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November 15, 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 for filing in the above-referenced matter are Verizon's responses to One Communications' Second Set of Information Requests.

Please note that these responses have been redacted to protect proprietary information. The unredacted, proprietary version of the responses is being filed with the Hearing Officer under separate cover and is being provided to those parties that have entered into Non-Disclosure Agreements with One Communications.

Thank you for your attention to this matter.

Respectfully submitted,

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

Richard C. Fipphen

Enclosure

cc: Lindsay DeRoche, Hearing Officer (3)
Service List

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Ann Amalia Dean
Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-1 Please provide Attachment A to the Verizon Panel Direct Testimony and any other attachments to the Verizon Panel Direct Testimony (if applicable) in their native form (such as Microsoft Excel ®) with all formulas and file links intact

REPLY: See Proprietary Attachment One Comm-VZ-2-1.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Counsel
Title:

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm- VZ 2-2 Please provide all workpapers, analyses and documents used in the preparation of the Verizon Panel Direct Testimony and Attachment A in their native form (such as Microsoft Excel ®).

REPLY: Objection. Verizon objects to this request on the grounds that the request seeks documents that are protected by the attorney work product rule and is unduly burdensome.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Counsel/Ann Amalia Dean
Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-3 To the extent not already provided in response to One Communications – VZ 2-1 and One Communications – VZ 2-2 above, please provide all versions of the NUCA modules – and all other contributing documents - used to produce the Incremental Impact of Adjustment on Total Cost/MOU and Cumulative Total per MOU columns presented in Attachment A to the Verizon Panel Direct Testimony. Please fully describe how such modules and contributing documents were used to produce the figures at lines 1-13 of the Schedule of Adjustments to NUCA Cost Model presented in Attachment A.

REPLY: Objection. To the extent not covered by Verizon's objection to One Comm-VZ 2-2, Verizon objects to this request on the ground that the request is vague and ambiguous.

Subject to the foregoing objection, Verizon responds as follows:

Attachment A to the Verizon Panel Testimony sets forth the thirteen adjustments that Verizon made to the NUCA modules. Attachment A identifies the specific module, worksheet, and cell(s) affected, along with the change made by Verizon for each adjustment identified on lines 1-13. The NUCA modules used by Verizon were those modules provided by One Comm in response to VZ-One Comm 1-1.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Paul B. Vasington

Title: Director – State Public Policy

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-4 Regarding the Verizon Panel Direct Testimony, p. 12, lines 10-13, and p. 13, lines 1-2, (cost studies in a Pennsylvania case), please confirm or deny that the cost studies referenced in these lines (a) are not based on the NUCA cost study platform, (b) were not intended to be forward-looking studies, and (c) were based on One Communications' actual (embedded) costs and the separations methodology prescribed by 47 C.F.R Parts 64 and 36. If Verizon's answer is anything other than an unequivocal "confirm," please explain the qualification in detail.

REPLY: Confirm.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Paul B. Vasington

Title: Director – State Public Policy

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-5 Regarding the Verizon Panel Direct Testimony, pp. 14-15 (question and answer starting on p. 14 line 14), please provide specific examples of the "legacy regulation" referenced by the Verizon Panel in comparison to the regulation of a CLEC in Massachusetts that contribute to higher "regulation" cost for a legacy company compared to a CLEC.

REPLY: The following are some examples of legacy regulation that impact Verizon MA, but not CLECs in Massachusetts:

1. Dominant carrier classification;
2. Price floors;
3. Service quality standards and penalties;
4. Retail rate regulation;
5. Reporting requirements;
6. Wholesale obligations (*i.e.*, unbundling, resale at discount, Performance Assurance Plan, etc.)
7. Service obligations.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Counsel/Ann Amalia Dean
Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-6 With regard to the Verizon Panel Direct Testimony at page 46, lines 1-4, please identify each instance in which Ms. Dean has prepared and/or sponsored a cost study regarding reciprocal compensation, switched access or interoffice traffic. Please provide the following for each such study:

- a. The date of the study and docket/case number (if applicable);
- b. The purpose of the study;
- c. The party for whom the study was prepared and/or sponsored;
- d. Confirmation that the study specifically excludes investments and costs related to DSX, DACS, MUX, FDP and OCx equipment;
- e. To the extent you cannot confirm – for each equipment type specified in sub part (d) of this request – please fully described the extent to which this equipment was included in the study and provide a copy of that study to support your answer.

