

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Counsel/Sherri D. Schlabs  
**Title:** Acting Director – Global  
Wholesale Interconnection  
Services

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-1

Please produce copies of all amendments to the Agreement not previously submitted to the Department.

**Reply:** Objection: The request is vague. The Competitive Carriers' First Set of Information Requests to Verizon defines the term "Agreement" as "the agreement between Verizon and Comcast submitted to the Department on or about May 30, 2013, which is the subject of this proceeding." Verizon MA, however, submitted *two* agreements to the Department that day. The defined term "Agreement" does not identify which agreement is the subject of this request. Based on Requests CC-VZ 1-24 and CC-VZ 1-25, which refer to "section 1.26 of the Agreement," Verizon MA concludes that the term "Agreement" intends to refer to \*\*\* **Begin Highly Sensitive Confidential \*\*\*** [REDACTED] \*\*\* **End Highly Sensitive Confidential \*\*\***.

Subject to the above objection, Verizon MA states that it has no documents responsive to this request.

**Verizon New England Inc.  
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**D.T.C. Docket No. 13-6**

**Respondent:** Counsel/Sherri D. Schlabs  
**Title:** Acting Director – Global  
Wholesale Interconnection  
Services

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-2

Please produce copies of all schedules, attachments, or appendices to the Agreement not previously submitted to the Department.

**Reply:** Objection: The request is vague. The Competitive Carriers' First Set of Information Requests to Verizon defines the term "Agreement" as "the agreement between Verizon and Comcast submitted to the Department on or about May 30, 2013, which is the subject of this proceeding." Verizon MA, however, submitted *two* agreements to the Department that day. The defined term "Agreement" does not identify which agreement is the subject of this request. Based on Requests CC-VZ 1-24 and CC-VZ 1-25, which refer to "section 1.26 of the Agreement," Verizon MA concludes that the term "Agreement" intends to refer to \*\*\* **Begin Highly Sensitive Confidential** \*\*\* [REDACTED] \*\*\* **End Highly Sensitive Confidential** \*\*\*.

Subject to the above objection, Verizon MA states that it has no documents responsive to this request.

Verizon New England Inc.  
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Commonwealth of Massachusetts

D.T.C. Docket No. 13-6

**Respondent:** Counsel/Sherri D. Schlabs  
**Title:** Acting Director – Global  
Wholesale Interconnection  
Services

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-3

Please produce copies of all agreements incorporated into or referred to in the Agreement.

**Reply:** Objection: The request is vague. The Competitive Carriers' First Set of Information Requests to Verizon defines the term "Agreement" as "the agreement between Verizon and Comcast submitted to the Department on or about May 30, 2013, which is the subject of this proceeding." Verizon MA, however, submitted *two* agreements to the Department that day. The defined term "Agreement" does not identify which agreement is the subject of this request. Based on Requests CC-VZ 1-24 and CC-VZ 1-25, which refer to "section 1.26 of the Agreement," Verizon MA concludes that the term "Agreement" intends to refer to \*\*\* **Begin Highly Sensitive Confidential** \*\*\* [REDACTED] \*\*\* **End Highly Sensitive Confidential** \*\*\*.

Verizon MA further objects to this request on the grounds that it is overly broad and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Moreover, \*\*\* **Begin Highly Sensitive Confidential** \*\*\* [REDACTED] \*\*\* **End Highly Sensitive Confidential** \*\*\*.

Subject to the above objection, Verizon MA is producing herewith as Attachment CC-VZ 1-3 a copy of its interconnection agreement with Comcast Digital Phone

of Massachusetts, Inc., dated June 26, 2001, as amended, and on file with the Department.

**Verizon New England Inc.  
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**Respondent:** Counsel/Sherri D. Schlabs  
**Title:** Acting Director – Global  
Wholesale Interconnection  
Services

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-4

Please produce a copy of the draft agreement referred to in paragraph 4 of Verizon MA's June 26, 2013 Motion for Abeyance.

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to the above objection, Verizon MA states that Verizon Services Corp. (on behalf of Verizon MA and other Verizon ILECs) and Comcast have subsequently entered into an agreement on the subject matter addressed in the draft agreement referenced in the request. Verizon MA submitted that agreement to the Department and served it on the parties on December 23, 2013.

**Verizon New England Inc.  
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**D.T.C. Docket No. 13-6**

**Respondent:** Counsel/Sherri D. Schlabs  
**Title:** Acting Director – Global  
Wholesale Interconnection  
Services

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-5

Please produce all drafts exchanged between Verizon and Comcast in connection with negotiations to memorialize the terms and conditions on which they exchange traffic in IP format.

