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September 17, 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 ("QCC") Objections to the First Set of Information Requests of One Communications to QCC.

QCC counsel was unsuccessful in its effort to informally resolve this discovery dispute with One Comm.

Thank you very much for your assistance.

Sincerely yours,



Alan D. Mandl

Enclosures

cc: Lindsay DeRoche, Hearing Officer
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

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D.T.C. 10-2

**RESPONSES OF QWEST COMMUNICATIONS COMPANY TO
FIRST SET OF INFORMATION REQUESTS OF ONE COMMUNICATIONS**

One Communications-Qwest-1-1

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.

Date: September 17, 2010

Respondent: Counsel

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

One Communications- Qwest-1-2	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.

Respondent: Counsel
Date: September 17, 2010

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Choice One Communications of Massachusetts,)	
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Rates as Established in D.T.C. 07-9)	

**RESPONSES OF QWEST COMMUNICATIONS COMPANY TO
FIRST SET OF INFORMATION REQUESTS OF ONE COMMUNICATIONS**

One Communications- Qwest-1-3	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.
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Response:	Please refer to the response to One Communications-Qwest-1-1.
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Respondent: Counsel
Date: September 17, 2010

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Choice One Communications of Massachusetts,)	
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Rates as Established in D.T.C. 07-9)	

**RESPONSES OF QWEST COMMUNICATIONS COMPANY TO
FIRST SET OF INFORMATION REQUESTS OF ONE COMMUNICATIONS**

One Communications-Qwest-1-4

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 referenced facilities over which One Communications provides services.

Response:

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

Respondent: Counsel

Date: September 17, 2010

Petition of Choice One Communications of Massachusetts,)
 Inc., Conversent Communications of Massachusetts, Inc.,)
 CTC Communications Corp. and Lightship Telecom LLC For) D.T.C. 10-2
 Exemption from Price Cap on Intrastate Switched Access)
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Respondent: Counsel
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DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 10-2

For those calls that Qwest contends may be completed without using the 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.

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

Respondent: Counsel
Date: September 17, 2010