



MESSER CAPARELLO & SELF, P.A.

Attorneys At Law

www.lawfla.com

September 8, 2009

VIA ELECTRONIC FILING

Ms. Ann Cole, Director
Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 080134-TP

Dear Ms. Cole:

Enclosed for filing on behalf of Intrado Communications Inc. is an electronic version of Intrado Communications Inc.'s Notice of Serving its Objections and Responses to FPSC Staff's Second Set of Interrogatories and Intrado Communications Inc.'s Notice of Serving its Objections and Responses to Verizon Florida' Third Set of Interrogatories and Second Request for Production of Documents in the above referenced docket.

Thank you for your assistance with this filing.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Floyd R. Self', is written over the typed name.

Floyd R. Self

FRS/amb
Enclosure

cc: Cherié Kiser, Esq.
Parties of Record

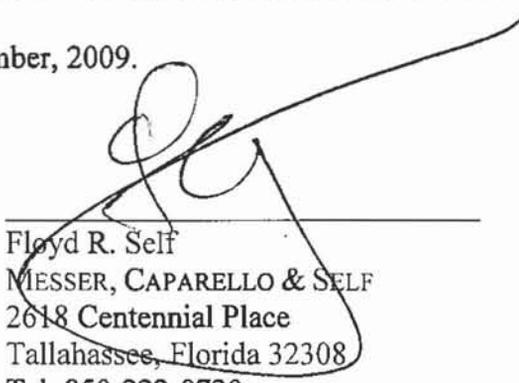
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Intrado Communications Inc.)
for arbitration to establish an interconnection)
agreement with Verizon Florida LLC, pursuant)
to Section 252(b) of the Communications Act)
of 1934, as amended, and Section 364.12, F.S.)
_____)

Docket No. 080134-TP
Date Filed: September 8, 2009

**INTRADO COMMUNICATIONS INC.'S NOTICE
OF SERVICE OF OBJECTIONS AND RESPONSES TO FPSC STAFF'S
SECOND SET OF INTERROGATORIES (NOS. 15-19)**

Intrado Communications Inc. ("Intrado") by and through its undersigned counsel, hereby files and serves Notice that it has served its Objections and Responses to FPSC Staff's Second Set of Interrogatories (Nos. 15-19) by electronic mail to ltan@psc.state.fl.us and by U. S. Mail to Lee Eng Tan, Esq., Florida Public Service Commission, 2540 Shumard Oak Boulevard, Florida 32399-0850 on the 8th day of September, 2009.



Floyd R. Self
MESSER, CAPARELLO & SELF
2618 Centennial Place
Tallahassee, Florida 32308
Tel. 850-222-0720
Fax 850-558-0656
E-mail: fself@lawfla.com

Counsel for Intrado Communications, Inc.

CERTIFICATE OF SERVICE

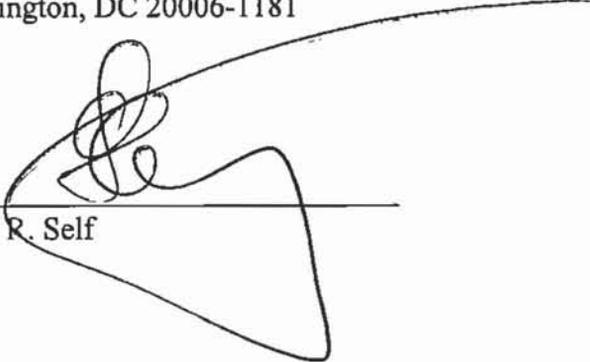
I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Electronic Mail and/or U. S. Mail and e-mail this 8th day of September, 2009.

Lee Eng Tan, Esq.
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Dulaney O'Roark, Esq.
Verizon
P.O. Box 110, MCFLTC0007
Tampa, FL 33601

Mr. David Christian
Verizon Florida LLC
106 East College Avenue, Suite 710
Tallahassee, FL 32301-7721

Chérie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, DC 20006-1181


Floyd R. Self

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Intrado Communications Inc.)
for arbitration to establish an interconnection) Docket No. 080134-TP
agreement with Verizon Florida LLC, pursuant)
to Section 252(b) of the Communications Act)
of 1934, as amended, and Section 364.12, F.S.)

**INTRADO COMMUNICATIONS INC.'S
RESPONSE TO STAFF'S SECOND SET OF INTERROGATORIES (NOS. 15-19)**

Intrado Communications Inc. ("Intrado Comm") hereby responds and objects to the Second Set of Interrogatories (Nos. 15-19) from Staff of the Florida Public Service Commission ("Commission") as follows. Any answers provided by Intrado Comm in response to these requests are provided subject to, and without waiver of, the following specific and general objections.

