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November 23, 2010

BY HAND AND E-FILING

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

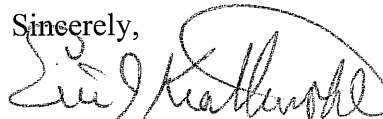
Re: D.T.C. 10-2, Petition of Choice One Communications of Massachusetts Inc.,  
Conversent Communications of Massachusetts Inc., CTC Communications Corp.  
and Lightship Telecom LLC For Exemption from Price Cap on Intrastate  
Switched Access Rates as Established in D.T.C. 07-9

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") are OneComm's supplemental responses to Information Requests AT&T-OneComm 1-15, 1-16 and 1-18 and VZ-OneComm 3-31, 3-32, 3-33, 4-5 and 4-6. This filing is made to comply with the Hearing Officer's Rulings dated November 10, 2010.

Please note that the responses to Information Requests AT&T-OneComm 1-16, VZ-OneComm 3-31, 3-32 and 4-5, and attachments to AT&T-OneComm 1-15, 1-16 and 1-18 and VZ-OneComm 3-32 are considered to be PROPRIETARY INFORMATION.

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

D.T.C 10-2

Supplemental Responses Of One Communications To AT&T's 1st Set Of Information  
Requests

**AT&T- OneComm- 1-15** Please provide the total original purchase price for the last three 5ESS Hosts installed in One Communications territory (excluding Massachusetts). Please itemize each piece of equipment installed.

**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 question asks for original purchase details related to switches that are not used in the NUCA and that do not reside in Massachusetts. The questions specifically seeks detail for switches in the Company's territories "excluding Massachusetts." NUCA did not use that information. The request is further objectionable because the requested information has not been compiled and it is believed that it would take substantial effort for One Communications to locate that information.

**Respondent(s):** Counsel to One Communications

**Supplemental Response:** Please see *ATT 1-15 Proprietary Information.zip*, including four files as follows:

1. *FINAL PRICE (Roch, Manch).xls*. This file identifies pricing from Lucent for the Choice One Rochester, NY and Manchester, NH 5ESS initial installations.
2. *Bss eqpt list (Roch, Manch).xls*. This file identifies the equipment included in the aforementioned initial installations.
3. *Final price1(prov).xls*. This file identifies pricing from Lucent for the Providence, RI Choice One 5ESS initial installation.
4. *Eqp list(prov).xls*. This file identifies the equipment included in the Providence installation.

The files described above include the information requested for the last three 5ESS Hosts installed in One Communications' territory (excluding Massachusetts) for which details of this type are available.

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

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**D.T.C 10-2**

**Supplemental Responses Of One Communications To AT&T's 1st Set Of Information  
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**PROPRIETARY ATTACHMENT**

**AT&T- ONECOMM 1-15**

**[REDACTED]**

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Supplemental Responses Of One Communications To AT&T's 1st Set Of Information  
Requests

**AT&T-OneComm- 1-16** Please provide the total purchase price for the last three 5ESS Host additional/growth installations in One Communications territory (excluding Massachusetts). Please itemize each piece of equipment installed.

**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 question asks for original purchase details related to switches that are not used in the NUCA and that do not reside in Massachusetts. The questions specifically seeks detail for switches in the Company's territories "excluding Massachusetts." NUCA did not use that information. The request is further objectionable because the requested information has not been compiled and it is believed that it would take substantial effort for One Communications to locate that information.

