

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

Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-1

Please provide a network diagram with all of the equipment used in One Communications' NUCA cost study. Please show explicitly the connection from One Communications' end users to and through the One Communications' network, to the point-of-presence of an interexchange carrier. Examples of the types of equipment that should be illustrated on the diagram are, but not limited to, IAD, digital loop carriers, voice gateways, routers, switches, muxes, etc. Also please illustrate (1) where the equipment is located (*i.e.*, aggregation nodes or switching centers), and (2) the conversions or changes of the switched voice signal that occur at each piece of equipment.

One Communications Response:

Please see One Communications' response to Qwest request QCC-ONE COMM 1-1 for a simplified network diagram including the equipment modeled within NUCA. The lower left hand corner of that diagram "maps" portions of the diagram to individual modules within NUCA provided in One Communications' response to Verizon request VZ-One Comm-1-1. Also, please see One Communications' responses to Verizon requests VZ-One Comm-1-44 through VZ-One Comm-1-48 for additional descriptions of the equipment identified within the network diagram. The cost assessment provided within NUCA does not rely upon, nor is pricing for equipment included therein based upon "conversions or changes of the switched voice signal that occur at each piece of equipment." An illustration of the conversions or changes of the switched voice signal that occur at each piece of equipment does not exist.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-2

Please provide a description of how changes in a network module (e.g., a change to the value of cell D12 to 0.01 in the Loop module, tab IAD Monthly Costs) flows through to the results module. For changes in a network module, are any manual changes required to any of the other modules?

One Communications Response:

The NUCA is fully unlocked, fully auditable and the "Trace Dependents" function in Microsoft Excel will identify where specifically within the NUCA changes will be reflected. The best way to view the impact of any particular change is to implement that change and follow the specific changes through the model using the "Trace Dependents" function. This Excel function and how it can be used in the NUCA study was demonstrated and fully explained at the DTC Technical Conference held on September 14, 2010. As recommended during the Technical Conference, all NUCA modules should be opened before making changes to inputs and calculations within specific modules to ensure that the changes flow through all of the Excel workbook file links into the *Results Module*.

However, in the interests of full explanation, in the specific example identified above (changing Cell D12 of the **IAD Monthly Cost** tab within the *Loop Cost Analysis Module* to \$0.01), the "IAD Monthly Costs" identified in column T of that same tab obviously go to zero. That, in turn, brings the "IAD Monthly Costs" in column E of the **Results by State** tab to zero and the "Total Month Expense" value in column G of that tab is reduced accordingly. After implementing a change of this type, the analyst should open the *One Communications NUCA - Results MA.xls* file to confirm the update appears in the appropriate tab therein.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-3

Please explain and contrast in detail how the switched voice signal from an end user changes as it travels across One Communications' (1) existing network, and (2) the network modeled in NUCA. The changes include, but are not limited to: analog to digital conversion, TDM to IP, DS0 to DS1 and higher speeds aggregation needed to get from the end user to the switches (TDM and IP). Please include all major pieces of equipment used in the Network Usage Cost Assessment Model (NUCA) for this purpose in the modeled network.

One Communications Response:

One Communications objects to this request. The question is vague in that it does not define the type or nature of calls for which it inquires as to the voice signal changes. There are numerous types of calls, from different types of customers using different access methods on the One Communications network. One Communications has not undertaken the analysis requested above with respect to the myriad alternative paths each such call might take and the protocol and platform conversions/multiplexing changes that may take place as those calls traverse the network, either on its existing network or on the network defined by NUCA. In the case of a POTS customer taking service from a TDM switch, for example, there are no "TDM to IP" or IP to TDM conversions that take place in One Communications' network. There are, however, points in the network in which the POTS/DS0 circuits would be concentrated into T1s, for example, which are then multiplexed - perhaps multiple times - in preparation for transport over fiber facilities in, for example, an OC48. Such circuits would be de-multiplexed, likely concentrated with other voice circuits and connected to the voice switch via DS3s. Please see One Communications' response to Qwest request QCC-ONE COMM 1-1 for a network diagram identifying the major pieces of equipment contained in the NUCA modules. Please see One Communications' responses to Verizon requests VZ-One Comm-1-46 through 1-48 for descriptions of the equipment contained in the NUCA modules.

Respondent(s):

Counsel to One Communications
James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-4 Please provide any source documents to the NUCA model and inputs that have not been previously provided as a response to data requests in this proceeding.

One Communications Response:

See One Communications' responses to VZ-One Comm-3-13 and VZ-One Comm-3-45.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-5

In the [BEGIN PROPRIETARY INFORMATION] ***
*** [END PROPRIETARY INFORMATION ***]
tab of the
, cell B19, what is the purpose of the item
entitled [BEGIN PROPRIETARY INFORMATION] ***
*** [END
PROPRIETARY INFORMATION ***]?

One Communications Response:

The purpose is to provide POTS services through a POTS specific card. Specifically, the engineering and provisioning practices of One Communications are such that a minimum of one telephone number per customer location with ADSL services is provided via a separate POTS card.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-6

In the [BEGIN PROPRIETARY INFORMATION] ***
*** [END PROPRIETARY INFORMATION ***]
tab of the "One Communications NUCA - Network Element
Database.xls", what is the source of the cost for the item in cell
D19, valued at [BEGIN PROPRIETARY INFORMATION]
*** [END PROPRIETARY INFORMATION
***]?

