?

RESPONSE TO INTERROGATORY NO. 6

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants state that they are not willing to use the New York State Carrier to Carrier Performance Standards and Reports – Bell Atlantic Reports for carrier-to-carrier service quality monitoring in the State of Ohio. GTE reached agreement in both California (Joint Settlement Agreement filed 1/7/99) and Nevada (Stipulation Agreement dated 2/11/99 and approved by the Nevada Commission on February 25, 1999) on a comprehensive set of OSS performance measures and reporting. The parties included ILECs, CLECs and commission staff representatives. A copy of the California and Nevada documents are attached.

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INTERROGATORY NO. 7

Quality of Service

Please state whether GTE currently possesses or has since September, 1996 possessed any documents relating to GTE's performance in meeting the Minimum Telephone Service Standards ("MTSS") set forth in Ohio Administrative Code ("OAC") Chapter 4901:1-5, including without limitations how long it takes GTE to install new service.

RESPONSE TO INTERROGATORY NO. 7

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE states that a document is prepared once a month that tracks how well GTE is performing with regard to the provisions of the MTSS. This document is an integral part of the GTE service quality reporting process, is internally distributed, and is used by management as a guide to either highlight GTE's success in meeting the objectives contained in the order or to identify those areas in which corrective measures may be necessary.

A copy of the **CONFIDENTIAL** document for 1998 is attached.

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INTERROGATORY NO. 8

Quality of Service

If the answer to the previous answer was in the affirmative, please identify those documents including without limitations who prepared the documents, when the documents were prepared, how they were prepared, and whether the documents are prepared and maintained in the regular course of GTE's business. Please provide all such documents.

RESPONSE TO INTERROGATORY NO. 8

Joint Applicants hereby incorporate their general objections stated above. In addition, Joint Applicants object to this request on the basis that it is over broad and seeks information that is irrelevant. Subject to and without waiver of the foregoing objections, GTE refers CoreComm, Inc. to Response No. 7 and the document attached therein.

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INTERROGATORY NO. 9

Quality of Service

Please state whether there is any difference, on average, in GTE's performance in meeting the MTSS set forth in OAC Chapter 4901:1-1-5 when GTE is dealing with its own customers as opposed to when GTE is dealing with a CLEC or a CLEC's customers. If a difference does exist, please describe the nature of this difference and the reasons, if any, for this difference.

RESPONSE TO INTERROGATORY NO. 9

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE states all such CLEC agreements today in Ohio are part of negotiated interconnection arrangements, and GTE complies with all regulatory and contractual requirements for both sets of customers.

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INTERROGATORY NO. 10

Quality of Service

Since September, 1996, please state the procedures that GTE has required CLECs to follow with respect to GTE's issuing them credits or monetary reimbursements pursuant to OAC Rule 4901:1-5-02 (G). If these procedures are written, please provide copies of the documents containing the procedures.

RESPONSE TO INTERROGATORY NO. 10

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE states it believes CoreComm, Inc. is asking this question in reference to OAC Rule 4901:1-5-01(G) as there is no OAC rule 4901:1-5-02(G). GTE further states that no requests have been received from a new entrant carrier per OAC Rule 4901:1-5-01(G). In addition, attached are the current procedures that GTE employs to issue credits to its end-user customers.

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INTERROGATORY NO. 11

Quality of Service

Since September, 1996, please state how many times GTE has had to reimburse CLECs money or credits on account of GTE's failure to meet standards in the MTSS pursuant to OAC Rule 4901:1-5-02 (G). List the CLECs and the credits/monetary reimbursements next to each.

RESPONSE TO INTERROGATORY NO. 11

Joint Applicants hereby incorporates its general objections stated above. Subject to and without waiver of the foregoing objections, GTE states that it believes CoreComm, Inc. is asking this question in reference to OAC Rule 4901:1-5-01(G) as there is no OAC Rule 4901:1-5-02(G). As such, GTE states that there have been no occurrences pursuant to OAC Rule 4901:1-5-01(G).

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INTERROGATORY NO. 12

Quality of Service

Please state whether GTE currently possesses or has in the past possessed any documents relating to GTE's performance in meeting internally-set requirements, benchmarks, standards, or other measurements pertaining to its end user customer operations, including, without limitations, those benchmarks or standards pertaining to rendering customer service. Please provide all such documents.

RESPONSE TO INTERROGATORY NO. 12

Joint Applicants hereby incorporate their general objections stated above. In addition, the Joint Applicants object to this request on the basis that it is overbroad and unduly burdensome to the extent that it seeks all documents pertaining to end user customer operation, regardless of the relevance to Ohio operations. Subject to and without waiver of the foregoing objections, GTE states that it maintains an extensive process whereby indicators of service quality are compiled and reported. This process encompasses such service-affecting areas as service order processing, trouble ticket processing, trunking/switching performance, and speed of answer.

