

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE  
D.T.C 10-2**

**Response Of One Communications To Verizon's 5th Set Of Information Requests**

<b>VZ-One Comm-5-1</b>	Please refer to Ankum Rebuttal Testimony at page 75, lines 3-8. Please provide references to any state or federal regulatory decision related to an incremental cost study that treated loop costs as "shared costs of switched access services." Please provide copies of any cited orders or decisions.
Response:	Please see One Communications' response and supplemental responses to DTC-One Comm-1-7.
Respondent(s):	August Ankum, Ph.D., QSI Consulting.

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**VZ-One Comm-5-2**      Please provide all One Communications' rebuttal testimony in this proceeding, including attachments, the Revised NUCA and all supporting documentation, in their original format (*i.e.* Excel or Word).

Response:              One Communications objects to this request on the grounds that it irrelevant and not likely to lead to the discovery of admissible evidence. Notwithstanding this objection, One Communications answers as follows: See Response to AT&T-OneComm-3-7, AT&T-One Comm-3-1, VZ-One Comm-5-4, VZ-One Comm-5-5, VZ-OneComm-5-7, VZ-One Comm-5-8, VZ-One Comm-5-9, VZ-One Comm-5-10, and ***One Comm Response to VZ 5-2 (Proprietary Information).zip*** provided with this response.

Respondent(s):        Counsel to One Communications  
  
James Webber, QSI Consulting.  
  
Warren Fischer, QSI Consulting.

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**VZ-One Comm-5-3**      Please refer to Webber Rebuttal Testimony, page 4, line 15, to page 5, line 11. Please provide all work papers concerning or showing the adjustment of unallocated transport costs.

Response:                      See One Communications' response to AT&T-One Comm-3-1.

Respondent(s):              James Webber, QSI Consulting.

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**VZ-One Comm-5-4**      Please refer to Webber Rebuttal Testimony, page 11, lines 3-13. Please provide all work papers showing the derivation of the 32.5% adjustment relating to line feature costs.

Response:              See *Spr5E 2001 FACR Breakdown QSI (PROPRIETARY INFORMATION).xlsx* provided with this response.

Respondent(s):        James Webber, QSI Consulting.

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**VZ-One Comm-5-5**      Please refer to Webber Rebuttal Testimony, page 27, lines 4-11. Please provide all work papers showing the derivation of the Verizon estimate of switching costs for the Lucent 5ESS switches.

Response:              Verizon refused to provide analyses, workpapers and documents supporting Verizon's proposed modifications to the NUCA in response to One Communications-VZ 2-2, One Communications-VZ 2-3 and One Communications-VZ 2-15. Had Verizon provided the requested information, One Communications would simply point to Verizon's estimate within Verizon's own workpapers. In response to One Communications-VZ 2-1, Verizon provided an electronic copy of Attachment A to the Verizon Panel Direct Testimony which summarizes 13 proposed adjustments to the NUCA model as well as Verizon's view of the "bottom-line" cost estimate on a per MOU basis. In response to One Communications-VZ 2-15, Verizon partially explained adjustment number 6 identified in Attachment A to the Verizon Panel Direct Testimony, which specifically addresses "model office sizing" and Lucent 5ESS costs. Based on the foregoing, One Communications replicated the steps described by Verizon and, as a result, was able to derive and confirm the figure provided at p.27, line 4 of Mr. Webber's testimony. ***One Communications Response to VZ 5-5 (Proprietary Information).zip*** provided with this response includes Microsoft Excel files that demonstrates One Communications' efforts to verify the figures presented in Attachment A to the Verizon Panel Direct Testimony were successful and similarly substantiates the accuracy of the figure in question.

Respondent(s):        James Webber, QSI Consulting.

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<b>VZ-One Comm-5-6</b>	Please provide the dates and applicable discounts for all MALC prices used in the Network Element Database file, including, but not limited to, the prices for the 48-port ADSL and 48-port POTS cards referenced on page 8, lines 16-17 of the Webber Rebuttal Testimony.
Response:	The prices addressed by this request were the most recent prices available to One Communications as of September 28, 2010. Please see also One Communications' response to VZ-OneComm-3-6 and VZ OneComm-3-7.
Respondent(s):	James Webber, QSI Consulting.

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**VZ-One Comm-5-7**      Please refer to Webber Rebuttal Testimony, page 9, lines 17-20. Please provide all work papers demonstrating the calculation of the percentage of DS0 lines that serve voice customers.

Response:              One Communications objects to the characterization of the testimony referenced in this response. Notwithstanding this objection, One Communications answers as follows: the figure at page 9, line 19 of Mr. Webber's Rebuttal Testimony does not reflect the percentage of DS0 lines that service voice customers. Rather, as stated in Mr. Webber's testimony, the figure accepts Verizon's methodology – with which One Communications disagrees - for purposes of argument, but corrects the company's mathematical calculation. See ***One Comm Response VZ 5-7 (Proprietary Information).xlsx*** provided with this response.