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to the above objection, Verizon MA states that Verizon Services Corp. (on behalf of Verizon MA and other Verizon ILECs) and Comcast have subsequently entered into an agreement on the subject matter addressed in the draft agreement referenced in the request. Verizon MA submitted that agreement to the Department and served it on the parties on December 23, 2013.

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**D.T.C. Docket No. 13-6**

**Respondent:** Counsel/Sherri D. Schlabs  
**Title:** Acting Director – Global  
Wholesale Interconnection  
Services

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-6

Please produce copies of the “model agreement” and “IP interconnection technical workbook” as referenced in Verizon’s December 4, 2013 ex parte letter by Maggie McCready, Vice President, Federal Regulatory Affairs, Verizon to the FCC in *Technology Transition Policy Task Force*, GN Docket 13-5.

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. This proceeding is about the voluntarily negotiated commercial agreements between Verizon MA and Comcast. Verizon MA has produced those agreements to the Department and the parties.

Subject to the above objections, Verizon MA is producing the requested documents herewith, as Confidential Attachment CC-VZ 1-6(a) and Confidential Attachment CC-VZ 1-6(b). In June of 2013, Verizon invited each member of the CLEC Coalition to negotiate a commercial IP agreement for VoIP traffic. Verizon sent the model agreement and technical workbook to those that responded and executed a non-disclosure agreement. Verizon has taken the same approach with other companies that have requested negotiations or that Verizon has invited to negotiate.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Eugene Spinelli  
**Title:** Manager – Corporate  
Technology

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-7

Please refer to the statement in Verizon’s December 4, 2013 ex parte to the FCC in GN Docket No. 13-5: “We [Verizon and Comcast] spent a year working through detailed technical implementation issues.”

- a. Have Verizon and Comcast finished working through “detailed technical implementation issues”?
- b. If so, when did they finish?
- c. If not, please describe the issues that remain to be worked through and the timetable for their anticipated resolution.

**Reply:**

- a. Verizon and Comcast have resolved the issues that are referenced in the sentence quoted in the request, although some technical issues may still surface that need attention from time to time.
- b. In or about December of 2012.
- c. Not applicable.

**Verizon New England Inc.  
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**D.T.C. Docket No. 13-6**

**Respondent:** Counsel/Sherri D. Schlabs  
**Title:** Acting Director – Global  
Wholesale Interconnection  
Services

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-8

Please state the date on which the negotiations between Verizon and Comcast that resulted in the Agreement commenced.

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. In addition, the request is vague, for the reasons stated in the objections to request CC-VZ 1-1.

Subject to the above objection, Verizon MA states that the negotiations between Verizon and Comcast that resulted in \*\*\* **Begin Highly Sensitive Confidential**

\*\*\*

\*\*\* **End Highly Sensitive Confidential** \*\*\* Verizon MA cannot identify a specific date on which such negotiations commenced. Those discussions centered on

\*\*\* **Begin Highly Sensitive Confidential** \*\*\*

\*\*\* **End Highly Sensitive Confidential** \*\*\* the exchange of VoIP traffic in IP format.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Counsel/Sherri D. Schlabs  
**Title:** Acting Director – Global  
Wholesale Interconnection  
Services

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-9

Which party initiated the negotiations between Verizon and Comcast that resulted in the Agreement?

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. In addition, the request is vague, for the reasons stated in the objections to request CC-VZ 1-1.

Subject to the above objection, Verizon MA states the following: see response to request CC-VZ 1-8.

**Verizon New England Inc.  
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**D.T.C. Docket No. 13-6**

**Respondent:** Counsel/Sherri D. Schlabs  
**Title:** Acting Director – Global  
Wholesale Interconnection  
Services

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-10

Please explain the facts and circumstances under which the negotiations between Verizon and Comcast that led to the Agreement were initiated, specifically including but not limited to whether such negotiations were a component or outgrowth of other business relationships or dealings between the parties.

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. In addition, the request is vague, for the reasons stated in the objections to request CC-VZ 1-1.

Subject to the above objection, Verizon MA states the following: see response to request CC-VZ 1-8.

**Verizon New England Inc.  
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**Respondent:** Counsel/Sherri D. Schlabs  
**Title:** Acting Director – Global  
Wholesale Interconnection  
Services

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-11

Is the Agreement, or any model agreement based on the Agreement, available only to providers that claim that their retail service is an information service, or is it available to providers of telecommunications services as well?

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence, to the extent that it seeks information regarding “any model agreement.” Verizon MA further objects to this request on the ground that the term “available” is unclear. Verizon presumes that the request is asking whether Verizon MA would be willing to enter into an agreement based on the alleged “model” agreement. In addition, the term “Agreement” is vague, for the reasons stated in the objections to request CC-VZ 1-1.

Subject to the above objection, Verizon MA would be willing to negotiate an agreement based on the model agreement referenced in Request CC-VZ 1-6. Such negotiations are not contingent upon how the other provider characterizes its retail services.

