

140 West Street
27th Floor
New York, NY 10007
Tel (212) 321-8115
Fax (212) 962-1687
richard.fipphen@verizon.com

Richard C. Fipphen
Assistant General Counsel



August 13, 2010

Catrice C. 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 please find Verizon's First Set of Information Requests to One Communications.

Thank you for your assistance in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard C. Fipphen".

Richard C. Fipphen

cc: 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) D.T.C. 10-2
for Exemption from Price Cap on Intrastate Switched)
Access Rates as Established in D.T.C. 07-9)

**VERIZON’S FIRST SET OF INFORMATION REQUESTS TO
ONE COMMUNICATIONS**

INSTRUCTIONS

1. Please answer each Information Request on a separate page, fully in writing under oath, unless it is objected to, in which event, state the reasons for objection in lieu of an answer, and answer each other portion of the Information Request to which no objection is asserted. Preface each answer by restating the Information Request to which the answer is addressed. The answers are to be signed by the person making them, and the objections signed by the attorney making them. However, if you produce business records in lieu of an answer to an Interrogatory, specify the records from which the answer may be derived or ascertained in sufficient detail to permit Verizon to locate and to identify the records from which the answer may be ascertained.

2. For any objection that is based on an asserted claim of privilege, state a brief description of the subject matter of the assertedly privileged information; the nature of the privilege claimed; the portion(s) of the data request to which the information is otherwise responsive; the nature and basis of the privileged claimed; the source(s) of the information; and the identities of all persons to whom such information has been communicated or with whom it has been shared, in whole or in part.

3. Documents that in their original 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. In any portion of a document is responsive to a request, the entire document shall be produced.

4. These Information Requests are deemed to be continuing in nature, and if further information with respect thereto comes to the attention of the Company, its officers, employees, agents, representatives, or attorneys between the date of service hereof and the date of the hearing in this proceeding, the answers and responses must be amended accordingly.

DEFINITIONS

1. All terms used herein shall be construed in an ordinary, common sense manner, and not in a technical, strained, overly-literal, or otherwise 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, either limited or general, association, joint venture, or other legal, business, or governmental entity, whether foreign or domestic.

4. “Document” means all writings and documentary materials of any kind whatsoever, both originals and copies, and drafts of such writings and documentary materials whether printed or recorded, or reproduced by any other mechanical process, or written or produced by hand, or recorded by any electrical or electronic means, including on any magnetic

tape, disk, hard disk, computer memory, or optical disk, including but not limited to, the following items: journals; purchase orders; audio and video tapes and transcripts thereof; testimony; affidavits; filings of any kind with governmental bodies; agreements; letters; communications, including intra-company communications; electronic mail; correspondence; envelopes, telegrams; telexes; facsimiles; memoranda, including internal memoranda; notes; reports; summaries; transcripts; reviews; analysis; studies; papers; files; message slips; records; books manuals; guides; guidelines; outlines; abstracts; histories; summaries, notes, or records of telephone conversations or interviews; diaries; desk calendars; logs; appointment books; forecasts; statistical statements; tabulations; graphs; indices; charts; tables; plots; minutes; notes, or records of meetings, conferences, or communications; minutes, notes, or records of board meetings; opinions or reports of consultants; appraisals; brochures; pamphlets; periodicals; circulars; trade letters; press releases; contracts; notes; projections; drafts of any document; recommendations; working papers; worksheets; copies; marginal notations; photographs; film; drawings; slides; samples; and other specimens; computer printouts; tapes; disks, recordings; data processing cards; programs; and any other documents or writings of whatever description, whether written, recorded, transcribed, punched, taped, or filmed, however produced or reproduced. The term “document” includes copies of documents that are not identical duplicates of the originals, and copies of 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 an action, event, or occurrence including a communication, meeting, or statement, shall mean: (i) state, the date of the action, event, or occurrence; (ii) state the nature of the action, event, or occurrence; (iii) state the location of the action, event, or occurrence; (iv) identify every participant in and witness to the action, event or occurrence; and (v) describe the action, event, or occurrence and, if it was a meeting, communication, or statement, state the substance of the matters communicated or discussed.

7. "Identify," when used in reference to documents, means to state the: (a) type of document (*e.g.*, letter, telegram); (b) contents of the document; (c) date and title of the document (if any); (d) length of the document (in pages); (e) present location 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.

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

9. "NUCA" and "One Communications cost study" mean the One Communications Network Usage Cost Assessment (NUCA) Model-Massachusetts, filed by One Communications in this proceeding.