GENERAL OBJECTIONS

1. Intrado Comm reserves all objections as to relevance and materiality. Where Intrado Comm submits responses and produces materials in response to the requests, it does so without conceding the relevancy or materiality of the information or materials sought or produced, or their subject matter, and without prejudice to Intrado Comm's right to object to further discovery, or to object to the admissibility of proof on the subject matter of any response, or to the admissibility of any document or category of documents, at a future time. Any disclosure of information not responsive to the requests is inadvertent and is not intended to waive Intrado Comm's right not to produce similar or related information or documents.

2. Intrado Comm objects to the requests to the extent they seek information protected by the attorney-client privilege, the work-product doctrine, or other applicable privileges and protections. Intrado Comm hereby claims all applicable privileges and protections to the fullest extent implicated by the requests and excludes privileged

information and materials from its responses. Any disclosure of such information or materials as a result of Intrado Comm's responses or otherwise is inadvertent and is not intended to waive any applicable privileges or protections.

Subject to and without waiving the foregoing General Objections, each of which are incorporated by reference into the responses below as if fully restated therein, Intrado Comm provides the following responses to the requests. Intrado Comm's responses are based on the best information presently available, and Intrado Comm reserves the right to amend, supplement, correct or clarify answers if other or additional information is obtained, and to interpose additional objections if deemed necessary.

RESPONSES TO INTERROGATORIES

STAFF INTERROGATORY #15

Please refer to Exhibit ES-20 attached to Intrado witness Sorensen's direct testimony.

- a. Please explain what services these rates are meant to capture and how they are applied.
- b. Do you believe the proposed rates are fair, just, and reasonable? Please explain your response.

INTRADO COMM RESPONSE:

(a) The rates contained in Exhibit ES-20 are associated with a carrier's connection to Intrado Comm's network. The rates apply to the provision of: (1) hardware for the termination and cross connection of a carrier's T1 circuit to Intrado Comm's selective router; (2) multiplexing of circuits to a DS0 level; (3) establishment of monitoring software; (4) ongoing monitoring and maintenance; and (5) provisioning and documentation of incoming circuits into Intrado Comm's network. There is a monthly recurring charge of \$127.00 for each incoming T1 and a monthly recurring charge of \$40.00 for each DS0 level circuit. The one-time nonrecurring for each is \$250.00 and is applied at time of billing after installation.

(b) Yes. Intrado Comm's rates are similar to the charges assessed by other 911 service providers throughout the country to CLECs and wireless carriers.

RESPONSIBLE PERSON:

Eric Sorensen, Senior Director- Regulatory Affairs

STAFF INTERROGATORY #16

Please refer to the rebuttal testimony of Intrado witnesses Sorensen and Hicks, page 3, lines 17-23. Does Intrado's Enterprise 911 Service allow enterprise 911 customers to originate calls to anyone other than PSAPs? Please explain your response.

INTRADO COMM RESPONSE:

No, the service is specifically designed to provide the enterprise customer access to the 911 network for delivery of the enterprise customer's 911 emergency calls to the appropriate PSAP. The appropriate PSAP is based on the caller's location at the time of the call. That is, Enterprise 911 service is designed to work with a call routing database that allows the enterprise customer to maintain accurate location information on stations working behind a premises-based private branch exchange service. The service to be offered by Intrado Comm is similar to that offered by Verizon. See Verizon Florida Inc.'s General Services Tariff Section A24, Emergency Reporting Services E911 Subsection .5, aa.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations.

STAFF INTERROGATORY #17

Please refer to Issue 6 and explain what witness Hicks meant on page 21 at line 6 of his direct testimony by the phrase “mutual exchange of traffic.”

INTRADO COMM RESPONSE:

Issue 6 addresses trunk forecasting for 911 trunks and specifically addresses language in the 911 Attachment of the proposed interconnection agreement. Both Parties will need to place orders for trunks to the other Party’s selective routers for delivery of 911 calls from each Party’s end users to the other Party’s served PSAP end users. Also, both Parties will need to order trunks to the other’s selective routers to enable PSAP-to-PSAP call transfer between each Party’s PSAP customers. PSAP-to-PSAP transfer is the mutual exchange of 911 traffic. Given that Intrado Comm will need to design its network to accommodate trunking for both 911 call origination from Verizon local exchange end users as well as Verizon PSAP customers, it is very important that Intrado Comm also get trunk forecasts from Verizon. Therefore, the language should be reciprocal as proposed by Intrado Comm.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

STAFF INTERROGATORY #18

In reference to Issue 47, what entity other than a caller would be calling 911?

INTRADO COMM RESPONSE:

The aged 911 infrastructure in place today was originally designed to only process 911 calls from end users of wired telephone service. This infrastructure has been adapted to accommodate calls from wireless telephone service callers and callers using voice over Internet protocol ("VoIP") services. However, the 911 infrastructure of the future will receive information in the form of data centric media such as text and video, so individuals requesting emergency assistance will not literally be "callers" in the traditional sense. Thus, access to the emergency infrastructure would not only be limited by an end user calling 911 as described in the proposed Verizon language.

