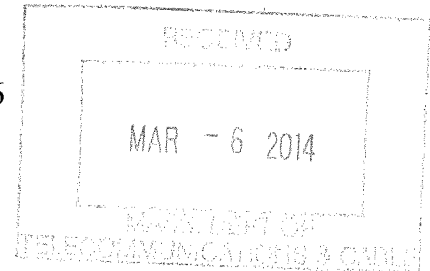


**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Investigation by the Department on its Own Motion to Determine whether an Agreement entered into by Verizon New England Inc., d/b/a Verizon Massachusetts is an Interconnection Agreement under 47 U.S.C. § 251 Requiring the Agreement to be filed with the Department for Approval in Accordance with 47 U.S.C. § 252

DTC 13-6



**COMPETITIVE CARRIERS'
SECOND SET OF INFORMATION REQUESTS
TO VERIZON**

The Competitive Carriers¹ serve this second set of information requests upon Verizon New England Inc.

Definitions and Instructions

1. "Identify" or "identity" when used in connection with (a) a natural person means to state the person's name, employer, and business address; (b) a corporation or other business entity means to state the name of the entity, "d/b/a" designation if any, address of its principal place of business and principal place of business in Massachusetts; (c) a document means to provide the identities of the author(s) and addressee(s), date, and a description of its contents; and (d) a communication means to provide the identities of the participants, date, and a description of its contents.

2. "Documents" means any written, printed, typed or visually reproduced material of any kind, whether or not privileged, and includes but is not limited to the original and all copies of any and all letters, reports, memoranda, electronic mail or e-mail, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets,

¹ CTC Communications Corp. d/b/a EarthLink Business; Lightship Telecom LLC d/b/a EarthLink Business; Choice One Communications of Massachusetts, Inc. d/b/a EarthLink Business; Conversent Communications of Massachusetts, Inc. d/b/a EarthLink Business; EarthLink Business, LLC (formerly New Edge Network, Inc. d/b/a EarthLink Business); Cbeyond Communications, LLC; tw data services llc; Level 3 Communications, LLC; and PEATEC Communications, Inc..

work papers, recordings, tapes, drawings, graphs, indexes, charts, telephone records, photographs, phonographic records, computer files, other data compilation, or any other written, recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work, figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge or information.

3. "Relating to," "relates to," "referring to," and "refers to" mean, without limitation, relating to, concerning, constituting, mentioning, referring to, describing, summarizing, evidencing, listing, relevant to, demonstrating, tending to prove or disprove, or explain.

4. If any part of a document is responsive to any request, the whole document is to be produced.

5. Any document that differs in any way from another document, including by means of marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document is a separate and distinct document and must be produced.

6. If you are unable to produce a document in response to any request, so state, and indicate whether the document ever existed, or whether the document once existed but cannot be located. If any document once was, but is no longer in your possession, custody or control, state the whereabouts of any such document when last in your possession, custody or control, state the date and manner of its disposition and identify its last known custodian. To the extent any documents are lost or destroyed, produce any documents which support your assertion that the document was lost or destroyed, and provide the date thereof.

7. To the extent you claim any document, communication, or information described herein is privileged or otherwise exempt from disclosure, or to the extent that you object to the production of any of the documents, please identify each and every document to which any claim of privilege or objection to production is asserted by identifying the document, communication, or other information and for each such document, communication, or information state the nature and basis for each claim of privilege or exemption, or objection.

8. An objection to any portion of a request does not negate the obligation to respond to all remaining portions.

9. Electronically-stored information should be produced in the organizational categories and formats ordinarily used in your business.

10. The connectives “and” and “or” mean either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

11. The use of the singular includes the plural, and vice versa.

12. The use of one gender includes all others, appropriate in the context.

13. As used in these requests, the singular shall also be treated as plural and vice-versa.

14. These information requests are continuing in nature and, thus, you are under a continuing duty to promptly supplement, correct or revise any response provided when the passage of time or change of circumstances would require a response to be supplemented, corrected or revised.

Information Requests

CC-VZ-2-1. Please refer to Verizon’s direct testimony, p. 6, lines 12-18.

- (a) Is any of the features described in this portion of the testimony necessary for a Verizon FiOS Digital Voice customer to place or receive voice calls?
- (b) If your answer is other than “no,” please explain your answer in full detail.

CC-VZ-2-2. Does Verizon have any information in its possession, custody, or control (whether obtained in the course of its negotiations and/or relationship with Comcast or otherwise) regarding how Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates obtain(s) numbering resources for the provision of VoIP service to Comcast customers in Massachusetts? If so:

- (a) Please describe in full detail how Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates obtain such numbering resources.
- (b) Please produce copies of all documents that describe, set forth, or relate to how Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates obtain(s) such numbering resources.

CC-VZ-2-3. Does Verizon have any information in its possession, custody, or control (whether obtained in the course of its negotiations and/or relationship with

Comcast or otherwise) regarding whether Comcast IP Phone, LLC, and/or its VoIP subsidiaries and affiliates, obtain(s) numbering resources for the provision of VoIP service to Comcast customers in Massachusetts from any Comcast affiliate? If so:

- (a) Please identify the Comcast affiliate(s) that provide(s) such numbering resources to Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates.
- (b) Please produce copies of all documents that describe, set forth, or relate to the provision by Comcast affiliates of such numbering resources to Comcast IP Phone, LLC, and/or its VoIP subsidiaries and affiliates.

CC-VZ-2-4. Does Verizon have any information in its possession, custody, or control (whether obtained in the course of its negotiations and/or relationship with Comcast or otherwise) regarding the provision by any Comcast affiliate of any other facilities and/or services to Comcast IP Phone, LLC, and/or its VoIP subsidiaries and affiliates, for the provision of VoIP service to Comcast customers in Massachusetts? If so:

- (a) Please identify each and every Comcast affiliate(s) that provide(s) such facilities and/or services to Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates
- (b) Please identify all such facilities and/or services provided by the Comcast affiliate(s) to Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates.
- (c) Please describe in full detail all arrangements under which Comcast affiliates provide any other facilities and/or services to Comcast IP Phone, LLC, and/or its VoIP subsidiaries and affiliates, for the provision of VoIP service to Comcast customers in Massachusetts.
- (d) Please produce copies of all documents that describe, set forth, or relate to the provision by Comcast affiliates of any other facilities and/or services to Comcast IP Phone, LLC, and/or its VoIP subsidiaries and affiliates, for the provision of VoIP service to Comcast customers in Massachusetts.

CC-VZ-2-5. Regarding the hypothetical call from Carl to Victor described on pp. 24-25 of Verizon's Direct Testimony, if Victor had answered the call:

- (a) Would he and Carl have been able to have a voice conversation?

- (b) Does the presence of any of the features described on p. 24, line 18 through p. 25, line 2 – *e.g.*, simultaneous ringing in multiple locations, display of caller ID on the television, sending a digital voicemail message to Victor's email – affect Victor's ability to have a voice conversation with Carl?
- (c) Does the presence of any of the features described on p. 24, line 18 through p. 25, line 2 – *e.g.*, simultaneous ringing in multiple locations, display of caller ID on the television, sending a digital voicemail message to Victor's email – affect Carl's ability to have a voice conversation with Victor?

CC-VZ-2-6. Please produce copies of the five "IP VoIP interconnection agreements" (*i.e.*, those Verizon has entered into with "Vonage, BroadVox, InterMetro, Bandwidth.com and Millicorp") referred to in Verizon's rebuttal testimony, page 4.

March 5, 2014

By its attorney,

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