One Communications Response:

The most recent purchase price available to One Communications for the card identified above is
[*** BEGIN PROPRIETARY INFORMATION
END PROPRIETARY INFORMATION ***]. The
source documentation is provided below for convenience.

[* BEGIN PROPRIETARY INFORMATION**

END PROPRIETARY INFORMATION *]**

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-7

Since [BEGIN PROPRIETARY INFORMATION]
[END PROPRIETARY INFORMATION ***]
[BEGIN PROPRIETARY
INFORMATION] *** *** [END
PROPRIETARY INFORMATION ***], please explain why
they are not used in modeling the network, instead of the [BEGIN
PROPRIETARY INFORMATION] ***
*** [END PROPRIETARY INFORMATION ***]
shown in the NUCA Network Element Database?

One Communications Response:

One Communications generally employs separate ADSL and POTS cards. "Combo cards" are generally more expensive for the same level of capacity (i.e. number of lines served per card) and, therefore, are not part of the Company's standard provisioning practices. The most recent price for a 48-port ADSL card for the [*** BEGIN PROPRIETARY INFORMATION

END PROPRIETARY INFORMATION *]** in the Network Element Database.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-8

In the Network Element Database module, what are the listed and discounted prices for these ADSL and ADSL/POTS combo cards –
[BEGIN PROPRIETARY INFORMATION]

***** [END PROPRIETARY INFORMATION ***]?**

One Communications Response:

Objection. The request is vague and ambiguous in that it is unclear what cell(s) within the Network Element Database Verizon intends to reference when it lists ***** BEGIN PROPRIETARY INFORMATION**

END PROPRIETARY

INFORMATION *]**. Subject to the objection, please see One Communications' responses to VZ-One Comm-3-6 and VZ-One Comm-3-7 above for the most recent prices available to One Communications for the 48 port cards used by the Company.

Respondent(s):

Counsel to One Communications
James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-9

In the Network Element Database module, **[BEGIN PROPRIETARY INFORMATION] *** *** [END PROPRIETARY INFORMATION ***]** tab, what are the sources of the hard-coded quantities used in column E, rows 12 through 20?

One Communications Response:

The quantities included at cells E12-E18 of the referenced tab are supported by the bundled Purchase Order Detail beginning at row 45 of the same worksheet. See, for example, cells D45, D49-D50, D55, D56 and D58. The quantity included in E19 reflects the Company's placement of POTS cards varying in proportion to ADSL card capacity consistent with the discussion of "back-up" for ADSL discussed in One Communications' response to Verizon request VZ-One Comm-3-5 above. The formula included in E20 reflects a model design wherein all available, unused card slots are assumed to be deployed in order to support POTS in the MALC device, which is discussed in Mr. Webber's Direct Testimony.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-10

In the Network Element Database module, [BEGIN PROPRIETARY INFORMATION] *** *** [END PROPRIETARY INFORMATION ***] tab, Row 58, or Item 10, [BEGIN PROPRIETARY INFORMATION] *** ***[END PROPRIETARY INFORMATION ***], why was there no discount for this item, unlike the [BEGIN PROPRIETARY INFORMATION] *** *** [END PROPRIETARY INFORMATION ***] discounts provided by this vendor for the other items?

One Communications Response:

These values – which reflect approximately 2% of the entire cost identified at cell F29 of the referenced tab – reflect vendor pricing as provided in the Bundled Pricing Summary. It is typical for vendors of telecommunications equipment to provide discounts which vary across equipment types as is expressed in the Pricing Summary.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-11

In Mr. Webber's testimony, page 22, lines 1-8, he states that IAD devices are needed "in order to provide its customers combined voice and data services over a single loop facility." Does the vendor of the DLC equipment chosen by One Communications for its Massachusetts forward looking network offer combo POTS/ADSL cards? If yes, is there still a need for these IAD devices?

One Communications Response:

Yes, the vendor offers "combo" POTS/ADSL cards. Yes, IADs are still required and, in fact, are provisioned in relation to T1s whereas the POTS and ADSL cards are deployed for DS0 and/or DSL type loops rather than for T1s.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-12 Please explain in detail the uses and functions of each of the Test Equipment detailed in the "Test Equipment" tab of the Network Element Database worksheet.

One Communications Response:

The T-Berd 224 is commonly used testing device within the telecommunications industry. It is typically used to test and maintain T1s ISDN, SS7, STS-1s, DS3 circuits. An example of this device in use is pictured below.

The T-Berd 310 is a network test tool that can address both electrical and SONET facilities. An example of this device in use is pictured below.

The T-Berd 2209 is a commonly deployed test pad (i.e. it is substantially smaller and more portable than, for example a T-Berd 224 or 310). This device is generally used for testing T1 and DS3 circuits and can be used "in the field" more easily than other test equipment.

The T-Berd 8000 is an optical testing device.

T-BERD 224



T-BERD 310



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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-13

Please provide all source files referenced in the "One Communications NUCA - Network Element Database.xls" such as:

[BEGIN PROPRIETARY INFORMATION] ***

*** **[END PROPRIETARY INFORMATION ***]**. These files were not provided as part of the response to VZ-One Comm 1-3.

One Communications Response:

Please see *Reltec.xls (PROPRIETARY INFORMATION).xls* and *MALC (PROPRIETARY).xls* included with this response.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-14

In the Transport module, Results by State tab, NUCA allocates
[BEGIN PROPRIETARY INFORMATION] ***
[END PROPRIETARY INFORMATION ***] of leased
transport and dark fiber (IRU) costs to voice service. Are these
leased transport and dark fiber facilities only providing switched
voice and DSL services? If not, provide the actual or your best
estimate of the proportions of these facilities used for transporting
voice, DSL data, and other services (*e.g.*, private line), expressed
in percentages for each of these three service categories.