GTE refers CoreComm, Inc. to the document provided in response to Request No. 7.

Additionally, GTE has accumulated service related policies, instructions, procedures and memorandum from its customer contact center, CARE center and the Dispatch Answer Center/Facility Answer Center. These documents are a representative collection of the information that is provided to GTE's customer contact centers as a tool to provide instruction and guidance, and are available for inspection at the offices of Thompson, Hine & Flory, 1 Columbus, 10 West Broad Street, Columbus, Ohio. Management of these service procedure objectives is a supervisory responsibility that is ongoing. Tracking is also a supervisory responsibility and performance observations are not retained.

In addition, GTE internally sets compensable service quality performance measures. These measures are established annually. They are set based on the company's determination of how customers evaluated service quality. While some measures by general description seem similar to measures reported to commissions, they may not be the same measure and may have entirely different or expanded criteria. Further, GTE's internal measures are evaluated each year and are changed, modified, eliminated or replaced based on the company's views on customer focus and the market place.

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INTERROGATORY NO. 13

Quality of Service

Please state whether GTE has any mechanism or procedure for tracking how customers are served by GTE including without limitation how long it takes for GTE to provide new service or repair service to customers.

RESPONSE TO INTERROGATORY NO. 13

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE states that it does have mechanisms in place for tracking how customers are served by GTE. Further, GTE refers CoreComm, Inc. to the response to Requests No. 7 and 12.

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INTERROGATORY NO. 14

Quality of Service

Please describe any internal performance levels, requirements, benchmarks, standards, or other measurements that GTE has implemented regarding the provision of its services to CLECs, including without limitation ordering and provisioning; maintenance and repair; billing; resale; unbundled network elements; combined network elements; interconnection trunks; directory assistance and operator services; interim number portability; 911 and E911; access to poles, ducts, conduits and rights of way; collocation; coordinated cutovers; and NXXs. Please provide all documents that describe GTE's internal measurements and all documents that contain such measurements.

RESPONSE TO INTERROGATORY NO. 14

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE refers CoreComm, Inc. to the response to Requests No. 6 and 9. In addition, GTE has implemented measurements in conjunction with negotiated interconnection arrangements. These arrangements (and the negotiated measurements and standards) are a matter of public record.

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INTERROGATORY NO. 15

Carrier-to-Carrier Issues

Are Bell Atlantic and GTE willing to engage in settlement discussions with the intervenors in this case?

RESPONSE TO INTERROGATORY NO. 15

Joint Applicants hereby incorporate their general objections stated above. Furthermore, Applicants object to this request on the basis that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence before this Commission. Notwithstanding these objections, the Joint Applicants state they are willing to engage in confidential settlement discussions in which all parties are involved.

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INTERROGATORY NO. 16

Carrier-to-Carrier Issues

Please describe fully the specific measures that GTE would undertake to open up its network to competition assuming the merger is consummated that would not be undertaken in the event that no merger occurs.

RESPONSE TO INTERROGATORY NO. 16

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE states that because there will be no immediate operational changes caused by the parent company merger, the measures GTE takes to open up its Ohio markets will be substantially the same after the merger as they were before the merger. Therefore, GTE does not currently plan to take any additional measures to open up its markets if the merger is consummated that it would not take if the merger were not consummated.

GTE also states that its actions to open up its markets have shown that it is committed to cooperating in good faith with new entrants to facilitate market entry in accordance with the Telecommunications Act of 1996. As of December 18, 1998, GTE has entered into 562 approved interconnection agreements across GTE's 28 states, and approval from state public utility commissions is pending for 127 additional agreements. Of these 689 effective and pending interconnection agreements, 95 percent have been negotiated without the need for state commission arbitration. Please also see the Pre-Filed Testimony of Sherry Bellamy at pages 16-18 with regard to Bell Atlantic's efforts to open its local markets.

Under these interconnection agreements, and as is shown in the December, 1998 Local Competition Report of the FCC's Common Carrier Bureau, GTE has provided 113,487 lines to CLECs via resale, and has provided 14,088 unbundled local loops. Additionally, GTE has established collocation arrangements in 168 switching centers. Thus, numerous CLECs have been able to negotiate interconnection agreements with GTE and enter the local market in GTE's local exchange areas.

In addition to the large number of interconnection agreements GTE has entered into, GTE has also made a significant capital and human resource commitment to opening its local markets. GTE has spent approximately \$281 million, opened three local wholesale ordering centers, and employed more than 500 people to open its local markets. It has also developed processes and systems to simplify and expedite service ordering and access to operations support systems ("OSS"), as is explained in further detail in the Pre-Filed Testimony of Jerome Holland. Thus, GTE's efforts to open its markets have extended beyond negotiating interconnection agreements and embraced pro-

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active measures to facilitate CLEC entry.

