



ATTORNEYS AND COUNSELORS AT LAW

Eric J. Krathwohl
Direct: (617) 556-3857
Email: ekrathwohl@richmaylaw.com

November 19, 2010

BY HAND AND E-FILING

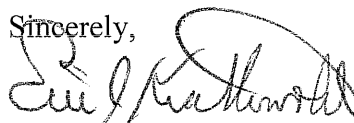
Catrice Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118-6500

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") is OneComm's Second Set of Information Requests to 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 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**

)
)
)
)
)
)
)

D.T.C. 10-2

ONE COMMUNICATIONS'

SECOND SET OF INFORMATION REQUESTS TO AT&T

Pursuant to Commission Rules of Practice and Procedure, One Communications requests that AT&T, as defined herein, provide the following information and documents and answer the following questions. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question. Please identify the person responsible for preparing the answer and the name of the witness in the proceeding who will sponsor the answer.

INSTRUCTIONS

1. These Requests for Information call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to AT&T Communications and any affiliates (collectively, "AT&T") or to any individual or entity sponsoring testimony or retained by AT&T to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page, beginning with a restatement of the question. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Request for Information to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
D.T.C 10-2
One Communications' 2nd Set of Information Requests to AT&T

7. A "document" shall be defined as "writings, drawings, graphs, charts, photographs, phonorecords, and other data compilations from which data can be obtained, or translated, if necessary, by the respondent through detection devices into reasonably usable forms."
8. For each document produced or identified in a response which is computer generated, state separately: (a) what types of data, files, or tapes are included in the input and the source thereof; (b) the form of the data which constitutes machine input (*e.g.*, punch cards, tapes); (c) a description of the recording system employed (including descriptions, flow charts, *etc.*); and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
9. If a Request for Information can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
10. If AT&T cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why AT&T cannot answer the Request in full, and state what information or knowledge is in AT&T's possession concerning the unanswered portions.
11. If, in answering any of these Document and Information requests, AT&T believes that any Request, definition, or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
12. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
13. A response which does not provide the responsive documents, and requires inspection of documents at any location is not responsive.
14. If AT&T refuses to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which AT&T refuses to respond, identify each such document.
15. Each request for information includes a request for all documentation which supports the response provided.
16. If the response contains attachments with confidential material and the cover sheet with the request is filed separately from the public filing, provide a copy of the cover sheet with the confidential attachment.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
D.T.C 10-2
One Communications' 2nd Set of Information Requests to AT&T**

17. Unless the request specifically provides otherwise, the term AT&T includes all witnesses, representatives, consultants, employees, and legal counsel.
18. Please provide each response as it is completed, rather than waiting for completion of the entire set.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
D.T.C 10-2
One Communications' 2nd Set of Information Requests to AT&T

- One Communications - AT&T- 2-1.** Please provide AT&T's switching cost studies submitted in Connecticut, DPUC Investigation Into The Southern New England Telephone Company's Cost of Service Re: Reciprocal Compensation, Docket No. 09-04-21. Specifically provide the Excel based proprietary versions of the following studies:
- a) Recip Comp study
 - b) Transit_CLEC study
 - c) Transit_Wireless study
 - d) SICAT study.
- One Communications - AT&T- 2-2.** Please identify by docket and year, each and every ILEC switching cost study that Dr. Oyefusi has constructed or sponsored for AT&T's ILEC affiliates, pre- and post-merger with AT&T. For each instance, generally discuss the scope of the review and responsibilities.
- One Communications - AT&T- 2-3.** Please identify by docket and year, each and every ILEC switching cost study that Mr. Nurse has constructed or sponsored for AT&T's ILEC affiliates, pre- and post-merger with AT&T. For each instance, generally discuss the scope of the review and responsibilities.
- One Communications - AT&T- 2-4.** Please describe each and every instance in which an AT&T local exchange carrier has produced a switching cost study and identify the percent of switch costs that have been associated with (1) line ports, (2) trunk ports, (3) usage, (4) features and (5) other. Please produce all documents necessary to support verify your responses in this regard.

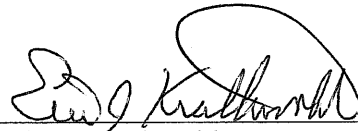
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

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 19th day of November, 2010.

A handwritten signature in black ink, appearing to read "Eric J. Krathwohl", is written over a horizontal line.

Eric J. Krathwohl
Counsel

Of Counsel for
One Communications