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September 8, 2009 – **VIA ELECTRONIC MAIL**

Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 080134-TP
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.

Dear Ms. Cole:

Enclosed for filing in the above matter is Verizon Florida LLC's Notice of Service of Responses to Intrado Communications Inc.'s First Set of Interrogatories (Nos. 1-3). Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at (678) 259-1449.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

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Enclosures

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 Filed: September 8, 2009

NOTICE OF SERVICE OF VERIZON FLORIDA LLC'S RESPONSES TO INTRADO COMMUNICATIONS INC.'S FIRST SET OF INTERROGATORIES (NOS. 1-3)

NOTICE IS HEREBY GIVEN that Verizon Florida LLC, by and through its undersigned counsel, has served its responses to Intrado Communications Inc.'s First Set of Interrogatories (Nos. 1-3) by electronic mail on September 8, 2009 to Cherie R. Kiser and Angela F. Collins, Cahill Gordon & Reindel LLP, 1990 K Street, N.W., Suite 950, Washington, DC 20006.

A copy of this Notice was also sent via electronic mail on September 8, 2009 to the Office of the Commission Clerk. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on September 8, 2009.

By: s/ Dulaney L. O'Roark III

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Attorney for Verizon Florida LLC

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

VERIZON FLORIDA LLC'S RESPONSES TO INTRADO COMMUNICATIONS INC.'S FIRST SET OF INTERROGATORIES (NOS. 1-3)

Verizon Florida LLC ("Verizon") hereby provides its responses to Intrado Communications Inc.'s First Set of Interrogatories (Nos. 1-3).

Interrogatory	Responded By	Title
1-3	Nicholas Sannelli	Product Manager, Emergency Communications and 911

GENERAL OBJECTIONS

1. Verizon objects to Intrado's interrogatories to the extent they seek to impose an obligation on Verizon to respond on behalf of subsidiaries, affiliates, or other persons that are not subject to the jurisdiction of the Florida Public Service Commission ("Commission") on the grounds that such discovery is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Verizon has interpreted Intrado's interrogatories to apply to Verizon's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any Intrado data request is intended to apply to matters that take place outside the state of Florida and which are not related to Florida intrastate operations subject to the jurisdiction of the Commission, Verizon objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Verizon objects to Intrado's interrogatories to the extent they call for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Verizon objects to the Intrado's interrogatories insofar as they are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests.

5. Verizon objects to the Intrado's interrogatories insofar as they are not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

6. Verizon objects to the Intrado's interrogatories insofar as they seek information or documents, or seek to impose obligations on Verizon which exceed the requirements of the Commission's rules of procedure, or applicable Florida law.

7. Verizon objects to providing information to the extent that such information is already in the public record before the Commission or which is already in the possession, custody, or control of Intrado, and to the extent that the interrogatories seek information and documents not within Verizon's possession, custody or control.

8. Verizon objects to the Intrado's interrogatories to the extent they are duplicative and overlapping, cumulative of one another, overly broad, unduly burdensome, expensive, oppressive, or excessively time consuming as written and which would place an undue burden on Verizon.

9. Verizon objects to each and every request to the extent that the information requested constitutes trade secrets and commercial or financial information where such trade secrets or information are proprietary, privileged or confidential

pursuant to Florida law. To the extent that Intrado's discovery seeks such information, Verizon will make that information available to counsel for Intrado pursuant to the terms and conditions of the Protective Order entered in the above-captioned proceeding, or pursuant to a mutually agreeable confidentiality agreement, subject to any other general or specific objections contained herein.

10. Verizon is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Verizon creates countless documents that are not subject to Commission or Federal Communications Commission ("FCC") retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. Verizon will conduct a reasonable and diligent search of those files that are reasonably expected to contain the requested information. To the extent that the Intrado's interrogatories purport to require more, Verizon objects on the grounds that compliance would impose an undue burden or expense.

11. Verizon objects to Intrado's interrogatories that seek to obtain "all," "each," or "every" document, item, customer, or other such piece of information to the extent that such discovery is overly broad and unduly burdensome.

12. Verizon objects to Intrado's interrogatories to the extent they seek to have Verizon create documents not in existence at the time of the request.

13. Verizon objects to the Intrado's interrogatories to the extent that any such request is not limited to any stated period of time or a stated period of time that is longer

than is relevant for purposes of the issues in this docket, as such discovery is overly broad and unduly burdensome.

14. In light of the short period of time Verizon has been afforded to respond to the Intrado's interrogatories, the development of Verizon's positions and potentially responsive information to Intrado's requests is necessarily ongoing and continuing. Accordingly, these are preliminary objections and Verizon reserves the right to supplement, revise, or modify its objections as warranted.