REPLY: Objection: Verizon objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to the foregoing objection, Verizon states as follows:

- a. Ms. Dean co-sponsored a cost study that was filed in Pennsylvania PUC Docket No. C-2002-7195, dated June 25, 2003.
- b. The study was an incremental cost study for switched access

service and local exchange service (dial tone line and usage) for Verizon PA and Verizon North.

- c. The cost study was prepared by Verizon.
- d. The switched access cost study included investment costs for multiplexing equipment only to the extent that they are associated with the multiplexing rate element of switched access service. Loop and loop-related investments were excluded from the switched access cost study.
- e. Please see subpart (d.) above.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Counsel/Paul B. Vasington
Title: Director – State Public Policy

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-7 With regard to the Verizon Panel Direct Testimony at page 46, lines 1-4, please identify each instance in which Mr. Vasington prepared and/or sponsored a cost study regarding reciprocal compensation, switched access or interoffice traffic. Please provide the following for each such study:

- a. The date of the study and docket/case number (if applicable);
- b. The purpose of the study;
- c. The party for whom the study was prepared and/or sponsored;
- d. Confirmation that the study specifically excludes investments and costs related to DSX, DACS, MUX, FDP and OCx equipment;
- e. To the extent you cannot confirm – for each equipment type specified in sub part (d) of this request – please fully described the extent to which this equipment was included in the study and provide a copy of that study to support your answer.

REPLY: Objection: Verizon objects to this request on the ground that it seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to the foregoing objection, Verizon states as follows:

Mr. Vasington jointly sponsored an incremental cost study in a New Jersey proceeding of Verizon New Jersey's price-regulated services, including switched access service.

- a. The cost study was filed with direct testimony on February 13, 2009, in Docket No. TX08090830.
- b. The purpose of the study was to calculate the incremental costs of price-regulated services for Verizon New Jersey.
- c. The study was prepared on behalf of Verizon.
- d. The switched access cost study included investment costs for these types of equipment only to the extent that they are associated with the multiplexing and entrance facilities rate elements of switched access service. Loop and loop-related investments were excluded from the switched access cost study.
- e. Please see subpart (d.) above.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Counsel/Ann Amalia Dean
Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-8 With regard to the Verizon Panel Direct Testimony at page 58, lines 1-5, please identify each instance in which Ms. Dean has prepared and/or sponsored a cost study that involved the number and/or type of switches to be used. Please provide the following for each such study:

- a. The date of the study and docket/case number (if applicable);
- b. The purpose of the study;
- c. The party for whom the study was prepared and/or sponsored;
- d. Separate confirmation that (1) the number, (2) type and (3) locations of switches were variable in the study and that ultimately (1) the number, (2) the type, and (3) locations of switches used in the study differ from the actual network being studied.
- e. To the extent you cannot confirm – for each item in sub part (d) of this request – please fully described the extent to which (1) the number, (2) the type and (3) the locations of switches used in the study differ from the actual network being studied. Provide a copy of each such study to support your response to this sub part.

REPLY: Objection: Verizon objects to this request on the grounds that it is vague and ambiguous, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to the foregoing objection, Verizon states as follows:

A properly done incremental cost study of switched access service will

establish model switching offices based on an appropriate demand study. Each host and remote switching wire center in the state is assigned to one of the representative model office constructs based on its central office design characteristics (*i.e.*, lines per office, busy hour CCS per line). Depending upon the results of the demand study, the model switching network used in the study to estimate forward looking incremental costs may differ from the actual switching network of the carrier.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Counsel/Paul B. Vasington
Title: Director – State Public Policy

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-9 With regard to the Verizon Panel Direct Testimony at page 58, lines 1-5, please identify each instance in which Mr. Vasington has prepared and/or sponsored a cost study that involved the number and/or type of switches to be used. Please provide the following for each such study:

- a. The date of the study and docket/case number (if applicable);
- b. The purpose of the study;
- c. The party for whom the study was prepared and/or sponsored;
- d. Separate confirmation that (1) the number, (2) type and (3) locations of switches were variable in the study and that ultimately (1) the number, (2) the type, and (3) locations of switches used in the study differ from the actual network being studied.
- e. To the extent you cannot confirm – for each item in sub part (d) of this request – please fully described the extent to which (1) the number, (2) the type and (3) the locations of switches used in the study differ from the actual network being studied. Provide a copy of each such study to support your response to this sub part.

