

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

Commonwealth of Massachusetts

Docket No. 05-28

Respondent: Carolyn B. Jussaume
Title: Corporate Account Manager

REQUEST: DSCI Corporation, Set #1

DATED: June 27, 2005

ITEM: DSCI 1-1 Reference the Pre-Filed Testimony of Carolyn B. Jussaume (“Jussaume Testimony”), at p.1, lines 5-14. Please detail the extent of Ms. Jussaume’s management responsibilities over the past three years, if any, with customer-specific pricing, individual case basis, or similar Verizon-Massachusetts (“Verizon”) contracts (collectively referred to as “CSPs”) involving Verizon enterprise business customers other than the Commonwealth of Massachusetts.

REPLY: During the past three years, Ms. Jussaume’s sole responsibility in her position of Corporate Account Manager in the Regional Enterprise Sales Branch has been managing the account of the Commonwealth of Massachusetts.

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ITEM: DSCI 1-2 Reference the Jussaume Testimony at p.5, lines 9-20. Please identify the five largest enterprise customer requests for information (“RFIs”), based on number of pages in the RFI, to which Verizon has responded over the past two years. Please provide complete copies of the referenced RFIs.

REPLY: Following are the five largest Enterprise customer RFIs (which were all non-government accounts) based on the number of pages, to which Verizon MA has responded over the last two years:

- 1) 36 pages
- 2) 26 pages
- 3) 16 pages
- 4) 7 pages
- 5) 5 pages

The information contained within the above referenced non-government RFIs is confidential and not to be disclosed by directive of the issuers.

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ITEM: DSCI 1-3 Reference the Jussaume Testimony at p.5, lines 9-20. Please identify the five largest enterprise customer requests for proposals ("RFPs), based on number of pages in the RFP, to which Verizon has responded over the past two years. Please provide complete copies of the referenced RFPs.

REPLY: Following are the five largest Enterprise customer RFPs, based on the number of pages, to which Verizon MA has responded over the last two years:

- 1) 236 pages (non-government)
- 2) 196 pages (COMA-ITT18)
- 3) 161 pages (non-government)
- 4) 145 pages (COMA-Lottery)
- 5) 123 pages (non-government)

The information contained within the above referenced non-government RFPs is confidential and not to be disclosed by directive of the issuers.

The COMA-ITT18 and the COMA-Lottery RFPs may be found at www.comm-pass.com.

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ITEM: DSCI 1-4
Reference the Jussaume Testimony at p. 7, lines 16-18. Please provide all documents referencing or codifying the “understanding that the class of customers that Verizon would be required to serve under the term of the Customer 38 and COMA CSPs” would be limited only to the Commonwealth itself and other “eligible entities.”

REPLY: The scope of the Customer 38 CSP is defined in the OSD ITT09 RFR section 1.1 “Scope of the Procurement” and in section 1.1.4 “Definition of Eligible Entity” and the COMA CSP in the OSD ITT18 RFR section 1.1 and 2.4, respectively. This information may be found on page 6 of the Profiled Testimony of Carolyn B. Jussaume and at www.comm-pass.com under “search for contracts.”

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Respondent: Pamela McCann
Title: Executive Director-Wholesale

REQUEST: DSCI Corporation, Set #1

DATED: June 27, 2005

ITEM: DSCI 1-5

Reference the Pre-Filed Testimony of Pamela McCann (“McCann Testimony”) starting at p.2 regarding development of a proposed “formal process to locate the requested CSPs and identify their principal terms for DSCI’s consideration (hereinafter referred to as “Proposed CSP Process”). Please:

- a. Identify the date by which Verizon intends to complete and circulate to DSCI a draft of the Proposed CSP process and associated forms.
- b. Identify the proposed time periods for completing each step in the Proposed CSP Process (McCann Testimony at pp. 3-4).
- c. Explain the circumstances in which a Retail CSP customer’s name would need to be redacted from the summary of contract terms provided to DSCI or other requesting CLEC, given that Retail CSP customer names are commonly not redacted in the Department’s CSP tariffs.
- d. Confirm that the “summary of contract terms” provided to DSCI or other requesting CLECs will include a complete description of all material terms and conditions Verizon proposes to place on resale of the CSP.

REPLY:

- a. The proposed process is outlined in Ms. McCann's Pre-Filed Testimony beginning on page 3 line 16 to page 4 line 21. The forms are available from the CLEC's Wholesale Account Manager.
- b. Subject to requirements of internal processes and the complexity of the request, Verizon anticipates that the process will be completed within 60 calendar days. The time frames are not finalized as the process has yet to be tested in application of an actual request.
- c. Depending upon the state jurisdiction, a Retail CSP customer's name may need to be redacted from the summary of contract terms provided to DSCI or other requesting CLEC. As the customer name is now included in Massachusetts CSP tariff filings, this would not apply in Massachusetts.
- d. The terms and conditions will be provided.