The following responses are provided subject to and without waiving these general objections, as well as the specific objections to the individual discovery requests. Subject to the aforementioned general objections, and without waiving any objection(s), Verizon responds to the Intrado's interrogatories set forth below.

INTERROGATORIES

1. (a) Are there geographic areas in Florida in which Verizon provides local exchange services to end user customers but does not serve as the 911/E-911 Service Provider for the geographic area(s)?

RESPONSE:

Verizon objects to this question. The extent to which Verizon has local exchange end user customers whose 911 calls are directed to a Public Safety Answering Point ("PSAP") for which Verizon is not the primary 911/E911 service provider is not relevant, nor reasonably calculated to lead to the discovery of admissible evidence, with respect to this proceeding to determine interconnection terms with Intrado, if any, under section 251(c) of the Communications Act of 1934, as amended. Notwithstanding this objection and without waiving it, Verizon responds as follows:

Verizon has end user local exchange customers served by the Charlotte County PSAP, whose primary 911/E911 service provider is Embarq. This is the only geographic area in Florida in which Verizon provides local exchange services to end user customers who are not served by a PSAP for which Verizon is the primary 911/E911 service provider. Verizon routes 911/E911 calls from these customers through its facilities, including Verizon's selective routers, within its

service territory and within the Local Access and Transport Area ("LATA") in which it operates, and hands off the calls to the primary 911/E911 service provider, Embarq, which then directs the calls to the Charlotte County PSAP.

(b) If your response to Interrogatory No. 1(a) is yes, please list in what geographic area(s) of Florida this occurs.

RESPONSE:

See response to 1(a) above.

(c) If your response to Interrogatory No. 1(a) is yes, does Verizon compete with the 911/E-911 Service Provider in the provision of services to Controlling 911 Authorities?

RESPONSE:

Verizon objects to this question on the basis that it is vague. Verizon does not know the meaning of the word "compete" as it is used by Intrado in this question. In addition, the extent to which Verizon "competes" with other 911/E911 service providers is not relevant, nor reasonably calculated to lead to the discovery of admissible evidence, with respect to this proceeding to determine interconnection terms with Intrado, if any, under section 251(c) of the Communications Act of 1934, as amended.

2. (a) If your response to Interrogatory No. 1(a) is yes, does Verizon deliver its end user customers' 911 calls to the 911/E-911 Service Provider for the geographic area(s)?

RESPONSE:

See response to 1(a) above.

(b) If your response to Interrogatory No. 2(a) is yes, please list in what geographic area(s) of Florida this occurs.

RESPONSE:

See response to 1(a) above.

(c) If your response to Interrogatory No. 2(a) is yes, please describe what arrangements are in place for Verizon to deliver its end user customers' 911 calls to the 911/E-911 Service Provider(s) for the geographic area(s) listed in your response to Interrogatory No. 2(b). Please discuss both physical interconnection and compensation arrangements.

RESPONSE:

Verizon objects to this question because it seeks proprietary and confidential information and because it does not seek information that is relevant to, or reasonably calculated to lead to the discovery of admissible evidence with respect to, this proceeding for determining interconnection terms with Intrado, if any, under section 251(c) of the Communications Act of 1934, as amended.

(d) Referring to your response to Interrogatory No. 2(c), please describe how such arrangements are documented. Please provide any and all documentation supporting your response.

RESPONSE:

See response to 2(c). Verizon objects to this request for documents that are proprietary, confidential and not relevant, nor reasonably calculated to lead to the discovery of admissible evidence, with respect to this proceeding to determine interconnection terms with Intrado, if any, under section 251(c) of the Communications Act of 1934, as amended.

(e) Referring to your response to Interrogatory No. 2(c), are the Controlling 911 Authorities for the geographic area(s) listed in your response to Interrogatory No. 2(b) aware of the arrangements used by Verizon to deliver its end user customers' 911 calls to the 911/E-911 Service Provider? If so, please describe how Controlling 911 Authorities are made aware of those arrangements.

RESPONSE:

Verizon objects to this question. The extent to which Controlling 911 Authorities are aware of arrangements used to direct 911 calls from Verizon's local exchange end user customers to PSAPs for which Verizon is not the primary 911/E911 service provider is not relevant, nor reasonably calculated to lead to the discovery of admissible evidence with respect to this proceeding to determine interconnection terms with Intrado, if any, under section 251(c) of the Communications Act of 1934, as amended. Notwithstanding this objection and without waiving it, Verizon presumes that Controlling 911 Authorities are aware of such arrangements because they receive 911 calls from Verizon local exchange end user customers and receive bills for 911 services provided by Verizon.

3. (a) If your response to Interrogatory No. 1(a) is yes, does Verizon deliver the 911 calls of other carriers' end users to the 911/E-911 Service Provider for the geographic area(s)?