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INTERROGATORY NO. 17

Carrier-to-Carrier Issues

Please describe and quantify, where possible, the reduction in the number of GTE employees that service CLEC accounts that would be associated with the elimination of duplicative operational or staff functions that would occur during the five years after the merger with Bell Atlantic.

RESPONSE TO INTERROGATORY NO. 17

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE states that the Pre-Filed testimony of William Griswold and of H. Chris Jacobi address the impact of the merger on hourly employees and management. As is stated by Mr. Jacobi and Mr. Griswold, the parent company merger is not expected to have a material impact on levels of hourly employees at GTE or Bell Atlantic. The only material impact is likely to be in management positions related to administrative and headquarters functions, where GTE and Bell Atlantic anticipate that redundancies will be identified. However, it is impossible at this time to quantify exactly what that impact might be.

Accordingly, to the extent that CLEC accounts are serviced by hourly employees, there will be little, if any, reduction in the number of employees immediately after the merger. To the extent these accounts are serviced by management-level employees, there may be some consolidation of positions as redundancies are identified, but a reduction cannot be quantified. Regardless, any reduction of management employees involved in CLEC accounts or any other operations will only be undertaken in light of the commitment of GTE and Bell Atlantic to provide service in good faith to its CLEC customers. Over the long term, the merged company may or may not eventually decide to consolidate employee positions in this area, but cannot, at this time, say whether this will be the case.

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INTERROGATORY NO. 18

Carrier-to-Carrier Issues

Does Bell Atlantic offer shared cage collocation, wherein Bell Atlantic allows collocators to sub-lease some of their collocation space to other collocators and accepts orders for network elements or interconnection services from both the host collocator and its sub-tenants, in New York? In Pennsylvania? In other states in the Bell Atlantic service area?

RESPONSE TO INTERROGATORY NO. 18

Joint Applicants incorporate their general objections stated above. Joint Applicants further object to this question on the grounds of relevance, to the extent it implies that a given policy within any Bell Atlantic state or its region, based on the facts and circumstances within it, is necessarily relevant to the policies that exist and are appropriate to Ohio, based on the facts and circumstances here. Subject to and without waiver of the foregoing objections, Joint Applicants state that Bell Atlantic offers Shared Collocation in all states and filed in the FCC tariffs NYNEX FCC No. 1, Section 28 and Bell Atlantic FCC No. 1, Section 19. It is also filed in the NY PSC 914. The Bell Atlantic tariffs in its Southern region tariffs mirror the south FCC tariff.

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INTERROGATORY NO. 19

Carrier-to-Carrier Issues

Will the merged company agree to offer shared cage collocation in Ohio? If not, why not?

RESPONSE TO INTERROGATORY NO. 19

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants state that no determinations have been made in Ohio with respect to policies on this matter at this time.

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INTERROGATORY NO. 20

Carrier-to-Carrier Issues

Does Bell Atlantic offer Secured Collocation Open Physical Environment ("SCOPE"), which permits collocators to collectively place their equipment, using locked cabinets instead of cages, in a secured area of a Bell Atlantic central office, separated from Bell Atlantic's equipment, in New York? In Pennsylvania? In other states in the Bell Atlantic service area?

RESPONSE TO INTERROGATORY NO. 20

Joint Applicants incorporate their general objections stated above. Joint Applicants further object to this question on the grounds of relevance, to the extent it implies that a given policy within any Bell Atlantic state or its region, based on the facts and circumstances within it, is necessarily relevant to the policies that exist and are appropriate to Ohio, based on the facts and circumstances here. Subject to and without waiver of the foregoing objections, Joint Applicants refer to their response to Request No. 18.

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INTERROGATORY NO. 21

Carrier-to-Carrier Issues

Will the merged company agree to offer SCOPE in Ohio? If not, why not?

RESPONSE TO INTERROGATORY NO. 21

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants refer CoreComm, Inc. to the response provided to Request No. 19.

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INTERROGATORY NO. 22

Carrier-to-Carrier Issues

Does Bell Atlantic offer identified space collocation, which allows a collocator to install and maintain its own equipment in a defined space alongside Bell Atlantic's and gives collocator representatives, escorted by Bell Atlantic personnel, access to collocated equipment for purposes of provisioning, maintenance, and repair, in New York? In Pennsylvania? In other states in the Bell Atlantic service area?

RESPONSE TO INTERROGATORY NO. 22

Joint Applicants incorporate their general objections stated above. Joint Applicants further object to this question on the grounds of relevance, to the extent it implies that a given policy within any Bell Atlantic state or its region, based on the facts and circumstances within it, is necessarily relevant to the policies that exist and are appropriate to Ohio, based on the facts and circumstances here. Subject to and without waiver of the foregoing objections, Joint Applicants state that Bell Atlantic currently offers identified space collocation only in New York.

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INTERROGATORY NO. 23

Carrier-to-Carrier Issues

Will the merged company agree to offer identified space collocation in Ohio? If not, why not?

