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September 8, 2010

BY FEDERAL EXPRESS PRIORITY OVERNIGHT

Catrice C. Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, 8th Floor
Boston, MA 02118-6500

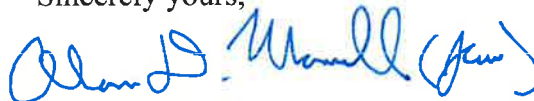
Re: D.T.C. 10-2- Petition of Choice One Communications of Massachusetts,
Inc., Conversent Communications of Massachusetts, Inc., CTC Communications
Corp. and Lightship Telecom LLC For Exemption from Price Cap on Intrastate
Switched Access Rates as Established in D.T.C. 07-9

Dear Secretary Williams:

Enclosed please find for filing in the above-referenced matter an original and nine (9)
copies of Qwest Communications Company, LLC's First Set of Information Requests to One
Communications.

Thank you very much for your assistance.

Sincerely yours,



Alan D. Mandl

Enclosures

cc: Lindsay DeRoche, Hearing Officer
Service List

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

1

of all persons to whom such alleged privileged information has been communicated or with whom it has been shared, in whole or in part.

3. Documents that in their original form or condition were stapled, clipped or otherwise fastened together shall be produced in such form. Documents responsive to each request are to be grouped separately by request. If any portion of a document is responsive to a request, the entire document should be produced.

4. Information requests are deemed to be continuing in nature. If further information responsive to any information request comes to the attention of the responding party, its officers, employees, agents, representatives or attorneys between the date of service of information requests and the date of the hearing in this matter, the response to such information request should be supplemented or amended accordingly.

DEFINITIONS

1. All terms used shall be construed in an ordinary, common sense manner, and not in a technical, strained or restrictive manner.

2. “Company” and/or “One Communications” shall mean each of the following individual competitive local exchange carriers, all predecessors and successors in interest, affiliates, parents, subsidiaries, subdivisions, and divisions of such entities: Choice One Communications of Massachusetts, Inc; Conversent Communications of Massachusetts, Inc., CTC Communications Corp. and Lightship Telecom LLC.

3. “Person” shall mean an individual, corporation, firm, proprietorship, partnership

(limited or general), association, limited liability corporation, association, joint venture, or other legal, business or governmental entity, whether foreign or domestic.

4. “Document” shall mean all writings and materials of any kind whatsoever, both originals and copies, and drafts of such writings or materials, whether printed or recorded, or written or produced by hand, or recorded by any electronic or electrical means, including on any magnetic tape, disk, hard disk, computer memory or optical disk, including but not limited to the following: journals; purchase orders; audio and video tapes and transcripts thereof; testimony; affidavits; filings of any kind with governmental bodies; agreements; letters; intracompany communications; e-mail; correspondence; telegrams; facsimiles; memoranda; notes; reports; studies; transcripts; analyses; outlines; summaries; notes; records of telephone conversations or interviews; logs; forecasts; graphs; charts; tables; minutes; records of meetings, conferences or calls; opinions or reports of consultants; contracts; drafts of any Document; workpapers; notations on Documents; slides; printouts; and any other documents or writings of whatever description and form. The term “Document” includes copies of documents that are not identical duplicates of the originals, and copies or documents of which the originals are not in the possession, custody or control of the Company, its officers, employees, agents, representatives, or attorneys.

5. “Identify,” when used in reference to a natural person or other legal entity, shall mean: (i) state the full name; (ii) state the present or last known business address, and, in the case of a natural person, residence address; (iii) the present or last known business telephone number, and in the case of a natural person, residence telephone number; and (iv) the person’s present or last known position or employer or primary line of business.

6. “Identify,” when used in reference to Documents, shall mean stating the: (a) type of Document; (b) contents of the Document; (c) date and title of the Document; (d) length of Document in pages; (e) present location(s) of the original and each copy of the Document; (f) entity of each custodian of the original and each copy of the Document; and (g) identity of each author, addressee and recipient of the original and each copy of the Document.

7. “You” and “your” means the Company, its officers, employees, agents, representatives, and all persons acting or purporting to act on behalf of the Company, including all past or present agents, employees, or officers, exercising discretion, discharging duties, making policy, or making decisions with respect to the business of the Company.

8. “NUCA” and “One Communications cost study” shall mean the One Communications Network Usage Cost Assessment (NUCA) Model-Massachusetts, filed by One communications in this proceeding.

