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August 23, 2011

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120


**Re: Pennsylvania Public Utility Commission v. Verizon Pennsylvania Inc.
Pennsylvania Telephone Association v. Verizon Pennsylvania Inc.
Pennsylvania Public Utility Commission v. Verizon North LLC
Pennsylvania Telephone Association v. Verizon North LLC
Docket Nos., R-2011-2234464, C-2011-2237456, R-2011-2234462, C-2011-2237496**

Dear Secretary Chiavetta:

Enclosed please find Verizon's Motion to Admit Into The Record PTA's Supplemental Discovery Responses, being filed by Verizon Pennsylvania Inc. and Verizon North LLC, in the above captioned matter.

Please do not hesitate to contact me if you have any questions.

Very truly yours,


Suzan D. Paiva

SDP/slb
Enc.

Via E-Mail and Federal Express Delivery
cc: The Honorable Dennis J. Buckley

Via E-Mail and First Class U.S. Mail
cc: Herbert Nurick, Mediation Coordinator
Attached Certificate of Service

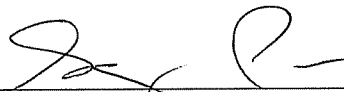
CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a copy of the Verizon Companies' Motion to Admit Into The Record PTA's Supplemental Discovery Responses, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 23rd day of August, 2011.

VIA E-MAIL and FIRST CLASS U.S. MAIL

Norman J. Kennard, Esquire
Patricia Armstrong, Esquire
Charles E. Thomas, III, Esquire
Thomas, Long, Niesen & Kennard
212 Locust Street, Suite 500
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Attorney for Verizon

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
v.	:	R-2011-2234464
Verizon Pennsylvania Inc.	:	
	:	
	:	
Pennsylvania Telephone Association	:	
v.	:	C-2011-2237456
Verizon Pennsylvania Inc.	:	
	:	
	:	
Pennsylvania Public Utility Commission	:	
v.	:	R-2011-2234462
Verizon North LLC	:	
	:	
	:	
Pennsylvania Telephone Association	:	
v.	:	C-2011-2237496
Verizon North LLC	:	

**VERIZON'S MOTION TO ADMIT INTO THE RECORD
PTA'S SUPPLEMENTAL DISCOVERY RESPONSES**

Pursuant to 52 Pa. Code § 5.402(a), Verizon Pennsylvania Inc. and Verizon North LLC (“Verizon”) hereby move for admission into the record certain Supplemental Answers of the Pennsylvania Telephone Association (“PTA”) to Verizon’s First Set of Data Requests and Requests for Admission.

On July 25, 2011, Verizon propounded its First Set of Data Requests and Requests for Admission to the PTA. Pursuant to the schedule in this proceeding, responses to Verizon’s discover requests were due on August 1, 2011. On August 3, 2011, PTA provided preliminary responses to Verizon’s discovery requests indicating for certain responses that “PTA Complainants are in the process of obtaining a response to a portion of this interrogatory.” On the day of the hearings – August 12, 2011 – PTA


provided Verizon with supplemental responses to Verizon's discovery requests.

Verizon's counsel did not receive those responses until the hearing was over.

Verizon now moves for the admission into the record of PTA's Supplemental Answers to Verizon's Data Requests Nos. 6, 10, 11 and 15. These Supplement Answers are attached hereto and are marked as Verizon's Cross Examination Exhibit No. 7.¹ PTA's counsel has advised Verizon that PTA has no objection to the admission of these Supplemental Answers.

WHEREFORE, for the foregoing reasons, Verizon respectfully requests that the PTA's Supplemental Answers attached hereto be admitted into the record.

Date: August 23, 2011


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Counsel for Verizon

¹ Verizon Exhibits 1 through 5 were admitted into the record at the hearing. Exhibit 6 was marked for identification but was not moved for admission.

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Verizon's First Set of Data Requests and Requests for Admission
Supplemental Answers and Objections of the Pennsylvania Telephone Association

Person Answering: Gary Zingaretti

VZ-PTA-I-6: Identify each PTA Complainant that operates a tandem switch in Pennsylvania, and for each such company:

- (a) State whether the PTA Complainant transits traffic originated from other local service providers and destined to a local service provider other than the PTA Complainant.
- (b) Identify all rates charged by the PTA Complainant for transit service.
- (c) Produce all agreements, tariffs or other documents relating to the rates, terms and/or conditions of transit service provided by each such PTA Complainant.

Objection: PTA objects to this request on the grounds that it seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and it is overly broad and would require an unduly burdensome search in that it is not reasonably limited as to time

Response: None of the PTA Complainants operate a tandem except as noted below:

Commonwealth Telephone Company, LLC has interconnection agreements with CLECs and wireless carriers that include provisions for transit service. Specifically, Commonwealth Telephone Company, LLC has interconnection agreements with the following and the agreements are publicly available documents.

- Americell PA-3 L.P. May 1, 2005
- Sprint Communications Company April 20, 2007
- Service Electric Telephone April 1, 2004
- Southwestern Bell Mobile Systems LLC dba Cingular Wireless June 1, 2004
- Dobson Cellular dba American Cellular Corp February 10, 2004
- Indigo Wireless May 1, 2005
- RCN Telecom Services May 4, 2007
- T-Mobile USA July 1, 2007
- Comcast August 1, 2008
- IDT June 24, 2008

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- Level 3 Communications LLC September 25, 2002
- Cleveland Unlimited dba Revol Wireless October 1, 2010
- Verizon Wireless 11/5/04
- CSM Wireless LLC dba Revol Wireless October 1, 2010
- NTELOS Licenses, Inc dba NTELOS wireless march 1, 2011
- NPCR, Inc August 1, 2006
- Sprint Spectrum LP dba Sprint PCS August 1, 2003
- Tem Wireless LLC December 1, 2003

Northeastern Pennsylvania Telephone Company operates a tandem, but the answers to (a) – (c) are no, not applicable, not applicable.

