



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

D.T.C. 24-3

July 22, 2025

Petition of Verizon New England Inc. For Reclassification as a Non-Dominant  
Telecommunications Carrier

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**THIRD SET OF INFORMATION REQUESTS BY THE  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE  
TO VERIZON NEW ENGLAND INC.**

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits to VERIZON NEW ENGLAND INC. the following information requests:

Instructions

The following instructions apply to this set of information requests.

1. All answers should be filed with the Department by the close of business on **September 12, 2025**.
2. Unless otherwise stated, each request should be answered in writing and include: 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.
3. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, legal filings, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or 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.
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 by Verizon in developing the projections or estimates.

5. The term “Verizon” means Verizon New England Inc., d/b/a Verizon Massachusetts and its corporate predecessors, agents, officers, employees, and assigns.
6. Requests shall be deemed continuing so as to require further supplemental responses if Verizon 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.
7. Unless specified otherwise, all requests for information are specific to Massachusetts.
8. If any of these requests are ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

### Request

- D.T.C. 3-1      Provide a three-prong market power analysis (supply elasticity, market share, and demand elasticity) for Verizon’s basic exchange service in Massachusetts. For the purpose of this analysis, define the market to only include basic exchange service and do not include any other telecommunications services, such as Voice over Internet Protocol (VoIP) or wireless calling. Provide complete and detailed documentation.

For more information on the three-prong analysis refer to *Investigation by the Department of Telecommunications & Energy on its own Motion into the Appropriate Regulatory Plan to Succeed Price Cap Regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts’ Intrastate Retail Telecommunications Services in the Commonwealth of Massachusetts*, D.T.E. 01-31 Phase I, *Final Order* (May 8, 2002).