

Attorneys at Law

RichMay

Rich May, P.C. 176 Federal Street, Boston, MA 02110

main: 617.556.3800 fax: 617.556.3890

Eric J. Krathwohl, Esq.

Direct: (617) 556-3896

Email: ekrathwohl@richmaylaw.com

April 4, 2014

VIA E-FILING AND HAND DELIVERY

Catrice C. Williams, Secretary
Department of Telecommunications & Cable
1000 Washington Street, 8th Floor, Suite 820
Boston, MA 02118-6500

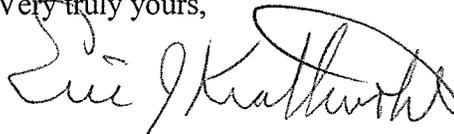
Re: *Investigation by the Department on its Own Motion to Determine whether an Agreement entered into by Verizon New England Inc. , d/b/a Verizon Massachusetts is an Interconnection Agreement under 47 U.S.C. § 251 Requiring the Agreement to be filed with the Department/or Approval in Accordance with 47 U.S.C. § 252, Dkt. No. D.T.C 13-6*

Dear Ms. Williams:

Enclosed on behalf of XO Communication Services, LLC (“XO”), please find one original and five copies of XO’s supplemental response to VZ-I 1-1 of the First Set of Information Requests of Verizon MA.

Any questions on this matter should be directed to the undersigned.

Very truly yours,



Eric J. Krathwohl, Esq.

Encl.

cc: Michael Scott, Esq., Hearing Officer
Service List

Information Requests

VZ-I 1-1

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 13-6

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached document upon all parties of record in this proceeding.

Dated at Boston, Massachusetts this 4th day of April, 2014.

A handwritten signature in black ink, appearing to read "Eric J. Krathwohl", written over a horizontal line.

Eric J. Krathwohl, Esq.
Counsel

Of Counsel for
XO Communications Services LLC

XO COMMUNICATIONS SERVICES, LLC RESPONSES TO
FIRST SET OF INFORMATION REQUESTS OF
VERIZON MA
D.T.C. 13-6

VZ-I 1-1 Please identify, by title, effective date and the names of all parties, each agreement that each you have entered into with a service provider other than an affiliate concerning, providing for or governing the exchange in IP format of voice traffic going from you to the other party as well as voice traffic coming from the other party to you.

OBJECTIONS: XO specifically objects to this request on the ground that it is immaterial, irrelevant, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Further, XO objects on the grounds that the request is not germane to the legal question under investigation which is whether the Verizon/Comcast agreements submitted to the Department are interconnection agreements under 47 U.S.C. § 251 and must be filed for review under § 252. In particular, and without limiting the generality of the foregoing, evidence of agreements between the XO and non-ILECs (including non-ILEC affiliates of ILECs) is not relevant to the legal issue before the Department nor would disclosure of such information be reasonably likely to lead to the discovery of admissible evidence.

In addition, XO objects to providing any information that is confidential, proprietary, or a trade secret.

RESPONSE (Revised 4-4-14): Subject to and without waiving these objections, XO states that it has not entered any agreement “concerning, providing for, or governing the exchange in IP format of voice traffic” with any incumbent local exchange carrier (ILEC).