Information Requests to One Communications

- VZ-One Comm-1-1** Please provide the electronic version of the NUCA model, including all Excel files that constitute the model.
- VZ-One Comm-1-2** Please provide an operating manual, user documentation, instruction guide and any other available overview materials for the NUCA model that would aid in re-running NUCA using alternative inputs and/or calculations.
- VZ-One Comm-1-3** Please provide all workpapers, supporting documents, data files and other contributing material that are used and/or relied upon in NUCA and its modules. Your response should include all external data files linked to the data files included and/or referenced in NUCA and its modules.
- VZ-One Comm-1-4** Please provide any and all documentary support and/or cost justification for the inputs and calculations used in NUCA. If any such inputs and calculations are based on (by way of example only, and without limitation) actual purchases or contracts, please provide all supporting documentation, including (again, by way of example only, and without limitation) purchase receipts, copies of the contracts, etc.
- VZ-One Comm-1-5** To the extent that NUCA relies in any way on pricing set forth in contracts between One Communications and third parties, please state whether all such contracts are still effective today. If your answer is anything other than an unqualified “yes,” please (a) identify all such contracts that have expired or been terminated; (b) identify all such contracts that have been modified, amended, superseded or otherwise replaced; and (c) provide copies of all such modified, amended, superseding or replacement contracts.
- VZ-One Comm-1-6** Please identify all network elements modeled in NUCA that do not exist in One Communications’ present switching and/or transport networks. Please identify all network elements modeled in NUCA that do not exist in One Communications’ present switching and/or transport network in Massachusetts used for providing intrastate switched access services.
- VZ-One Comm-1-7** Please provide all calculations, justifications, back-up documentation and other support for the input values used in the calculation of the ACFs used in NUCA.
- VZ-One Comm-1-8** Has any state commission and/or state commission staff adopted, accepted, approved, retained or otherwise endorsed One Communications’ intrastate switched access rates after considering the NUCA cost model? If so, please identify the proceeding(s) in which the commission(s) and/or

commission staff did so, including the dates of relevant commission orders and/or staff testimony, if any.

- VZ-One Comm-1-9** Has any state commission and/or state commission staff declined to adopt, accept, approve, retain or otherwise rejected One Communications' intrastate switched access rates after considering the NUCA cost model? If so, please identify the proceeding(s) in which the commission(s) and/or commission staff did so, including the dates of relevant commission orders and/or staff testimony, if any.
- VZ-One Comm-1-10** Has any state commission and/or state commission staff ordered or recommended that modifications be made to the NUCA model and/or the inputs used therein? If so, (a) please identify the proceeding(s) in which the commission(s) and/or commission staff did so, including the dates of relevant commission orders and/or staff testimony, if any; and (b) state whether such ordered or recommended modifications were made to the NUCA model and/or the inputs used in the One Communications Massachusetts cost study.
- VZ-One Comm-1-11** Please provide documentation that explains how/where various inputs and assumptions are originally loaded in the NUCA model and how/where these inputs/assumptions can be changed.
- VZ-One Comm-1-12** Please provide a list of all inputs and assumptions in the NUCA model that are hard-wired or cannot be changed and explain why these inputs/assumptions are hard-wired or cannot be changed.
- VZ-One Comm-1-13** Define and explain IAD monthly costs. (Results tab, page 5 of 12, Loop tab, page 3 of 11.)
- VZ-One Comm-1-14** Define and explain Integrated Access Device Inventory and the Integrated Access Device Expense. (Loop tab, page 9 of 11.)
- VZ-One Comm-1-15** Define and explain the percentage of voice service attributable to loop costs. (Results tab, page 5 of 12, Loop tab, page 3 of 11.)
- VZ-One Comm-1-16** Define and explain Unique Collocation costs. (Results tab, page 6 of 12.)
- VZ-One Comm-1-17** Identify and explain Signaling Expense. (Results tab, page 7 of 12.)
- VZ-One Comm-1-18** Define and explain IRU monthly expense. (Results tab, page 8 of 12.)
- VZ-One Comm-1-19** Define and explain the percentage of voice service attributable to transport costs. (Results tab, page 8 of 12.)

