

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

**APPLICATION OF COMPETITIVE CARRIERS OF )  
THE SOUTH, INC. FOR A DECLARATORY ORDER ) CASE NO.  
AFFIRMING THAT THE INTERCONNECTION ) 2015-00283  
REGIMES UNDER KRS 278.530 AND 47 U.S.C. § 251 )  
ARE TECHNOLOGICALLY NEUTRAL )**

**COMPETITIVE CARRIERS OF THE SOUTH, INC'S  
INFORMATION REQUESTS TO MCIMETRO ACCESS TRANSMISSION  
SERVICES, LLC d/b/a VERIZON ACCESS TRANSMISSION SERVICES**

MCImetro Access Transmission Services, LLC, d/b/a Verizon Access Transmission Services ("Verizon"), pursuant to the Order dated August 9, 2016 which set the Procedural Schedule in the above-styled case is requested to file responses to the following requests for information by November 23, 2016, with copies to the Commission and to all parties of record, and in accordance with the following:

**INSTRUCTIONS**

1. Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.
2. If any request appears confusing, please request clarification directly from Competitive Carriers of the South, Inc. ("CompSouth").
3. The responses provided should first restate the question asked and also identify the person(s) supplying the information.
4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any information request, so state and give as

much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. These requests shall be deemed continuing so as to require further and supplemental responses if Verizon receives or generates additional information within the scope of these requests between the time of the original responses and the end of any hearings in this proceeding.

6. To the extent that the specific document, workpaper or information does not exist as requested, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

7. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

8. If you object to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify CompSouth as soon as possible.

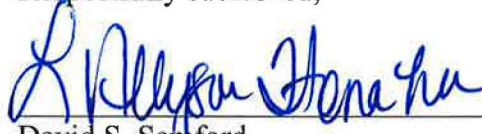
9. For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

10. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, recordings, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the

foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), code number thereof, or other means of identifying it and its present location and custodian. If any such document was, but is no longer in your possession or subject to your control, state what disposition was made of it, including the date of such disposition.

11. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any information request who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.

Respectfully submitted,



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*Counsel for Competitive Carriers of the South, Inc.*

**CERTIFICATE OF SERVICE**

This is to certify that foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on November 9, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being hand delivered to the Commission on this the 9<sup>th</sup> day of November.



*Counsel for Competitive Carriers of the South, Inc.*

## INFORMATION REQUESTS

**REQUEST 1.** How is Verizon affected by the Commission's decision in this proceeding?

**REQUEST 2.** For each commercial negotiation that Verizon or its affiliates has either proposed in writing to commence or entered into with a service provider, including any affiliate of Verizon concerning, providing for or governing the exchange in IP format of voice traffic going from Verizon to the other party as well as voice traffic coming from the other party to Verizon, please state whether Verizon or its affiliates required its affiliate or the service provider to agree that the final agreement contain the provision that it not be subject to 47 U.S.C. §§ 251-252 or that the final agreement be executed as a commercial agreement.

**REQUEST 3.** Were each of the carriers that Verizon has negotiated IP interconnection agreements provided copies of the COMCAST agreement prior to negotiations?

**REQUEST 4.** Were each of the carriers that Verizon has negotiated IP interconnection agreements provided an opportunity to adopt the COMCAST agreement?

**REQUEST 5.** For a call that originates in TDM and terminates in TDM, please identify how the exchange of traffic at the point of interconnection in IP format provides enhanced functionality to end users solely as a result of the use of IP format at the point of interconnection.

**REQUEST 6.** For a call that originates in VoIP and terminates in VoIP, please identify how the exchange of traffic at the point of interconnection in IP format provides enhanced functionality to end users solely as a result of the use of IP format at the point of interconnection.

**REQUEST 7.** For a call that originates in TDM and terminates in VoIP, please identify how the exchange of traffic at the point of interconnection in IP format provides enhanced functionality to end users solely as a result of the use of IP format at the point of interconnection.

**REQUEST 8.** For a call that originates in VoIP and terminates in TDM, please identify how the exchange of traffic at the point of interconnection in IP format provides enhanced functionality to end users solely as a result of the use of IP format at the point of interconnection.

**REQUEST 9.** Does Verizon agree that the FCC has not preempted a state from requiring IP interconnection agreements to be negotiated and filed in accordance with 47 U.S.C. §§ 251-252? If Verizon claims that such preemption has occurred, provide a citation.

**REQUEST 10.** Please quantify the cost and time for both internal and external resources that Verizon North expended to adjudicate the *Verizon North, Inc. v. Strand* before the Michigan Public Service Commission.