REPLY: Objection: Verizon objects to this request on the grounds that it is vague and ambiguous, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to the foregoing objection, Verizon states as follows:

- (a) See response to One Comm-VZ 2-7.
- (b) See response to One Comm-VZ 2-7.
- (c) See response to One Comm-VZ 2-7.
- (d) See response to One Comm-VZ 2-8.
- (e) See response to (d) above.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Ann Amalia Dean
Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-10 Regarding the Verizon Panel Direct Testimony, p. 58, (a discussion of MetaSwitches versus Lucent LCS switches), please provide the following information.

- (a) Please explain how the Verizon Panel's observation at lines 11-12 that the "capacity of the MetaSwitch is far larger than the Lucent LCS switches" affects the modeled cost. For example, does it increase or decrease cost?
- (b) Please fully explain and provide all reports, workpapers and analyses used or relied upon by the Verizon Panel to reach its conclusion that the "MetaSwitch is large enough that it could potentially handle all of the traffic from the **BEGIN PROPRIETARY** [REDACTED] **END PROPRIETARY** Lucent LCS switches."
- (c) Fully explain all network re-arrangements and routing modifications that would be required to accommodate a re-routing of all customers and all traffic from the Lucent LCS switches to MetaSwitch(s) as contemplated at page 58 (lines 15-19) including all additional transport and transport termination equipment which would be required to manage the necessary network rearrangement contemplated in the Verizon Panel's statement in this regard.
- (d) In light of the Verizon Panel's discussion on p. 59, lines 5-15, please confirm or deny that the larger capacity of a MetaSwitch compared to a Lucent LCS switch would result in lower per unit costs when using a MetaSwitch compared to a Lucent LCS switch. Please explain your answer.

REPLY:

- (a) If the modeled office is sized larger than what is needed to meet the current and/or forecasted demand, it would increase the cost. Replacing each Lucent LCS switch, on a one-for-one basis, with the larger MetaSwitch improperly inflates One Comm's switching investment costs. The larger capacity of the MetaSwitch means that the same amount of traffic currently handled by the current LCS switches can be handled by fewer larger capacity switches. Keeping the total number of switches the same unnecessarily increases costs.
- (b) As explained in the testimony, One Comm failed to do a demand study, but in One Comm's response to DTC-One Comm-1-38, part a, One Comm states that MetaSwitch deployments have at least twice the capacity of the LCS switches. If the MetaSwitches are modeled properly, it could handle the traffic from the LCS switch. As an illustration, the Springfield Metaswitch is equipped with **BEGIN PROPRIETARY** [REDACTED] **END PROPRIETARY.**
- (c) A properly done incremental cost study for switching would be built upon the development of model switching offices. Network re-arrangement and other similar costs are not appropriate in a properly done study because the purpose of the study is to estimate forward looking incremental costs and is not designed to estimate costs of reconfiguring an embedded network to make it match the model network.

As One Comm had indicated in response to DTC-One Comm-1-38, part e, "NUCA does not contain cost detail specific to the Lucent LCS". One Comm further added in that response: "That said, if it were assumed that switch port capacity provided by the LCS was approximately **BEGIN PROPRIETARY** [REDACTED]

END PROPRIETARY. However, assuming all else being equal, an older switch, such as the Lucent LCS, with the same capacity and with the same features and functionalities, should cost more than a current switch, such as the MetaSwitch. If true, it is reasonable to assume that a Lucent LCS switch, with a smaller capacity, would have a higher unit cost per line, than the higher capacity MetaSwitch.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Counsel/Ann Amalia Dean

Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-11 With regard to the Verizon Panel Direct Testimony at pages 59-61, please identify each instance in which Ms. Dean has prepared and/or sponsored a cost study that used – in any way – TPI factors. Please provide the following for each such study:

- a. The date of the study and docket/case number (if applicable);
- b. The purpose of the study;
- c. The party for whom the study was prepared and/or sponsored;
- d. Confirmation that each TPI factor for each year included the study was below 1.0.
- e. To the extent you cannot confirm sub part (d) for each study, please fully described the extent to which (1) the TPI was 1.0, (2) the TPI was greater than 1.0. Provide a copy of each such study to support your response to this sub part.

REPLY: Objection: Verizon objects to this request on the grounds that it is overly broad and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to the foregoing objection, Verizon states as follows:

Verizon does not use TPI factors for switching costs in its cost studies.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Counsel/Paul B. Vasington
Title: Director – State Public Policy

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-12 With regard to the Verizon Panel Direct Testimony at pages 59-61, please identify each instance in which Mr. Vasington has prepared and/or sponsored a cost study that used – in any way – TPI factors. Please provide the following for each such study:

- a. The date of the study and docket/case number (if applicable);
- b. The purpose of the study;
- c. The party for whom the study was prepared and/or sponsored;
- d. Confirmation that each TPI factor for each year included the study was below 1.0.
- e. To the extent you cannot confirm sub part (d) for each study, please fully described the extent to which (1) the TPI was 1.0, (2) the TPI was greater than 1.0. Provide a copy of each such study to support your response to this sub part.

REPLY: Objection: Verizon objects to this request on the grounds that it is overly broad and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to the foregoing objection, Verizon states as follows:

Verizon does not use TPI factors for switching costs in its cost studies.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Ann Amalia Dean
Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm- VZ 2-13 Regarding the Verizon Panel Direct Testimony, p. 58, line 9:

- (a) Please provide the data source in support for this statement.
- (b) Please explain the scope of the phrase "current demand" in the context of this statement. Specifically, why does the Verizon Panel ignore in this phrase the current demand at the remaining switches that currently operate in One Communications' network in Massachusetts?

REPLY:

- (a) The data source for this statement is the Proprietary Table in the response to DTC-One Comm-1-37.
- (b) Verizon did not ignore the current demand at the remaining switches.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Ann Amalia Dean
Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-14 Regarding the Verizon Panel Direct Testimony, p. 58, lines 13-15, consider a situation in which a long-distance call is being "routed" to a voice mail system or call feature services such as call forwarding or call waiting. Assume that the calling party is on a usage-sensitive plan and the call is not a collect call or a toll free call. Next, assume the access elements used to provision this long distance call are priced on a usage-sensitive basis. Please confirm or deny that the following would occur in this scenario:

- (a) An IXC would generally bill the calling party toll charges for such call (i.e. for the duration of the calling party's voice message or the duration of the call at the forwarded location, etc.);
- (b) A LEC would generally bill the IXC of the calling party access charges for such call (i.e. for the duration of the calling party's voice message or the duration of the call at the forwarded location, etc.); and
- (c) Voice mail and call feature services such as call forwarding or call waiting permit long-distance communications – communications that would otherwise not take place.

If the Verizon Panel's answers to the above requests are something other than "confirm," please explain your answer in detail.

REPLY:

- (a) Confirm.
- (b) Confirm; the LEC would generally bill the IXC originating access charges, terminating access charges, or both.
- (c) Voice mail and call feature services may be used in connection with long distance services, but voice mail and call features are end user retail services whose costs are caused by the end user. Voice

mail and call features may be switch related or they may be part of the end user's CPE (customer premise equipment). Using the premise of the above scenario, an answering machine also facilitates (or "permits") long distance communications, but One Comm is appropriately not seeking to include the costs of its end users' CPE in its switched access cost study.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Ann Amalia Dean

Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm- VZ 2-15 Please fully explain and demonstrate how the Verizon Panel reached its conclusion at p. 59, footnote 94, of the Verizon Panel Direct Testimony that the additional investment for **BEGIN PROPRIETARY** [REDACTED] **END PROPRIETARY**. Please provide all reports, workpapers, documents and analyses upon which that conclusion is based and provide all underlying calculations in the native format.