RESPONSE TO INTERROGATORY NO. 23

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants refer CoreComm, Inc. to the response provided to Request No. 19.

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INTERROGATORY NO. 24

Carrier-to-Carrier Issues

Does Bell Atlantic offer assembly room and assembly point collocation, which allows collocators to combine Bell Atlantic loops and ports in a secure, unconditioned space, in New York? In Pennsylvania? In other states in the Bell Atlantic service area?

RESPONSE TO INTERROGATORY NO. 24

Joint Applicants incorporate their general objections stated above. Joint Applicants further object to this question on the grounds of relevance, to the extent it implies that a given policy within any Bell Atlantic state or its region, based on the facts and circumstances within it, is necessarily relevant to the policies that exist and are appropriate to Ohio, based on the facts and circumstances here. Subject to and without waiver of the foregoing objections, Joint Applicants state that Bell Atlantic currently offers assembly room and assembly point collocation only in New York.

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INTERROGATORY NO. 25

Carrier-to-Carrier Issues

Will the merged company agree to offer assembly room and assembly point collocation in Ohio? If not, why not?

RESPONSE TO INTERROGATORY NO. 25

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants refer CoreComm, Inc. to the response provided to Request No. 19.

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INTERROGATORY NO. 26

Carrier-to-Carrier Issues

Please provide the number of operational physical collocations between Bell Atlantic and CLECs in New York, in Pennsylvania, and in all other states in the Bell Atlantic service area, by state.

RESPONSE TO INTERROGATORY NO. 26

Joint Applicants incorporate their general objections stated above. Joint Applicants further object to this request on the grounds that the number of physical collocations within each of its individual states is not relevant to any issue in this Ohio proceeding. Subject to and without waiver of the foregoing objections, Joint Applicants state that the number of physical collocation arrangements in Bell Atlantic's operating service area was 845 as of December 31, 1998.

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INTERROGATORY NO. 27

Carrier-to-Carrier Issues

Please provide the number of operational physical collocations between GTE and CLECs in Ohio and in all other states in the GTE service area, by state.

RESPONSE TO INTERROGATORY NO. 27

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE states there are currently no operational physical collocation arrangements between GTE and CLECs in Ohio.

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INTERROGATORY NO. 28

Carrier-to-Carrier Issues

Once Bell Atlantic and GTE have merged, which subsidiary of the merged company will provide for and process requests for collocation in Ohio?

RESPONSE TO INTERROGATORY NO. 28

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants state that upon closing, GTE North will continue to provide for and process requests for collocation in Ohio as it does today in accordance with the Ohio Commission's regulations, GTE North's collocation tariff, and interconnection agreements.

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INTERROGATORY NO. 29

Carrier-to-Carrier Issues

Please state whether GTE collocation policies and procedures will be modified after the merger in any way other than as described above. If they will be, please identify how collocation policies and procedures will be modified.

RESPONSE TO INTERROGATORY NO. 29

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE refers CoreComm, Inc. to the response provided to Request No. 28.

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INTERROGATORY NO. 30

Carrier-to-Carrier Issues

Please identify any and all new products and services, other than collocation options, that GTE does not currently offer to CLECs but would offer to CLECs if the merger were approved.

RESPONSE TO INTERROGATORY NO. 30

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Applicants state that the new products and services referenced above will be an outgrowth of the combination of the resources and capabilities of the two companies, and will depend in large part on customer needs and demands in the increasingly competitive market. In addition, Joint Applicants have not made specific decisions as to what services or products will be made available, and thus cannot identify "any and all new products and services" at this time. Nevertheless, by combining the abilities and best practices of the two companies, it is anticipated that the merged company will be better able to both conceive of such new and improved products and services, and because of the more favorable economics created by the merger in terms of greater efficiency and capital cost savings, better able to deploy the innovations it develops.

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INTERROGATORY NO. 31

Carrier-to-Carrier Issues

Identify each and every legal action filed by GTE in response to the Telecommunications Act of 1996 and/or the Federal Communications Commission's subsequent rulemakings implementing the local competition provisions of the Act (CC Docket No. 96-98).

RESPONSE TO INTERROGATORY NO. 31

Joint Applicants hereby incorporate their general objections stated above. Furthermore, Applicants object to this request on the basis that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence before this Commission in this docket. Furthermore, Applicants object to this request on the basis that it is unduly burdensome to the extent it seeks information that is part of the public record. Applicants also object to this request on the basis that it is overly broad and seeks information concerning states other than Ohio and that such information is irrelevant and beyond the scope of the Commission's jurisdiction. Applicants also object to this request on the basis that it is irrelevant and unduly burdensome to the extent it seeks information having nothing to do with GTE North's continuing operations following the merger.

