



ATTORNEYS AND COUNSELORS AT LAW

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September 27, 2010

BY HAND AND E-FILING

Catrice Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118-6500

Re: D.T.C. 10-2, Petition of Choice One Communications of Massachusetts Inc.,
Conversent Communications of Massachusetts Inc., CTC Communications Corp.
and Lightship Telecom LLC For Exemption from Price Cap on Intrastate
Switched Access Rates as Established in D.T.C. 07-9

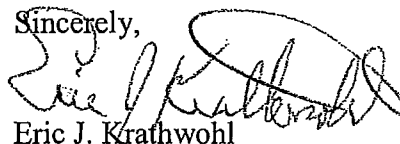
Dear Ms. Williams:

Enclosed for filing on behalf of Choice One Communications of Massachusetts Inc., Conversent Communications of Massachusetts Inc., CTC Communications Corp. and Lightship Telecom LLC ("OneComm") are OneComm's responses to Information Requests AT&T-OneComm 1-1 through AT&T-OneComm 1-65 and Comcast-OneComm 1-1 through Comcast-OneComm 1-28, including OneComm's specific and General Objections.

Please note that the response to Information Requests AT&T-OneComm 1- 23, 1-24, 1-26, 1-27, 1-28, 1-31, 1-32, 1-33, 1-38, 1-47, 1-49, 1-53, 1-54, 1-59, 1-60; Comcast 1-3, 1-6, 1-10 are considered to be PROPRIETARY INFORMATION.

Also enclosed is OneComm's Motion for Extension of Time to respond to the additional information requests of Verizon and AT&T.

Sincerely,



Eric J. Krathwohl

cc: Lindsay DeRoche, Esq., Hearing Officer
D.T.C. 10-2 Service List



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

_____)
Petition of Choice One Communications of
Massachusetts Inc., Conversent Communications
of Massachusetts, LLC, CTC Communications Corp.
and Lightship Telecom, LLC for Exemption
from Price Cap on Intrastate Switched Access Rates
as Established in D.T.C. 07-9
_____)

D.T.C. 10-2

**MOTION OF ONE COMMUNICATIONS FOR EXTENSION OF TIME TO FILE
RESPONSES TO CERTAIN INFORMATION REQUESTS ISSUED BY VERIZON AND
AT&T**

One Communications¹ hereby moves that the Department grant a one week extension of time for filing of responses to certain Information and Document Requests issued by the Verizon Companies² (“Verizon”) and AT&T Corp. (“AT&T”) to One Communications.

1. In a memorandum to the parties dated July 27, 2010, the Hearing Officer specified that responses to all Information and Document Requests in this proceeding should be provided within ten calendar days of receipt of the request.

2. To date, One Communications has received 280 Information and Document Requests in this proceeding. These requests have contained multiple subparts comprising a total of 392 separate requests requiring responses from One Communications.

3. Today, One Communications is responding to 140 of these requests and believes it will be able to complete its responses to the 45 information requests issued by the Department

¹ Choice One Communications of Massachusetts Inc., Conversent Communications of Massachusetts Inc., CTC Communications Corp. and Lightship Telecom LLC all do business as and are referred to herein as “One Communications”).

² Verizon New England Inc. d/b/a Verizon Massachusetts, MCImetro Access Transmission Services of Massachusetts, Inc. d/b/a Verizon Access Transmission Services, MCI Communications Services, Inc. d/b/a Verizon Business Services, Verizon Long Distance LLC, and Verizon Select Services Inc. (collectively, “the Verizon Companies” or “Verizon”).

on or before Monday, October 4, 2010. However, with respect to Verizon's Third Set of Requests and AT&T's Second Set of Requests issued to One Communications on September 21, 2010 (consisting of an additional 83 separate information and document requests), One Communications is very concerned with its ability to complete the necessary compilation of information, internal review, proper redaction (to the extent they contain confidential information), production and filing of the responses in accordance within the required ten calendar day time period.

4. While One Communications is committed to file all the discovery responses as quickly as possible, given limits on One Communications' and QSI's resources, it appears to be impossible for One Communications to file responses to Verizon's Third and AT&T's Second Set of Requests by Friday, October 1, 2010, particularly given the volume of Information and Document Requests received to date³.

5. In light of these circumstances, One Communications respectfully requests that it be granted a one week extension in which to file responses to the Information and Document Requests issued by Verizon and AT&T on September 21, 2010. One Communications commits to provide such responses as soon as it can, but not later than October 8, 2010. Such timing will still allow Verizon and AT&T over three weeks to review One Communications' responses before their testimony is due. Good cause exists to grant this very limited relief.

³ Note that One Communications has already responded to 124 discovery requests and with today's filing will have responded to 264 separate discovery requests in total.


WHEREFORE, One Communications respectfully requests that the Hearing Officer:

- A. Grant this motion; and
- B. Grant such other and further relief as may be just and equitable.

Respectfully submitted,

ONE COMMUNICATIONS

By its attorney,



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Dated: September 27, 2010

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 10-2

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Practice and Procedure).

Dated at Boston, Massachusetts this 27th day of September, 2010.



Eric J. Krathwohl
Counsel

Of Counsel for
One Communications