



**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 11-7

February 15, 2013

In the Matter of the Application of Nexus Communications, Inc. for Designation as an Eligible Telecommunications Carrier for Low Income Support Only

**SECOND SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO NEXUS COMMUNICATIONS, INC.**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits to Nexus Communications, Inc. the following information requests.

Instructions

The following instructions apply to this set of information requests, and all subsequent requests issued by the Department in this proceeding.

1. Unless otherwise stated, each request should be answered in writing on a separate three-hole punch page including: the case docket number; a reference to the request number; the name of the person responsible for the answer; and a recitation of the request.
2. Do not wait for all answers to be completed before supplying answers. Provide answers as soon as they are completed.
3. The term “Nexus” means Nexus Communications, Inc., and its corporate predecessors, agents, officers, employees, and assigns.
4. The term “Petition” means the Application of Nexus Communications, Inc. for Designation as an Eligible Telecommunications Carrier for Low Income Support Only, filed with the Department on June 10, 2011.
5. The term “Amended Petition” means the Amended Application of Nexus Communications, Inc. for Designation as an Eligible Telecommunications Carrier for Low Income Support Only, filed with the Department on January 2, 2013.
6. The term “FCC” means the Federal Communications Commission.
7. The term “USAC” means the Universal Service Administrative Company.

8. The term “affiliate” is any individual, partnership, association, joint stock company, trust, corporation, or other entity who (or that), directly or indirectly, owns or controls, is owned or controlled by, or is under common ownership or control with, Nexus.
9. Requests shall be deemed continuing so as to require further supplemental responses if Nexus and/or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
10. If any of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
11. File an original and three copies of the responses with Catrice C. Williams, Secretary of the Department not later than the close of business on **March 1, 2013.**

REQUESTS

- D.T.C. 2-1 Refer to page 2 of the Amended Petition in which Nexus states that it “submits this Amended Application for ETC designation exclusively for wireless Lifeline support in the non-rural areas of Massachusetts indicated in Exhibit C (the ‘Designated Service Area’)”:
- a. Provide a complete list of the rural areas in Massachusetts in which Nexus does not seek designation as an ETC.
 - b. Clarify whether Nexus plans to offer Lifeline service for the Granby, Hancock, and Richmond rate centers listed in Exhibit C.
- D.T.C. 2-2 Refer to Exhibit C to the Amended Petition and the Designated Service Area map contained therein:
- a. Clarify whether the yellow areas on the map are the rate centers for which Nexus seeks ETC designation, and the white areas are the rate centers for which Nexus does not seek ETC designation.
 - b. Provide a complete list of all rate centers contained in the white areas of the Designated Service Area map.
 - c. Explain in narrative form the reason(s) that the Hancock rate center, which is served by a rural ILEC, is not identified on the Designated Service Area map as a “Non-Verizon ILEC Rate Center.”
- D.T.C. 2-3 Refer to pages 9 and 11 of Exhibit C to the Amended Petition and explain in narrative form how the Pawtucket and Warren rate centers in Rhode Island are relevant to the provision of Lifeline service in Massachusetts.

D.T.C. 2-4 Refer to the Petition at Exhibit A and explain in narrative form how Nexus assesses minutes for international voice calls.

D.T.C. 2-5 Provide for the last three fiscal years:

- a. Nexus' financial statements.
- b. The number of Lifeline subscribers served by Nexus nationwide, separating out the number of its wireless and wireline customers.
- c. The number of non-Lifeline subscribers served by Nexus nationwide, separating out the number of its wireless and wireline customers.
- d. Nexus' revenues from its Lifeline service, separating out its revenues from its wireless and wireline customers, as well as the revenues from the sale of replenishment airtime and text minutes.
- e. Nexus' revenues from its non-Lifeline service, separating out its revenues from its wireless and wireline customers, as well as the revenues from the sale of replenishment airtime and text minutes.

D.T.C. 2-6 Provide a detailed description of Nexus' participation in the In-Depth Validation ("IDV") process with the FCC and USAC. Include in the response to this request: a) all information regarding the number of intracompany and intercompany duplicates by state that were identified in the IDV process; b) the total number of duplicates; and c) the number of duplicates as a percentage of total subscribers.