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Meraj Abdul-Qadir, CP
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November 10, 2010

Via DTC E-Filing and U.S. Mail

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

Re: Qwest Communications Company, LLC's First Supplemental Responses to One
Communications' First Set of Interrogatories in Docket No. D.T.C. 10-2

Dear Secretary Williams:

Enclosed for filing in the above-referenced matter is an original and nine copies of Qwest Communications Company, LLC's ("QCC") first supplemental responses to One Communications' first set of interrogatories. The enclosed have also been sent to DTC and the service list by email.

If you have any questions regarding the enclosed, please contact me. Thank you,

Very truly yours,

A handwritten signature in cursive script, reading "Meraj Abdul-Qadir".

Meraj Abdul-Qadir

/mfa

Enclosures

cc: Service List

Massachusetts
D.T.C. 10-2
One Communications 1-001 SUPP 1

INTERVENOR: One Communications

REQUEST NO: 001 SUPP 1

Please explain whether and to what extent One Communications' switched access costs are pertinent to this proceeding.

RESPONSE:

Qwest Communications Company ("QCC") objects to this request on the ground that discovery on QCC is premature. QCC has not submitted a pre-filed direct case. The procedural schedule in this matter does not provide for commencement of discovery upon intervenors until November 1, 2010. Under 220 CM.R.1.06(6)(b), the procedural schedule adopted by the Hearing Officer is binding upon the parties unless modified by the Hearing Officer. QCC reserves the right to assert other objections to this request at a later time.

SUPPLEMENTAL RESPONSE SERVED NOVEMBER 10, 2010

QCC objects to this request on the ground that it calls for a legal conclusion. Without waiving its objection, QCC answers that One Comm should refer to the Order in DTC 07-9.

Respondent: Legal

Massachusetts
D.T.C. 10-2
One Communications 1-002 SUPP 1

INTERVENOR: One Communications

REQUEST NO: 002 SUPP 1

Please identify and fully define the cost methodology (for example, Total Element Long Run Incremental Cost ("TELRIC"), Total Services Long Run Incremental cost ("TSLRIC"), etc.) which should be used as the basis for determining One Communications' cost of switched access services in this proceeding.

RESPONSE:

Please refer to the response to One Communications-Qwest-1-1.

SUPPLEMENTAL RESPONSE SERVED NOVEMBER 10, 2010

QCC objects to this request on the ground that it calls for a legal conclusion. Without waiving its objection, QCC notes that in its June 22, 2009 Order in DTC 07-9 at page 20, the Department stated in note 11: "Since the parties did not submit any type of CLEC-specific cost data in this case, the Department does not need to address the question of what type of cost standard to apply-historical, marginal or long-run incremental." At page 27 of its Order, the Department stated that a CLEC must be "...able to demonstrate justifiable costs in excess of the proposed rate cap with cost-specific data..." In its December 7, 2009 Order on Motion for Reconsideration and Clarification at page 20, the Department stated that it "...will not issue an exemptive order until it has had an opportunity to make findings of fact on whether the study is 'in accordance with industry standards' and whether the results warrant an exemption. These decisions will be made after a full adjudication of the matter." In QCC's view, certain general principles for industry standards must be maintained. The first principle is cost causation. Cost causation employs two concepts: 1) the cost of a service/network component results from the ordering or use of a service/network component. The cost should be recovered from the party who makes the decision whether or not to order or use the service/network component; and 2) Costs should be recovered in the manner in which they are incurred. If a facility is dedicated to one party, the cost does not change to the provider depending on how much it is used. Thus, dedicated facility costs should be recovered through a flat-rate charge to the party to which the facility is dedicated. On the other hand, if facilities are shared among more than one party, such as tandem transmission, such that the more the parties use the facilities the more facilities will have to be provided, then the costs are caused by usage and should be recovered with a usage sensitive based charge to the users. The second principle is that costs must be efficiently incurred, just, and reasonable.

Respondent: Peter Copeland

Massachusetts
D.T.C. 10-2
One Communications 1-003 SUPP 1

INTERVENOR: One Communications

REQUEST NO: 003 SUPP 1

Please identify the margin, or mark-up, above costs which should be used in determining the rate for One Communications' intrastate switched access services in this proceeding.

