



The Commonwealth of Massachusetts

**DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY**

MEMORANDUM

TO: D.T.E. 03-60 Service List, Tracks A & B
(*via email and regular mail*)

FROM: Paula Foley, Assistant General Counsel
Jesse Reyes, Hearing Officer

RE: Motion of AT&T Communications of New England, Inc. to Compel Responses
to Information Requests

DATE: January 23, 2004

On January 22, 2004, AT&T Communications of New England, Inc. ("AT&T") filed with the Department a Motion to Compel Responses by Verizon Massachusetts ("Verizon") to certain AT&T Information Requests.¹ Parties wishing to file written comments in response to this motion must do so by 5:00 p.m., Wednesday, February 4, 2004. Reply comments will be due by 5:00 p.m., Wednesday, February 11, 2004.

In addition, AT&T is requested to supplement its Motion to Compel on or before Wednesday, January 28, 2004, indicating the efforts AT&T undertook to resolve this dispute before bringing it to the Department, pursuant to the requirements included in the Ground Rules for this proceeding. See D.T.E. 03-60, Ground Rules at 2 (October 17, 2003).² Also, Verizon is requested to contact AT&T prior to filing its response to AT&T's Motion to Compel in a good faith attempt to reduce further the scope of disputed issues. Verizon should indicate the results of this effort in its response to AT&T's Motion to Compel.

If you have any questions, please contact Jesse Reyes at (617) 305-3735 or Paula Foley at (617) 305-3608.

¹ AT&T requests that the Department order Verizon to respond to information requests ATT-VZ 1-2, 1-5, 1-24, 1-25, 1-26, 1-27, 1-28, 1-31, 2-50, 2-58, 3-131, 3-132 and 3-133.

² Parties are requested to include this information as part of all future written motions concerning discovery disputes.