

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

**JOINT PARTIES-1:** Please state whether you are either an incumbent local exchange provider ("ILEC") providing telecommunications service in the Massachusetts or an affiliate of such an ILEC. If you are an affiliate of an ILEC, please identify the ILEC and describe the affiliation. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S. § 153(1)

**Respondent:** David Graham, Consultant

**Response:** See Conversent's response to ATT-CLEC-1.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

**JOINT PARTIES-2:** Please state whether you are either a competitive local exchange carrier ("CLEC") providing telecommunications service in Massachusetts or an affiliate of such a CLEC. If you are an affiliate of a CLEC, please identify the CLEC and describe the affiliation. For purposes of these requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1)

**Respondent:** David Graham, Consultant

**Response:** See Conversent's response to ATT-CLEC-1.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

**JOINT PARTIES-3:** Do you lease analog voice-grade loops from Verizon to provide local exchange service in Massachusetts? (For purposes of this question, please do not include any DS-0 or voice grade circuits that are part of a T1 circuit or a DS-1 or above circuit.)

**Respondent:** David Graham, Consultant

**Response:** Yes.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

**JOINT PARTIES-4:** Do you use non-ILEC switches to provide local exchange service to Massachusetts's customers via analog voice-grade loops? (For purposes of this question, please do not include any DS-O or voice grade switched circuits that are part of a T1 circuit or a DS-1 or above circuit.)

**Respondent:** David Graham, Consultant

**Response:** Yes.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

**JOINT PARTIES-5:** To the extent that you have not already provided this information in response to the Department's Information Requests, please provide the following information for each switch owned by you that you use to provide local exchange service to Massachusetts customers

- a. the 8-digit common language location identifier ("CLLI") code as it appears in the Local Exchange Routing Guide ("LERG");
- b. street address, city and zip code;
- c. currently equipped line side capacity in
  - i. DS-0/voice grade
  - ii. DS-1 circuits;
- d. currently utilized line side capacity in
  - i. DS-0/voice grade circuits and
  - ii. DS-1 circuits;
- e. current switch processor capacity in CCS;
- f. busy hour and busy season utilized switch processor capacity in CCS;
- g. function of the switch (e.g., stand-alone, host, or remote, other [e.g. DLC node with no intelligence and/or no or limited switching capability].

**Respondent:** David Graham, Consultant

**Response:**

- a. WRCSMAWA
- b. 90 Washington St., Worcester, MA

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

- c. This information will be provided under the terms of a protective order.
- d. This information will be provided under the terms of a protective order.
- e. Not available.
- f. Not available.
- g. Stand alone.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

- JOINT PARTIES-6:** Please provide the following general information regarding any local exchange service that you currently offer to customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch (i.e., excluding service offered via UNE-P or via T1 circuits or DS-1 or above circuits).
- a. Do you currently provide local exchange service to residential customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain [e.g. broadcast or print advertising, telemarketing, direct mail, Internet, etc.].
  - b. Do you currently provide local exchange service to business customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain.
  - c. Please provide a description of each of the residential and/or business local exchange products that you currently provide to Massachusetts's customers using analog voice grade, non T-1 loops. You may choose to respond by completing the following matrix.

Product Name	Available to Res. Customers?	Available to Bus. Customers?	Retail Price?	Bundled with LD or DSL Service?	Available as Standalone Local Product?	Currently Advertising?	Currently Marketing?
[Name of product]	[Yes/No]	[Yes/No]	[\$X.XX]	[Yes/No]	[Yes/No]	[Yes/No]	[Yes/No]

**Respondent:** David Graham, Consultant

- Response:**
- a. No.
  - b. Yes. Conversent does not advertise its services. Conversent markets its services in areas where it is collocated by way of direct, in-person sales efforts.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

- c. Conversent provides local, toll and data services to small and medium sized businesses.



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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

**JOINT PARTIES-7**

If you offer cable telephony service in Massachusetts, please state:

- a. To what percent of your cable telephony customers do you provide standalone local exchange service (i.e. no broadband, no cable television)? What is the typical or average retail price for this service?
- b. To what percent of your cable telephony customers do you provide local exchange service and broadband service but not cable television service? What is the typical or average retail price for this service.
- c. To what percent of your cable telephony customers do you provide local exchange service and cable television service but not broadband service? What is the typical or average price for this service?
- d. To what percent or your cable telephony customers do you provide local exchange service, cable television service, and broadband service? What is the typical or average price for this service?