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INTERROGATORY NO. 32

Carrier-to-Carrier Issues

Identify all arbitrated interconnection agreements with CLECs that (a) GTE has executed and submitted to state commissions for approval; (b) GTE has not executed; (c) GTE has appealed to federal district courts.

RESPONSE TO INTERROGATORY NO. 32

Joint Applicants hereby incorporate their general objections stated above. Furthermore, Applicants object to this request on the basis that it is irrelevant and not reasonably designed to lead to the discovery of admissible evidence before this Commission in this docket. Furthermore, Applicants object to this request on the basis that it is overly broad and seeks information concerning states other than Ohio and that such information is irrelevant and beyond the scope of the Commission's jurisdiction.

Subject to and without waiver of the foregoing objections, GTE states that in the state of Ohio:

- (a) GTE has not executed and submitted to the state commission for approval any arbitrated interconnection agreements;
- (b) GTE has not executed the GTE/AT&T Interconnection, Resale and Unbundling Agreement;
- (c) See the response to item (b) above.

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INTERROGATORY NO. 33

Carrier-to-Carrier Issues

Does GTE anticipate realizing any cost savings from the merger in the GTE service area? If so, how much of the projected cost savings are attributable to Ohio?

RESPONSE TO INTERROGATORY NO. 33

Joint Applicants hereby incorporate their general objections stated above. In addition, Applicants object to this request to the extent it seeks information about states other than Ohio on the grounds it is irrelevant and that it is beyond the scope of the Commission's jurisdiction. Subject to and without waiver of the foregoing objections, GTE states that it does anticipate realizing cost savings from the merger in the GTE service area. In addition, merger costs will be incurred in order to achieve the anticipated merger savings.

The companies have estimated that full synergies (revenue, expense and capital) anticipated and publicly announced will be realized in the third year of operations after merger consummation. In addition, projected merger costs are anticipated to be fully incurred after three years of operation. The companies have not projected any material change in synergies beyond year 3. It is important to note that these estimates of costs and savings are forecasts based on the best information available at this time.

The cumulative projected net savings (merger costs and savings) attributable to Ohio to be realized over the three years following merger consummation is \$8.6M.

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INTERROGATORY NO. 34

Carrier-to-Carrier Issues

If there are merger savings attributable to Ohio, how does GTE intend pass through those savings to its customers, both CLEC and end users? Does GTE intend to adjust its cost-based rates for interconnection and unbundled network elements to reflect merger cost savings in Ohio? In other states in the GTE service area?

RESPONSE TO INTERROGATORY NO. 34

Joint Applicants hereby incorporate their general objections stated above. In addition, Applicants object to this request to the extent it seeks information about states other than Ohio on the grounds that it is irrelevant and that it is beyond the scope of the Commission's jurisdiction.

Subject to and without waiver of those general objections, GTE states that GTE intends to treat the costs and cost savings related to the merger in the same manner as other costs incurred to provide products and services. At this time, GTE does not intend to seek any special ratemaking treatment of merger costs or savings.

The actual costs and realized savings will flow to GTE North's Ohio books and records in the normal course of business. GTE expects that GTE North's Ohio net cost savings, when fully implemented, will exceed the merger-related costs. The net savings will thus permit GTE North to better meet Ohio customers' future needs, and react more quickly to competitor's actions.

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INTERROGATORY NO. 35

Carrier-to-Carrier Issues

Does Bell Atlantic anticipate realizing any cost savings from the merger in the Bell Atlantic service area? If so, how does Bell Atlantic intend to pass those savings on to its customers, both CLEC and end user? Does Bell Atlantic intend to adjust its cost-based rates for interconnection and unbundled network elements to reflect merger cost savings?

RESPONSE TO INTERROGATORY NO. 35

Joint Applicants incorporate their above general objections stated above. In addition, Joint Applicants object to this request on the grounds of relevance, since issues concerning cost savings as they effect Bell Atlantic states is not relevant to this Ohio proceeding. Subject to and without waiver of the foregoing objections, Joint Applicants state that no specific analysis or allocation of the cost savings as they impact any individual state has been performed. The exact manner in which cost savings will benefit both consumers and other customers (such as CLECs) will be determined by the facts and regulatory plans in place in any individual state as well as by the needs and demands of the marketplace. As a general matter, and as in Ohio, the greater efficiencies offered by the merger is expected to permit Bell Atlantic to better respond to those needs.

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INTERROGATORY NO. 36

Carrier-to-Carrier Issues

Has GTE submitted cost studies to the Commission for purposes of evaluating and setting permanent rates for interconnection, unbundled network elements, and wholesale services? If so, please provide copies of the cost studies submitted to the Commission. If not, please indicate when GTE expects to submit such studies for the Commission's consideration.

RESPONSE TO INTERROGATORY NO. 36

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE states that no studies have been submitted to the Ohio Commission for purposes of evaluating and setting permanent rates for interconnection, unbundled network elements, and wholesale services. Preliminary meetings have been held with the Ohio Commission Staff and a final file date has yet to be determined.

