

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO RCN NEW YORK COMMUNICATION, LLC; RCN TELECOM SERVICES OF
MA, INC.; RCN TELECOM SERVICES, INC.; AND RCN CORPORATION
(collectively "RCN")
D.T.C. 08 - 5

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable ("Department") submits to RCN the following information requests.

Instructions

The following instructions apply to this set of information requests, and all subsequent requests issued by the Department in this proceeding.

1. Unless otherwise stated, each request should be answered in writing on a separate three-hole punch page including: the case docket number; a reference to the request number; the name of the person responsible for the answer; and a recitation of the request.
2. Do not wait for all answers to be completed before supplying answers. Provide answers as soon as they are completed.
3. Requests shall be deemed continuing so as to require further supplemental responses if RCN or its witnesses 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.

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, e-mail or other electronic documents, 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 of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses as follows: (a) one original to Catrice C. Williams, Secretary of the Department; and (b) one copy to all parties on the service list.

REQUESTS

D.T.C. – RCN 1-1

Regarding the Joint Stipulated Statement of Facts at ¶ 14, please provide copies of any state or federal statutes, regulations, regulatory decisions, court decisions or any other applicable documents that support your position.

D.T.C. – RCN 1-2

Regarding the Joint Stipulated Statement of Facts at ¶¶ 20-21, please provide a full explanation, including the facts at issue, on the circumstances that would require the Department to provide guidance to the parties regarding each of the listed questions.