

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



September 30, 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 Fourth 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

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 10-2

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.

Fourth Set of Information Requests to One Communications

- VZ-One Comm-4-1** Please identify, by date and docket number, all orders or decisions of the Department of Telecommunications and Cable (and its predecessor agencies) that were reviewed by Dr. Ankum in connection with the preparation of his direct testimony in this proceeding.
- VZ-One Comm-4-2** Please refer to the direct testimony of Dr. Ankum, page 3, line 15, to page 4, line 8. Please identify all state public utility commission proceedings in which QSI and/or Dr. Ankum have reviewed and corrected ILEC cost studies for switched access service. Please provide copies or URL citations for all testimony filed by QSI and/or Dr. Ankum in those proceedings.
- VZ-One Comm-4-3** Please provide copies or URL citations for the testimony filed by Dr. Ankum in the following proceedings referenced on his resume:
- | | |
|----------|------------------|
| Michigan | Case No. U-11280 |
| Michigan | Case No. U-11366 |
| Michigan | Case No. U-11831 |
| Texas | Docket No. 8585 |
- VZ-One Comm-4-4** Please state whether One Communications or any of its operating companies sought judicial review of the 2001 order of the Federal Communications Commission capping CLEC interstate switched access rates.
- 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.
- 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?