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INTERROGATORY NO. 37

Carrier-to-Carrier Issues

Please state whether GTE has offered to other CLECs the rates for interconnection, unbundled network elements, and wholesale services set by the Ohio Commission in GTE's arbitration with AT&T. If not, why not?

RESPONSE TO INTERROGATORY NO. 37

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE states that it has offered the rates of the AT&T arbitration to other CLECs in the state of Ohio.

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INTERROGATORY NO. 38

Carrier-to-Carrier Issues

Please identify the wholesale discount rates adopted by state commissions in Bell Atlantic's and GTE's service areas by state. Please state whether these discounts are interim, permanent, and/or adopted a part of an interconnection arbitration.

RESPONSE TO INTERROGATORY NO. 38

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants state that the GTE wholesale discount rate in Ohio is 12.16% for services requested with GTE operator and directory assistance services, and 16.41% for services requested without GTE operator and directory assistance services. These discount rates were the result of arbitration proceedings with GTE/AT&T (Case No. 96-832-TP-ARB) and GTE/Sprint (Case No. 96-1021-TP-ARB).

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INTERROGATORY NO. 39

Carrier-to-Carrier Issues

The GTE wholesale discount rates set in the AT&T arbitration in Ohio (12.16% with operator services and directory assistance, 16.41% without) are substantially lower than the wholesale discount rates set in most Bell Atlantic service areas (e.g., 19.1% w/ OS and 21.7% w/o OS in NY, 18.43% w/ OS and 20.69% w/o OS in PA, 18.5% w/ OS and 21.3% w/o OS in VA). Please explain Bell Atlantic's and GTE's methodology for deriving wholesale discount rates and identify the differences in methodology between the avoided cost studies used by Bell Atlantic and GTE that have produced such disparate rates.

RESPONSE TO INTERROGATORY NO. 39

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants state that the methodology used in the preparation of Bell Atlantic's and GTE's Avoided Cost Studies are governed by section 252(d)(3) and related provisions of the Telecommunications Act of 1996. Bell Atlantic's and GTE's Avoided Cost Studies are consistent with the Act and its underlying principles. The methodology employed by both Bell Atlantic and GTE is a matter of public record and known by CoreComm, Inc. as demonstrated by this interrogatory.

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INTERROGATORY NO. 40

Carrier-to-Carrier Issues

After the merger, will the merged company use Bell Atlantic's or GTE's avoided cost methodology in proposing wholesale discount rates? If the merged company intends to use the GTE methodology in either GTE's service territory or both service territories, please identify reasons why Bell Atlantic's methodology is considered inferior to GTE's.

RESPONSE TO INTERROGATORY NO. 40

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants state that the wholesale discount rates for GTE North will continue to apply after the merger has been consummated.

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INTERROGATORY NO. 41

Carrier-to-Carrier Issues

Will GTE agree to increase the wholesale discount rate in Ohio as a condition of merger approval?

RESPONSE TO INTERROGATORY NO. 41

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, no. As explained in response to Request No. 39, rates have been set in conformance with the Telecommunications Act of 1996. In addition, Joint Applicants refer to the response to Request No. 40.

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INTERROGATORY NO. 42

Carrier-to-Carrier Issues

Will GTE agree to a higher wholesale discount rate for resold services provided to residential consumers in Ohio as a condition of merger approval? Does GTE provide higher wholesale discounts for residential consumers in any state in its service territory? If so, please list the residential and business discounts for those states.

RESPONSE TO INTERROGATORY NO. 42

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, GTE refers CoreComm, Inc. to the response to Request No. 40. GTE does not provide a higher discount for residential customers in any state.

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INTERROGATORY NO. 43

Carrier-to-Carrier Issues

Please describe in detail (a) GTE's position on geographic deaveraging and (b) Bell Atlantic's position on geographic deaveraging.

RESPONSE TO INTERROGATORY NO. 43

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants state that GTE's and Bell Atlantic's policy positions regarding geographic deaveraging are outlined below.

GTE states that its policy is that rates should be geographically de-averaged to better reflect underlying cost differences in conjunction with a de-averaged and competitively neutral universal service funding (USF) mechanism. Rates for many ILEC telecommunications services are set on a statewide average basis. Rates for other ILEC services are de-averaged but on a basis that reflects value of service principles and not economic costs. Neither of these rate making practices is sustainable as telecommunications markets are opened further to competition.

As ILECs move to cost-based de-averaged rates, it is critical that the de-averaging basis is consistently and concurrently implemented across all the ILEC's wholesale and retail offerings. The de-averaging basis must also be associated with a competitively neutral USF plan and be consistent with the funding received from any explicit universal service support mechanism.

