

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

**Petition of Choice One Communications of)
Massachusetts Inc., Conversent Communications)
Massachusetts, LLC, CTC Communications)
and Lightship Telecom, LLC For Exemption from) D.T.C. 10-2
Price Cap On Intrastate Switched Access Rates))
as Established in D.T.C. 07-9)
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**ONE COMMUNICATIONS' RESPONSES TO
AT&T'S THIRD SET OF INFORMATION REQUESTS**

In accordance with 220 C.M.R. § 1.06(6)(c)2., One Communications (“One Comm”) submits the following responses to AT&T’s Third Set of Information Requests:

General Objections

1. One Comm objects to each Data Request to the extent that it seeks production of information that is protected from disclosure by the attorney work product privilege, attorney-client communication privilege, or other applicable privilege.
2. One Comm objects to each Data Request to the extent that it seeks production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.
3. One Comm objects to each Data Request to the extent that it is ambiguous, vague, overly broad, or contains language or undefined terms susceptible to multiple meanings.
4. One Comm objects to each Data Request to the extent that it seeks production of information that is in the public domain, for example, documents that have been filed with a government agency.

5. One Comm objects to each Data Request to the extent that it seeks production of information that is in the possession, custody, or control of AT&T.
6. One Comm objects to each Data Request to the extent that it seeks disclosure of confidential or proprietary information that is not relevant to this proceeding.
7. One Comm objects to each Data Request that seeks information not limited in scope to the time period at issue in this proceeding.
8. One Comm objects to each Data Request to the extent that it is unduly burdensome, expensive, or oppressive to respond to as presently written, particularly where an Data Request seeks information regarding “all” instances or examples.
9. One Comm objects to each Data Request to the extent that it is argumentative or calls for a legal conclusion.

As discovery is ongoing in this matter, One Comm reserves the right to supplement and update these responses.