**Respondent:** David Graham, Consultant

**Response:** This question does not apply to Conversent.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

**JOINT PARTIES-8:** If you are a CLEC offering circuit-switched local exchange service in Massachusetts, for each month or quarter over the most recent 12 month period for which data is available, please provide the following for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis:

- a. The number of newly installed business lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS-1 or above circuits);
  - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
  - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.
- b. The number of newly installed business lines served by UNE-P;
  - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
  - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.
- c. The number of newly installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS-1 or above circuits);
  - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
  - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.
- d. The number of newly installed residential lines served by UNE-P.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

- i. Number or percentage of such lines that were migrated from the ILEC's retail service.
- ii. Number or percentage of such lines that were migrated from a CLEC's retail service.

For lines migrated from a CLEC's retail service, please separately disaggregate whether those customers were migrated from a UNE-L or UNE-P service delivery mechanism.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS-1 or above level facilities in your response.

**Respondent:** David Graham, Consultant

**Response:** Conversent does not have this information available. See Conversent's response to Joint Parties 10.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

- JOINT PARTIES-9:** Please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis, the number for your company of:
- a. Installed business lines served by unbundled analog voice-grade loops (i.e, excluding service offered via UNE-P or via T-1 circuits or DS-1 or above circuits) served by circuit switches;
  - b. Installed business lines served by UNE-P;
  - c. Installed business lines served by non-circuit switches;
  - d. Installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T-1 circuits or DS-1 or above circuits) service by circuit switches;
  - e. Installed residential lines served by UNE-P;
  - f. Installed residential lines served by non-circuit switches.
- If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops service via DS-1 or above level facilities in your response.
- Objection:** Conversent objects to this question on the grounds that it seeks highly sensitive and confidential information.
- Respondent:** David Graham, Consultant
- Response:**
- a. Responsive information will be provided under the terms of a protective order.
  - b. Responsive information will be provided under the terms of a protective order.
  - c. 0

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

d. 0

e. 0

f. 0

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60

**JOINT PARTIES-10:** For each switch your company operates in Massachusetts, please provide the information requested in TABLES 1A, 1B, and 1C. If you are unable to provide information responsive to all three tables, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS-1 or above level facilities in your response.

TABLE 1A

CLEC Switch CLI	Number of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers <sup>1</sup>	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers <sup>2</sup>
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
...(continue pattern as above)						
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

<sup>1</sup> This category includes loops used for fax and/or modem-only traffic.  
<sup>2</sup> This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60

TABLE 1B

ILEC Wire Center	Number of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers <sup>3</sup>	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers <sup>4</sup>
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
...(continue pattern as above)						
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

<sup>3</sup> This category includes loops used for fax and/or modem-only traffic.

<sup>4</sup> This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60

TABLE 1-C

Mass-achusetts	Number of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers <sup>5</sup>	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers <sup>6</sup>
	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
...(continue pattern as above)						
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

**Objection:** Conversent objects to this question on the grounds that it seeks highly sensitive and confidential information.

**Respondent:** David Graham, Consultant

**Response:** To the extent it is available, responsive information will be provided under the terms of a protective order.

<sup>5</sup> This category includes loops used for fax and/or modem-only traffic.  
<sup>6</sup> This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).



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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

- JOINT PARTIES-11:** For each switch that your company operates in Massachusetts other than circuit switches, please provide the following:
- a. the date(s) on which you installed the switch and began providing local exchange service on the switch;
  - b. the geographic area served by the switch compared to the geographic area served by any circuit switches you use to provide local exchange service;
  - c. any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (e.g., specialized phone set; availability of computer, cable modem, set top box, need for customer premises battery backup for telephone service), access method (e.g., DSL, cable television, satellite service), provisioning interval.

**Respondent:** David Graham, Consultant

**Response:** This question does not apply to Conversent.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

<b>JOINT PARTIES-12:</b>	Do your Massachusetts intrastate tariffs limit in any way the availability of your local exchange service products to particular customer segments, either by geography, class of customer, number of lines purchased, or otherwise? If so, please describe the service offering and explain the limitation, including an explanation of the service delivery mechanism by which you offer the product (e.g. UNE-P, UNE-L, non-circuit-switched, etc.).
<b>Respondent:</b>	David Graham, Consultant
<b>Response:</b>	Conversent does not have a tariffed residential offering.

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60

**JOINT PARTIES-13:** Please explain whether you currently have in place application-to-application, electronically integrated systems that can accomplish, on an automated, flow-through basis (i.e. no manual intervention is required for completion of the migration), migrations between each of the following service configurations: 1) VZ voice only; 2) VZ voice plus DSL; 3) VZ DSL only; 4) LCEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only. To the extent possible, please answer by completing the following matrix, indicating "Yes" or "No" in each box.