RESPONSIBLE PERSON:

Eric Sorensen, Senior Director - Regulatory Affairs

STAFF INTERROGATORY #19

Is the term caller defined in the agreement? If not, why not? If so, where is it defined?

INTRADO COMM RESPONSE

The term caller is not defined in the interconnection agreement. This language was based on Verizon's template interconnection agreement provided to Intrado Comm. Intrado Comm does not know why a definition was not included in the interconnection agreement.

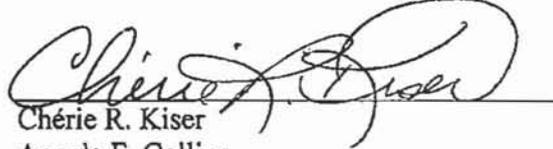
RESPONSIBLE PERSON:

Eric Sorensen, Senior Director - Regulatory Affairs

Respectfully submitted this 8th day of September, 2009.

Respectfully submitted,

INTRADO COMMUNICATIONS INC.



Cherie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, DC 20006
202-862-8950 (telephone)
202-862-8958 (facsimile)
ckiser@cgrdc.com
acollins@cgrdc.com

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
2618 Centennial Place
Tallahassee, Florida 32308
850-425-5213 (telephone)
850-558-0656 (facsimile)
fself@lawfla.com

Its Attorneys

Craig W. Donaldson
Senior Vice President, Regulatory &
Government Affairs, Regulatory Counsel

Rebecca Ballesteros
Assistant General Counsel

Intrado Communications Inc.
1601 Dry Creek Drive
Longmont, CO 80503
720-494-5800 (telephone)
720-494-6600 (facsimile)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Intrado Communications, Inc. for arbitration to establish an interconnection agreement with Verizon Florida LLC, pursuant to Section 252(b) of the Communications Act of 1934, as amended, and Section 364.162, F.S.

Docket No. 080134-TP
Filed: September 8, 2009

**INTRADO COMMUNICATIONS INC.'S NOTICE
OF SERVICE OF OBJECTIONS AND RESPONSES TO VERIZON FLORIDA LLC'S
THIRD SET OF INTERROGATORIES (NOS. 11-30) AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 3-9)**

Intrado Communications Inc. ("Intrado") by and through its undersigned counsel, hereby files and serves Notice that it has served its Objections and Responses to Verizon Florida LLC's Third Set of Interrogatories (Nos. 11-30) and Second Request for Production of Documents (Nos. 3-9) by electronic mail to de.oroark@verizon.com and U. S. Mail to Dulaney L. O'Roark III, Esq., Verizon Florida LLC, P.O. Box 110, MCFLTC0007, Tampa, FL 33601 on this 8th day of September, 2009.



Floyd R. Self
MESSER, CAPARELLO & SELF
2618 Centennial Place
Tallahassee, Florida 32308
Tel. 850-222-0720
Fax 850-558-0656
E-mail: fself@lawfla.com

Counsel for Intrado Communications, Inc.

CERTIFICATE OF SERVICE

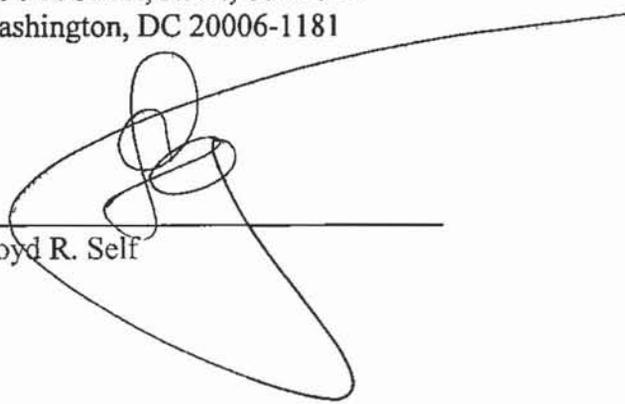
I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Electronic Mail and/or U. S. Mail and e-mail this 8th day of September, 2009.

Lee Eng Tan, Esq.
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Dulaney O'Roark, Esq.
Verizon
P.O. Box 110, MCFLTC0007
Tampa, FL 33601

Mr. David Christian
Verizon Florida LLC
106 East College Avenue, Suite 710
Tallahassee, FL 32301-7721

Chérie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, DC 20006-1181



Floyd R. Self

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Intrado Communications Inc.)
for arbitration to establish an interconnection) Docket No. 080134-TP
agreement with Verizon Florida LLC, pursuant)
to Section 252(b) of the Communications Act)
of 1934, as amended, and Section 364.12, F.S.)

