

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

**Commonwealth of Massachusetts**

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

**Respondent:** Peter D'Amico  
**Title:** Product Manager – Global  
Wholesale Services

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-1

For the period between January 2013 and December 2013, provide a monthly analysis on a percentage basis the volume of Verizon MA's FiOS Digital Voice voice traffic exchanged in: (1) IP-to-IP format; (2) IP-to-TDM format; (3) TDM-to-TDM format; (4) TDM-to-IP format.

**Reply:** The request is confusing. Verizon MA interprets it as seeking, for each month of 2013, the percentages of all traffic to and from FiOS Digital Voice customers that is exchanged with all non-Verizon carriers that fall into each of the four categories specified. Verizon MA is able to provide only the information requested in category (3). The Department's First Set of Information Requests to Verizon MA differentiates among categories (1) through (4) based on the format in which the traffic originates and terminates. All FDV voice traffic is in IP format when it originates from or is terminated to the FDV customer, so that no FDV voice traffic falls within category (3) above. With respect to categories (2) and (4), however, Verizon MA generally does not know the format in which a call it receives from another carrier originated or the format in which a call it sends to another carrier is terminated. As a result, Verizon MA does not know the volume of calls in these categories. Finally, Verizon MA does not track the data necessary to respond to part (1) of the request, such as the total volume of traffic to and from FDV customers. While Verizon MA does track usage data required for billing, that data does not distinguish between FDV traffic and PSTN traffic because that is not necessary to render bills.

Verizon MA is investigating whether it would be possible to retrieve and process usage data that would allow it to respond to part (1) of the request. Assuming that the necessary data is available, such a project would be both time- and resource-intensive, and Verizon MA estimates that it would take a few months to complete the work required to answer this question for several sample weeks in 2013.

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

**Commonwealth of Massachusetts**

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

**Respondent:** Peter D'Amico  
**Title:** Product Manager – Global  
Wholesale Services

**REQUEST:** D.T.C. to Verizon, Set #1

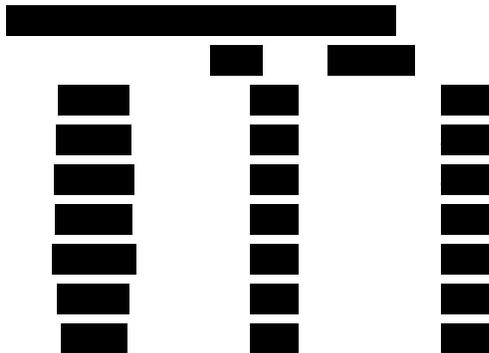
**DATED:** February 4, 2014

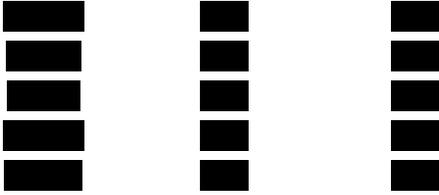
**ITEM:** DTC-VZ 1-2

For the period between January 2013 and December 2013, provide a monthly analysis on a percentage basis the volume of Verizon MA's FiOS Digital Voice traffic exchanged with (1) Comcast MA; (2) Comcast IP; (3) Other Comcast Affiliate.

**Reply:** As explained in response to DTC-VZ 1-1, Verizon MA does not track the data necessary to respond to this request, including the total volume of FDV traffic exchanged between it and other carriers. Nor does Verizon MA track the total volume of FDV traffic it exchanges with Comcast entities for Massachusetts customers. However, Verizon MA does track other traffic volume data that, while not directly responsive to the specific parameters stated in this request, addresses the relative volumes of traffic exchanged with Comcast in IP format and in TDM format. Specifically, below is a table showing, for each month of 2013, the percentage of traffic exchanged between Verizon and Comcast that was exchanged in IP format and the percentage that was exchanged in TDM format. This data is not limited to traffic to and from Verizon's FDV customers and it is not specific to Massachusetts.