Marianna and Scenery Hill respond as follows:

Marianna operates a subtending tandem

- (a) Marianna does not transit traffic originated from other local service providers
- (b) N/A – Marianna does not provide transit service
- (c) N/A – Marianna does not provide transit service

Consolidated Communications of Pennsylvania Company responds as follows:

CCPA operates a tandem.

- (a) CCPA has transit terms and conditions in its CLEC and wireless interconnection agreements with the following companies:

CLEC

Armstrong
CityNet
Comcast
Full Service Networks
MCI Metro (Verizon Business)
TCG (AT&T)
US LEC

Wireless

Dobson Cellular/AT&T Wireless
Cricket Wireless
T-Mobile (no transit rate)
Nextel (no transit rate)
Sprint
Verizon Wireless

- (b) All agreements are publicly available documents on file with the PA PUC.
- (c) All agreements are publicly available documents on file with the PA PUC.

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Person Answering: Gary Zingaretti

VZ-PTA-I-10: Reference the PTA's Answer to New Matter, paragraph 6, stating that "at the present time, Verizon is effectively a monopoly provider of tandem transit traffic service." At any time from June 27, 2007 to the present, have any of the PTA Complainants utilized the network of a carrier other than Verizon to transit local traffic originated on the PTA Complainant's network and terminating to another local service provider? If your answer is anything other than an unqualified "no":

- (a) Identify the carrier whose network was used for Transit service and the approximate dates of such use.
- (b) State whether the PTA Complainant compensated the other carrier for providing Transit service, and if so identify the rate(s) paid for such service.
- (c) Produce all documents relating to the use of the other carrier's network for Transit service, including but not limited to any contracts or tariffs relating to the service, any correspondence between the parties regarding Transit service and any invoices for Transit service (if voluminous, examples of the invoices may be provided).

Objection: PTA objects to this request on the grounds that it seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and it is overly broad and would require an unduly burdensome search in that it is not reasonably limited as to time. PTA will address this in their testimony.

Response: None of the PTA Complainants have utilized the network of a carrier other than Verizon to transit local traffic originated on the PTA Complainant's network and terminating to another local service provider

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Verizon's First Set of Data Requests and Requests for Admission
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Person Answering: Gary Zingaretti

VZ-PTA-I-11: Reference the PTA's Answer to New Matter, paragraph 6, stating that "at the present time, Verizon is effectively a monopoly provider of tandem transit traffic service." At any time from June 27, 2007 to the present, has any affiliate of the PTA Complainants (e.g. CLEC or wireless carriers) utilized the network of a carrier other than Verizon to transit local traffic originated on its own network and terminating to another local service provider in the Commonwealth of Pennsylvania? If your answer is anything other than an unqualified "no":

- (a) Identify the carrier whose network was used for transit service and the approximate dates of such use and the PTA affiliate transiting traffic through that carrier.
- (b) State whether the affiliate of the PTA Complainant compensated the other carrier for providing transit service, and if so identify the rate(s) paid for such service;
- (c) Produce all documents relating to the use of the other carrier's network for transit, including but not limited to any contracts or tariffs relating to the service, any correspondence between the parties regarding transit service and any invoices for transit service (if voluminous, examples of the invoices may be provided).

Objection: PTA objects to this request on the grounds that it seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and it is overly broad and would require an unduly burdensome search in that it is not reasonably limited as to time. PTA will address this in their testimony.

Response: No affiliate of the PTA Complainants utilized the network of a carrier other than Verizon to transit local traffic originated on its own network and terminating to another local service provider in the Commonwealth of Pennsylvania

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Person Answering: Gary Zingaretti

VZ-PTA-I-15: Identify each affiliate of any of the PTA Complainants that has a currently effective agreement with Verizon in Pennsylvania for the provision of Transit service and identify the date of and the parties to such agreement.

Objection: PTA objects to this request on the grounds that it seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and it is overly broad and would require an unduly burdensome search in that it is not reasonably limited as to time. PTA will address this in their testimony.

Response: Verizon has all agreements to which Verizon is a party and no further response is required. However no affiliate of any of the PTA Complainants has an agreement with Verizon except as follows:

Frontier: CTSI, LLC is a Frontier affiliate CLEC operating in the Verizon territories of Pennsylvania. CTSI, LLC has the following interconnection agreements in place with Verizon in Pennsylvania:

Interconnection, Resale and Unbundling Agreement between Verizon North, Inc and CTSI, LLC approved by PA PUC order entered December 6, 2002.

Interconnection Agreement Under Sections 251 and 252 of the Telecommunications Act of 1996 between Bell Atlantic-Pennsylvania, Inc and CTSI, Inc approved by PA PUC order entered March 2, 2000

Pymatuning Telephone Company: (CLEC) has a November 2006 agreement with Verizon

Citizens Telephone Company: Citizens Telecom Solutions has an agreement with Verizon

Consolidated Communications of Pennsylvania Company: Our affiliate CLEC, CCES (formerly known as Penn Telecom) has an interconnection agreement with Verizon.