**INTRADO COMMUNICATIONS INC.'S
RESPONSE TO VERIZON'S THIRD SET OF INTERROGATORIES (NOS. 11-30)**

Intrado Communications Inc. ("Intrado Comm") hereby responds and objects to the Third Set of Interrogatories (Nos. 11-30) from Verizon Florida LLC ("Verizon") as follows. Any answers provided by Intrado Comm in response to these requests are provided subject to, and without waiver of, the following specific and general objections.

GENERAL OBJECTIONS

1. Intrado Comm reserves all objections as to relevance and materiality. Where Intrado Comm submits responses and produces materials in response to the requests, it does so without conceding the relevancy or materiality of the information or materials sought or produced, or their subject matter, and without prejudice to Intrado Comm's right to object to further discovery, or to object to the admissibility of proof on the subject matter of any response, or to the admissibility of any document or category of documents, at a future time. Any disclosure of information not responsive to the requests is inadvertent and is not intended to waive Intrado Comm's right not to produce similar or related information or documents.

2. Intrado Comm objects to the requests to the extent they seek information protected by the attorney-client privilege, the work-product doctrine, or other applicable privileges and protections. Intrado Comm hereby claims all applicable privileges and protections to the fullest extent implicated by the requests and excludes privileged information and materials from its responses. Any disclosure of such information or materials

as a result of Intrado Comm's responses or otherwise is inadvertent and is not intended to waive any applicable privileges or protections.

3. Intrado Comm objects to the Requests to the extent that Verizon attempts to impose upon Intrado Comm obligations different from, or in excess of, those imposed by Florida Public Service Commission ("Commission") orders in this proceeding or Florida law.

Subject to and without waiving the foregoing General Objections, each of which are incorporated by reference into the responses below as if fully restated therein, Intrado Comm provides the following responses to the requests. Intrado Comm's responses are based on the best information presently available, and Intrado Comm reserves the right to amend, supplement, correct or clarify answers if other or additional information is obtained, and to interpose additional objections if deemed necessary.

RESPONSES TO INTERROGATORIES

VERIZON INTERROGATORY #11

When did Intrado begin to offer its Intelligent Emergency Network® Service in Florida?

INTRADO COMM RESPONSE:

July 9, 2008

RESPONSIBLE PERSON:

Eric Sorensen, Senior Director – Regulatory Affairs for Intrado Comm

INTRADO COMM RESPONSES TO VERIZON THIRD SET (NOS. 11-30)

VERIZON INTERROGATORY #12

Please identify the “issued” and “effective” dates of Intrado’s Florida Price List which implemented Intelligent Emergency Network® Service.

INTRADO COMM RESPONSE:

Issued July 8, 2008
Effective July 9, 2008

RESPONSIBLE PERSON:

Eric Sorensen, Senior Director – Regulatory Affairs for Intrado Comm

VERIZON INTERROGATORY #13

Please describe all changes that Intrado has made to the Emergency Services section of its Florida Price List since those services were first implemented and identify the “issued” and “effective” dates those changes were incorporated into Intrado’s Florida Price List.

INTRADO COMM RESPONSE:

Intrado Comm added a new section, Section 5.4 – Enterprise E9-1-1 Service, on June 8, 2009 with an effective date of June 9, 2009.

RESPONSIBLE PERSON:

Eric Sorensen, Senior Director – Regulatory Affairs for Intrado Comm

INTRADO COMM RESPONSES TO VERIZON THIRD SET (NOS. 11-30)

VERIZON INTERROGATORY #14

Please admit or deny that the most recent changes made to Intrado's currently effective Florida Price List were issued on June 8, 2009, with an effective date of June 9, 2009.

INTRADO COMM RESPONSE:

Admitted.

RESPONSIBLE PERSON:

Eric Sorensen, Senior Director – Regulatory Affairs for Intrado Comm

VERIZON INTERROGATORY #15

Please admit or deny that Intrado's Enterprise E9-1-1 service first appeared in Intrado's Florida Price List with the changes issued on June 8, 2009, with an effective date of June 9, 2009.

INTRADO COMM RESPONSE:

Admitted.

RESPONSIBLE PERSON:

Eric Sorensen, Senior Director – Regulatory Affairs for Intrado Comm

VERIZON INTERROGATORY #16

Please specifically identify where Intrado's Petition for Arbitration addresses interconnection with Verizon for Intrado's Enterprise E9-1-1 service.

INTRADO COMM RESPONSE:

See page 6 and n.12 of Intrado Comm's Petition for Arbitration, in which Intrado Comm indicated that it would provide services "to end users such as public safety agencies or governmental 911 authorities, VoIP service providers, and other wireline, wireless, and telematics service providers" and that Intrado Comm would aggregate and transport 911 call traffic from the end users of wireline, wireless, VoIP, and telematics service providers to the appropriate PSAP, which may be Intrado Comm's PSAP customer, a Verizon PSAP customer, or another third-party carrier's PSAP customer.

