

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 16, 2010

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

***Re: DTC 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 for filing in the above-referenced matter is Verizon's Objections to One Communications' First Set of Information Requests to Verizon.

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: Lindsay DeRoche, Hearing Officer
Kajal Chattopadhyay, General Counsel
Michael Isenberg, Director, Competition Division

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 10-2

REQUESTS TO VERIZON

Verizon New England Inc. d/b/a Verizon Massachusetts (“Verizon

GENERAL OBJECTIONS

1. Verizon objects to the Information Requests on the ground that the

requests are premature. The period for discovery on intervenors does not commence until

November 1, 2010. Pursuant to the authority granted by 220 CMR §1.06(6)(c)(3), the

Hearing Officer established a procedural schedule on July 27, 2010. Under the schedule,

discovery on intervenor testimony begins on November 1, 2010, allowing intervenors

such as Verizon to focus their efforts on obtaining discovery from One Communications

and preparing their own testimony. Verizon will respond and/or object to the Information

Requests on or before November 11, 2010, ten days after the beginning of the period of

discovery on intervenors.

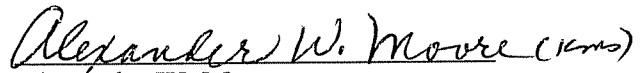
2. Verizon objects to the Information Requests to the extent that they seek to elicit Verizon's positions on issues potentially in dispute between One Communications and the intervenors prior to the deadline for filing of direct testimony. For example, One Communications requests 1-12 through 1-14 are "contention" interrogatories. Verizon has no objection to the use of contention interrogatories at the appropriate time, but seeking Verizon's positions *before* Verizon is required to file its direct testimony is clearly inappropriate. One Communications has no right to an advance "preview" of Verizon's testimony. Verizon will respond and/or object to the Information Requests on or before November 11, 2010, ten days after the beginning of the period of discovery on intervenors.

Verizon reserves the right to make specific objections to the individual requests at the time Verizon is obligated to file responses.

Respectfully submitted,

VERIZON NEW ENGLAND INC.,
MCIMETRO ACCESS TRANSMISSION
SERVICES OF MASSACHUSETTS, INC.,
MCI COMMUNICATIONS SERVICES, INC.,
VERIZON LONG DISTANCE LLC, and
VERIZON SELECT SERVICES, INC.

By their Attorneys,


Alexander W. Moore
125 High Street, Oliver Tower, 7th Floor
Boston, Massachusetts 02110-1585
(617) 743-2265

Richard C. Fipphen
140 West Street – 27th Floor
New York, New York 10007
(212) 321-8115

Dated: September 16, 2010