One Communications Response:

The percentage noted in this question is intended to reflect the split between switched voice and data services. The percent of the transport network in Massachusetts comprising "private line" which is separate and distinct from switched voice and data services is likely to be de minimis, if any.

Respondent(s):

James Webber, QSI Consulting, Inc.
Warren Fischer, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-15

For the One Communications NUCA - Trunk-to-Trunk Switching Module MA.xls, Meta EF&I tab, provide support and the rationale for the hard coded values in the calculations under column "e," if not in any of the following source files: (1) PB4500s for growth Aug.xls, (2) Planning_Quote_SAS_CSR_EMS.xls, and (3) Onecomm MetaSphere SSS W LNS and Lab121008.xls, including cells E13, E15 and E16.

One Communications Response:

Please see cells E21 and D33 of the *Planning_Quote_SAS_CSR_EMS.xls* file for the per unit value calculated at cell E13 of the *NUCA - Trunk-to-Trunk Switching Module MA.xls*, **Meta EF&I** tab. The rationale for use of this figure is that the Company's ***** BEGIN PROPRIETARY INFORMATION**

END PROPRIETARY INFORMATION *]** for cells E15 and E16 respectively as well as the derivation of those figures.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-16

For the One Communications NUCA - Trunk-to-Trunk Switching Module MA.xls, Meta EF&I tab, provide a detailed description (functions) of each **[BEGIN PROPRIETARY INFORMATION]** *** **[END PROPRIETARY INFORMATION ***]** component shown on this tab. Specifically, how are they used to provide switched access service?

One Communications Response:

[* BEGIN PROPRIETARY INFORMATION**

END PROPRIETARY INFORMATION *]** See One Communications' responses to Verizon requests VZ-One Comm-1-44 and VZ-One Comm-3-12 for details related to the test equipment. See One Communications' response to Verizon request VZ-One Comm-1-44 for details related to the GPS/timing equipment. See One Communications' response to Verizon request VZ-One Comm-1-48 for details related to measurement and recording equipment identified in the referenced worksheet.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-17

For the One Communications NUCA - Trunk-to-Trunk Switching Module MA.xls, Meta EF&I tab, the calculation indicates that there are [BEGIN PROPRIETARY INFORMATION] ***

*** [END PROPRIETARY INFORMATION ***] being modeled. Is this design for redundancy purposes? Are there [BEGIN PROPRIETARY INFORMATION] *** *** [END PROPRIETARY INFORMATION ***] in each [BEGIN PROPRIETARY INFORMATION] *** *** [END PROPRIETARY INFORMATION ***] location?

One Communications Response:

No. The configuration described above is not employed for redundancy purposes. Rather, the equipment identified is utilized to support traffic. [*** BEGIN PROPRIETARY INFORMATION

END PROPRIETARY INFORMATION ***]

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-18 For the One Communications NUCA - Trunk-to-Trunk Switching Module MA.xls, Meta Unit Investment tab, please provide support for hard coded values (lines 7 and 8).

One Communications Response:

See One Communications' response to AT&T request AT&T-One Comm-1-28.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-19 For the One Communications NUCA - Trunk-to-Trunk Switching Module MA.xls, Meta Monthly tab, row 9, does the factor shown on this row (column e) have any maintenance-related expenses? If yes, please provide the type of maintenance expenses that are included.

One Communications Response:

The factor referenced in the request above is the annual cost factor ("ACF") for switching equipment which is inclusive of a proportional share of network operations expenses that comprise the Operating Expense Factor component of the ACF for digital switching equipment. Since One Communications does not track its network operations expenses by plant investment type as ILECs do according to Part 32 accounting rules, all network operations expenses, inclusive of equipment maintenance costs, are allocated to each plant investment account in proportion of each plant investment account balance to total tangible plant-in-service. See tab **Results** in the *Factors Module*.

However, payments made to [*** **BEGIN PROPRIETARY INFORMATION**
END PROPRIETARY ***] equipment were excluded from total network operations expense used to calculate the Operating Expense Factor since they are recovered through a separate maintenance factor applied to [*** **BEGIN PROPRIETARY**
END PROPRIETARY ***] investment. See tab **2009 SG&A by Department** within the *Factors Module*. Maintenance fees specific to the [*** **BEGIN PROPRIETARY**
END PROPRIETARY ***] equipment are recovered through the separate maintenance factor on tab **Meta Monthly**, row 14, within the *Trunk-to-Trunk Switching Module*.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-20

For the One Communications NUCA - Trunk-to-Trunk Switching Module MA.xls, Meta Monthly tab, row 14, what does the Annual Maintenance Factor [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION] factor represent? What type of maintenance does it provide? Is it specifically for [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION]? Is this also covered in the cost factor?

One Communications Response:

See One Communications' response to AT&T-One Comm-1-23. Please also see One Communications' response to VZ-One Comm-3-19 above for a description of how these maintenance fees are excluded from the Operating Expense Factor applied to switching equipment investment.

Respondent(s):

Warren Fischer, QSI Consulting, Inc.
James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-21 For the One Communications NUCA Trunk-to-Trunk Switching Module MA.xls, 5E EF&I tab, please provide support for hard coded values in the calculations under column "e".

