

**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 FIRST REQUEST FOR
INTERROGATORIES TO MCI COMMUNICATIONS SERVICES, INC.**

Pursuant to 47 C.F.R. § 1.730(a)-(b), Defendant Wide Voice, LLC ("Wide Voice") hereby submits to the Commission, and concurrently serves on Complainant MCI Communications Services, Inc. ("Verizon"), this First Request for Interrogatories ("Interrogatories"). Verizon 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. “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.

5. “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.

6. “Identify” or “identity,” 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. When used in relation to a corporate entity, “identify” means to state the full name of the corporation.

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

8. “You” or “your” means MCI Communications Services, Inc. In that regard, each and every interrogatory contained herein is directed at you.

9. "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. 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.

7. Please begin the response to each request on a separate page.
8. Please restate each interrogatory before providing the response or objection.
9. 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.
10. For each separate interrogatory, identify the person(s) under whose supervision the response was prepared.
11. 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.
12. 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. These interrogatories seek information (a) relating to assertions made in Verizon's complaint by its Declarant, Ms. Traci Morgan and (b) about how Verizon and related entities and affiliates implement the

Commission's access charge orders and regulations, which are central to this dispute. Wide Voice attempted to enter into a stipulation with Verizon as to many of the facts sought in these interrogatories, but the parties were unable to reach agreement.

INTERROGATORIES

Wide Voice-Verizon 1: Please identify the full legal name of the legal entity that employs Ms. Traci Morgan, MCI Communications Service, Inc.'s declarant in this matter.

Wide Voice-Verizon 2: In her declaration, Ms. Morgan asserts that "Verizon conducted an internal audit of Wide Voice's intercarrier compensation charges based on suspicious billing patterns."

(a) Please describe methodology Verizon used to conduct the "internal audit of Wide Voice's intercarrier compensation charges" with detail sufficient for the audit to be replicated using Wide invoice's invoices.

(b) Please describe in detail all "suspicious billing patterns" identified.

Wide Voice-Verizon 3: Ms. Morgan further states in paragraph 4 of her declaration that "[b]eginning with Wide Voice's December 2018 invoice, Verizon began disputing and withholding payment with respect to Wide Voice's terminating charges." Please describe in detail all bases for Verizon's refusal to pay Wide Voice's July 2018 through November 2018 invoices for terminating traffic that was routed through another company's end office switch, a "third party."

Wide Voice-Verizon 4: On June 16, 2017, the Verizon Telephone Companies issued revisions to Tariff F.C.C. Nos. 1, 11, 14, and 16 (the "Verizon ILECs' Tariffs"). In

those filings, the Verizon Telephone Companies included one set of rates for Tandem Switched Transport that applied to traffic “Terminating to Telephone Company End Offices” and another set of rates for Tandem Switched Transport that applied to traffic “Terminating to Third Party.”

- (a) Please describe in detail how the Verizon ILECs’ Tariffs’ rates comply with 47 C.F.R. § 51.906(h) (the Commission’s “Step 6” reduction).
- (b) Are the Verizon Telephone Companies issuing Tariff F.C.C. Nos. 1, 11, 14, and 16 “Price Cap carriers” as that term is used in 47 C.F.R. § 51.906(h).
- (c) According to the Verizon ILEC Tariffs, does the term “Telephone Company” include only the price cap LEC issuers of the tariffs?
- (d) Does “Terminating to Third Party” traffic include termination to any other provider, including any non-price cap LEC affiliate of Verizon?
- (e) Do the Verizon price cap LECs charge non-zero tandem switched transport charges for traffic they terminate to non-price cap LEC affiliates of Verizon?

Wide Voice-Verizon 5: Please identify all entities related to or affiliated with Verizon that subtend another Verizon-affiliated tandem services provider, and each such entity’s regulatory classification (e.g., incumbent local exchange carrier, competitive local exchange carrier, interconnected VoIP provider, etc.).

DATED: July 3, 2019

WIDE VOICE, LLC

By Its Attorneys,

/s/ Lauren J. Coppola

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