\*\*\* Begin Confidential\*\*\*

The table content is completely redacted with black boxes. The structure appears to be a table with 4 columns and 8 rows of data points.



**\*\*\*End Confidential\*\*\***

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

**Commonwealth of Massachusetts**

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

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

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-3

Identify any and all documents(s) governing Verizon MA's exchange of voice traffic in IP-to-IP format with Comcast. If more than one document is identified, explain the applicability of each document to the exchange of voice traffic in IP-to-IP format. If no documents are identified, explain in narrative why there are no documents governing this traffic exchange.

**Reply:** The documents governing Verizon MA's exchange of voice traffic that is originated, terminated and exchanged (with Comcast) in IP format are as follows:

1) **\*\*\* Begin Confidential \*\*\***

[REDACTED]

2)

[REDACTED]

3)

[REDACTED]



\*\*\*

**End Confidential \*\*\***

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

**Commonwealth of Massachusetts**

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

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

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-4

Identify any and all documents(s) governing Verizon MA's exchange of voice traffic in IP-to-TDM format with Comcast. If more than one document is identified, explain the applicability of each document to the exchange of voice traffic in IP-to-TDM format. If no documents are identified, explain in narrative why there are no documents governing this traffic exchange.

**Reply:** Based on the definitions in the Department's First Set of Information Requests to Verizon MA, we understand this request to be seeking information regarding all documents governing Verizon MA's exchange with Comcast, in either TDM or IP format, of voice traffic that originates in IP and is terminated to an end-user on the PSTN. Those documents are as follows:

- 1) The Interconnection Agreement between Verizon New England Inc. d/b/a Verizon Massachusetts and Comcast Phone of Massachusetts Inc., effective June 26, 2001, (produced in discovery as Attachment CC-VZ 1-3) governs the exchange of such traffic in TDM format.

- 2) **\*\*\* Begin Confidential \*\*\*** [REDACTED]

**\*\*\* End Confidential \*\*\***

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

**Commonwealth of Massachusetts**

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

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

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-5

Identify any and all documents(s) governing Verizon MA's exchange of voice traffic in TDM-to-IP format with Comcast. If more than one document is identified, explain the applicability of each document to the exchange of voice traffic in TDM-to-IP format. If no documents are identified, explain in narrative why there are no documents governing this traffic exchange.

**Reply:** Based on the definitions in the Department's First Set of Information Requests to Verizon MA, we understand this request to be seeking information regarding all documents governing Verizon MA's exchange with Comcast, in either TDM or IP format, of voice traffic that originates on the PSTN and is terminated to an end-user in IP. Those documents are as follows:

- 1) The Interconnection Agreement between Verizon New England Inc. d/b/a Verizon Massachusetts and Comcast Phone of Massachusetts Inc., effective June 26, 2001, (produced in discovery as Attachment CC-VZ 1-3) governs the exchange of such traffic in TDM format.

- 2) **\*\*\* Begin Confidential \*\*\***

**\*\*\* End Confidential \*\*\***

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

**Commonwealth of Massachusetts**

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

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

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-6

Identify any and all documents(s) governing Verizon MA's exchange of voice traffic in TDM-to-TDM format with Comcast. If more than one document is identified, explain the applicability of each document to the exchange of voice traffic in TDM-to-TDM format. If no documents are identified, explain in narrative why there are no documents governing this traffic exchange.

**Reply:** Based on the definitions in the Department's First Set of Information Requests to Verizon MA, we understand this request to be seeking information regarding all documents governing Verizon MA's exchange with Comcast, in either TDM or IP format, of voice traffic that originates on the PSTN and is terminated on the PSTN. To our understanding, all Comcast end-user customers in Massachusetts are currently served by VoIP, so that all traffic originating from or terminating to such customers is VoIP traffic on at least one end.

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

**Commonwealth of Massachusetts**

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

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

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-7

Verify whether Verizon MA exchanged voice traffic in IP-to-IP format with Comcast prior to the execution of May 30, 2013 Agreement 2 and identify the Agreement, if any, that provided the terms of that exchange.

