Attachment A

COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Petition for a Determination that Verizon IP-to-IP Interconnection Agreements Must be Filed for Review) and Approval and for Associated Relief

D.T.C. No.	3-2	FRECLIVED			
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DECLARATION OF JENNIFER E. ROSS

1. My name is Jennifer E. Ross. I am the director of Verizon's interconnection group within the Verizon Global Wholesale organization. In this role, I lead and direct the group within Verizon that is responsible for negotiating, implementing and managing interconnection agreements between Verizon MA and other providers. I file this Declaration in support of the Motion to Dismiss of Verizon New England Inc.

2. The procedures for initiating an interconnection request are well known in the industry. And the Verizon Global Wholesale group's website, www.verizon.com/wholesale, provides step-by-step instructions for any providers new to the process. Once a provider sends a request for negotiation of an interconnection agreement to the Contract Management Group using this process, it will be routed internally to my group for handling.

3. My group's responsibility includes negotiating agreements to exchange voice traffic in IP format with other providers. Verizon MA takes seriously its obligation to negotiate in good faith in response to requests for IP voice interconnection.

4. I understand that the petitioners in this proceeding are CTC Communications Corp.; Lightship Telecom LLC; Choice One Communications of Massachusetts, Inc.; Conversent Communications of Massachusetts, Inc.; Earthlink Business, LLC; Cbeyond Communications, LLC; and tw data services llc. All of these CLECs and/or their affiliates have relationships with Verizon MA and with my group. Each of them should be aware that my group handles interconnection agreements for Verizon MA.

5. None of the CLECs that filed the Petition to interconnect in IP format submitted a request for negotiation of an IP interconnection agreement to the Contract Management group nor did my group receive any such request. If my group were to receive a request from one of those CLECs, Verizon would fulfill its obligation to negotiate in good faith with that carrier.

6. This concludes my declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Janif E. Ron

Date: February 14, 2013