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August 27, 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 Second 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

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)))))))	D.T.C. 10-2
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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.

Second Set of Information Requests to One Communications

- VZ-One Comm-2-1** At page 6, line 13, of his Direct Testimony, Mr. Webber identifies NUCA Output as Confidential Exhibit JDW-2. Please provide legible screenshots of price quotes or purchase orders of materials used that are contained in Exhibit JDW-2.
- VZ-One Comm-2-2** At page 7, lines 11-13, of his Direct Testimony, Mr. Webber states that “QSI’s experts meet with those personnel in order discuss the engineering and operational data in order to develop an understanding of the technologies and equipment configurations currently in use.” Please provide your understanding of the technologies, equipment, and equipment configurations currently in use to provide traffic-sensitive intrastate switched access services in Massachusetts.
- VZ-One Comm-2-3** At page 7, lines 13-15, of his Direct Testimony, Mr. Webber refers to “a continuing emphasis on those technologies that have emerged as the company’s preferred ‘best in class’ technology choices.” Does Mr. Webber contend that assumptions relating to a “best in class” technology should be limited to technology currently employed or about to be deployed by One Communications, rather than by the telecommunications industry generally? If your answer is anything other than an unqualified “no,” please explain.
- VZ-One Comm-2-4** At page 9, lines 9-10, of his Direct Testimony, Mr. Webber states that “[t]hese modules utilize various engineering assumptions...” Please provide these assumptions and the rationale for their use in the model.
- VZ-One Comm-2-5** At page 11, lines 6-8, of his Direct Testimony, Mr. Webber states that the diagrams of the NUCA model “depict a typical long run incremental cost analysis that relies upon network data and equipment prices in order to develop forward-looking investments.” Please provide all analyses that have been performed that demonstrate that the technology and network configuration assumptions modeled in NUCA are the most efficient and least cost available. Also provide the reasons that the TSLRIC methodology, which requires the assumption of the use of the most efficient, least cost technology and network configuration, was not used in the modeling of the economic cost of intrastate switched access service.
- VZ-One Comm-2-6** At pages 15, line 19, of his Direct Testimony, Mr. Webber states that “NUCA assumes a ‘model office’ approach for switching.” Please provide a detailed description of all attributes of and equipment employed in the “model office” assumed by NUCA, including, but not limited to, the switching architecture, programming and physical layout. If not already provided in response to other data requests, please provide all facts and/or

analyses upon which Mr. Webber and/or QSI Consulting relied to estimate the traffic-sensitive portion for intrastate switched access service for each attribute of and piece of equipment employed in the “model office” assumed by NUCA.

- VZ-One Comm-2-7** At page 16, lines 4-6, of his Direct Testimony, Mr. Webber states that “NUCA undertakes a similar ‘model office’ approach for equipment in One Communications’ Access Nodes used to aggregate traffic for delivery to the switch.” Please provide a detailed description of all attributes of and equipment employed in the “Access Nodes” assumed by NUCA. If not already provided in response to other data requests, please provide all facts and/or analyses upon which Mr. Webber and/or QSI Consulting relied to estimate the traffic-sensitive portion for intrastate switched access service for each attribute of and piece of equipment employed in the “Access Nodes” assumed by NUCA, including the links and equipment used to transport traffic back to One Communications’ switches.
- VZ-One Comm-2-8** At page 16, lines 8-10, of his Direct Testimony, Mr. Webber states “the modeled equipment within the Access Nodes is generally sized by NUCA to match forecasted demand for services.” Please provide the forecasted demand of services; list the services; provide the forecast period; and the date when the forecast was prepared.
- VZ-One Comm-2-9** At page 17, lines 18-20, of his Direct Testimony, Mr. Webber states that NUCA “accounts for total demand in that all usage on the network – whether local, intraLATA, interLATA, etc. – are accounted for.” Please identify the additional usage included in “etc.” in the above statement. Also please identify what services are regulated telecommunication services, unregulated telecommunications services, regulated data services, unregulated data services, or other non-telecommunications services, such as video type services.
- VZ-One Comm-2-10** At page 18, lines 13-14, of his Direct Testimony, Mr. Webber states that “NUCA uses a centralized database – the Network Element Database.”
- a. Please provide any facts and/or analyses upon which Mr. Webber and/or QSI Consulting relied in determining whether a particular network element is an entirely or partially traffic-sensitive cost for intrastate switched access service. If Mr. Webber and/or QSI Consulting did not rely on any facts or analyses, please explain the basis on which Mr. Webber and/or QSI Consulting concluded that each network element was an entirely or partially traffic-sensitive cost for intrastate switched access service.

