

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

**MCI COMMUNICATIONS
SERVICES, INC.,**

Complainant,

v.

WIDE VOICE, LLC,

Defendant.

Proceeding Number 19-121

**Bureau ID Number
EB-19-MD-003**

**MCI COMMUNICATIONS SERVICES, INC.’S FIRST REQUEST FOR
INTERROGATORIES TO WIDE VOICE, LLC**

Pursuant to 47 C.F.R. § 1.730(a)-(b), Complainant MCI Communications Services, Inc. (“Verizon”) hereby submits to the Commission, and concurrently serves on Defendant Wide Voice, LLC (“Wide Voice”), this First Request for Interrogatories (“Interrogatories”). Wide Voice shall respond to these interrogatories in the time provided by 47 C.F.R. § 1.730, in writing, under oath, and in accordance with the Commission’s rules and the Instructions and Definitions set forth herein.

DEFINITIONS

1. All terms used herein shall be construed in an ordinary, commonsense manner, and not in a hyper-technical, strained, overly literal, or otherwise restrictive manner; however, acronyms and other terms of art in the telecommunications industry shall have the meaning typically ascribed to them by the industry.

2. “Affiliate” means the ownership or common control relationship as defined in 47 U.S.C. § 153(2).

3. “Any” means each, every, and all persons, places, or things to which the term refers.

4. “Communication” means any transfer of information, whether written, printed, electronic, oral, pictorial, or otherwise transmitted by any means or manner whatsoever.

5. “Concerning” means relating to, involving, reflecting, identifying, stating, referring to, evidencing, constituting, analyzing, underlying, commenting upon, mentioning, or connected with, in any way, the subject matter of the request.

6. “Copy” means any reproduction, in whole or in part, of an original document and includes, but is not limited to, non-identical copies made from copies.

7. “Describe” or “description” means to set forth fully, in detail, and unambiguously each and every fact of which you have knowledge related to answering the interrogatory.

8. “Document” means any written, drawn, recorded, transcribed, filed, or graphic matter, including scientific or researchers’ notebooks, raw data, calculations, information stored in computers, computer programs, surveys, tests and their results, however produced or reproduced. With respect to any document that is not exactly identical to another document for any reason, including but not limited to marginal notations, deletions, or redrafts, or rewrites, separate documents should be provided.

9. “Identify,” “identity,” or “identification,” when used in relation to “person” or “persons,” means to state the full name and present or last known address of such person or persons and, if a natural person, his or her present or last known job title, the name and address

of his or her present or last known employer, and the nature of the relationship or association of such person to you.

10. “Identify,” “identity,” or “identification,” when used in relation to “document” or “documents,” means to state the date, subject matter, name(s) of person(s) that wrote, signed, initialed, dictated, or otherwise participated in the creation of the same, the name(s) of the addressee(s) (if any), and the name(s) and address(es) (if any) of each person or persons who have possession, custody, or control of said document or documents.

11. “Identify,” when used in relation to a “communication,” means to identify the participants in each communication and, if such communication is not contained in a document, the date, place, and content of such communication.

12. “Including” means including but not limited to.

13. “Original” means the first archetypal document produced; that is, the document itself, not a copy.

14. “Person” or “persons” means any natural person or persons, group of natural persons acting as individuals, group of natural persons acting as a group (e.g., as a board of directors, a committee, etc.), or any firm, corporate entity, partnership, association, joint venture, business, enterprise, cooperative, municipality, commission, or governmental body or agency.

15. “You,” “your,” or “Wide Voice” means Wide Voice, LLC. In that regard, each and every interrogatory contained herein is directed at you.

16. “Verizon” means MCI Communications Services, Inc.

INSTRUCTIONS

When responding to the following interrogatories, please comply with the instructions below:

1. Each interrogatory is continuing in nature and requires supplemental responses as soon as new, different, or further information is obtained that is related to answering the interrogatory.
2. Provide all information, including all documents, related to answering the interrogatory that are in your possession, custody, or control, regardless of whether such documents are possessed directly by you or by your employees, officers, directors, agents, representatives, or any other person or entity acting or purporting to act on their behalf.
3. In any interrogatory, the present tense shall be read to include the past tense, and the past tense shall be read to include the present tense.
4. In any interrogatory, the singular shall be read to include the plural, and the plural shall be read to include the singular.
5. In any interrogatory, the use of the conjunctive shall be read to include the disjunctive, and the use of the disjunctive shall be read to include the conjunctive.
6. Any document withheld from production on the grounds of a privilege is to be specifically identified by author(s), addressee(s), length, and date, with a brief description of the subject matter or nature of the document, and a statement of the privilege asserted.
7. If you contend that any part of your response to a particular Interrogatory contains trade secrets or other proprietary or confidential business or personal information, such contention shall not provide a basis for refusing to respond within the time required by the

applicable rules. You shall respond according to and consistent with the terms of the Protective Order entered by the Commission on May 9, 2019.