**Verizon New England Inc.  
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**D.T.C. Docket No. 13-6**

**Respondent:** Counsel  
**Title:**

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-12

Does any Verizon affiliate interconnect with any other Verizon affiliate on an IP-to-IP basis?

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Counsel  
**Title:**

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-13

If the answer to the preceding request is other than an unqualified "no," please:

- a. Identify the affiliates;
- b. Describe the means of interconnection;
- c. Describe the facilities used; and
- d. Specify the locations of all points of interconnection.

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Counsel  
**Title:**

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-14

Does any Verizon affiliate exchange traffic with any other Verizon affiliate in IP format?

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Counsel  
**Title:**

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-15

If the answer to the preceding request is other than an unqualified "no," please:

- a. Identify the affiliates;
- b. Describe the arrangements under which the affiliates exchange such traffic;
- c. Describe the facilities used; and
- d. Specify the locations of all points in the network at which such traffic is exchanged.

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Eugene J. Spinelli  
**Title:** Manager – Corporate  
Technology

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-16

At the present time, can customers of Verizon's VoIP services make voice calls to customers of Comcast's VoIP services:

- a. within the same local calling area in Massachusetts;
- b. within the same the same LATA but between different local calling areas in Massachusetts;
- c. in a different LATA?

**Reply:** Yes.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Eugene J. Spinelli  
**Title:** Manager – Corporate  
Technology

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-17

If the answer to any of a, b, or c in the preceding information request is other than an unqualified “yes,” please explain why not.

**Reply:** Not applicable.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Eugene J. Spinelli  
**Title:** Manager – Corporate  
Technology

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-18

At the present time, can customers of Verizon's non-VoIP services make voice calls to customers of Comcast's VoIP services:

- a. within the same local calling area in Massachusetts;
- b. within the same the same LATA but between different local calling areas in Massachusetts;
- c. in a different LATA?

**Reply:** Yes.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Eugene J. Spinelli  
**Title:** Manager – Corporate  
Technology

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-19

If the answer to any of a, b, or c in the preceding information request is other than an unqualified “yes,” please explain why not.

**Reply:** Not applicable.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Eugene J. Spinelli  
**Title:** Manager – Corporate  
Technology

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-20

At the present time, can customers of Comcast's VoIP services make voice calls to customers of Verizon's VoIP services:

- a. within the same local calling area in Massachusetts;
- b. within the same the same LATA but between different local calling areas in Massachusetts;
- c. in a different LATA?

**Reply:** Yes.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Eugene J. Spinelli  
**Title:** Manager – Corporate  
Technology

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-21

If the answer to any of a, b, or c in the preceding information request is other than an unqualified “yes,” please explain why not.

**Reply:** Not applicable.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Eugene J. Spinelli  
**Title:** Manager – Corporate  
Technology

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-22

At the present time, can customers of Comcast's VoIP services make voice calls to customers of Verizon's non-VoIP services:

- a. within the same local calling area in Massachusetts;
- b. within the same the same LATA but between different local calling areas in Massachusetts;
- c. in a different LATA?

**Reply:** Yes.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Eugene J. Spinelli  
**Title:** Manager – Corporate  
Technology

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-23

If the answer to any of a, b, or c in the preceding information request is other than an unqualified “yes,” please explain why not.

**Reply:** Not applicable.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Counsel  
**Title:**

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-24

Please provide the volume of traffic exchanged in IP format between Verizon and Comcast under the Agreement each month since the Agreement became effective, broken down by the categories described in section 1.26 of the Agreement.

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Counsel  
**Title:**

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-25

Please provide the volume of traffic exchanged in TDM format between Verizon and Comcast under the Agreement each month since the Agreement became effective, broken down by the categories described in section 1.26 of the Agreement.

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Counsel  
**Title:**

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-26

Please provide the volume of traffic exchanged between Verizon and Comcast under any agreement or arrangement other than the Agreement, for the same months described in the preceding request.

**Reply:** Objection: The request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
d/b/a Verizon**

**Commonwealth of Massachusetts**

**D.T.C. Docket No. 13-6**

**Respondent:** Counsel  
**Title:**

**REQUEST:** Competitive Carriers to Verizon, Set #1

**DATED:** December 20, 2013

**ITEM:** CC-VZ 1-27

For each person whom Verizon expects to call as an expert witness at hearing: a. identify the person; b. state the subject matter on which the expert is expected to testify, and c. state the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

**Reply:** Objection: Verizon MA objects to this request on the grounds that it essentially seeks the direct testimony that Verizon MA may offer in this proceeding, in advance of the January 15, 2014, date the Department has established in its Scheduling order for submitting that testimony.