Bell Atlantic states that Bell Atlantic's Operating Telephone Companies have not geographically deaveraged its rates from the historical rate relationships which have been approved by their respective state Commissions. Bell Atlantic's policy in this regard, as with other pricing issues, is to fully comply with the terms of the regulatory plans under which its companies operate. In the context of such plans, the propriety of geographic rate deaveraging would have to be assigned on a case-by-case basis.

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INTERROGATORY NO. 44

Carrier-to-Carrier Issues

The New York Public Service Commission has deaveraged loop rates into two zones. Do Bell Atlantic and GTE agree that two geographically deaveraged zones fail to meet the FCC's requirement, in 47 C.F.R. § 57.507(f), that state Commissions must establish different rates for elements in at least three defined geographic areas? If either Bell Atlantic or GTE disagrees, please explain why.

RESPONSE TO INTERROGATORY NO. 44

Joint Applicants hereby incorporate their general objections stated above. Additionally, Applicants object to this request on the basis that this interrogatory is irrelevant to this proceeding.

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INTERROGATORY NO. 45

Carrier-to-Carrier Issues

Please describe in detail (a) GTE's position on CLEC's pick and choose and Most Favored Nations rights under 47 U.S.C. § 252(i) and (b) Bell Atlantic's position on the same issue. Please address specifically whether a CLEC may exercise its 47 U.S.C. §252(i) right to adopt any interconnection agreement that has been approved by the relevant State Commission in its entirety and that is still in effect, or any interconnection, service, or network elements of an approved agreement, both before and after the CLEC executes an interconnection agreement with Bell Atlantic or GTE.

RESPONSE TO INTERROGATORY NO. 45

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants state as follows:

- (a) Subject to the GTE policy regarding unbundled network elements referred to in its response to Data Request No. 46, GTE will process "pick and choose" and "most favored nations" requests in accord with Section 252(i), and FCC Rule 809 generally as follows:

A CLEC may adopt an entire effective, approved interconnection agreement¹, or any individual arrangement contained therein applicable to interconnection, resale, or network elements subject to GTE's right to refuse or limit such a request as set forth in FCC Rule 809. For example, if a CLEC requests all of the terms and conditions of an effective approved agreement GTE will grant such request in the same manner as it did prior to the January 25, 1999 Supreme Court decision in AT&T Corp. v. Iowa Utilities Board, __ U.S. __ (1999). If a CLEC requests an entire interconnection, resale or UNE subsection of an effective approved agreement GTE will also grant such request in like manner provided that the CLEC must agree to adopt all of the terms and conditions "legitimately related" to the requested subsection. Further, if a CLEC requests individual interconnection, resale or UNE arrangements within a subsection, GTE will allow adoption of such individual arrangements so long as the CLEC agrees to adopt all of the provisions legitimately related to the arrangement. Likewise, if a CLEC is party to an existing approved agreement, GTE will permit the CLEC to exercise a "most favored nations" election to the extent required by 252(i) and Rule 809 -- a "most favored nations" request shall be granted so long as the CLEC agrees to adopt all of the terms and conditions applicable or "legitimately related" to the requested interconnection, resale or network element arrangement. In short, GTE's 252 (i) position follows the law currently applicable to "pick and choose" and "most favored nations" elections. However, to the extent 252(i) and FCC Rule 809 permit GTE to

¹ These "agreements" are not agreements in the generally accepted understanding of that term. GTE was required to accept these agreements, which were required to reflect the then-effective FCC rules.

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refuse a "pick and choose" or "most favored nations" request GTE is not waiving its rights to do so.

(b) Bell Atlantic's policy on these issues is a matter of public record.

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INTERROGATORY NO. 46

Carrier-to-Carrier Issues

Please state whether Bell Atlantic and GTE agree to provide all unbundled network elements listed in 47 U.S.C. § 51.319 pending the FCC's action on remand from the Eighth Circuit following the Supreme Court's decision in *AT&T vs. Iowa Utilities Board*.

RESPONSE TO INTERROGATORY NO. 46

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants state GTE's policy regarding unbundled network elements is described in its February 17, 1999 letter to Mr. Jay Agranoff, Attorney Examiner for the Ohio Commission. An unsigned but otherwise true and correct copy of the February 17 letter is attached.

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INTERROGATORY NO. 47

Affiliates

As noted in the Commission's Entry setting forth the issues in this proceeding, both Bell Atlantic and GTE have affiliates that are certified to provide interexchange carrier services throughout Ohio. Please state Bell Atlantic's and GTE's position(s) on whether such affiliates should be permitted to continue to provide interexchange services post-merger and whether the provision of such services violates 47 U.S.C. § 271(a).