RESPONSE:

Please refer to the response to One Communications-Qwest-1-1.

SUPPLEMENTAL RESPONSE SERVED NOVEMBER 10, 2010

QCC objects to this request on the ground that it calls for a legal conclusion. Without waiving its objection, QCC states that margin should be based on efficiently incurred costs. In a competitive market, the price of a good or service is driven close to the cost of the most efficient competitors. As price approaches the cost of the efficient competitors, those competitors which are not efficient end up with negative margins and are driven out of business. Because intrastate access service is a monopoly service and not subject to competition, margin should be based on the costs of an efficient carrier in order to emulate prices that would prevail in a competitive market.

Respondent: Peter Copeland

Massachusetts
D.T.C. 10-2
One Communications 1-004 SUPP 1

INTERVENOR: One Communications

REQUEST NO: 004 SUPP 1

Does Qwest contend that for a Qwest long distance customer who uses One Communications' local services in Massachusetts, an originating long distance call can be carried by Qwest without that call having to utilize, or traverse (a) the local loop facility over which One Communications provides services and/or (b) the aggregation and other equipment in One Communications' collocation arrangement in the central office serving that customer? If the answer to the foregoing question is not an unequivocal no, please fully explain all methods by which such a call can be completed without using or traversing the references facilities over which One Communications provides services.

RESPONSE:

Please refer to the response to One Communications-Qwest-1-1.

SUPPLEMENTAL RESPONSE SERVED NOVEMBER 10, 2010

QCC objects to this data request on the grounds that it calls for speculation and is unintelligible. Based upon One Communications service offerings listed on its web site, One Communications only offers its end user customers itself as a choice as the long distance provider with local service. Since Qwest is not a possible choice as a long distance provider for a One Communications local customers, it is not possible to answer this question.

Respondent: Peter Copeland

Massachusetts
D.T.C. 10-2
One Communications 1-005 SUPP 1

INTERVENOR: One Communications

REQUEST NO: 005 SUPP 1

Does Qwest contend that a terminating long distance call can be carried by Qwest and terminated to a One Communications local customer without that call having to utilize, or traverse (a) the local loop facility over which One Communications provides services and/or (b) the aggregation and other equipment in One Communications' collocation arrangement in the central office serving that customer? If the answer to the foregoing question is not an unequivocal no, please fully explain all methods by which such a call can be completed without using or transversing the referenced facilities over which One Communications provides services.

RESPONSE:

Please refer to the response to One Communications-Qwest-1-1.

SUPPLEMENTAL RESPONSE SERVED NOVEMBER 10, 2010

No. However, the proper question is "does QCC contend that a terminating long distance call can be carried by QCC and terminated to a One Communications local customer without causing costs in (a) the local loop facility over which One Communications provides services and/or (b) the aggregation and other equipment in One Communications' collocation arrangement in the central office serving that customer?" QCC would argue that the answer to this proper question is "Yes", calls can be terminated without additional cost.

Respondent: Peter Copeland

Massachusetts
D.T.C. 10-2
One Communications 1-006 SUPP 1

INTERVENOR: One Communications

REQUEST NO: 006 SUPP 1

For those calls that Qwest contends may be completed without using facilities used by One Communications to provide service, all as described in Information Requests One Communications Qwest 1-5 and 1-6, please separately identify the number of minutes of use for each month during the most recent one year period available that were either (a) originated or (b) terminated without using facilities used by One Communications to provide services.

RESPONSE:

Please refer to the response to One Communications-Qwest-1-1.

SUPPLEMENTAL RESPONSE SERVED NOVEMBER 10, 2010

QCC objects to this data request on the grounds that it is overly broad, unduly burdensome and requires a special study. Without waiving its objections, QCC responds that it does not contend that calls don't use said facilities, only that the calls don't cause any additional cost associated with those facilities.

Respondent: Peter Copeland

CERTIFICATE OF SERVICE

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

I hereby certify that on this 10th day of November 2010, a true and correct copy of the foregoing was sent via email and regular U.S. Mail to the following:

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