RESPONSIBLE PERSON:

Eric Sorensen, Senior Director – Regulatory Affairs for Intrado Comm

VERIZON INTERROGATORY #17

How will a 911/E911 call from a customer using Intrado's Enterprise E9-1-1 service be transported to Intrado's selective router? In particular, (a) what facilities, if any, will Intrado provide under its Enterprise E9-1-1 service to transport a 911/E911 call from the customer's premises to Intrado's selective router; and, (b) will the customer be required to build its own facilities or to obtain facilities from a person other than Intrado to transport a 911/E911 call from the customer's premises to Intrado's network?

INTRADO COMM RESPONSE:

Intrado Comm's Enterprise E9-1-1 Service will allow the enterprise customer to originate an emergency call by dialing the digits "9-1-1" and will route the call to the appropriate PSAP based on the caller's location. The Enterprise E9-1-1 Service provides the enterprise customer with all functionality needed to complete a 911 call from the enterprise customer's location to the appropriate PSAP.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #18

Please identify and explain each and every difference in the way a 911/E911 call is routed from a customer to PSAPs served by Intrado using Intrado's Enterprise E9-1-1 service and that same customer not using Intrado's Enterprise E9-1-1 service?

SPECIFIC OBJECTION:

Intrado Comm objects to this interrogatory as overly broad.

INTRADO COMM RESPONSE:

Notwithstanding the foregoing objection, Intrado Comm responds as follows: It would be inappropriate for Intrado Comm to speculate on the operational arrangements used by other carriers or private switch providers to route 911 calls to the appropriate PSAP.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #19

Please identify and explain each and every difference in the port on Intrado's selective router used to provide Intrado's Enterprise E9-1-1 service and the port on Intrado's selective router used to interconnect with local exchange carriers.

INTRADO COMM RESPONSE:

To the best of Intrado Comm's knowledge, the ports used for termination of circuits from local exchange carriers are the same ports used for Enterprise E9-1-1 Service.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #20

Please explain how Intrado will handle a 911/E911 call from a customer of Intrado's Enterprise E9-1-1 service that is to be delivered to a PSAP that is served by Verizon.

INTRADO COMM RESPONSE:

Intrado Comm seeks as part of its Section 251 interconnection agreement with Verizon the ability to exchange traffic with Verizon and to interconnect the Parties' selective routers. Once this interconnection arrangement has been established, Intrado Comm would hand off 911/E911 calls over these facilities to the Verizon selective router for completion to the appropriate Verizon served PSAP.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #21

Please admit or deny that Intrado never raised the issue of interconnection for Intrado's Enterprise E9-1-1 service in its negotiations with Verizon. If Intrado denies that it did not raise the issue of interconnection for its Enterprise E9-1-1 service in negotiations with Verizon, please describe, as specifically as possible, who it was raised with, when, and in the context of negotiating which provisions?

INTRADO COMM RESPONSE:

Denied. Intrado Comm's Enterprise E9-1-1 Service is a retail service that need not be raised in the course of interconnection negotiations. There is no obligation for a competitor to identify each and every retail offering it plans to offer at any point in time in order to obtain interconnection pursuant to Section 251 of the Act.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #22

Please admit or deny that Intrado never provided Verizon with a supplemental response or responses to Verizon's interrogatory number 4 in which Intrado affirmed that it plans to provide in Verizon's service territory the same services Intrado plans to provide in AT&T's and Embarq's service territories in Florida.

INTRADO COMM RESPONSE:

Denied. *See* the following documents, which supplemented to Intrado Comm's response to Verizon Interrogatory No. 4: (1) Intrado Comm Responses to Verizon Interrogatory Nos. 3 and 5 (dated April 27, 2009) discussing the services to be offered by Intrado Comm in Verizon's service territory; (2) Direct Testimony of Thomas W. Hicks and Direct Testimony of Eric Sorensen, both filed June 24, 2009 and both discussing the services to be offered by Intrado Comm in Verizon's service territory and attaching current Price List; and (3) Panel Rebuttal Testimony of Thomas W. Hicks and Eric Sorensen filed August 5, 2009 discussing the services to be offered by Intrado Comm in Verizon's service territory and specifically addressing Verizon's claims regarding Intrado Comm's interrogatory responses.

RESPONSIBLE PERSON:

Eric Sorensen, Senior Director – Regulatory Affairs for Intrado Comm

VERIZON INTERROGATORY #23

Please identify any and all differences between the services that Intrado offers or intends to provide in Verizon's service territory in Florida and the services it offers or intends to provide in AT&T's and Embarq's service territories in Florida.

