

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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)	D.T.C. 13-6
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)	

MOTION OF VERIZON MA FOR LEAVE TO FILE REPLY

Pursuant to 220 CMR 1.03(5), Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon MA”) hereby moves for leave to file the enclosed Reply of Verizon MA in Support of Motion for Abeyance. As grounds for this motion, Verizon MA states that the short Reply will not burden the forward progress of this case and may assist the Department in addressing arguments made by the CLECs in opposition to the motion for abeyance, in particular a new claim that the agreement at issue must be filed for Department approval for reasons unrelated to its provision for the exchange of VoIP traffic in IP format.

WHEREFORE, Verizon MA respectfully requests that the Department grant it leave to file the Reply attached hereto.

Respectfully submitted,

VERIZON NEW ENGLAND INC.

By its attorney,



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