COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
D.T.C 10-2
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AT&T-One Comm-2-1 For each and every piece of equipment listed on the Model Tab (Column C), Springfield 5ECost Model QSI (PROPRIETARY INFORMATION).xls, please identify whether the equipment is processor or processor-related, port or port-related, software, or other.

a) For each and every piece of equipment listed on the 6 Paid 3 Zero Tab, PB4500s for growth Aug (PROPRIETARY INFORMATION).xls, please identify whether the equipment is processor or processor-related, port or port-related, software, or other.

One Communications Response:

One Communications objects to this request. It seeks information that is vague and ambiguous in that it has not defined how AT&T intends for the phrases "processor or processor-related" and "port or port-related" to be interpreted within the context of this question; it is beyond the scope of this proceeding; it is not reasonably calculated to provide evidence which is admissible in this proceeding and it is unduly burdensome. Despite these objections, One Communications answers as follows:

(a) Although the *One Communications Trunk-to-Trunk Switching Module MA.xls* file references as a source the *Springfield 5ECost Model QSI (PROPRIETARY INFORMATION).xls* file cited in this subpart, it does not utilize an analysis of the nearly 200 switch components included in Column C (DESCRIPTION) that categorizes the individual components as "processor or processor-related," "port or port-related," "software," or "other." Moreover, AT&T has purchased, deployed and currently maintains thousands of the Lucent 5ESS switches throughout its multi-state network and can rely upon its experience in order to perform the requested analysis should it so desire. Additionally, although the *One Communications Trunk-to-Trunk Switching Module MA.xls* file references as a source the *PB4500s for growth Aug (PROPRIETARY INFORMATION).xls* file, it does not rely upon an analysis that categorizes the individual components as "processor or processor-related," "port or port-related," "software," or "other." The components are categorized as "Hardware," "Software" and/or "Installation and Training." See, for example, Column A of the referenced worksheet. The switches accommodate trunk-to-trunk traffic and, following AT&T's own cost study practices, the entire cost of such switches, which AT&T typically expresses on a per port basis, are related to usage and recouped through usage charges.

Respondent(s): Counsel to One Communications

James Webber, QSI Consulting, Inc.

August Ankum, Ph.D., QSI Consulting, Inc.

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AT&T-One Comm-2-2 For each and every piece of equipment displayed on the Model Tab (Column E) Springfield 5ECost Model QSI (PROPRIETARY INFORMATION).xls, please populate or estimate the Initial Cost investment dollar amount for each.

One Communications Response:

Please see the **Original Purchase** tab of the referenced worksheet for original purchase price detail as provided by the vendor. In that tab, the original purchase costs are separated into the following sub categories: Material, RTU, Spares, Engineering, Installation, and Transport. No further level of granularity was provided or utilized within the NUCA.

Respondent(s): James Webber, QSI Consulting, Inc.

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AT&T-One Comm-2-3 Please provide a list, or otherwise describe, the wholesale marketing and sales activities performed by One Communications that are caused by switched access.

One Communications Response:

Marketing and sales activities are captured in NUCA specifically as shared and/or common costs because they cannot be effectively allocated to any one service based upon causality as requested in the question. One Communications' sales and marketing efforts are generally intended to increase demand for and usage by all services.

Respondent(s): Warren Fischer, QSI Consulting, Inc.

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AT&T-One Comm-2-4 With respect to ADSL ports within One Communications' network and/or modeled within NUCA, please provide a history, preferably for at least 2009, of any and all instances, occurrences, and/or occasions, whereby such ADSL ports served or operated in a supporting or "back up" functionality to non-ADLS (or POTS) ports. As part of your response, please indicate the number of times and the number of ports involved when voice traffic was transferred over from POTS ports to ADSL ports.

One Communications Response:

One Communications does not maintain its service records or trouble tickets in such a manner that would allow it to pull, extract or automatically produce a report that identifies all instances or occurrences of ADSL port or line card failure. Likewise, the requested analysis was not utilized in the development of NUCA.

Respondent(s): James Webber, QSI Consulting, Inc.

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AT&T-One Comm-2-5 Please provide One Communications' average minutes of use (MOU) per line or per port, preferably for Massachusetts, for each of the following: a) ADSL, b) POTS.

One Communications Response:

One Communications does not track average minutes of use by ADSL and/or POTS port. Please see the **Intersw MOU by CLLI** and **All Data MOU by CLLI** tabs within the *One Communications NUCA – Traffic Module MA.xls* for historic and projected minutes of use data for each of the switches in Massachusetts. Please see also One Communications' response to AT&T-OneComm-1-50.