INTRADO COMM RESPONSE:

Intrado Comm intends to offer the same services statewide.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #24

For all of the differences between the 911/E911 service Intrado offers or intends to provide in Verizon's service territory and the service Intrado offers or intends to provide in AT&T's and Embarq's service territories, what are the purposes of the differences in the services and when were the differences in the services identified and implemented?

INTRADO COMM RESPONSE:

Intrado Comm intends to offer the same services statewide.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #25

Please admit or deny that Intrado's Intelligent Emergency Network® Service, as set forth in Intrado's Florida Price List, does not allow Intrado's PSAP customer to make an outgoing call.

INTRADO COMM RESPONSE:

Denied.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #26

Please describe how Intrado's conferencing and call-transfer disconnect processes work.

SPECIFIC OBJECTION:

Intrado Comm objects to this interrogatory as overly broad. Intrado Comm also objects to this interrogatory because it requests proprietary, confidential, and competitively sensitive information regarding Intrado Comm's network.

INTRADO COMM RESPONSE:

Notwithstanding the foregoing objection, Intrado Comm responds as follows: Intrado Comm's service is designed to provide, at a minimum, the equivalent functionality experienced by PSAPs today. With a 911 caller on the line, a call taker will be able to press a button or perform a hook-flash on the telephone and obtain a second dialtone. The call taker can then dial another telephone number and create a conference bridge between the original caller, the call taker, and the added party. The call taker has the ability to exit the conference and allow the original party and the added party to continue their communication. The call taker line is also freed for another incoming call.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #27

To what other parties can a PSAP using Intrado's 911 service transfer a call (*e.g.*, only to other PSAPs, or to anyone)?

INTRADO COMM RESPONSE:

The call taker at the PSAP location can transfer the emergency call to any 10-digit number within the public switched telephone network ("PSTN") as well as to any PSAP served by Intrado Comm's Intelligent Emergency Network®. Emergency calls may also be transferred to PSAPs served by other 911 service providers with which Intrado Comm has obtained the necessary interconnection arrangements.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #28

Has Intrado marketed its Enterprise E9-1-1 Service in Florida? If so, please identify all prospective customers to whom Intrado has marketed its Enterprise E9-1-1 Service in Florida.

SPECIFIC OBJECTION:

Intrado Comm objects to this interrogatory because it is irrelevant to Intrado Comm's request for interconnection from Verizon, and is not calculated to lead to the discovery of admissible evidence in this proceeding. Intrado Comm also objects to this interrogatory because it requests proprietary, confidential, and competitively sensitive information regarding Intrado Comm's customers in Florida.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #29

Does Intrado have any customers that subscribe to its Enterprise E9-1-1 Service in Florida? If so, identify each customer, the service address(es) of each customer, and the dates on which the customer applied for the Enterprise E9-1-1 Service, the dates on which service was, or will be, installed, and, if the service has been disconnected, the date of disconnection.

SPECIFIC OBJECTION:

Intrado Comm objects to this Interrogatory because it is irrelevant to Intrado Comm's request for interconnection from Verizon, and is not calculated to lead to the discovery of admissible evidence in this proceeding. Intrado Comm also objects to this Interrogatory because it requests proprietary, confidential, and competitively sensitive information regarding Intrado Comm's customers in Florida.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #30

Page 3 of the Panel Rebuttal Testimony of Thomas Hicks and Eric Sorensen indicates that Intrado will provide an optional feature that will provide “the ability of a public safety answering point (“PSAP”) to originate calls on Intrado’s Intelligent Emergency Network® lines.” With respect to this testimony, please answer the following:

- (a) When did Intrado make this optional feature available?
- (b) Where in Intrado’s Florida Price List are the terms and conditions of this feature described?
- (c) What types of calls may be originated by the PSAP and to whom may each type of call be placed?
- (d) Is this feature available to PSAPs in AT&T’s service territory in Florida and, if so, when did it become available?
- (e) Is this feature available to PSAPs in Embarq’s service territory in Florida and, if so, when did it become available?
- (f) Did Intrado describe this optional feature in testimony, exhibits or briefs in the AT&T and Embarq arbitration proceedings? If so, please identify the testimony, exhibits or briefs that provide the description.
- (g) How does this optional feature work?
- (h) If an Intrado customer wants the capability to originate calls, how will Intrado implement that capability?
- (i) What equipment enables this feature to work?
- (j) Please provide a diagram of how a call would be routed using this feature.

SPECIFIC OBJECTION:

Intrado Comm objects to portions of this interrogatory as follows:

- (g) Intrado Comm objects to this interrogatory as vague.
- (h) Intrado Comm objects to this interrogatory because it seeks confidential, proprietary, and competitively sensitive information about Intrado Comm’s network.
- (i) Intrado Comm objects to this interrogatory because it seeks confidential, proprietary, and competitive sensitive information about Intrado Comm’s network.