REPLY: The difference between the **BEGIN PROPRIETARY** [REDACTED]

END PROPRIETARY.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Counsel/Ann Amalia Dean
Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-16 Please identify each instance in which Ms. Dean has prepared and/or sponsored a cost study regarding, or including, the cost of Lucent 5ESS switches. Please provide the following for each such study:

- a. The date of the study and docket/case number (if applicable);
- b. The purpose of the study;
- c. The party for whom the study was prepared and/or sponsored;
- d. The per DS3 investment for that switch type; and,
- e. All documentation necessary to support the per DS3 investment as provided in response to sub part (d) of this request.

REPLY:

Objection: Verizon objects to this request on the ground that it is overly broad and unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to the foregoing objection, Verizon states as follows:

Verizon incremental cost studies do not estimate switching costs on the basis of investment costs per DS3.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Paul B. Vasington

Title: Director – State Public Policy

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-17 Please identify each instance in which Mr. Vasington has prepared and/or sponsored a cost study regarding, or including, the cost of Lucent 5ESS switches. Please provide the following for each such study:

- a. The date of the study and docket/case number (if applicable);
- b. The purpose of the study;
- c. The party for whom the study was prepared and/or sponsored;
- d. The per DS3 investment for that switch type; and,
- e. All documentation necessary to support the per DS3 investment as provided in response to sub part (d) of this request.

REPLY:

- (a) See response to One Comm-VZ 2-7.
- (b) See response to One Comm-VZ 2-7.
- (c) See response to One Comm-VZ 2-7.
- (d) See response to One Comm-VZ 2-16.
- (e) See response to One Comm-VZ 2-16.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Counsel/Ann Amalia Dean
Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-18 Regarding footnote 94 at page 59 of the Verizon Panel Direct Testimony, please provide Verizon's average investment for **BEGIN PROPRIETARY** [REDACTED] **END PROPRIETARY** switch type. Please include all supporting detail needed to verify that investment and to express that investment on a per DS3 basis.

REPLY: Objection: Verizon objects to this request on the ground that it seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to the foregoing objection, Verizon states as follows:

See response to One Comm-VZ 2-16.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Counsel/Ann Amalia Dean
Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-19 Regarding the Verizon Panel Direct Testimony, p. 60, lines 4-15, please provide factual support to the assertion that digital switch costs are constantly decreasing. This support should be inclusive of, but not limited to, the following:

- (a) Price lists, invoices, industry reports, etc. that contain digital switch costs by vendor and switch type over the last 10 years reflecting a continuous decline in digital switch costs;
- (b) Digital switch costs at the level of granularity that is applicable to One Communications' cost model, i.e. switch cost units/components and years utilized in One Communications' *Trunk-to-Trunk Switching Module*, Tabs **Meta EF&I** and **5E EF&I**; and
- (c) All data, reports, analyses, workpapers and/or documents the panel relied upon when drafting its testimony in this regard.

REPLY: Objection. Verizon objects to this request on the grounds that it seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence, and is overly broad and unduly burdensome.

Subject to the foregoing objection, Verizon responds as follows:

Verizon's testimony is based on its experience as a purchaser of digital switching equipment and the general industry knowledge of its witnesses. Further, support for the statement that the costs of digital switching are decreasing can be found in One Comm's response to DTC-One Comm-1-38.

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

Commonwealth of Massachusetts

Docket No. D.T.C 10-2

Respondent: Ann Amalia Dean

Title: Senior Staff Consultant

REQUEST: One Communications', Set #2

DATED: November 5, 2010

ITEM: OneComm-VZ 2-20 Regarding Attachment A to the Verizon Panel Direct Testimony, Adjustments 12 and 13, column Change Made, please fully explain and provide all calculations, source data, and assumptions used to develop the adjustment to remove **BEGIN PROPRIETARY** [REDACTED] **END PROPRIETARY** of the amounts in the specified cells within the NUCA *Factors Module*.

REPLY: See Proprietary Attachment One Comm-VZ 2-20, cell N9.