



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

**Petition of Verizon New England, Inc., MCI)
metro Access Transmission Services)
of Massachusetts, Inc., d/b/a Verizon Access)
Transmission Services, MCI)
Communications Services, Inc., d/b/a Verizon) D.T.C. 07-9
Business Services, Bell Atlantic)
Communications, Inc., d/b/a Verizon Long)
Distance, and Verizon Select Services, Inc. for)
Investigation under Chapter 159, Section 14)
of the Intrastate Access Rates of Competitive)
Local Exchange Carriers.)**

**FIRST SET OF INFORMATION REQUESTS FROM THE DEPARTMENT OF
TELECOMMUNICATIONS AND CABLE TO RICHMOND CONNECTIONS, INC.
D/B/A RICHMOND NETWORK AND RICHMOND TELEPHONE COMPANY.**

Pursuant to 220 C.M.R. §1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits to Richmond Connections, Inc. d/b/a Richmond NetWorx and Richmond Telephone Company (“Richmond”) 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. 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 Richmond 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, electronic mail messages, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, 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; (b) one copy to all parties on the service list; (c) two copies to Lindsay E. DeRoche, Hearing Officer.

Information Requests

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| D.T.C.-Richmond 1-1 | Page 4, line 1: Your testimony states that Verizon is a non-rural ILEC, by definition. Is Richmond Telephone “Rural Telephone Company” also considered a non-rural ILEC by that same federal standard? |
| D.T.C.-Richmond 1-2 | Page 4, line 9: Your testimony states (in several questions) that it costs more to serve rural areas than non-rural areas. Provide a detailed explanation supporting this statement. |
| D.T.C.-Richmond 1-3 | Page 4, line 21: Your testimony states that Richmond Telephone and Richmond Networx serve only Berkshire County, and thus serve only high-cost areas. Provide a detailed explanation supporting this statement. |
| D.T.C.-Richmond 1-4 | Page 5, line 17: Your testimony states that Verizon is subsidizing access rates in rural areas and charging artificially low prices there. Can you provide more specific data to support this statement? |
| D.T.C.-Richmond 1-5 | Page 8, line 5: Your testimony states that Berkshire County has a significantly higher average cost to serve than Verizon’s statewide service area. Provide a detailed explanation supporting this statement. |
| D.T.C.-Richmond 1-6 | Page 8, line 12: Your testimony suggests that the Department include a rural exemption if it adopts any sort of rate cap for CLEC’s. Propose the exact language of such an exemption. In addition, how many other carriers in the Commonwealth could potentially qualify for such an exemption? Also, what, if any, |

impact, positive or negative, would this exemption have on intercarrier compensation reform in Massachusetts?

- D.T.C.-Richmond 1-7 Page 9, line 3: Your testimony states that Richmond Telephone's access rates should be used to establish any rate cap for "rural" CLECs, and in particular that Richmond Telephone's rates are a much better proxy for rural rates than Verizon's rates. Provide a detailed explanation supporting these statements.
- D.T.C.-Richmond 1-8 Page 9, line 7: Your testimony states that Richmond Telephone's rates have been found to be "just and reasonable" by the Department. Provide a citation supporting this statement.
- D.T.C.-Richmond 1-9 Page 9, line 23: Your testimony states that a rebuttable presumption process for CLECs to seek a waiver from a rate cap would be an unnecessary burden for a rural CLEC. Provide a detailed analysis of why this process would be burdensome and unnecessary.
- D.T.C.-Richmond 1-10 Page 11, line 17: Your testimony states that Richmond Telephone recovers its costs through end user rates, access rates, and universal service. Provide a detailed breakdown explaining how these revenues are utilized to keep end user rates competitive for Richmond Telephone.
- D.T.C.-Richmond 1-11 Please explain whether the FCC created an exemption for CLECs serving rural areas when it capped CLEC access rates in the FCC Access Charge Order.
- D.T.C.-Richmond 1-12 Please indicate the annual revenue effect of Verizon's proposal on your company, both in dollar terms and by percentage of overall intrastate revenues.
- D.T.C.-Richmond 1-13 Please explain how your company will be able to make up the lost revenues and over what time period.
- D.T.C.-Richmond 1-14 Please explain how your company was able to make up the lost access charge revenues resulting from the FCC's Access Charge Order and over what period of time.
- D.T.C.-Richmond 1-15 Please explain in detail, with supporting documentation, whether adoption of Verizon's proposal will force your company to exit the Massachusetts market.