One Communications Response:

The ***** BEGIN PROPRIETARY INFORMATION END PROPRIETARY INFORMATION ***** at row 25 comprises a subject matter expert opinion as to the cost of the hardware referenced in cell K9. All other hard coded values are contained in the source files noted in column K of the corresponding row.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-22 For the One Communications NUCA Trunk-to-Trunk Switching Module MA.xls, 5E EF&I tab, provide detailed description (functions) of each Switch component shown on this tab. Specifically, how are the used to provide switched access?

One Communications Response:

[* BEGIN PROPRIETARY INFORMATION**

END PROPRIETARY INFORMATION*]** Please see One Communications' responses to Verizon requests VZ-One Comm-1-44 and VZ-One Comm-3-12 for details related to the test equipment used to install, monitor, test and maintain the network such that traffic of all types can properly flow through the Company's network. See One Communications' response to Verizon request VZ-One Comm-1-44 for details related to the GPS/timing equipment. See One Communications' response to Verizon request VZ-One Comm-1-48 for details related to measurement and recording equipment identified in the referenced worksheet.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-23

In the One Communications NUCA - Trunk-to-Trunk Switching Module, tab "5E EF&I", cells E17, E18, and tab "Meta EF&I", cells E23, E24, both include inputs for Test equipment and GPS timing investments of [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION ***], respectively. In the same module, tab "Switch Inventory", rows 31 through 43, show there are [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION ***] switch locations in Massachusetts – [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION ***]. Using the [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION ***] location as an example, there are [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION ***] switches located in this same location and these Test equipment and GPS Timing costs appeared for each of the [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION ***] switches listed, for a total investment of [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION ***] at this location alone. Why are the equipment needed and why do they need to be included [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION ***] times for switches located in the same building?

One Communications Response:

Please see One Communications' responses to Verizon requests VZ-One Comm-1-44 and VZ-One Comm-3-12 for details related to the test equipment and its use. See One Communications' response to Verizon request VZ-One Comm-1-44 for details related to the GPS/timing equipment and its use in the network. This equipment has been included in the cost studies presented here in consultation with One Communications' engineers as a conservative estimate of the timing and test equipment necessary to support the number of switches (in their present locations/switch rooms), collocation spaces and the services supported by that switching and collocation infrastructure.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-24

In the One Communications NUCA - Trunk-to-Trunk Switching Module, Switch Inventory tab, please define and describe the
[BEGIN PROPRIETARY INFORMATION] ***
***** [END PROPRIETARY INFORMATION ***]**.
Provide the associated investment (vendor quotes) that One Communications paid for this equipment, by equipment component, and the associated capacity for each component.

One Communications Response:

Please see One Communications' response to DTC request DTC-One Comm-1-38 for a description of the Company's ***** BEGIN PROPRIETARY INFORMATION**

END PROPRIETARY INFORMATION *]**. Vendor quotes for this equipment type were not utilized within the NUCA and are not available.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-25

In the One Communications NUCA - Trunk-to-Trunk Switching Module, TPI tab, what is the purpose of the TPI? Does the application of the TPI to embedded plant balances produce a forward looking cost of plant? Please explain.

One Communications Response:

The values contained in tab **TPI** within the *Trunk-to-Trunk Switching Module* reflect One Communications-specific Current Cost-to-Book Cost ("CC/BC") ratios by plant vintage developed using the TPI published by AUS Consultants applied to One Communications' fixed asset acquisition costs. The TPI are used to determine the current cost in today's dollars of equipment purchased in prior years where current pricing from vendors is not readily available.

The original acquisition cost represents the price negotiated by One Communications with its vendor at the time of purchase net of any applicable discounts. Application of the TPI factor associated with the equipment's year of acquisition determines the reproduction cost of equipment that would be used today by One Communications' engineers. The current costs of the modeled equipment are reflected in the TPI Adjusted columns within the **5E EF&I** and **Meta EF&I** tabs of the *Trunk-to-Trunk Switching Module*.

See Mr. Webber's Direct Testimony, pages 16-17, for discussion of how current prices for modeled equipment are generally used and pages 36-37 for discussion of when TPI factors are used. See One Communications' responses to DTC-One Comm-1-22 and 1-23 for a detailed discussion of the TPI published by AUS and the resulting One Communications-specific CC/BC ratios that were developed.

Respondent(s):

Warren Fischer, QSI Consulting, Inc.
James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-26

In the One Communications NUCA - Aggregation Module, the floor plan and relay rack layouts are based on current equipment deployed. How many relay racks can be eliminated based on use of new DLC equipment and the elimination of the old DSLAM equipment, and by consolidating the new equipment into the existing and vacated spaces on these racks?

One Communications Response:

The floor plan and relay rack layouts specified in the **Current FLOORPLAN** tab of the *One Communications – Aggregation Module MA.xls* file are based upon current deployments as stated in cell C6 of the **Introduction – User Guide** tab of that same file. An analysis has not been conducted which would determine the extent to which a relay rack can be eliminated within the collocation layout based upon use of new equipment that addresses both DSL and DS0 (voice only) services.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-27

In the One Communications NUCA - Aggregation Module, Model-1 tab, what are the sources of the following hard-coded inputs?:

[BEGIN PROPRIETARY INFORMATION] ***

***** [END PROPRIETARY INFORMATION] *****

One Communications Response:

- (1) One Communications subject matter expert opinion.
- (2) As stated in cell Q35 (i.e. the cell immediately to the left of R35), the source is the *CFA.xls* file which was provided in One Communications' response to Verizon request VZ-One Comm-1-3. See, specifically, the **DS0** tab.
- (3) As stated in cell Q48 (i.e. the cell immediately to the left of R48), the source is the *CFA.xls* file which was provided in One Communications' response to Verizon request VZ-One Comm-1-3. See, specifically, the **DS1** tab.
- (4) As stated in cell Q63 (i.e. the cell immediately to the left of R63), the source is the *CFA.xls* file which was provided in response to Verizon request VZ-One Comm-1-3. See, specifically, the **DS3** tab.