**Respondent(s):** Counsel to One Communications

**Supplemental Response:** Please see *ATT 1-16 Proprietary Information.zip*, including three files as follows:

1. *08us024829a1 pittsburgh sm add.2.27.09.xls*. This file identifies charges from Alcatel-Lucent related to growth on the Pittsburgh 5ESS. As can be seen in this workbook, a good deal of the hardware used for this growth job [\*\*\* BEGIN PROPRIETARY INFORMATION END PROPRIETARY INFORMATION \*\*\*].
2. *mw10800295a1\_milwaukee\_stsx1\_add.xls*. This file identifies charges from Alcatel-Lucent related to growth on the Milwaukee 5ESS. As can be seen in this workbook, a good deal of the hardware used for this growth job [\*\*\* BEGIN PROPRIETARY INFORMATION END PROPRIETARY INFORMATION \*\*\*].
3. *mw107001844a1\_south\_bend\_stsx1\_add\_rev1.xls*. This file identifies charges from Alcatel-Lucent related to growth on the South Bend, IN 5ESS. As can be seen in this workbook, a good deal of the hardware used for this growth job [\*\*\* BEGIN

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**PROPRIETARY INFORMATION END**

**PROPRIETARY INFORMATION \*\*\*].**

The files described above include the information requested for the last three 5ESS growth installations in One Communications' territory (excluding Massachusetts) for which details of this type are available.

**Respondent(s):**

Jim Weidman, Manager – Switch Engineering  
James Webber, QSI Consulting

**COMMONWEALTH OF MASSACHUSETTS  
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D.T.C 10-2  
Supplemental Responses Of One Communications To AT&T's 1st Set Of Information  
Requests**

**PROPRIETARY ATTACHMENT**

**AT&T- ONECOMM 1-16**

**[REDACTED]**

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Supplemental Responses Of One Communications To AT&T's 1st Set Of Information  
Requests

**AT&T-OneComm- 1-18** Please provide the calculated 5ESS replacement/new, growth mix for One Communications in Massachusetts. Also provide the calculated 5ESS replacement/new, growth mix for One Communications in all states were One Communications operates.

**Response:** One Communications objects to this request to the extent it seeks information regarding switching resources outside of Massachusetts. Despite that objection, One Communications answers as follows:

NUCA does not include a “calculated 5ESS replacement/new, growth mix for One Communications in Massachusetts.” Please see *One Communications NUCA – Trunk-to-Trunk Switching Module.xls* at tab **5E EF&I** (provided in response to Verizon request VZ-One Comm-1-1) for costs related to the *5ESS switching platform*. See also, *Springfield 5ECost Model QSI (PROPRIETARY INFORMATION).xls* (provided in response to Verizon request VZ-One Comm-1-3) at tabs **Original Purchase** and **Cost Model Per Unit** for new installation and additions costs.

**Respondent(s):** James Webber, QSI Consulting

**Supplemental Response:** *Please see C1 5E New-Growth (PROPRIETARY INFORMATION).xls* for STS counts at initial installation, current STS counts, and the calculated “new” and “growth” percentages for (11) of the 5ESS switches deployed throughout the company’s network. Initial STS counts for the few remaining 5ESS switches in One Communication’s network cannot be located at this time, largely as a result of the vintage of the data and the legacy business entities that purchased the switches in the first instance.

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

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DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

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**Supplemental Responses Of One Communications To AT&T's 1st Set Of Information  
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**PROPRIETARY ATTACHMENT**

**AT&T- ONECOMM 1-18**

**[REDACTED]**



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D.T.C 10-2

Supplemental 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

**One Communications Supplemental Response (November 23, 2010):**

One Communications' 2009 non-recurring revenue for Massachusetts was [\*\*\* BEGIN  
HIGHLY SENSITIVE PROPRIETARY INFORMATION END HIGHLY SENSITIVE  
PROPRIETARY INFORMATION \*\*\*] net of customer credits. See *Highly Sensitive  
Proprietary Information Attachment to VZ-One Comm-3-32.xls*, tab **Output 1 (MA-00000000)**,  
provided in the supplemental response to VZ-One Comm-3-32 for a detailed breakdown of this  
amount.