- b. For the NUCA model inputs, for each material price input, please provide:
 - i. the vendor listed price;
 - ii. the vendor discount (percentage or dollar amounts); and
 - iii. if there was no discount given, please provide the typical discount One Communications would have received for similar class of equipment and for the quantities needed in the modeling of its forward looking network.

- VZ-One Comm-2-11** At page 21, lines 4-22, of his Direct Testimony, Mr. Webber discusses the loop cost module. Does Mr. Webber contend that loop costs attributable to the provision of local exchange service are appropriately included in a cost study for intrastate switched access service? If your answer is anything other than an unqualified “no,” please explain.
- VZ-One Comm-2-12** At page 21, lines 19-22, of his Direct Testimony, Mr. Webber discusses the loop cost module. He states that “[l]ease expenses included within this module were provided to QSI in February 2010 and include database output related to the most recent month’s actual vendor invoices assessed One Communications as of February 10, 2010.” Please provide the vendor invoices. Also provide the lease expenses for 2007, 2008 and 2009 and the related vendor invoices.
- VZ-One Comm-2-13** At page 22 of his Direct Testimony, Mr. Webber discusses the Integrated Access Devices Inventory tab and Monthly Cost tab in NUCA. Does Mr. Webber contend that Integrated Access Devices costs attributable to the provision of data services are appropriately included in a cost study for intrastate switched access service? If your answer is anything other than an unqualified “no,” please explain.
- VZ-One Comm-2-14** At page 25, line 6, Table 2, Massachusetts Loop Cost Analysis shows loop costs as follows: DS0 MRCs, DS1 and above MRCs, and IAD monthly costs. Does Mr. Webber contend that these loop costs are appropriately included in a cost study for intrastate switched access service? If your answer is anything other than an unqualified “no,” please explain.
- VZ-One Comm-2-15** At pages 26, lines 17-20, of his Direct Testimony, Mr. Webber states that “[t]he Aggregation Module captures the investment-related costs and ongoing expenses associated with building and maintaining these aggregation arrangements, comprised largely of collocation build-out equipment and related costs and lease expenses.” Please provide a detailed description of all attributes of and equipment employed in the “Aggregation Module” assumed by NUCA. If not already provided in response to other data requests, please provide all facts and/or analyses upon which Mr. Webber and/or QSI Consulting relied to estimate the

traffic-sensitive portion for intrastate switched access service for each cost and expense in the “Aggregation Module” assumed by NUCA.

- VZ-One Comm-2-16** At page 31, lines 13-15, of his Direct Testimony, Mr. Webber states “my decision to employ technology substitution in this instance results in per unit investments that are lower than would otherwise have been the case.” Please provide the comparison analysis between the equipment from the two vendors named in the confidential testimony and the supporting documentation that lead to Mr. Webber’s decision.
- VZ-One Comm-2-17** At page 35, lines 9-12, of his Direct Testimony, Mr. Webber states that “One Communications relies on [confidential number omitted] different switching platforms in Massachusetts including a combination of traditional circuit switches as well as soft-switches.” Please provide a detailed description of the switching platforms, including the type and vendor of the traditional circuit switches and packet switches that One Communications uses to provide service in Massachusetts.
- VZ-One Comm-2-18** At page 42, lines 7-9, of his Direct Testimony, Mr. Webber states that the Transport Termination Module “is designed to estimate the forward-looking costs associated with terminating traffic within One Communications’ switching centers and/or collocation arrangements.” Please provide a detailed description of all attributes of and equipment employed in the transport network assumed by NUCA. If not already provided in response to other data requests, please provide all facts and/or analyses upon which Mr. Webber and/or QSI Consulting relied to estimate the traffic-sensitive portion for intrastate switched access service for each attribute of and piece of equipment employed in the transport network assumed by NUCA.
- VZ-One Comm-2-19** At page 50, line 4, of his Direct Testimony, Mr. Webber states that “[i]ntraswitch usage in the Traffic Module was taken by another source – One Communications’ Special Study of intraswitch usage based on billing records.” Please provide the Special Study and the billing records used as support for the study.