- VZ-One Comm-1-20** Define and explain each of the capital cost factors (depreciation expense, cost of equity expense, income tax expense, interest expense, operating expense, property tax expense, retail operations, gross receipts tax) investment factors (sales tax, power and common , telco installation, capitalized leasehold improvements) and common costs and bad debt factors (shared and common cost, regulatory fees, bad debt expense). (Results tab, page 11 of 12.)
- VZ-One Comm-1-21** Define and explain wholesale annual cost factors. (Results tab, page 11 of 12.)
- VZ-One Comm-1-22** Please provide a list of all wholesale services provided by One Communications in Massachusetts. Identify which services are regulated.
- VZ-One Comm-1-23** Please provide a list of all retail services provided by One Communications in Massachusetts. Identify which services are regulated.
- VZ-One Comm-1-24** Please provide copies or web links to any federal and Massachusetts state tariffs for One Communications services.
- VZ-One Comm-1-25** Please provide the number of wholesale customers served by One Communications in Massachusetts.
- VZ-One Comm-1-26** Please provide the number of retail customers served by One Communications in Massachusetts.
- VZ-One Comm-1-27** Define and identify the components of shared costs. (Results tab, page 11 of 12.)
- VZ-One Comm-1-28** Define and identify Digital Electronic Switching Equipment. (Results tab, page 11 of 12.)
- VZ-One Comm-1-29** Define and identify Circuit Equipment. (Results tab, page 11 of 12.)
- VZ-One Comm-1-30** Define and identify Aggregation Nodes. (Results tab, page 12 of 12, Aggregation tab page 3 of 12.)
- VZ-One Comm-1-31** Identify all One Communications collocations in Massachusetts and other states served by Massachusetts switches. (Results tab, page 12 of 12.)
- VZ-One Comm-1-32** Define and identify the total number of active DS0s and DS1s served by Massachusetts switches. Include a definition of the term “active” as it applies to DS0s and DS1s. (Results tab, page 12 of 12.)
- VZ-One Comm-1-33** Define and identify the total switch MOU. (Results tab, page 12 of 12.)

- VZ-One Comm-1-34** Describe and identify all the uses of the Zhone MALC 723, Telzon 200, DSX-3 Modules, DSX-3 chasis, DSX1, M13 modules, and M13 chasis equipment. (Aggregation Module tab, pages 12 and 13 of 26.)
- VZ-One Comm-1-35** Identify the Massachusetts Intrastate Switch MOUs for One Communications for 2007, 2008, and 2009. (Traffic Module tab, page 8 of 16.)
- VZ-One Comm-1-36** Identify the Massachusetts Interstate Switch MOUs for One Communications for 2007, 2008, and 2009. (Traffic Module tab, page 8 of 16.)
- VZ-One Comm-1-37** Please provide the CABS study for 2007, 2008 and 2009. (Traffic Module tab, page 8 of 16.)
- VZ-One Comm-1-38** Please identify all annual or periodic reports made by One Communications to the Federal Communications Commission and/or Massachusetts Department of Telecommunications and Cable from the years 2000 to the present.
- VZ-One Comm-1-39** Please provide the 2007, 2008 and 2009 balance sheet, income statement and regulatory fees for One Communications. (Factor tab, page 5.)
- VZ-One Comm-1-40** Please provide any audits, reviews and compilations for the 2007, 2008 and 2009 balance sheet and income statements.
- VZ-One Comm-1-41** Please provide support for the equity to debt ratio. (Factors tab, page 6.)
- VZ-One Comm-1-42** Please provide the support for the bad debt expense. (Factor tab, page 79.)
- VZ-One Comm-1-43** Please provide any financial filings made by One Communications for the years 2007, 2008, and 2009 with any governmental agencies not limited to the Federal Communications Commission, Massachusetts Department of Telecommunications and Cable, and the Securities and Exchange Commission.
- VZ-One Comm-1-44** For each element in the network element database, please explain how One Communications employs the unit for the provisioning of intrastate switched access services in Massachusetts. (Network Element Database tab, pages 1-21 of 21.)
- VZ-One Comm-1-45** Describe and identify all the uses of the PT 6300, PT 6200 and PT 6101 equipment. (Signaling Module tab, page 7 of 11.)
- VZ-One Comm-1-46** Describe and identify all the uses of the Meta, Lucent LCS and SE equipment. (Signaling Module tab, page 8 of 11.)

- VZ-One Comm-1-47** Describe and identify all the uses of transport electronics, cross connect systems and devices, multiplexers, DWDM equipment, and echo cancellation equipment. (Transport Termination Module tab, pages 2 and 4 of 17.)
- VZ-One Comm-1-48** Describe and identify all the uses of edge routers, core routers, Cisco switches, TSC, ACME Packet Session Border Controllers, MetaSwitch, Test equipment, GPS timing and Measurement and Recording. (Trunk to Trunk Switching Module tab, pages 9 and 10 of 14.)
- VZ-One Comm-1-49** Please provide One Communications total revenues, total regulated revenues, total regulated intrastate revenues, total Massachusetts intrastate switched access revenues and total Massachusetts interstate switched access revenues, for years 2007, 2008 and 2009.