Respondent(s): James Webber, QSI Consulting, Inc.

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AT&T-One Comm-2-6 For One Communications' data customers, please provide the average length of time (*e.g.*, hours or minutes per day) customers' network connection with One Communications is active (i.e., always connected or readily usable).

One Communications Response:

One Communications does not track the requested information.

Respondent(s): James Webber, QSI Consulting, Inc.

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AT&T-One Comm-2-7 For each of the years 2008, 2007, and 2006, please provide the following, and in

(a) thru (d) specifically identify and group the revenues in a matrix by (1) type of provider (CLEC/ILEC, mobile wireless services provider, cable VolP services provider, and non-cable VolP services provider), and by (2) each tariffed rate element billed:

(a) Total ***intrastate, terminating*** switched access revenues billed and MOUs;
(b) Total ***intrastate, originating*** switched access revenues billed and MOUs;
(c) Total ***interstate, terminating*** switched access revenues billed and MOUs;
(d) Total ***interstate, originating*** switched access revenues billed and MOUs;
(e) Please provide the work papers for the rate elements, volumes, revenues and associated calculations for (a) through (d) above in electronic/Excel format.

One Communications Response:

Objection. The request seeks information that is not relevant to this proceeding and not likely to lead to the discovery of admissible evidence. The scope of this proceeding is to determine One Communications' cost of providing switched access services. One Communications' billed revenues and minutes are simply unrelated to One Communications' cost of providing the aforesaid service.

Respondent(s): Counsel to One Communications

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AT&T-One Comm-2-8 For each of the years 2008, 2007, and 2006, provide the following:

(a) Volumes of intraMTA minutes terminated on behalf of all wireless carriers, and dollars billed for such terminating intraMTA minutes; (b) Volume of intrastate, interMTA minutes terminated, on behalf of wireless carriers, and dollars billed for such intrastate, interMTA minutes. (c) Volume of local minutes terminated and dollars billed for wireless traffic as reciprocal compensation for such traffic; (d) Volume of local minutes terminated, and dollars billed for non-wireless traffic as reciprocal compensation for such traffic;

One Communications Response:

Objection. The request seeks information that is not relevant to this proceeding and not likely to lead to the discovery of admissible evidence. The scope of this proceeding is to determine One Communications' cost of providing switched access services. One Communications' billed revenues and minutes are simply unrelated to One Communications' cost of providing the aforesaid service.

Respondent(s): Counsel to One Communications

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AT&T-One Comm-2-9 For a site within One Comm's MA network wherein both a Lucent 5ESS and a Metaswitch are found and included the NUCA cost model, please admit or deny that the Metaswitch is capable of handling all of the traffic currently directed to the Lucent 5ESS and to the Metaswitch. If your response is anything but an unequivocal "admit", please demonstrate quantitatively, and using the cost materials heretofore provided, why that is not the case. Provide all the technical specifications of the Metaswitch as reveal for the equipment manufacturer's documentation.

One Communications Response:

Denied. There are a number of reasons why the MetaSwitch is not duplicative of and cannot supplant the nearby Lucent 5ESS.

First, although not physically located in the same switch room, One Communications maintains both a Lucent 5ESS and a MetaSwitch at **[*** BEGIN PROPRIETARY INFORMATION**

END PROPRIETARY INFORMATION *]**, respectively**.** One Communications seeks to maintain a P.01 Grade of Services and sizes its switches accordingly. See, for example, the Company's response to AT&T-OneComm-1-51. As described in response to AT&T-OneComm-1-49, the 5ESS and MetaSwitch deployments in Springfield, MA are similarly sized in terms of their DS3 capacity. And, as identified in the **All Data MOU by CLLI** tab of the *One Communications NUCA – Traffic Module MA.xls*, usage volumes on those two switches has been and is projected to be similar. All of the traffic currently directed to the Lucent 5ESS and to the MetaSwitch cannot be handled by the MetaSwitch alone as contemplated in the hypothetical construct proposed by AT&T in this question.