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ITEM: DSCI 1-6

Please provide a detailed description of the process and associated maximum time frames applied to requests by Verizon Retail for approval of CSP pricing to an existing or new Verizon retail enterprise customer. If the time frames applicable to processing Retail CSP pricing requests differ from those in the Proposed CSP Process for resale of CSPs by CLECs, please explain the basis for such differences.

REPLY:

Verizon objects to this request on grounds that it seeks information that is irrelevant to the resolution of the issues before the Department in this case. The process and maximum time frames by which Verizon provides CSP pricing to its existing or new Enterprise customers is irrelevant as a predictor of the process that should apply to a CLEC request to resell an existing Verizon CSP, which, as discussed in the Pre-Filed Testimony of Pamela McCann (at pp. 3-5), requires coordination between Verizon's Retail and Wholesale organizations.

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ITEM: DSCI 1-7 Please provide a detailed description of the process and associated maximum time frames followed by Verizon Retail in seeking or responding to customer requests to extend, modify or terminate an existing CSP. If a Retail CSP subject to extension, modification or termination discussions is being resold to a CLEC, does Verizon intend to provide notice of the impending changes to the reselling CLEC. If so, please describe the nature of the proposed notices to the CLEC.

REPLY: Verizon objects to this request on grounds that it seeks information that is irrelevant to the resolution of the issues before the Department in this case. The process and maximum time frames by which Verizon responds to a retail customer's request to extend or modify an existing Retail CSP is irrelevant as a predictor of the process that should apply to a CLEC request to resell an existing Verizon CSP, which, as discussed in the Pre-Filed Testimony of Pamela McCann (at pp. 3-5), requires greater coordination between Verizon's Retail and Wholesale organizations. Moreover, Verizon does not have a legal obligation to, nor does it intend to provide notice of discussions of extensions, modifications or terminations of retail CSPs.

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DATED: June 27, 2005

ITEM: DSCI 1-8 Reference the McCann Testimony at p. 5, lines 10-11. Please confirm that the acknowledgement letter signed by DSCI states that DSCI would comply with “all relevant terms and conditions of the COMA CSP” (emphasis added).

REPLY: The referenced document speaks for itself. Verizon does not dispute that the letter contains language stating that DSCI must comply with “all relevant terms and conditions” of the COMA CSP. *See* Verizon’s response to DTE 1-2.

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Respondent: Pamela McCann/ Carolyn B. Jussaume

Title: Executive Director-
Wholesale/Corporate Account
Manager

REQUEST: DSCI Corporation, Set #1

DATED: June 27, 2005

ITEM: DSCI 1-9 Reference the McCann Testimony at p. 5, line 19 through p. 6, line 5. Please reconcile the statement that DSCI would be able to resell the COMA CSP and Customer 38 CSP to “all of the customers Verizon serves under those agreements” with the statements in the COMA acknowledgement letter and e-mails that DSCI is precluded from reselling these agreements to any state agencies or eligible entities currently served by Verizon Retail.

REPLY: As previously discussed, in reselling the COMA CSP and the Customer #38 CSP, DSCI must adhere to all of the terms and conditions associated with both contracts, including limiting sales to eligible entities only. Based on the advice of counsel, it is our understanding that where an eligible entity is served by Verizon, DSCI may resell the same services to that entity only where that customer terminates its service agreement with Verizon in accordance with its terms, including the payment of any applicable termination penalties.

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ITEM: DSCI 1-10 Reference the McCann Testimony at p.6, lines 12-13. Please identify the “tariff pricing” that will apply if usage volumes are not met in the absence of a renegotiated rate.

REPLY: The tariff pricing referenced has been previously provided to DCSI in an email on May 21, 2005, citing DTE MA No. 10, Part A, Sections 5,6,7,9,10 and 11 and Part M, Sections 1.5.1,1.6.1,1.7.1,1.9.1, 1.10.1, and 1.11.1.

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ITEM: DSCI 1-11

Reference the McCann Testimony at p. 6, line 22 to p. 7, line 8. Please identify the specific “local, toll or circuit switched data optional calling plan/customer specific pricing (CSP) plan” that Verizon contends applies to the COMA Contract and is included in the language of the COMA CSP. To the extent Verizon contends that the reference in Tariff to the fact that “local and toll usage must be carried by the Telephone Company” constitutes a “plan,” please identify all Department precedents or other sources of law that support such contention.

REPLY:

According to the State Procurement Regulations, the Commonwealth of MA and its eligible entities may buy directly from the approved services on the Comm-PASS website, as the contracted services have already been competitively bid. Other than the DTE 10 tariff rates for usage, the only available usage discount plan approved by the Commonwealth is Customer #38 CSP. While the referenced COMA CSP Tariff language requiring that “local and toll usage must be carried by the Telephone Company” is not itself a “plan,” that language reflects the fact that the COMA CSP includes usage, which as noted above, is the discounted usage plan available to eligible entities under the Customer 38 CSP.