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

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D.T.C 10-2

Supplemental 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

**One Communications Supplemental Response (November 23, 2010):**

See *Highly Sensitive Proprietary Information Attachment to VZ-One Comm-3-32.xls* for One Communications' 2009 Massachusetts revenue by company and by service. Each service was designated as either retail or wholesale. One Communications' wholesale revenue is generally recorded in the Intercarrier Usage section of the Revenue Detail with the exception of services provided by Choice One (see tab **Output 1 (01-MA-00000000-041)**). One Communications' 2009 Massachusetts total retail and wholesale revenue was [\*\*\* **BEGIN HIGHLY SENSITIVE PROPRIETARY INFORMATION END HIGHLY SENSITIVE PROPRIETARY INFORMATION \*\*\***], respectively. See tab **Output 1 (0F-MA-00000000-RTL)**.

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

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Requests**

**PROPRIETARY ATTACHMENT**

**VZ - ONECOMM 3-32**

**[REDACTED]**

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D.T.C 10-2

Supplemental 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

**One Communications Supplemental Response (November 23, 2010):**

See One Communications' supplemental response to VZ-One Comm-3-32 for 2009 Massachusetts retail and wholesale revenue by service for each of the requested companies.

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



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**Supplemental Responses of One Communications to Verizon's 4th Set of Information Requests**

**VZ-One Comm-4-5** Please provide One Communications' average revenue per minute in Massachusetts for intrastate switched access for the months of July, August, and September, 2010. Please provide One Communications' monthly intrastate Massachusetts switched access revenues and minutes of use for July, August and September 2010.

**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' current average revenue per minute and monthly switched access revenue and minutes of use are unrelated to One Communications' cost of providing the aforesaid service.

The objection notwithstanding, see page 53 of Mr. Webber's Direct Testimony for One Communications' FY 2009 Massachusetts intrastate switched access minutes of use. See One Communications' response to DTC 1-10 for its Massachusetts intrastate switched access minutes of use by month for the study period used in the NUCA model (March 2009 – February 2010). See One Communications' response to DTC 1-25 for One Communications' total company switched access revenue earned in FY 2009.

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

**One Communications Supplemental Response (November 23, 2010):**

One Communications' switched access revenue, minutes of use, and average revenue per minute for the months of July, August, and September 2010 were as follows:

[\*\*\* BEGIN HIGHLY SENSITIVE PROPRIETARY INFORMATION \*\*\*]

[\*\*\* END HIGHLY SENSITIVE PROPRIETARY INFORMATION \*\*\*]

One Communications' average revenue per minute in each month exceeds the rate cap set in DTC 07-09 due to the inclusion of switched access minutes of use from periods prior to the rate change in June 2010 (billed at the rates in effect at that time) with July and August usage, mileage charges associated with the Local Transport Facility rate element, and billing errors that are in the process of being corrected.

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

**COMMONWEALTH OF MASSACHUSETTS  
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**D.T.C 10-2**

**Supplemental Responses of One Communications to Verizon's 4th Set of Information  
Requests**

**VZ-One Comm-4-6**

Please refer to the direct testimony of Dr. Ankum at page 7, line 18, where Dr. Ankum states that "the rate cap permits recovery of \$0.003752 per minute of use ..." (footnote omitted). What is One Communications' recovery per minute of use under the tariff revisions that the One Communications companies made in compliance with the Department's Order in D.T.C. 07-9?

**One Communications Response:**

One Communications' revised intrastate switched access rate per the tariff filing made in compliance with the DTC's Order in D.T.C. 07-09 is the same as the rate cap ordered in D.T.C. 07-09.

**Respondent(s):** Counsel to One Communications

**One Communications Supplemental Response (November 23, 2010):**

See One Communications' supplemental response to VZ-One Comm-4-5.

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

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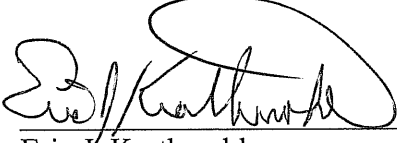
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

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 23<sup>rd</sup> day of November, 2010.

  
Eric J. Krathwohl  
Counsel

Of Counsel for  
One Communications