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

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

Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-28 Proprietary attachment to VZ-One Comm-1.3, "5E Util 01-13-10.xls" shows the total number of ports (column H) for each of One Communications switches. Please provide the total number of DS0s provided by each of the Massachusetts switches.

One Communications Response:

Objection as to the form of the request. The request incorrectly states that the referenced attachment contains the total number of ports for each of One Communications' switches. This attachment contains port counts related to ***** BEGIN PROPRIETARY INFORMATION**

END PROPRIETARY INFORMATION *** switches, see proprietary attachment *Meta_LCS Util01-28-10 (PROPRIETARY INFORMATION).xls* provided in One Communications' response to VZ-One Comm-1-3.

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

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DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-29 Please provide electronic copies of One Communications' publicly available tariffs, as referenced in One Communications' response to VZ-One Comm-1-23.

One Communications Response:

The retail tariffs of CTC Communications Corp., Lightship Telecom, LLC, Choice One Communications of Massachusetts, Inc., and Conversent Communications of Massachusetts, Inc. are publicly available at the Massachusetts Department of Telecommunications and Cable.

Respondent(s): Counsel to One Communications

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DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-30

Please provide the following source file referenced in the response to VZ-One Comm-1-3:

[BEGIN PROPRIETARY INFORMATION] * “**

***** [END PROPRIETARY INFORMATION ***]**

One Communications Response:

One Communications objects to this request on the grounds that the requested information pertains to switches located outside of Massachusetts and is not relevant to any specific claims, defenses, issues or questions presented in this proceeding and is not reasonably calculated to lead to the discovery of data relevant to resolution of these issues.

Respondent(s): Counsel to One Communications

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-31 Please provide One Communications' non-recurring revenues for Massachusetts for 2007, 2008 and 2009.

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' non-recurring revenues for Massachusetts for 2007, 2008, and 2009 are unrelated to One Communications' cost of providing the aforesaid service.

Respondent(s): Counsel to One Communications

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-32

Please provide One Communications' retail (by type of retail service – *i.e.*, bundled services, DSL, business, digital voice, PRI, etc.) and wholesale (by type – *i.e.*, private line, orig/term services, etc.) Massachusetts revenues for 2007, 2008 and 2009. Also provide One Communications' total retail and wholesale Massachusetts revenues for 2007, 2008 and 2009.

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' retail and wholesale revenue by service type for 2007, 2009, and 2009 are unrelated to One Communications' cost of providing the aforesaid service.

Respondent(s):

Counsel to One Communications

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-33

If not provided in response to the above data requests, please provide the information requested in 3-32 above for each of the following companies: CTC Communications Corp., Lightship Telecom, LLC, Choice One Communications of Massachusetts, Inc., and Conversant Communications of Massachusetts, Inc.

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' retail and wholesale revenue by service type for each of CTC Communications Corp., Lightship Telecom, LLC, Choice One Communications of Massachusetts, Inc., and Conversant Communications of Massachusetts, Inc. for 2007, 2008, and 2009 are unrelated to One Communications' cost of providing the aforesaid service.

Respondent(s):

Counsel to One Communications

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-34

Please provide One Communications' retail and wholesale minutes of use for Massachusetts for 2007, 2008 and 2009. Also please provide the minutes of use (by type of retail/wholesale) for each category provided in 3-32 above. If minutes of use are not available for a type of service, then please provide in-service line counts for the services.

One Communications Response:

One Communications objects to this requests on the grounds that the information requested 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.

Notwithstanding the objection, One Communications responds as follows. One Communications does not track minutes of use by the requested categories. For total minutes of use on One Communications' switched network for the study period March 2009 through February 2010, see the NUCA *Traffic Module* (file *One Communications NUCA - Traffic Module MA.xlsx*).

Respondent(s):

Counsel to One Communications
James Webber, QSI Consulting, Inc.

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VZ-One Comm-3-35 If not provided in response to the above data request, please provide the information requested in 3-34 for each of the following companies: CTC Communications Corp., Lightship Telecom, LLC, Choice One Communications of Massachusetts, Inc., and Conversant Communications of Massachusetts, Inc.

One Communications Response:

See One Communications' response to VZ-One Comm-3-34.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-36

In the Proprietary file [BEGIN PROPRIETARY
INFORMATION] ***
*** [END
PROPRIETARY INFORMATION ***], provided in response to
VZ-One Comm-1-3, please populate column E in the Model tab.

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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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-37

Please identify in the Proprietary file **[BEGIN PROPRIETARY INFORMATION] ***** ***** [END PROPRIETARY INFORMATION ***]**, Original Purchases tab, where the subtraction identified in the notes section occurs.