Furthermore, assuming for purposes of argument that the MetaSwitch could handle all of the traffic currently directed to the 5ESS and MetaSwitch (which is not true), the collocation, OS/DA, 911, signaling, and carrier trunking (as well as the associated optical transport hardware and electronics) are not currently capable of "directing" traffic in the manner suggested. Similarly, the equipment is not located in the same physical space and would have to be disconnected, moved and reconnected. The hypothetical implicit in this question would necessitate some sort of "migration plan," which has not been described or considered in AT&T's question though AT&T itself typically argues to include such migration costs in its own switching related cost studies. Last, the 5ESS provides ISDN BRI services that the MetaSwitch is not capable of providing. The above discussion is not based on MetaSwitch "cost materials." However, additional information related to MetaSwitch can be located at: http://www.metaswitch.com/.

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Respondent(s): Srikanth Gomattam, Manager – Product Engineering
Jim Weidman, Manager – Switch Engineering
James Webber, QSI Consulting, Inc.
August Ankum, Ph.D., QSI Consulting, Inc.

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AT&T-One Comm-2-10 Please provide all relevant documentation explaining and supporting the current, as well as NUCA modeled, configuration(s) of Metaswitch within One Communications' MA network. Your response should have sufficient detail distinguishing such configuration(s) from the various other configurations feasible with Metaswitch.

One Communications Response:

The MetaSwitch configuration, within the Company's network and in NUCA, comprises MetaSwitch hardware, including, for example, Media Gateways and Call Agents, physically located together in Company switching centers. See, for example, *the One Communications NUCA – Trunk-to-Trunk Switching Module MA.xls* at tab Switch Inventory for the switch locations and port counts for each of the Massachusetts MetaSwitch deployments as well as references to source documentation. The MetaSwitches rely upon various routers, switches and session border controllers to route and switch packets – both "voice" packets and "signaling packets" – amongst locations throughout the Company's network and the "outside world." Such devices are generally located both with the MetaSwitches and in other locations throughout the network. See, for example, *the One Communications NUCA – Trunk-to-Trunk Switching Module MA.xls* at tab Routers Switches SBCs for equipment descriptions, locations, pricing and source documentation. The Massachusetts MetaSwitches rely upon the company's SS7 network, as modeled in the *Signaling Module*, and are linked thereto, for purposes of signaling functionality and interaction with the PSTN. The MetaSwitch relies upon transport termination and transport facilities (as modeled in the *Transport Termination* and *Transport Modules*) to move voice traffic among switches in the Company's network as well as the "outside world." The MetaSwitches in Massachusetts rely upon loop and aggregation facilities and equipment (as modeled in the *Aggregation* and *Loop Cost Analysis Modules*) to aggregate, transport and connect voice traffic between the Company's customers and other calling/called party's both within and outside the company's network. Please see One Communications' response to Verizon request VZ One Comm-3-16 for additional details related to MetaSwitch. Please see also One Communications response to QCC-ONE COMM 1-1 for a simplified network diagram as well as One Communications response to Verizon request VZ-One Comm-1-1 and VZ-One Comm-1-3 for numerous documents as discussed above as well as the source documents noted therein. For various other configurations feasible with MetaSwitch, please see the manufacturer's website at: http://www.metaswitch.com/ .

Respondent(s): James Webber, QSI Consulting, Inc.
Jim Weidman, Manager – Switch Engineering

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AT&T-One Comm-2-11 For One Comm's operation in MA, for each calendar year 2006 through 2009, and for the most recent date available, please identify the total number of revenue-producing access lines (separately both for wholesale and retail) that One Comm provides in Massachusetts for the following:

(a) Standalone basic local residential service access lines, (i.e, offered separately and not combined with any other services or features).
(b) The total number of residential lines of all kinds.

One Communications Response:

Objection. The request seeks information that is not relevant to this proceeding and not likely to lead to the discovery of admissible evidence. The scope of this proceeding is to determine One Communications' cost of providing switched access services. One Communications' revenue producing access lines are simply unrelated to One Communications' cost of providing the aforesaid service.

Respondent(s): Counsel to One Communications

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AT&T-One Comm-2-12 For each calendar year 2003 through 2009, and for the most recent date available, please identify the total number of revenue-producing access lines (separately both for wholesale and retail) that One Comm provides in Massachusetts for the following:

(a) Single-line residential lines;
(b) Single-line business lines;
(c) Multi-line residential lines;
(d) Multi-line business lines;
(e) Other revenue-producing access lines not included in (a) to (d).

One Communications Response:

Objection. The request seeks information that is not relevant to this proceeding and not likely to lead to the discovery of admissible evidence. The scope of this proceeding is to determine One Communications' cost of providing switched access services. One Communications' revenue producing access lines are simply unrelated to One Communications' cost of providing the aforesaid service.

Respondent(s): Counsel to One Communications