RESPONSE TO INTERROGATORY NO. 47

Joint Applicants hereby incorporate their general objections stated above. Subject to and without waiver of the foregoing objections, Joint Applicants states that they will continue to provide interLATA interexchange service through their respective subsidiaries GTE Communications Corporation (GTECC) and Bell Atlantic Communications, Inc. (BACI) after the merger in the same manner as it is doing now – by authority of the Ohio Public Utilities Commission. The reasons that no change in the current arrangement in Ohio is necessary are as follows:

The merger with Bell Atlantic will have no effect on the ability of the merged company or any of its affiliates to provide interLATA long distance service originating in Ohio. Both GTE and Bell Atlantic currently are permitted to offer such services in Ohio under the Telecommunications Act, and may continue doing so after the merger. GTE is permitted to do so because it is not a Bell Operating Company, and is therefore exempt from Section 271. Bell Atlantic is permitted to do so under Section 271(b)(2) of the Telecommunications Act, which authorizes Regional Bell Operating Companies to originate interLATA traffic "outside [their] in-region states after the date of enactment of the Telecommunications Act of 1996." Under Section 271(i)(1), Bell Atlantic's "in-region states" consist of the 14 jurisdictions that comprised the Bell Atlantic and NYNEX territories as of February 8, 1996, the date the Telecommunications Act was enacted. Ohio obviously is not one of those states. After GTE and Bell Atlantic merge, GTE will become an affiliate of Bell Atlantic, and therefore be subject to Section 271 restrictions within Bell Atlantic's in-region states, but not in any states (such as Ohio) outside Bell Atlantic's region. Therefore, the merged company will not be required to obtain section 271 approval after the merger to continue offering interLATA long distance service in Ohio.

Application of Section 271 can be more easily explained by comparing the merger between GTE and Bell Atlantic to a hypothetical merger between GTE and Ameritech. If GTE and Ameritech merged, and Ameritech had not yet received Section 271 approval for Ohio, then the merged company would not be able to originate long distance service in Ohio until such approval was obtained, or an appropriate waiver of the requirement was granted. This follows because Ameritech is the BOC for Ohio. Bell Atlantic is not. Thus, even if there are some states where Bell Atlantic has not obtained

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Section 271 approval by the time the merger is consummated, the Section 271 requirement is not applicable to any of the merged company's operations in Ohio.

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INTERROGATORY NO. 48

Affiliates

Please state whether GTE is authorized to provide interexchange services in any state in the Bell Atlantic service area. Please list the states where GTE has such authorization.

RESPONSE TO INTERROGATORY NO. 48

Joint Applicants hereby incorporate their general objections stated above. In addition, Applicants objects to this Request on the grounds that it seeks neither information relevant to the subject matter of these proceedings, nor information reasonably calculated to lead to the discovery of relevant information. Applicants additionally object to this Request to the extent it seeks information about states other than Ohio; such information is irrelevant and is beyond the scope of the Commission's jurisdiction.

Subject to and without waiver of the foregoing objections, GTE states that GTE Communications Corporation is authorized to provide interexchange services in all states wherein Bell Atlantic has incumbent local exchange carrier operating territory.

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INTERROGATORY NO. 49

Affiliates

If GTE is authorized to provide interexchange services in any state in the Bell Atlantic service area, please state Bell Atlantic's and GTE's position(s) on whether GTE should be permitted to continue to provide interexchange service in the states in Bell Atlantic's service area post-merger and whether the provision of such services would violate 47 U.S.C. § 271(a).

RESPONSE TO INTERROGATORY NO. 49

Joint Applicants hereby incorporate their general objections stated above. In addition, Applicants objects to this Request on the grounds that it seeks neither information relevant to the subject matter of these proceedings, nor information reasonably calculated to lead to the discovery of relevant information. Applicants additionally object to this Request to the extent it seeks information about states other than Ohio; such information is irrelevant and is beyond the scope of the Commission's jurisdiction.

Subject to and without waiver of the foregoing objections, Applicants state that they are confident that Bell Atlantic will receive approval to provide in-region interexchange services or will receive other interim relief by the time the merger is consummated.

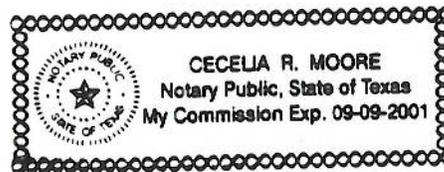
VERIFICATION

I, Cedric L. Tracy, Director of GTE Merger Approval Team, do solemnly swear that the facts in the foregoing Interrogatories and Requests for Documents, and all exhibits incorporated by reference, insofar as they relate to GTE Corporation, are to the best of my knowledge and belief, true and correct and that said statements of fact constitute a complete statement of the matter to which they relate.


GTE Corporation

Subscribed and sworn to before me
This 10th day of March, 1999
At Irving, Texas.


Notary Public



As to objections:


Thomas E. Lodge (0015741)

Thompson Hine & Flory LLP
One Columbus
10 West Broad Street, Suite 700
Columbus, Ohio 43215-3435
PH: (614) 469-3246
FAX: (614) 469-3361

Date: March 11, 1999