One Communications Response:

The "TOTAL" identified at cell H4 includes the total paid (net of discounts) for the initial installation. Similarly, the "MATERIAL" amount identified at cell B2 includes the amount paid for "MATERIAL" net of the notes below the referenced table.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-38

Do the One Communications' switches located in Massachusetts serve only Massachusetts customers? If not, please list the states that they provide services. For each switch located in Massachusetts that serves more than one state, please provide, for each switch, the total number of lines and associated revenues for (a) customer locations in Massachusetts, and (b) customer locations outside of Massachusetts. Please provide the requested information for 2007, 2008, and 2009.

One Communications Response:

Please see proprietary attachment *workbook Collocations and Lines Served by MA Switches -- MA (PROPRIETARY INFORMATION).xlsx*, Tab **Collo List**, column V provided in One Communications' response to VZ-One Comm-1-3. Regarding the request to provide, for each switch, the total number of lines and associated revenues for (a) customer locations in Massachusetts, and (b) customer locations outside of Massachusetts, One Communications does not track information at this level. However, for an estimate of voice lines by state served by Massachusetts switches, see column AN of the above referenced data source.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-39

In the Proprietary file "OneComm Switch Inventory (Proprietary Information).xls", "Meta" tab, provide justification for excluding units for "CHTNWVYA".

One Communications Response:

Objection. This request is vague and ambiguous in that it is unclear how Verizon intends One Communications to interpret the phrase "justification for excluding units." Subject to the objection, One Communications responds as follows. The CLLI: CHTNWVYA is included at rows 3 and 4 of the referenced worksheet. As Verizon no doubt is aware, CLLI: CHTNWVYA pertains to West Virginia whereas the costs explored in this proceeding relate to Massachusetts.

Respondent(s):

Counsel to One Communications
James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-40

In Excel file, "Collocations and Lines Served by MA Switches -- MA (PROPRIETARY INFORMATION).xls", provided in response to VZ-One Comm-1-3, what is the source of the input in tab "DS0 and DS1 counts", cell Q4, that all DS1 circuits contain [BEGIN PROPRIETARY INFORMATION] *** ***[END PROPRIETARY INFORMATION ***] voice channels?

One Communications Response:

Actual information for this measure was not available. The numerical value for this input is equal to the expected value of a uniformly distributed random variable that takes values between zero and one. This value was selected so as to not artificially bias the analysis in which it was utilized.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-41

Proprietary attachment to VZ-One Comm-1-3, "5E Util 01-13-10.xls" shows the total number of ports (columns H and I) for each of One Communications' switches. For each office, please provide the type of lines each port serves. For example, the [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION ***] office is equipped with [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION ***] DS1 ports and has [BEGIN PROPRIETARY INFORMATION] *** [END PROPRIETARY INFORMATION ***] in-service DS1 ports. Of the equipped and in-service ports, how many are used for retail (by type of retail lines) and how many are used for wholesale services?

One Communications Response:

One Communications objects to this request. It is vague and ambiguous; 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. The referenced worksheet does not distinguish between "retail" and "wholesale" services. Costs related to the switch equipment identified in the referenced worksheet do not vary based upon a "retail" or "wholesale" type designation. Further, the DS1s identified in the referenced worksheet can be – and are - used for multiple purposes. That is, both "retail" and "wholesale" services may traverse any particular DS1. Indeed, trunks on the "egress" side of the switch are generally "multi-use" or "shared" trunks and cannot be designated as "retail" or "wholesale." Moreover, any particular minute of use may comprise both a "retail" and a "wholesale" minute of use depending upon the particular call. The requested data do not exist in the format requested and were not relied upon or reviewed for purposes of NUCA and would take a substantial amount of manual effort to create.

Respondent(s):

Counsel to One Communications
James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-42

In the Proprietary file [BEGIN PROPRIETARY
INFORMATION] *** [END
PROPRIETARY INFORMATION ***], provided in response to
VZ-One Comm-1-3, please populate column E in the Model tab
(i.e., provide the associated unit costs for the units shown on
column D).

One Communications Response:

Please see One Communications' response to VZ-One Comm-3-36.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-43

Please refer to Proprietary file **[BEGIN PROPRIETARY
INFORMATION] ***** ***** [END
PROPRIETARY INFORMATION ***]**, Original Purchases tab.
Please explain the meaning of the note regarding the 14STS 1.

One Communications Response:

The note identifies a "discounted" price at that particular size. The "TOTAL" identified at cell H4 includes the total paid (net of discounts) for the initial installation. Similarly, the "MATERIAL" amount identified at cell B2 includes the amount paid net of the notes below the referenced table for "MATERIAL."

Respondent(s):

James Webber, QSI Consulting, Inc.

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VZ-One Comm-3-44

In Dr. Ankum's direct testimony, page 25, lines 12-17, he states: "For example, as will be discussed in more detail by Mr. Webber, the costs of facilities dedicated to non-switched services or end-users are not included or, to the extent their costs are comingled with the costs of shared facilities, say in the form of switch ports, special care is taken to apportion an appropriate cost share to such non-switched service and to proportionally reduce the costs to be shouldered by switched services." Please provide reference(s), in the switching module (and provide calculations) as to where the adjustments were made for switch ports.

One Communications Response:

Please see the *One Communication NUCA – Trunk-to-Trunk Switching Module MA.xls* file at cells E15 and E16 of the **Meta EF&I** tab and cell G41 of the **Routers Switches SBCs** tab.

Respondent(s):

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-45

In Warren Fischer's direct testimony, page 12, he states that "the mapping of One Communications' native general ledger accounts to Part 32 accounts was a labor intensive process requiring interviews of One Communications accounting personnel and a detailed review of the functional activities recorded in each general ledger account on One Communications' 2009 Trial Balance." Please provide all detailed reviews, workpapers and other documentation that details the mapping of One Communications' 2009 Trial Balance to Part 32 accounts. Please provide cost center, job function code or other detail that will indicate the functional nature of the expenses.