INFORMATION REQUESTS

QCC-ONE COMM 1-1 Please refer to the testimony of James D. Webber. Please provide a diagram showing in each case below at what point between the end user and the (a) Metaswitch; (b) 5ESSD; or (c) Internet each of the following components is located in the forward looking network model used in the cost study:

- a. Integrated Access Devices (IADs)-page 22
- b. Combined multimedia device that addresses both DS0 and DSL aggregation-page 27

- c. The device and equipment named on page 30, lines 14 and 16
[acronym is CONFIDENTIAL]
- d. 5ESS switch-page 35
- e. Metaswitch-page 35
- f. Routers-page 37
- g. Switches-page 37
- h. SBCs-page 37
- i. Transport electronics-page 42
- j. Cross connect systems and devices-page 42
- k. Multiplexers-page 42
- l. Echo cancellation equipment-page 42
- m. G6-page 42
- n. DWDM-page 42
- o. OC-48 and OC-192 fiber nodes or fiber multiplexers-page 43

QCC-ONE COMM 1-2

Please refer to page 22 of Mr. Webber's testimony, where he states that One Comm provides combined voice and data services to its customers over a single loop facility and where he uses terminology such as Voice TDM, Voice VoIP, and DSL.

- a. Please define Voice TDM, Voice VoIP and DSL, as these acronyms are used by Mr. Webber and in the cost study model.
- b. Please explain whether the cost study model treats VoIP as a voice or data service or as both.

- c. Please identify each service carried within the DSL bandwidth on loop facilities (a) under the cost study model and (b) in the One Comm network in Massachusetts.
- d. If Voice VoIP is identified in the answer to c. above, please explain whether Voice VoIP is routed differently than DSL data service at any point between the loop and the Metaswitch for purposes of (a) the cost study model and (b) in the One Comm network in Massachusetts. If such different routing occurs, at what point is the VoIP separated from the DSL data stream (using the diagram provided in response to QCC One Comm. 1-1 to show the network component where this separation occurs).

QCC-ONE COMM-1-3 For each network component identified in QCC-One Comm-1-1, please describe the function that it performs within the network.

QCC-ONE COMM-1-4 For each component identified in QCC-One Comm.-1-1, please describe in what form each component receives Voice TDM, VoIP and DSL (data) and in what form Voice TDM, VoIP and DSL (data) leave each component. For example, Component A receives Voice TDM from copper loops that carry only TDM and from loops that carry both DSL (data) and Voice TDM. The TDM is converted into IP and aggregated together with the DSL (data) and

VoIP traffic from other loops and together all of this traffic is sent to component B in IP format over a common facility.

- QCC-ONE COMM-1-5 In (a) the cost study model and in (b) One Comm's network in Massachusetts, does the Metaswitch switch:
- a. Voice TDM traffic?
 - b. Voice VoIP traffic?
 - c. DSL (data) traffic?
- QCC-ONE COMM-1-6 In (a) the cost study model and in (b) One Comm's network in Massachusetts, please explain what traffic enters the Metaswitch and identify the types of ports through which the traffic enters.
- QCC-ONE COMM-1-7 In (a) the cost study model and in (b) One Comm's network in Massachusetts, please explain what traffic exists the Metaswitch and identify the types of ports through which the traffic exits.
- QCC-ONE COMM-1-8 Are there functions that the Metaswitch provides and the 5ESS does not provide in the provision of Voice TDM and Voice VoIP services? If so, please identify and describe all such functions provided by the Metaswitch that are not provided by the 5ESS.
- QCC-ONE COMM-1-9 Are there functions that the 5ESS provides more economically than the Metaswitch in the provision of Voice TDM and/or Voice VoIP services? If so, please identify and describe each such

function provided more economically by the 5ESS and any quantifications of these economic differences.

QCC-ONE COMM-1-10 Please refer to Table 6 on page 53 of Mr. Webber's testimony.
Please provide a copy of or web link to the tariffs upon which the Scenario 1 composite rates are based (the response to VZ-One Comm.-1-23 does not appear to make this information available or readily available, as some links to tariffs on the D.T.C. web site are either difficult to find or non-existent).

QCC-ONE COMM-1-11 Please refer to Table 6 on page 53 of Mr. Webber's testimony.
Which rate elements in the tariffs upon which Scenario 1 composite rates are based are being supported with the NUCA cost study? If more than one rate element is being supported, please map the components of the cost study to each rate element.

QCC-ONE COMM-1-12 Please refer to Table 6 on page 53 of Mr. Webber's testimony.
Please provide the percentage of the Intrastate Access MOUs that are originating.