

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Complaint of DSCI Corporation	:	
Re: Availability of Assume 9	:	D.T.C. No. 08-_____
Dialing Feature With COMA CSP	:	
Resale Offering	:	

**PREFILED TESTIMONY OF TIM BATTLES
ON BEHALF OF PETITIONER DSCI CORPORATION**

Introduction and Background

Q. Mr. Battles, please state your name, title and business address, for the record.

A. My name is Tim Battles. I am Vice President of Finance of DSCI Corporation ("DSCI"), a competitive local exchange carrier ("CLEC") operating in most states in the Northeast, with offices in Lexington, Massachusetts, and Manchester and Tilton, New Hampshire. My business address is 275 Wyman Street, Waltham, Massachusetts 02541.

Q. Please describe your educational background and related experience.

A. I graduated with an A.B. from Bowdoin College in 1987. I worked in the telecommunications industry for twenty years. I created national and regional sales organizations that have provided superior service and garnered high customer loyalty. I have extensive experience managing sales forces that

concentrated on high-end technical customer applications such as WANs, VPNs, Remote Access and Internet service. Currently I am the Vice President and one of four co-founders of DSCI Corporation, where I manage the day to day financial operations of the company. Previously, I was a Vice President of Sales at Digital Broadband Communications, Inc., a northeast broadband service provider, and opened nine markets growing the sales force from 0 to 96 employees in ten months. Prior to Digital Broadband Communications I was part of a group of five people who started Digital Signal Communications, Incorporated. As Vice President of Sales, I was part of the senior management team that drove the growth of Digital Signal Communications' revenue. Before that I held positions including Sales Engineering, National Accounts and Sales Management at USTeleCenters and Sprint.

Q. Have you appeared as a witness in prior regulatory proceedings?

A. No. I have not.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to support DSCI's request for a ruling from the Department of Telecommunications and Cable ("Department" or "DTC") regarding a single disputed term or condition of Verizon's "customer specific pricing" agreement with the Commonwealth of Massachusetts (hereinafter

referred to as “COMA CSP”) – namely, the availability of Assume 9 as a dialing feature to DSCI and its customers eligible for COMA CSP pricing.

As noted in Mr. Dandley’s testimony filed herewith, one factor supporting the availability of Assume 9 to DSCI customers under the COMA CSP is Verizon’s initial concurrence with DSCI that Assume 9 is a standard provisioning feature available under COMA Centrex. I participated with Mr. Dandley in the February 18, 2005 review of COMA CSP-related documents at Verizon’s offices during which Mr. Dandley and I determined that we could use the Assume 9 dialing feature for DSCI’s COMA CSP resale customers. I also participated in conference calls with Patrick McCarthy of Verizon’s Resale group and other Verizon personnel in late February and early March of 2005 in which Mr. Dandley and I expressed the intention to allow the Assume 9 feature to be provisioned for DSCI customers to a COMA CSP resale offering. While Verizon subsequently sought to limit resale of COMA CSP to “eligible entities” and deny DSCI the ability to combine per-line COMA CSP rates with Corporate Rewards usage rates, Verizon at no time challenged DSCI’s request regarding the Assume 9 for eligible COMA CSP resale customers.

Q: Does this conclude your testimony?

A: Yes it does.

Dated: May 1, 2008