(j) Intrado Comm objects to this interrogatory because it seeks confidential, proprietary, and competitively sensitive information about Intrado Comm's network.

INTRADO COMM RESPONSE:

Notwithstanding the foregoing objections, Intrado Comm answers as follows:

(a) The service will be available to IP-equipped PSAPs once testing of the Intrado Comm proprietary interface is completed.

(b) Applicable terms and conditions will be added to Intrado Comm's tariff when the service is made available.

(c) Calls to any 10-digit telephone number within the PSTN may be made by the PSAP.

(d) No, but upon completion of interface testing this feature will be available statewide. *See* Intrado Comm Response to Interrogatory 30(a).

(e) No, but upon completion of interface testing this feature will be available statewide. *See* Intrado Comm Response to Interrogatory 30(a).

(f) No.

(g) *See* Intrado Comm Response to Interrogatory 30(h).

(h) The optional calling feature is available to PSAPs who chose to use IP connectivity to receive emergency calls from the Intrado Comm Intelligent Emergency Network®. This feature is available with an Intrado Comm IP interface and the interface must be tested with the PSAP customer premises equipment ("CPE") to assure compatibility. Once the Intrado Comm interface has been found to be compatible with the PSAP CPE, the service will be configured to allow a PSAP call taker to press a single button on the CPE to get dialtone to originate a call. The existence of an in-progress call will not be necessary to use this feature.

(i) *See* Intrado Comm Response to Interrogatory 30(h).

(j) No such diagram exists.

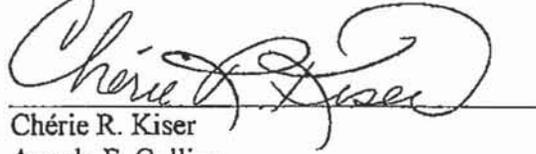
RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

Respectfully submitted this 8th day of September, 2009.

Respectfully submitted,

INTRADO COMMUNICATIONS INC.



Cherie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, DC 20006
202-862-8950 (telephone)
202-862-8958 (facsimile)
ckiser@cgrdc.com
acollins@cgrdc.com

Craig W. Donaldson
Senior Vice President, Regulatory &
Government Affairs, Regulatory Counsel

Rebecca Ballesteros
Assistant General Counsel

Intrado Communications Inc.
1601 Dry Creek Drive
Longmont, CO 80503
720-494-5800 (telephone)
720-494-6600 (facsimile)

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
2618 Centennial Place
Tallahassee, Florida 32308
850-425-5213 (telephone)
850-558-0656 (facsimile)
fself@lawfla.com

Its Attorneys

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Intrado Communications Inc.)
for arbitration to establish an interconnection) Docket No. 080134-TP
agreement with Verizon Florida LLC, pursuant)
to Section 252(b) of the Communications Act)
of 1934, as amended, and Section 364.12, F.S.)

**INTRADO COMMUNICATIONS INC.'S
RESPONSE TO VERIZON'S SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS (NOS. 3-9)**

Intrado Communications Inc. ("Intrado Comm") hereby responds and objects to the Second Request for Production of Documents (Nos. 3-9) from Verizon Florida LLC ("Verizon") as follows. Any documents provided by Intrado Comm in response to these requests are provided subject to, and without waiver of, the following specific and general objections.

GENERAL OBJECTIONS

1. Intrado Comm reserves all objections as to relevance and materiality. Where Intrado Comm submits responses and produces materials in response to the requests, it does so without conceding the relevancy or materiality of the information or materials sought or produced, or their subject matter, and without prejudice to Intrado Comm's right to object to further discovery, or to object to the admissibility of proof on the subject matter of any response, or to the admissibility of any document or category of documents, at a future time. Any disclosure of information not responsive to the requests is inadvertent and is not intended to waive Intrado Comm's right not to produce similar or related information or documents.

2. Intrado Comm objects to the requests to the extent they seek information protected by the attorney-client privilege, the work-product doctrine, or other applicable privileges and protections. Intrado Comm hereby claims all applicable privileges and protections to the fullest extent implicated by the requests and excludes privileged

INTRADO COMM RESPONSES TO VERIZON SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
(NOS. 3-9)

information and materials from its responses. Any disclosure of such information or materials as a result of Intrado Comm's responses or otherwise is inadvertent and is not intended to waive any applicable privileges or protections.

3. Intrado Comm objects to the requests to the extent that Verizon attempts to impose upon Intrado Comm obligations different from, or in excess of, those imposed by Florida Public Service Commission ("Commission") orders in this proceeding or Florida law.

Subject to and without waiving the foregoing General Objections, each of which are incorporated by reference into the responses below as if fully restated therein, Intrado Comm provides the following responses and materials. Intrado Comm's responses are based on the best information presently available, and Intrado Comm reserves the right to amend, supplement, correct or clarify answers if other or additional information is obtained, and to interpose additional objections if deemed necessary.

RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

VERIZON DOCUMENT REQUEST #3

Please provide copies of all documents that support Intrado's responses to interrogatories 11-30 in Verizon Florida LLC's Third Set of Interrogatories to Intrado Communications Inc.

INTRADO COMM RESPONSE:

All existing documents supporting Intrado Comm's responses to Interrogatory Nos. 11-30 have been previously provided in this proceeding.

RESPONSIBLE PERSON:

Eric Sorensen, Senior Director – Regulatory Affairs for Intrado Comm

VERIZON DOCUMENT REQUEST#4

Please provide all documents describing Intrado's Enterprise E9-1-1 Service.

INTRADO COMM RESPONSE:

Please see Attachment 1 to Direct Testimony of Thomas W. Hicks filed June 24, 2009.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON DOCUMENT REQUEST #5

Please provide all documents setting out the rates, terms and conditions of Intrado's Enterprise E9-1-1 Service.

INTRADO COMM RESPONSE:

Please see Attachment 1 to Direct Testimony of Thomas W. Hicks filed June 24, 2009. As reflected in Intrado Comm's Florida Price List, the Intrado Comm Enterprise E9-1-1 Service is offered on an individual case basis specific to arrangements needed for the particular customer.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON DOCUMENT REQUEST #6

Please provide all documents related to Intrado's implementation of its Enterprise E9-1-1 Service.

SPECIFIC OBJECTION:

Intrado Comm objects to this request as vague. Intrado Comm also objects to this request because it is irrelevant to Intrado Comm's request for interconnection from Verizon, and is not calculated to lead to the discovery of admissible evidence in this proceeding. Intrado Comm also objects to this request because it requests proprietary, confidential, and competitively sensitive information regarding Intrado Comm's operational and technical relationship with its customers in Florida.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON DOCUMENT REQUEST #7

Please provide all marketing materials related to Intrado's Enterprise E9-1-1 Service.

SPECIFIC OBJECTION:

Intrado Comm objects to this request because it is irrelevant to Intrado Comm's request for interconnection from Verizon, and is not calculated to lead to the discovery of admissible evidence in this proceeding.

INTRADO COMM RESPONSE:

Notwithstanding the foregoing objection, Intrado Comm responds as follows: Intrado Comm has no documents responsive to this request.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON DOCUMENT REQUEST #8

Please provide all documents describing how Intrado's Intelligent Emergency Network® Service allows a Public Safety Answering Point or other customer to place an outgoing call.

SPECIFIC OBJECTION:

Intrado Comm objects to this request because it requests proprietary, confidential, and competitively sensitive information regarding Intrado Comm's network.

INTRADO COMM RESPONSES TO VERIZON SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
(Nos. 3-9)

INTRADO COMM RESPONSE:

Notwithstanding the foregoing objection, Intrado Comm responds as follows: Intrado Comm has no documents responsive to this request.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON DOCUMENT REQUEST #9

Please provide all documents that Intrado provides to its Public Safety Answering Point and governmental agency customers describing how Intrado's Intelligent Emergency Network® Service allows a Public Safety Answering Point or other customer to place an outgoing call.

SPECIFIC OBJECTION:

Intrado Comm objects to this request because it requests proprietary, confidential, and competitively sensitive information regarding Intrado Comm's network.

INTRADO COMM RESPONSE:

Notwithstanding the foregoing objection, Intrado Comm responds as follows: Intrado Comm has no documents responsive to this request.

RESPONSIBLE PERSON:

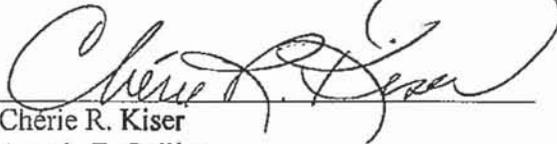
Thomas Hicks, Director - Carrier Relations

INTRADO COMM RESPONSES TO VERIZON SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
SET (Nos. 3-9)

Respectfully submitted this 8th day of September, 2009.

Respectfully submitted,

INTRADO COMMUNICATIONS INC.



Cherie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, DC 20006
202-862-8950 (telephone)
202-862-8958 (facsimile)
ckiser@cgrdc.com
acollins@cgrdc.com

Craig W. Donaldson
Senior Vice President, Regulatory &
Government Affairs, Regulatory Counsel

Rebecca Ballesteros
Assistant General Counsel

Intrado Communications Inc.
1601 Dry Creek Drive
Longmont, CO 80503
720-494-5800 (telephone)
720-494-6600 (facsimile)

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
2618 Centennial Place
Tallahassee, Florida 32308
850-425-5213 (telephone)
850-558-0656 (facsimile)
fself@lawfla.com

Its Attorneys