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March 19, 2014

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

Re: D.T.C. 13-6 – Agreement of Verizon New England Inc.

Dear Secretary Williams:

Enclosed for filing in the above-referenced proceeding are Verizon's Responses to the Competitive Carrier's Second Set of Information Requests.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Alexander Moore" followed by a stylized monogram.

Alexander W. Moore

Enclosure

cc: Michael Scott, Hearing Officer (2)
Service List

**Verizon New England Inc.
d/b/a Verizon MA**

Commonwealth of Massachusetts

D.T.C. Docket No. 13-6

Respondent: Paul Vasington
Title: Director, State Government
Relations

REQUEST: Competitive Carriers to Verizon, Set #2

DATED: March 5, 2014

ITEM: CC-VZ 2-1

Please refer to Verizon's direct testimony, p. 6, lines 12-18.

- a) Is any of the features described in this portion of the testimony necessary for a Verizon FiOS Digital Voice customer to place or receive voice calls?
- b) If your answer is other than "no," please explain your answer in full detail.

Reply to A and B:

Yes, because Verizon MA only offers FiOS Digital Voice as an integrated service that includes these features.

**Verizon New England Inc.
d/b/a Verizon MA**

Commonwealth of Massachusetts

D.T.C. Docket No. 13-6

Respondent: Counsel
Title:

REQUEST: Competitive Carriers to Verizon, Set #2

DATED: March 5, 2014

ITEM: CC-VZ 2-2

Does Verizon have any information in its possession, custody, or control (whether obtained in the course of its negotiations and/or relationship with Comcast or otherwise) regarding how Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates obtain(s) numbering resources for the provision of VoIP service to Comcast customers in Massachusetts? If so:

- a) Please describe in full detail how Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates obtain such numbering resources.
- b) Please produce copies of all documents that describe, set forth, or relate to how Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates obtain(s) such numbering resources.

Reply: Objection: Any limited information Verizon MA has regarding how Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates obtain(s) numbering resources is equally known by or available to the Intervenor. In addition, the information described in subparts (a) and (b) should be sought directly from the Comcast affiliate that is a party to this proceeding.

**Verizon New England Inc.
d/b/a Verizon MA**

Commonwealth of Massachusetts

D.T.C. Docket No. 13-6

Respondent: Counsel
Title:

REQUEST: Competitive Carriers to Verizon, Set #2

DATED: March 5, 2014

ITEM: CC-VZ 2-3

Does Verizon have any information in its possession, custody, or control (whether obtained in the course of its negotiations and/or relationship with Comcast or otherwise) regarding whether Comcast IP Phone, LLC, and/or its VoIP subsidiaries and affiliates, obtain(s) numbering resources for the provision of VoIP service to Comcast customers in Massachusetts from any Comcast affiliate? If so:

- a) Please identify the Comcast affiliate(s) that provide(s) such numbering resources to Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates.
- b) Please produce copies of all documents that describe, set forth, or relate to the provision by Comcast affiliates of such numbering resources to Comcast IP Phone, LLC, and/or its VoIP subsidiaries and affiliates.

REPLY: Objection: Any limited information Verizon MA has regarding how Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates obtain(s) numbering resources is equally known by or available to the Intervenors. In addition, the information described in subparts (a) and (b) should be sought directly from the Comcast affiliate that is a party to this proceeding.

**Verizon New England Inc.
d/b/a Verizon MA**

Commonwealth of Massachusetts

D.T.C. Docket No. 13-6

Respondent: Counsel
Title:

REQUEST: Competitive Carriers to Verizon, Set #2

DATED: March 5, 2014

ITEM: CC-VZ 2-4

Does Verizon have any information in its possession, custody, or control (whether obtained in the course of its negotiations and/or relationship with Comcast or otherwise) regarding the provision by any Comcast affiliate of any other facilities and/or services to Comcast IP Phone, LLC, and/or its VoIP subsidiaries and affiliates, for the provision of VoIP service to Comcast customers in Massachusetts? If so:

- a) Please identify each and every Comcast affiliate(s) that provide(s) such facilities and/or services to Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates
- b) Please identify all such facilities and/or services provided by the Comcast affiliate(s) to Comcast IP Phone, LLC and/or its VoIP subsidiaries and affiliates.
- c) Please describe in full detail all arrangements under which Comcast affiliates provide any other facilities and/or services to Comcast IP Phone, LLC, and/or its VoIP subsidiaries and affiliates, for the provision of VoIP service to Comcast customers in Massachusetts.
- d) Please produce copies of all documents that describe, set forth, or relate to the provision by Comcast affiliates of any other facilities and/or services to Comcast IP Phone, LLC, and/or its VoIP subsidiaries and affiliates, for the provision of VoIP service to Comcast customers in Massachusetts.

REPLY: Objection: Any limited information Verizon MA has regarding the provision by any Comcast affiliate of facilities and/or services to Comcast IP Phone, LLC, and/or its VoIP subsidiaries and affiliates is equally known by or available to the Intervenor. In addition, the information described in subparts (a), (b), (c) and (d) should be sought directly from the Comcast affiliate that is a party to this proceeding.

**Verizon New England Inc.
d/b/a Verizon MA**

Commonwealth of Massachusetts

D.T.C. Docket No. 13-6

Respondent: Paul Vasington
Title: Director, State Government
Relations

REQUEST: Competitive Carriers to Verizon, Set #2

DATED: March 5, 2014

ITEM: CC-VZ 2-5

Regarding the hypothetical call from Carl to Victor described on pp. 24-25 of Verizon's Direct Testimony, if Victor had answered the call:

- (a) Would he and Carl have been able to have a voice conversation?
- (b) Does the presence of any of the features described on p. 24, line 18 through p. 25, line 2 - *e.g.*, simultaneous ringing in multiple locations, display of caller ID on the television, sending a digital voicemail message to Victor's email- affect Victor's ability to have a voice conversation with Carl?
- (c) Does the presence of any of the features described on p. 24, line 18 through p. 25, line 2 - *e.g.*, simultaneous ringing in multiple locations, display of caller ID on the television, sending a digital voicemail message to Victor's email- affect Carl's ability to have a voice conversation with Victor?

RESPONSE:

- a) Yes, even if Victor answered the call on his cell phone.
- b) Yes. The presence of these features enhances the customer's experience. For example, because of these features, Victor would be able to answer Carl's call at Victor's location of choice.
- c) Yes. The presence of these features enhances the customer's experience. These features make it more likely that Carl's call will be answered by Victor.

**Verizon New England Inc.
d/b/a Verizon MA**

Commonwealth of Massachusetts

D.T.C. Docket No. 13-6

Respondent: Sherri Schlabs

Title: Acting Director – Global
Wholesale Services

REQUEST: Competitive Carriers to Verizon, Set #2

DATED: March 5, 2014

ITEM: CC-VZ 2-6

Please produce copies of the five "IP VoIP interconnection agreements" (*i. e.*, those Verizon has entered into with "Vonage, BroadVox, InterMetro, Bandwidth.com and Millicorp") referred to in Verizon's rebuttal testimony, page 4.

RESPONSE:

Objection: The information sought in this request is proprietary and confidential to the non-Verizon MA contracting parties listed above. Notwithstanding this objection, Verizon MA is exploring whether it will be possible for it to produce responsive information in a timely manner, subject to appropriate confidentiality protections.