	TO VZ voice only	TO VZ voice plus DSL	TO VZ DSL only	TO CLEC UNE-P voice only	TO CLEC switch- based voice only	TO CLEC line sharing	TO CLEC line splitting	TO CLEC DSL only
FROM VZ voice only								
FROM VZ voice plus DSL								
FROM VZ DSL only								
FROM CLEC UNE-P voice only								
FROM CLEC switch- based voice only								

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60

FROM CLEC line sharing								
FROM CLEC line splitting								
TO CLEC DSL only								

Objection:

Conversent objects to this question on the grounds that it is not reasonably calculated to lead to evidence that pertains to whether the FCC's self-provisioning trigger or wholesale trigger is met for unbundled switching.

Respondent:

David Graham, Consultant

Response:

Conversent does not have in place application-to-application, electronically integrated systems that can accomplish, on an automated, flow-through basis (i.e., no manual intervention is required for completion of the migration) migrations for the identified service configurations.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

**JOINT PARTIES-14:** Please explain whether you have always been able to obtain a customer service record ("CSR") from Verizon and/or other CLECs for the provision of 1) local exchange voice service on UNE-P; 2) local exchange voice service on UNE loop. If not, please provide a detailed explanation of the reason(s) you did not obtain the CSR.

**Objection:** Conversent objects to this question on the grounds that it not reasonably calculated to lead to evidence that pertains to whether the FCC's self-provisioning trigger or wholesale trigger is met for unbundled switching.

**Respondent:** David Graham, Consultant

**Response:** It is very rare for Conversent to be unable to obtain a CSR from Verizon. Occasionally, Conversent has problems obtaining CSRs from other CLECs.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

**JOINT PARTIES-15:** Please explain whether you currently use an electronic automated (i.e., not requiring any manual intervention prior to completion of task) method to interface with Verizon to send or receive each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc.); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

**Objection:** Conversent objects to this question on the grounds that it is not reasonably calculated to lead to evidence that pertains to whether the FCC's self-provisioning trigger or wholesale trigger is met for unbundled switching.

**Respondent:** David Graham, Consultant

**Response:** Conversent uses Verizon's web-GUI interface.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

<b>JOINT PARTIES-16:</b>	Please provide a detailed explanation of the electronic method (e.g. EDI, CORBA, etc.) that you currently use to send to or receive from ILECs and/or CLECs each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc.) c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.
<b>Objection:</b>	Conversent objects to this question on the grounds that it is not reasonably calculated to lead to evidence that pertains to whether the FCC's self-provisioning trigger or wholesale trigger is met for unbundled switching.
<b>Respondent:</b>	David Graham, Consultant
<b>Response:</b>	See Conversent's response to Joint Parties-15. Conversent sends and receives information to and from other CLECs by email.

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

- JOINT PARTIES-17:** Please explain whether you currently have in place and use electronic automated systems to:
- a. Process orders placed by customers whose service will be provisioned using your own switches.
  - b. Provision service for customers using your own switches.
  - c. Maintain and repair service for customers whose service is provisioned using your own switches.
  - d. Conduct trouble isolation and repair for customer services provisioned via your own switches using UNE loops.
  - e. Conduct testing for customer services provisioned via your own switches using UNE loops.
  - f. Bill customers whose services are provisioned using your own switches.

If with respect to your answer to any of the above subparts your systems are only partially electronic, please identify specifically which portions are electronic, and which are manual, and provide a detailed explanation of the limitations created by the manual portions.

**Objection:** Conversent objects to this question on the grounds that it is not reasonably calculated to lead to evidence that pertains to whether the FCC's self-provisioning trigger or wholesale trigger is met for unbundled switching.

**Respondent:** David Graham, Consultant

- Response:**
- a. yes
  - b. yes



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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

c.      yes

d.      no

e.      no

f.      yes

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

**Conversent Communications of Massachusetts, LLC's  
Responses and Objections to the Joint Parties First Set of Discovery Requests to CLECs  
DTE Docket No. 03-60**

<b>JOINT PARTIES-18:</b>	<p>Please state:</p> <p>a. Whether your company has ever applied for Eligible Telecommunicaitons Carrier ("ETC") status in Massachusetts.</p> <p>b. If the answer to (a) is yes, please state whether ETC status was granted, the DTE case number in which it was granted, and the date of the order approving the status.</p>
<b>Objection:</b>	<p>Conversent objects to this question on the grounds that it is not reasonably calculated to lead to evidence that pertains to whether the FCC's self-provisioning trigger or wholesale trigger is met for unbundled switching.</p>
<b>Respondent:</b>	<p>David Graham, Consultant</p>
<b>Response:</b>	<p>No.</p>