



COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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September 18, 2001

VIA E-MAIL AND U.S. MAIL

Anthony Richard Petrilla
Covad Communications Company
Hamilton Square
600 14th Street, N.W., Suite 750
Washington, D.C. 20005-2088

Re: D.T.E. 98-57-Phase III
D.T.E.'s Second Set of Information Requests to Covad

Dear Mr. Petrilla:

Enclosed please find the Department's Second Set of Information Requests to Covad Communications Company ("Covad") issued in the above-captioned matter. Please submit Covad's responses to the Department and the participants in hard copy and by e-mail on or before **5:00 p.m. on September 25, 2001**. Should you have any questions please contact Jesse Reyes at (617) 305-3735 or Paula Foley at (617) 305-3608.

Very truly yours,

Jesse S. Reyes,
Hearing Officer

Paula Foley,
Hearing Officer

Encl.

cc: DTE 98-57-Phase III Service List (w/encl.)

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

VERIZON NEW ENGLAND, INC.
D/B/A VERIZON MASSACHUSETTS, D.T.E. 98-57-PHASE III

SECOND SET OF INFORMATION REQUESTS
OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO COVAD COMMUNICATIONS COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Covad Communications Company (“Covad”) the following Information Requests.

INSTRUCTIONS

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number and phase of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed, but **no later than 7 days of receipt of the request**.
3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officers so that the request may be clarified prior to the preparation of a written response.
7. Please serve one (1) copy of the responses on Mary Cottrell, Secretary of the Department and on all parties; also submit one (1) copy to all Department staff, two (2) copies of the responses to Paula Foley, Hearing Officer, and one (1) copy to Jesse Reyes, Hearing Officer.

SECOND SET OF INFORMATION REQUESTS TO COVAD
D.T.E. 98-57-PHASE III
September 18, 2001

1. Referring to the Testimony of Larry D. Gindlesberger and Michael Clancy on behalf of Covad at 11-12 (September 10, 2001), please explain in detail what specific issues you would like a collaborative to resolve and why a collaborative would be an appropriate method of addressing each of those issues.
2. Please explain fully how a Massachusetts collaborative would differ in scope from the New York and Texas collaboratives.
3. Why would a Massachusetts collaborative provide different relief for Covad than from the New York DSL collaborative?
4. Please explain fully how a Massachusetts collaborative would differ from the meetings conducted by the Maryland commission.