

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

Investigation by the Department on its Own Motion to Determine whether an Agreement entered into by Verizon New England Inc., d/b/a Verizon Massachusetts is an Interconnection Agreement under 47 U.S.C. § 251 Requiring the Agreement to be filed with the Department for Approval in Accordance with 47 U.S.C. § 252

D.T.C. 13-6

**DECLARATION OF ALEXANDER W. MOORE IN SUPPORT OF
THE OPPOSITION OF VERIZON MA
TO INTERVENORS' MOTION FOR SUMMARY JUDGMENT**

I, Alexander W. Moore, declare:

1. I am a member in good standing of the bar of Massachusetts and counsel to Verizon New England Inc., d/b/a Verizon Massachusetts ("Verizon MA") in this action. I make this declaration in support of Verizon MA's opposition to the Intervenor's motion for summary judgment.
2. Attached as Exhibit A is a true copy of the Traffic Exchange Agreement. This exhibit is being filed only in a Highly Sensitive Confidential version.
3. Attached as Exhibit B is a true copy of the VoIP-to-VoIP Agreement. This exhibit is being filed only in a Highly Sensitive Confidential version.
4. Attached as Exhibit C is a true copy of the Preliminary Statement to Comcast's Response to Competitive Carriers' First Set of Information Requests (Jan. 10, 2014).
5. Attached as Exhibit D is a true copy of the Direct Testimony of Eugene J. Spinelli, Sherri D. Schlabs and Paul B. Vasington ("Verizon MA Panel Testimony"), without exhibits. It is being filed only in a Highly Sensitive Confidential version.

6. Attached as Exhibit E is a true copy of pages 1 through 3 of XO Communications Services, LLC's Opposition to Verizon-MA's Motion to Compel, D.T.C. 13-6 (Apr. 4, 2014).

7. Attached as Exhibit F is a true copy of Comcast's Response to Information Request 1 in Verizon's First Set of Information Requests to Comcast (Feb. 6, 2014).

8. Attached as Exhibit G is a true copy of the cover page and pages 9 through 10 and 12 through 23 of the Rebuttal Testimony of David J. Malfara, Sr. Only the public, redacted version is being filed.

9. Attached as Exhibit H is a true copy of the cover page and pages 21 through 25 of the Rebuttal Testimony of Joseph Gillan. Only the public, redacted version is being filed.

10. Attached as Exhibit I is a true copy of the cover page and pages 17 and 18 of the Direct Testimony of Joseph Gillan. Only the public, redacted version is being filed.

11. Attached as Exhibit J is a true copy of the cover page and pages 3 through 6 of the Rebuttal Testimony of Eugene J. Spinelli, Sherri D. Schlabs and Paul B. Vasington ("Verizon MA Panel Rebuttal Testimony").

12. Attached as Exhibit K is a true copy of the Joint Submission, *Request for Commission Approval of an Interconnection Agreement Between Sprint Spectrum L.P. and AT&T Michigan*, Case No. U-17569 (Mich. Pub. Serv. Comm'n filed Feb. 25, 2014).

13. Attached as Exhibit L is a true copy of the Stipulation of Dismissal of Count V of Plaintiffs' Complaint, *SprintCom, Inc. v. Scott*, No. 1:13-cv-06565 (N.D. Ill. filed Feb. 28, 2014).

14. Attached as Exhibit M is a true copy of the Joint Motion for New Hearing Dates and Suspension of Prehearing Activity, *Sprint Spectrum, L.P.'s Petition for Arbitration Pursuant to Section 252(b) of the Communications Act of 1934, as Amended by the Telecommunications Act of 1996, and the Applicable Laws for Rates, Terms and Conditions of Interconnection with*

Indiana Bell Telephone Company d/b/a AT&T Indiana, Cause No. 44409-INT 01 (Ind. Util. Reg. Comm'n filed Feb. 28, 2014).

Signed under the pains and penalties of perjury on April 11, 2014.


Alexander W. Moore