



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

D.T.C. 13-6

March 04, 2014

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

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**DEPARTMENT OF TELECOMMUNICATIONS AND CABLE FIRST SET OF  
INFORMATION REQUESTS TO SPRINT SPECTRUM L.P., SPRINT  
COMMUNICATIONS COMPANY L.P., NEXTEL COMMUNICATIONS OF THE MID-  
ATLANTIC, INC., AND VIRGIN MOBILE USA, INC.**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable ("Department") makes the following information requests to Sprint Spectrum L.P., Sprint Communications Company L.P., Nextel Communications of the Mid-Atlantic, Inc., and Virgin Mobile USA, Inc. (collectively "Sprint").

Instructions and Definitions

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 Sprint and/or its witnesses receive or generate 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. 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.
5. The responses should be served in accordance with the Ground Rules to this proceeding, as written in the PROCEDURAL SCHEDULE AND NOTICE, issued on November 29, 2013.
6. The term "IP" means Internet Protocol.

7. The term “Sprint” refers to Sprint Nextel Corporation and any entity that is an affiliate of Sprint Nextel Corporation, including Sprint Spectrum L.P., Sprint Communications Company L.P., Nextel Communications of the Mid-Atlantic, Inc., and Virgin Mobile USA, Inc.
8. The term “affiliate” is any individual, partnership, association, joint stock company, trust, corporation, or other entity who (or that), directly or indirectly, owns or controls, is owned or controlled by, or is under common ownership or control with, Sprint Nextel Corporation.
9. The term “ILEC” means Incumbent Local Exchange Carrier as defined in 47 U.S.C. 251(h).

## REQUESTS

- D.T.C. 1-1      Produce a copy of each of the 12 IP interconnection agreements Sprint currently has with major carriers, as referenced in Sprint's July 8, 2013 Comments to the FCC in *Technology Transitions Policy Task Force Seeks Comment on Potential Trials*, GN Docket No. 13-5, at 6 (July 8, 2013).
- D.T.C. 1-2      State whether Sprint has entered into an IP interconnection agreement with an ILEC, and if yes, produce a copy of the IP interconnection agreement and state whether Sprint or the ILEC has filed the IP interconnection agreement with a state agency for approval pursuant to 47 U.S.C. 252.