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Complaint of Choice One Communications of)	
Massachusetts Inc., Conversent Communications)	
of Massachusetts, LLC, CTC Communications)	
Corp. and Lightship Telecom, LLC (collectively)	
“One Communications”) Concerning Alleged)	D.T.C. No. 08-3
Unlawful Charges Imposed by Verizon New)	
England Inc., d/b/a Verizon Massachusetts for)	
Access Toll Connecting Trunk Ports and E911/911)	
Dedicated End Office Trunk Ports.)	
)	

1. Please answer each Information Request on a separate page, fully in writing under oath, unless it is objected to, in which event, state the reasons for objection in lieu of an answer, and answer each other portion of the Information Request to which no objection is asserted. Preface each answer by restating the Information Request to which the answer is addressed. The answers are to be signed by the person making them, and the objections signed by the attorney making them. However, if you produce business records in lieu of an answer to an Interrogatory, specify the records from which the answer may be derived or ascertained in sufficient detail to permit the Verizon MA to locate and to identify the records from which the answer may be ascertained.

2. For any objection that is based on an asserted claim of privilege, state a brief description of the subject matter of the assertedly privileged information; the nature of the privilege claimed; the portion(s) of the date request to which the information is otherwise responsive; the nature and basis of the privileged claimed; the source(s) of the information; and

the identities of all persons to whom such information has been communicated or with whom it has been shared, in whole or in part.

3. Documents that in their original condition were stapled, clipped or otherwise fastened together shall be produced in such form. Documents responsive to each request are to be grouped separately by request. In any portion of a document is responsive to a request, the entire document shall be produced.

4. These Information Requests are deemed to be continuing in nature, and if further information with respect thereto comes to the attention of Freedom Ring Communications d/b/a BayRing Communications, its officers, employees, agents, representatives, or attorneys between the date of service hereof and the date of the hearing in this proceeding, the answers and responses must be amended accordingly.

DEFINITIONS

1. All terms used herein shall be construed in an ordinary, common sense manner, and not in a technical, strained, overly-literal, or otherwise restrictive manner.

2. “Freedom Ring Communications d/b/a BayRing Communications” shall mean individually and collectively Freedom Ring Communications d/b/a BayRing Communications, all predecessors and successors in interest, affiliates, parents, subsidiaries, subdivisions, and divisions of such entities.

3. “Person” shall mean an individual, corporation, firm, proprietorship, partnership, either limited or general, association, joint venture, or other legal, business, or governmental entity, whether foreign or domestic.

4. “Document” means all writings and documentary materials of any kind whatsoever, both originals and copies, and drafts of such writings and documentary materials whether printed or recorded, or reproduced by any other mechanical process, or written or

produced by hand, or recorded by any electrical or electronic means, including on any magnetic tape, disk, hard disk, computer memory, or optical disk, including but not limited to, the following items: journals; purchase orders; audio and video tapes and transcripts thereof; testimony; affidavits; filings of any kind with governmental bodies; agreements; letters; communications, including intra-company communications; electronic mail; correspondence; envelopes, telegrams; telexes; facsimiles; memoranda, including internal memoranda; notes; reports; summaries; transcripts; reviews; analysis; studies; papers; files; message slips; records; books manuals; guides; guidelines; outlines; abstracts; histories; summaries, notes, or records of telephone conversations or interviews; diaries; desk calendars; logs; appointment books; forecasts; statistical statements; tabulations; graphs; indices; charts; tables; plots; minutes; notes, or records of meetings, conferences, or communications; minutes, notes, or records of board meetings; opinions or reports of consultants; appraisals; brochures; pamphlets; periodicals; circulars; trade letters; press releases; contracts; notes; projections; drafts of any document; recommendations; working papers; worksheets; copies; marginal notations; photographs; film; drawings; slides; samples; and other specimens; computer printouts; tapes; disks, recordings; data processing cards; programs; and any other documents or writings of whatever description, whether written, recorded, transcribed, punched, taped, or filmed, however produced or reproduced. The term “document” includes copies of documents that are not identical duplicates of the originals, and copies of documents of which the originals are not in the possession, custody, or control of Freedom Ring Communications d/b/a BayRing Communications, its officers, employees, agents, representatives, or attorneys.

5. “Identify,” when used in reference to a natural person or other legal entity, shall mean: (i) state the full name (ii) state the present or last known business address, and, in the case of a natural person, residence address; (iii) the present or last known business telephone number,

and, in the case of a natural person, residence telephone number; and (iv) the person's present or last known position or employer or primary line of business.

6. "Identify," when used in reference to an action, event, or occurrence including a communication, meeting, or statement, shall mean: (i) state, the date of the action, event, or occurrence; (ii) state the nature of the action, event, or occurrence; (iii) state the location of the action, event, or occurrence; (iv) identify every participant in and witness to the action, event or occurrence; and (v) describe the action, event, or occurrence and, if it was a meeting, communication, or statement, state the substance of the matters communicated or discussed.

7. "Identify," when used in reference to documents, means to state the (a) type of document (e.g., letter, telegram); (b) contents of the document; (c) date and title of the document (if any); (d) length of the document (in pages); (e) present location of the original and each copy of the document; (f) entity of each custodian of the original and each copy of the document; and (g) identity of each author, addressee and recipient of the original and each copy of the document.

8. "You" and "your" means Freedom Ring Communications d/b/a BayRing Communications, all agents, employees, officers, or members, and all persons acting or purporting to act on behalf of Freedom Ring Communications d/b/a BayRing Communications, including all past or present agents, employees, officers, or members, exercising discretion, discharging duties, making policy, or making decisions with respect to the business of Freedom Ring Communications d/b/a BayRing Communications.

9. "Verizon" and "Verizon MA" refers to Verizon New England Inc.

Information Requests to BayRing

- VZ-BayRing-1-1** For each of the ATC trunk groups for which Verizon has billed BayRing for dedicated tandem trunk port charges, please describe the physical configuration of the trunk group providing service between Verizon's tandem switch and BayRing's switch, including whether the arrangement includes a mid-span meet or whether BayRing's facility is collocated at Verizon's tandem. For each such arrangement, please also provide the interconnection point in the interconnection agreement BayRing opted into referenced in the Petition to Intervene and Notice of Appearance, statements number 4 through 6, and state the source of that information.
- VZ-BayRing-1-2** Please describe all intrastate access charges, including all rate elements, that Bayring assesses IXC's in Massachusetts. For each such rate element, state the specific rates Bayring charges.