

GLOBAL NAPS, INC.

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: John O. Postl

Title: Assistant General Counsel

REQUEST: Department of Telecommunications and Energy Record Requests

DATED: December 8, 1999

ITEM: DTE RR 243 (A) Provide Documentation to support Global NAPs' claim that approximately one-third of its traffic is not ISP bound; (B) Copies of correspondence between Global NAPs and Bell Atlantic regarding the issue of payment for non-ISP bound traffic; (C) Copies of bills from Bell Atlantic; (D) Copy of Bell Atlantic's proposed Non Disclosure Agreement.

REPLY: A. Global NAPs has no documentation specifically with respect to the ratio of its ISP to non-ISP traffic. Global NAPs reiterates the Department's statement in its May, 1999 Reciprocal Compensation Order that there is no "precise means to separate ISP-bound traffic from other traffic." D.T.E. 97-166-C at 28 n.31. Thus, Global NAPs' can offer, at best, a rough estimate which was arrived at by comparing the traffic terminated to customers who Global NAPs believes are Internet Service Providers to the total traffic terminated by Global NAPs in Massachusetts. Global NAPs does not ask its customers whether or not their traffic is ISP bound.

B. A copy of the Letter dated May 27, 1999 is attached hereto.

Other portions of this Record Response were filed on March 3, 2000 under a motion for confidential treatment which was granted in part by the Department on April 7, 2000.