One Communications Response:

Mr. Fischer's detailed review of One Communications' general ledger accounts consisted primarily of his review of One Communications' Chart of Accounts, Trial Balance, fixed asset records, and discussions with One Communications' accounting personnel. The purpose of Mr. Fischer's investigation was to ascertain the types of equipment that were recorded in the fixed asset accounts on One Communications' Balance Sheet and the activities represented by the expenses recorded on One Communications' Income Statement. Where the general ledger account description was not self explanatory in terms of the equipment type or expense-related activity, Mr. Fischer documented his understanding of One Communications' accounting practices from discussions with One Communications' accounting personnel in Excel cell comments within the *Factors Module*. Copies of three e-mails documenting Mr. Fischer's queries and One Communications' responses related to account mapping issues are included as proprietary attachments to this response. The electronic attachments provided by One Communications are also included as proprietary attachments in their native form. All other relevant details regarding this review are documented within the *Factors Module*.

One Communications does not track its operating expenses at the cost center or job function code level. Instead, it records all operating expenses by department. See the attached e-mail to this response, *E-mail (03-03-2009) (PROPRIETARY INFORMATION).pdf*, for a description of the functional activities performed by each department. Mr. Fischer used these descriptions to map the expenses of each department to the appropriate Part 32 operating expense account for cost study purposes. See tab **2009 SG&A by Department** within the *Factors Module* for a listing of the One Communications' departments and the mapping of expenses to Part 32 accounts.

Respondent(s):

Warren Fischer, QSI Consulting, Inc.

Responses of One Communications to Verizon's 3rd Set of Information Requests

Please define “reproduction cost,” as it is used in the direct testimony of Warren Fischer, page 17, lines 20 and 22.

The term “reproduction cost” as it is used in Mr. Fischer’s testimony is defined as the cost in today’s dollars to reproduce the company’s embedded plant in service. Mr. Fischer uses this term synonymously with the term “current cost” in conjunction with the application of CC/BC ratios to asset acquisition costs to determine the current reproduction costs of each asset.

Warren Fischer, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-47

In the One Communications NUCA – Traffic Module, are the switched minutes of use (MOUs) that are used in the Traffic Module Busy Hour minutes? If not, please provide MOUs based on the Busy Hour.

One Communications Response:

No, they are total minutes. Busy Hour minutes are not available as they were not collected when developing the *Traffic Module*.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-48

Mr. Webber, on pages 31-32 of his direct testimony, states, "Simply put, the **Collocation Inventory** tab within the *Aggregation Module* identifies [*** **BEGIN CONFIDENTIAL**
END CONFIDENTIAL ***] unique central offices in which One Communications maintains cageless and/or physical collocation arrangements in Massachusetts. [footnote omitted]"

For each location, and for each company (*i.e.*, CTC Communications Corp., Lightship Telecom, LLC, Choice One Communications of Massachusetts, Inc., and Conversent Communications of Massachusetts, Inc.), please provide the following:

- (a) The collocation square footage ordered and whether or not the type of collocation was caged, cageless, SCOPE (Secured Collocation Open Physical Environment) or virtual collocation;
- (b) The monthly per load amp on each feed ordered;
- (c) The monthly per feed up to 15, 30, 45, 60 AMPs; and
- (d) The number of DS0s, DS1s, DS3s and fibers that have been ordered and how many have been utilized.

One Communications Response:

Objection. One Communications objects to this request on the grounds that the information Verizon seeks regarding One Communications' collocation sites within Verizon central offices is already available to Verizon itself. One Communications also objects on the grounds that the request is vague and ambiguous in that it is unclear how Verizon intends for the phrase "per load amp on each feed ordered" to be understood. Subject to these objections, One Communications responds as follows.

- (a) Please see the *OneComm Collocation Inventory (PROPRIETARY Information).xls* file provided in One Communications' response to Verizon request VZ-One Comm-3-48 for the CLLI codes associated with each of the One Communications' collocation spaces, the "legacy company" associated with each individual space and a designations as to whether the space is "Scope," "CCOE", "Physical" or "Virtual." The square footage of each space is not included in the referenced file and was not used in the cost calculations included within NUCA. Rather, actual lease expenses (*i.e.*, lease expenses assessed by Verizon for collocation) were utilized. To the extent Verizon desires detail on square footage specifically despite that such information is not utilized within NUCA, that detail is available to Verizon itself.

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- (b) The NUCA does not identify or utilize power feeds or AMPs as part of its calculations. Rather, actual lease expenses (i.e., lease expenses assessed by Verizon for collocation) were utilized. To the extent Verizon desires additional detail despite that such information is not utilized within NUCA, that detail is available to Verizon itself.
- (c) The NUCA does not identify or utilize monthly per feed up to 15, 30, 45, 60 AMPs as part of its calculations. Rather, actual lease expenses (i.e., lease expenses assessed by Verizon for collocation) were utilized. To the extent Verizon desires additional detail despite that such information is not utilized within NUCA, that detail is available to Verizon itself.
- (d) Active DS0, DS1 and DS3 counts are included within the **Collocation Inventory** tab of the *One Communications NUCA – Aggregation Module MA.xls* file. The number of fibers ordered is not an input to this module and is not included therein. Rather, actual lease expenses (i.e., lease expenses assessed by Verizon for collocation) were utilized. To the extent Verizon desires additional detail despite that such information is not utilized within NUCA, that detail is available to Verizon itself.