Respondent(s):        James Webber, QSI Consulting.

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**VZ-One Comm-5-8**      Please provide a detailed, step-by-step explanation of the calculation of the revised voice/data percentage shown on page 10, line 5 of the Webber Rebuttal Testimony and all work papers supporting or concerning the revised voice/data percentage.

Response:              See Cell J102 of *DS0-DSL Request (Proprietary Information).xls* provided with this response.

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



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**VZ-One Comm-5-9**      Please refer to Webber Rebuttal Testimony, page 14, lines 17-20. Please provide all work papers showing the calculation of average VZ-MA loop lengths.

Response:                      See *One Comm Response to VZ 5-9.xlsx* provided with this response.

Respondent(s):              James Webber, QSI Consulting.

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**VZ-One Comm-5-10**      Please refer to Webber Rebuttal Testimony, page 15, lines 4-8. Please provide all work papers showing the calculation of the average distance between a One Comm switch and a One Comm collocation.

Response:                      See *workbook Mile Collocations and Lines Served by MA Switches – MA (PROPRIETARY INFORMATION).xlsx*.

Respondent(s):              James Webber, QSI Consulting.

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- VZ-One Comm-5-11** Please refer to Webber Rebuttal Testimony, Exhibit JDW-3, Page 4, showing the revised rate per MOU.
- (a) Please list separately each and every adjustment made to the NUCA model as filed by One Comm in its direct testimony in this proceeding.
- (b) For each adjustment, please state the net effect of the adjustment on the rate per MOU presented in One Comm's direct testimony.
- (c) For each adjustment, please identify the specific date on which QSI began to investigate revisions to the original NUCA model filed in this proceeding.

Response:

- a) Changes discussed in One Communications Rebuttal testimony are below. All changes are highlighted in yellow within the native Excel files and the Adobe Acrobat version of the NUCA model in Exhibit JDW-3.

**\*\*\* BEGIN PROPRIETARY INFORMATION**

**END PROPRIETARY INFORMATION \*\*\*]**

**Aggregation Module, Collocation Inventory tab:**

1. Adjusted columns **P** and **S** to reflect updated DS0 and DS1 line count data per DS0-DSL Request (PROPRIETARY INFORMATION).xls.

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2. Adjusted cell **AC4** to reflect current "%MA Lines" as expressed in Updated Collocations and Lines Served by MA Switches – MA (PROPRIETARY INFORMATION).xlsx, reflective of updated DS0 and DS1 line count data for all collocations served by MA switches.

**[\*\*\* BEGIN PROPRIETARY INFORMATION**

**END PROPRIETARY INFORMATION \*\*\*]**

**Factors Module, Capitalized Software Factor tab:**

1. Corrected the formula in cell D13 to pull in the current cost of capitalized co-location fees and rent asset values instead of historical book cost.

**Factors Module, Telco Installation Factor tab:**

1. Added row 9 (Line 2) to the factor calculation to include omitted capitalized labor associated with switch installations. Cell D9 contains the added capitalized labor.

**Factors Module, Placement Factors tab:**

1. Corrected the formula in cell D13 to pull in the current cost of capitalized co-location equipment investment and capitalized co-location fees instead of historical book cost.
- b) One Communications objects to this request as unduly burdensome. It would require running multiple iterations of the NUCA cost model to isolate the impact of each change made in the version submitted with One Communications' rebuttal testimony. Neither One Communications nor QSI Consulting has prepared the analyses requested in this subpart and, as such, responsive workpapers and/or documents do not exist.
  - c) While specific records do not exist that identify the specific date on which QSI began to contemplate that revisions to the original NUCA modules filed in this proceeding may be warranted, our best estimate is follows:

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1. Transport Module: It was first contemplated that changes to this module might be warranted on or about November 3, 2010. Changes were implemented beginning in mid November and were completed on or about December 9, 2010.
2. Network Element Database: It was recognized that changes to this module might be warranted while preparing responses to discovery including, for example, VZ-One Comm-3-7. Changes were implemented beginning in mid November and were completed on or about December 9, 2010.
3. Aggregation Module: It was recognized that changes to this module might be warranted while preparing responses to discovery. Changes were implemented beginning in mid November and were completed on or about December 9, 2010.
4. Switching Module: It was first contemplated that changes to this module might be warranted on or about November 3, 2010. Changes were implemented beginning in early December and were completed on or about December 9, 2010.
5. Factors Module: It was recognized that changes to this module might be warranted while preparing responses to discovery. Changes were implemented beginning in mid November and were completed on or about December 9, 2010.

Respondent(s): Counsel to One Communications  
Warren Fischer, CPA, QSI Consulting.  
James Webber, OSI Consulting.