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June 21, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: MCI Communications Services, Inc. v. Wide Voice, LLC;
Proceeding No. 19-121; Bureau ID No. EB-19-MD-003

Dear Ms. Dortch:

Attached please find Wide Voice, LLC's Opposition and Objections to Complainant's First Request for Interrogatories in the above-referenced proceeding, filed and served pursuant to 47 C.F.R. §§ 1.730(c), 1.734(f)(3).

Sincerely,



Lauren J. Coppola

Enclosure

cc: Lisa Griffin, Enforcement Bureau (*via email*)
Lisa Boehley, Enforcement Bureau (*via email*)
Curtis L. Groves, Counsel for Complainant (*via email*)
Scott H. Angstreich, Counsel for Complainant (*via email*)
Joshua Hafenbrack, Counsel for Complainant (*via email*)
Sean Nadel, Counsel for Complainant (*via email*)

**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

**WIDE VOICE, LLC’S OPPOSITION AND OBJECTIONS TO
COMPLAINANT’S FIRST REQUEST FOR INTERROGATORIES**

Pursuant to 47 C.F.R. § 1.729(c), Defendant Wide Voice, LLC (“Wide Voice”), by and through its undersigned counsel, hereby serves its Opposition and Objections to the First Set of Interrogatories from Complainant MCI Communications Services, Inc. (“Verizon”).

Verizon’s complaint challenges the validity of Wide Voice’s tariff, and none of Verizon’s challenges turn on whether or to what extent any entity is a Wide Voice “affiliate,” as that term is defined in the Communications Act and the Commission’s regulations. Verizon’s complaint raises purely legal issues, and factual discovery into irrelevant issues, many of which are outside the scope of Wide Voice’s knowledge, is not warranted. Verizon’s efforts to conduct discovery on certain other entities are intended solely to harass and distract from the tariff issues in question. As will be set forth in further detail in Wide Voice’s forthcoming answer and brief in support of answer, the issue as to whether a Wide Voice “affiliate” terminated traffic that traversed a Wide Voice tandem switch is a red herring.

GENERAL OBJECTIONS AND OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

1. Wide Voice objects to each and every Definition, Instruction, and Interrogatory to the extent it attempts to alter the scope of discovery or impose obligations that are inconsistent with or exceed those required under the Commission's rules.

2. Wide Voice objects to the Interrogatories to the extent they seek information that is outside of Wide Voice's custody and control or is otherwise in the public domain or equally as accessible to Verizon as it is to Wide Voice.

3. Wide Voice objects to the Interrogatories to the extent they seek documents or information that are protected by the attorney-client privilege and/or any other applicable privileges including, but not limited to, common interest and/or joint defense and the work product doctrines. Any inadvertent disclosure of such information shall not be deemed a waiver of any applicable privilege or immunity recognized by statute or case law.

4. Wide Voice objects to the Interrogatories to the extent they are vague, overbroad, unduly burdensome, irrelevant, duplicative, cumulative, or not reasonably calculated to lead to the discovery of admissible evidence.

5. Wide Voice objects generally to any interrogatory that calls for information that is not in its possession, custody or control.

SPECIFIC OBJECTIONS

VERIZON INTERROGATORY NO. 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.

WIDE VOICE'S RESPONSE:

In addition to its General Objections, Wide Voice objects to Interrogatory No. 1 as it seeks information that is not both relevant to the material facts in dispute in this proceeding and necessary to the resolution of this dispute. Wide Voice further objects to this interrogatory because it seeks information that is not in Wide Voice's possession, custody, or control. Moreover, Wide Voice objects to this interrogatory to the extent it seeks public information or information otherwise accessible to Verizon.

VERIZON INTERROGATORY NO. 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.

WIDE VOICE'S RESPONSE:

In addition to its General Objections, Wide Voice objects to Interrogatory No. 2 as it seeks information that is not both relevant to the material facts in dispute in this proceeding and necessary to the resolution of this dispute. Moreover, the information sought in this request is not within the possession, custody or control of Wide Voice, LLC.

VERIZON INTERROGATORY NO. 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.

WIDE VOICE'S RESPONSE:

In addition to its General Objections, Wide Voice objects to Interrogatory No. 3 as it seeks information that is not both relevant to the material facts in dispute in this proceeding and necessary to the resolution of this dispute. Moreover, aside from the information sought in this request from Wide Voice, LLC, the information sought in this request is not within the possession, custody or control of Wide Voice, LLC.

VERIZON INTERROGATORY NO. 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.

WIDE VOICE'S RESPONSE:

In addition to its General Objections, Wide Voice objects to Interrogatory No. 4 as it seeks information that is not both relevant to the material facts in dispute in this proceeding and necessary to the resolution of this dispute. Moreover, aside from the information sought in this request from Wide Voice, LLC, the information sought in this request is not within the possession, custody or control of Wide Voice, LLC.

VERIZON INTERROGATORY NO. 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.

WIDE VOICE'S RESPONSE:

In addition to its General Objections, Wide Voice objects to Interrogatory No. 5 as it seeks information that is not both relevant to the material facts in dispute in this proceeding and necessary to the resolution of this dispute.

VERIZON INTERROGATORY NO. 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.

WIDE VOICE'S RESPONSE:

In addition to its General Objections, Wide Voice objects to Interrogatory No. 6 as it seeks information that is not both relevant to the material facts in dispute in this proceeding and necessary to the resolution of this dispute.

VERIZON INTERROGATORY NO. 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.

WIDE VOICE'S RESPONSE:

In addition to its General Objections, Wide Voice objects to Interrogatory No. 7 as it seeks information that is not both relevant to the material facts in dispute in this proceeding and

necessary to the resolution of this dispute. Moreover, the information sought in this request is not within the possession, custody or control of Wide Voice, LLC.

VERIZON INTERROGATORY NO. 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.

WIDE VOICE'S RESPONSE:

In addition to its General Objections, Wide Voice objects to Interrogatory No. 8 as it seeks information that is not both relevant to the material facts in dispute in this proceeding and necessary to the resolution of this dispute.

DATED: June 21, 2019

WIDE VOICE, LLC

By Its Attorneys,

/s/ Lauren J. Coppola

Lauren J. Coppola

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Suite 2500

Boston, MA 02199

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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2019, I caused a copy of the foregoing Wide Voice, LLC'S Opposition and Objections to Complainant's First Request for Interrogatories, to be served by electronic mail upon the following:

/s/ Lauren J. Coppola
Lauren J. Coppola

Lisa Griffin
Lisa Boehly
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