**Reply:** Verizon MA did not exchange voice traffic with Comcast in IP format prior to execution of the May 30, 2013 Agreement 2 (a.k.a. the Traffic Exchange Agreement).

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

**Commonwealth of Massachusetts**

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

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

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-8

If Verizon MA did not exchange voice traffic in IP-to-IP format with Comcast prior to the execution of May 30, 2013 Agreement 2, explain how a subscriber to FiOS Digital Voice service completed a voice call to a subscriber of Comcast's XFINITY Voice or Comcast Business service.

**Reply:** Before Verizon MA and Comcast IP began exchanging traffic in IP format, Verizon would convert a call from an FDV customer from IP format to TDM format before exchanging it with Comcast MA in TDM format. Our understanding is that Comcast MA would then hand the call off to Comcast IP, which would convert it back into IP format for termination to its end-user.

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

**Commonwealth of Massachusetts**

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

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

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-9

Referring to the May 30, 2013 Agreement 2, identify and provide a copy of **\*\*\*Begin Highly Sensitive Confidential\*\*\*** [REDACTED]

[REDACTED] **\*\*\*End Highly Sensitive Confidential\*\*\***

**Reply: \*\*\*Begin Highly Sensitive Confidential\*\*\*** [REDACTED]

[REDACTED]  
**Confidential\*\*\***

[REDACTED] **\*\*\*End Highly Sensitive**

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

**Commonwealth of Massachusetts**

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

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

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-10

Identify the total number of **\*\*\*Begin Confidential\*\*\*** [REDACTED]  
[REDACTED] **\*\*\*End Confidential\*\*\*** executed or currently under negotiation, to  
which Verizon MA is a party as of January 31, 2014.

**Reply:** The Voice-Over-Internet-Protocol Traffic Exchange Agreement between Verizon MA and Comcast is unique. Verizon MA has not entered into, and is not currently in negotiations over, a Voice-Over-Internet-Protocol Traffic Exchange Agreement with any other carrier.

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

**Commonwealth of Massachusetts**

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

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

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-11

Referring to May 30, 2013 Agreement 1, explain in detailed narrative **\*\*\*Begin Highly Sensitive Confidential\*\*\***

**\*\*\*End Highly Sensitive Confidential\*\*\*.**

**Reply: \*\*\*Begin Highly Sensitive Confidential\*\*\***

[Redacted]

**\*\*\*End Highly Sensitive Confidential\*\*\***

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

**Commonwealth of Massachusetts**

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

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

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-12

Identify and list each voice and non-voice service currently provided through the exchange of traffic in TDM-to-TDM format that cannot be provided through the exchange of traffic in:

- A. IP-to-IP format;
- B. TDM-to-IP format; and
- C. IP-to-TDM format.

**Reply:** This request is unclear. Verizon MA reads it as asking which services that Verizon MA currently exchanges with other carriers in TDM format could not be exchanged in IP format as a technical matter and in the absence of the restrictions in the IP agreements between Verizon and Comcast. Verizon MA is not aware of any such services.

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

**Commonwealth of Massachusetts**

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

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

**REQUEST:** D.T.C. to Verizon, Set #1

**DATED:** February 4, 2014

**ITEM:** DTC-VZ 1-13

The December 23, 2013 Agreement, **\*\*\*Begin Highly Sensitive Confidential** [REDACTED]

[REDACTED] **\*\*\*End Highly Sensitive Confidential\*\*\***. Identify and list, if any, **\*\*\*Begin Highly Sensitive Confidential\*\*\*** [REDACTED]

[REDACTED] **\*\*\*End Highly Sensitive Confidential\*\*\*** under the May 30, 2013 Agreement 2.

**Reply: \*\*\*Begin Highly Sensitive Confidential\*\*\*** [REDACTED]

[REDACTED] **\*\*\*End Highly Sensitive Confidential\*\*\***