8. Please begin the response to each request on a separate page.
9. Please restate each interrogatory before providing the response or objection.
10. Please specify the interrogatory in response to which any document, narrative response, or objection is provided. If a document, narrative response, or objection relates to more than one request, please cross reference.
11. For each separate interrogatory, identify the person(s) under whose supervision the response was prepared.
12. For any interrogatory consisting of separate subparts or portions, a complete response is required to each subpart as if the subpart or portion were propounded separately.
13. Produce any documents in the form of legible, complete, and true copies of the original documents as “original” is defined herein. To the extent that electronic workbooks, spreadsheets, presentations, or other documents are produced, they should be provided in native format.
14. Please provide all documents in their native format, together with all metadata.
15. If you assert that documents or information related to answering an interrogatory are unavailable or have been discarded or destroyed, state when and explain in detail why any such document or information was unavailable, discarded, or destroyed, and identify the person directing the discarding or destruction. If a claim is made that the discarding or destruction occurred pursuant to a discarding or destruction program, identify and produce the criteria, policy, or procedures under which such program was undertaken.

16. If any interrogatory cannot be answered in full after reasonable inquiry, provide the response to the extent available, state why the interrogatory cannot be answered in full, and provide any information within your knowledge concerning the description, existence, availability, and custody of any unanswered portions.

EXPLANATION FOR WHY THESE INTERROGATORIES ARE NECESSARY

The information sought in these interrogatories is necessary to resolve Verizon's Formal Complaint against Wide Voice. Specifically, these interrogatories seek information relating to Wide Voice's affiliate relationship with the owners of certain end office switches to which Wide Voice terminated traffic for which it billed Verizon tandem switching rate elements. Verizon attempted to enter into a stipulation with Wide Voice as to the facts sought in these interrogatories, but the parties were unable to reach agreement as to the facts underlying the affiliation issue.

INTERROGATORIES

Verizon-Wide Voice 1: Identify the actual legal name and all Operating Company Number(s) ("OCN") of (1) Native American Telecom, LLC and (2) Native American Telecom – Pine Ridge, LLC.

Verizon-Wide Voice 2: For each of the companies identified in Interrogatory 1, identify all ownerships interests, as well as the owners, by percentage, of each person with an ownership interest in any of the companies identified in Interrogatory 1 and, if applicable, the Chief Executive Officer, the President, the Chief Technology Officer (or Chief Technical Officer), the Controller, Secretary, Treasurer, and all Directors and Managing Members, from January 2015 to the present.

Verizon-Wide Voice 3: For Wide Voice, LLC, WideVoice Communications Inc., and each of the companies identified in Interrogatory 1, identify the positions held by, and where applicable membership status of, Andrew Nickerson, Patrick Chicas, Kathryn Glaser, Carlos Cestero, Keith Williams, Tandy DeCosta, Becky Prince, Erla Erlingsdottir and David Erickson, from January 2015 to the present.

Verizon-Wide Voice 4: For Wide Voice, LLC and each of the entities identified in Interrogatory 1, identify the ownership interest held directly or indirectly by WideVoice Communications Inc., from January 2015 to the present.

Verizon-Wide Voice 5: For WideVoice Communications Inc. and each of the entities identified in Interrogatory 1, identify the ownership interest held directly or indirectly by Wide Voice, LLC, from January 2015 to the present.

Verizon-Wide Voice 6: Identify the members of Wide Voice, LLC and their ownership interests, by percentage, as well as the owners, by percentage, of each person with an ownership interest in Wide Voice, LLC, from January 2015 to the present.

Verizon-Wide Voice 7: Identify the owners of WideVoice Communications Inc. by percentage, as well as the owners, by percentage, of each person with an ownership interest in WideVoice Communications Inc., from January 2015 to the present.

Verizon-Wide Voice 8: Identify all Wide Voice Affiliates, by legal name and OCN, that own or operate one or more end office switch(es) listed in the Local Exchange Routing Guide as having assigned an NPA-NXX code(s), a block(s) of one thousand telephone numbers or a Local Routing Number(s) subtending a tandem owned or operated by Wide Voice or a Wide Voice Affiliate.

Respectfully submitted,

/s/ Curtis L. Groves

Curtis L. Groves

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