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

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VZ-One Comm-3-49

Starting at page 38, line 19 and ending at page 39, line 1, of his direct testimony, Mr. Webber states that "One Communications was able to provide a database report which included the most recent month's invoiced charges from Verizon that are related to SS7 expenses as of February 10, 2010." Please provide the database report.

One Communications Response:

See *One Comm Collocation and SS7 Expense Data (PROPRIETARY INFORMATION).xls* and *Other (PROPRIETARY INFORMATION).csv* provided in One Communications' response to Verizon request VZ-One Comm-1-3.

Respondent(s):

James Webber, QSI Consulting, Inc.

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VZ-One Comm-3-50

At page 40, lines 1-3, of his direct testimony, Mr. Webber that "[t]he transport lease and IRU expenses data included within this module were provided to QSI in February of 2010 and include database output reflecting the most recent month's vendor invoice One Communications categorizes as transport and IRU, respectively." Please provide the transport leases that are reflected in the database output.

One Communications Response:

Objection. The request is unduly burdensome in that providing the requested data would require an unreasonable expenditure of time and resources, is cumulative and/or only has a limited likelihood of leading to the discovery of data relevant to specific issues, and the value of providing the data is outweighed by the burden of production. In addition, given the bulk of the transport expense comes from Verizon itself, the requested data is already available to it. Subject to these objections, One Communications responds as follows. See *One Comm Leased Transport Expense Data (PROPRIETARY INFORMATION).xls*, *iru (PROPRIETARY INFORMATION).csv*, and *transport (PROPRIETARY INFORMATION).csv* provided in One Communications' response to Verizon request VZ-One Comm-1-3.

Respondent(s):

Counsel to One Communications
James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One-Comm-3-51 In the Network Element Database module, **[BEGIN
PROPRIETARY INFORMATION] ***** ***** [END
PROPRIETARY INFORMATION ***]** tab, what are the
corresponding actual in-service (used) usable ports and POTS
ports?

One Communications Response:

See *MALC Ports In-Service (PROPRIETARY INFORMATION).xls* provided with this response.

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

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-52

In the One Communications NUCA - Traffic Module, do the switched Minutes of Use (MOUs) used in the Traffic Module only reflect completed minutes of use?

One Communications Response:

It is unclear how Verizon intends the phrase "completed minutes of use" to be interpreted. The minutes of use in the NUCA model reflect the usage of the trunks.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-53

One Communications' response to VZ-One Comm-2-8 states "see the file entitled 'One Communications NUCA – Traffic Module MA.xls' previously provided in response to VZ-One Comm-1-1 for details related to all switched minutes of use relied upon and forecasted within NUCA. Please also review the direct testimony of James Webber at pages 44-51 for a discussion of the Traffic Module."

At page 47, lines 8-20, of his direct testimony, Mr. Webber states, "For the majority of Massachusetts switches monthly per day usage was relatively stable over the observed 12 months, so that the actual historical 12-month data were the best available estimate for future usage. For these switches, the Traffic Module forecasted annual demand as a 12-month average of historical per day data times the number of days in a year. For several switches monthly per day usage dropped significantly in the last several months of the observed historical period. One Communications' Manager of Switch Engineering explained to QSI that the observed decreases in traffic were associated with network re-arrangements in which traffic was moved to another switch, or product retirements. In these cases a shorter, more recent time period was a more appropriate basis for the forecast rather than the full 12-month period. For these switches, the Traffic Module forecasted annual demand by using the most recent 6 months of actual data."

Please provide the historical per-day data and the 12-month and 6-month forecasted annual demand for both interswitch and intraswitch minutes of use. Identify the "several switches" using the 6-month forecasted annual demand.

One Communications Response:

Please see the *Traffic Module* (file *One Communications NUCA - Traffic Module MA.xlsx*) Tab **All Data MOU by CLLI**.

Respondent(s):

James Webber, QSI Consulting, Inc.

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Responses of One Communications to Verizon's 3rd Set of Information Requests

VZ-One Comm-3-54

- (a) Please provide a narrative description of the two highly sensitive files (customer.lookup_06-10-2010.xls and One Communication NGN IP overview.vsd) submitted in response to VZ-One Comm-1-3. Please explain how the files were used by the NUCA model.
- (b) For tabs No-MPLS_VRF and customer lookup in the customer.lookup_06-10-2010.xls file, please provide column titles and descriptions of the data contained in the columns.

One Communications Response:

- (a) The *customer.lookup_06-10-2010.xls* file submitted in response to VZ-One Comm-1-3 identifies One Communications' Massachusetts end router IP addresses as well as the serial numbers of T1 appearances at those routers (including both working and protect). This file was used to determine the number of customer IADs deployed in Massachusetts, by dividing the total count in the **NO-MPLS-VRF** tab by two. The *One Communications NGN IP overview.vsd* submitted in One Communications' response to VZ-One Comm-1-3 identifies locations in which One Communications has deployed routers and switches. It was used in NUCA to identify equipment locations within the *Trunk-to-Trunk Switching Module*.
- (b) Column A = IP address of the PE router. Column B = the T1 interface to the customer. Column C = customer interface description.

Respondent(s):

James Webber, QSI Consulting, Inc.

Responses of One Communications to Verizon's 3rd Set of Information Requests

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