RESPONSE:

Verizon objects to this question. The extent to which Verizon routes calls on behalf of other carriers' end users to PSAPs for which Verizon is not the primary 911/E911 service provider is not relevant, nor reasonably calculated to lead to the discovery of admissible evidence, with respect to this proceeding to determine interconnection terms with Intrado, if any, under section 251(c) of the Communications Act of 1934, as amended. Notwithstanding this objection and without waiving it, Verizon responds that it does route 911 calls from other carriers to PSAPs for which Verizon is not the primary 911/E911 service provider.

(b) If your response to Interrogatory No. 3(a) is yes, please list in what geographic area(s) of Florida this occurs.

RESPONSE:

See responses to 3(a) and 1(a).

(c) If your response to Interrogatory No. 3(a) is yes, please describe what arrangements are in place for Verizon to deliver the 911 calls of other carriers' end users to the 911/E-911 Service Provider for the geographic area(s) listed in your response to Interrogatory No. 3(b). Please discuss both physical interconnection and compensation arrangements.

RESPONSE:

Verizon objects to this question on the basis that it is ambiguous and not relevant. It is unclear if the physical interconnection and compensation arrangements contemplated by the question are between each third party carrier and Verizon or between Verizon and Embarq. In addition, the extent to which Verizon routes 911 calls on behalf of other carriers' end users to PSAPs for which Verizon is not the primary 911/E911 service provider is not relevant, nor reasonably calculated to lead to the discovery of admissible evidence, with respect to this proceeding to determine interconnection terms with Intrado, if any, under section 251(c) of the Communications Act of 1934, as amended. Notwithstanding this objection and without waiving it, Verizon responds that arrangements between Verizon and the carriers whose end users' 911 calls are routed by Verizon to PSAPS for which Verizon is not the primary 911/E911 service provider are described in publicly available interconnection agreements approved by the Florida Public Service Commission.

(d) Referring to your response to Interrogatory No. 3(c), please describe how such arrangements are documented. Please provide any and all documentation supporting your response.

RESPONSE:

See response to 3(c).

(e) Referring to your response to Interrogatory No. 3(c), are the Controlling 911 Authorities for the geographic area(s) listed in your response to Interrogatory No. 3(b) aware of the arrangements used by Verizon to deliver the 911 calls of other carriers' end users to the 911/E911 Service Provider? If so, please describe how Controlling 911 Authorities are made aware of those arrangements.

RESPONSE:

Verizon objects to this question. The extent to which Controlling 911 Authorities are aware of arrangements between Verizon and third party carriers to direct 911 calls from third party carriers' end users to PSAPs for which Verizon is not the primary 911/E911 service provider is not relevant, nor reasonably calculated to lead to the discovery of admissible evidence, with respect to this proceeding to determine interconnection terms with Intrado, if any, under section 251(c) of the Communications Act of 1934, as amended. Notwithstanding this objection, Verizon presumes that 911 controlling authorities are aware of such arrangements because they receive 911 calls from third party carriers' end user customers.

(f) Referring to your response to Interrogatory No. 3(c), are such arrangements consistent with the recommendations and standards established by the National Emergency Number Association ("NENA"), Association of Public-Safety Communications Officials ("APCO"), Alliance for Telecommunications Industry Solutions ("ATIS"), or any other telecommunications industry or standards-setting organization? Please provide any and all documentation supporting your response.

RESPONSE:

Verizon objects to this question because it is vague and overly broad. In addition, Verizon's arrangements with third parties for the delivery of their end users' 911 calls to PSAPs for which Verizon is not the primary 911/E911 service provider is not relevant, nor reasonably calculated to lead to the discovery of admissible evidence, with respect to this proceeding to determine interconnection terms with Intrado, if any, under section 251(c) of the Communications Act of 1934, as amended. Notwithstanding this objection and without waiving it, Verizon responds that such arrangements between Verizon and the carriers whose end users' 911 calls are routed by Verizon to PSAPS for which Verizon is not the primary 911/E911 service provider are described in publicly available interconnection agreements approved by the Florida Public Service Commission.

(g) Referring to your response to Interrogatory Nos. 3(c) and 3(e), does Verizon bill Controlling 911 Authorities for the facilities used by Verizon to deliver the 911 calls of other carriers' end users to the 911/E-911 Service Provider?

RESPONSE:

Verizon objects to this question. The extent to which Verizon bills third parties for services it provides is not relevant, nor reasonably calculated to lead to the discovery of admissible evidence, with respect to this proceeding to determine interconnection terms with Intrado, if any, under section 251(c) of the Communications Act of 1934, as amended. Notwithstanding this objection and without waiving it, Verizon responds that it bills appropriate entities tariff or contract rates for services Verizon provides.

(h) If your response to Interrogatory No. 3(g) is yes, please provide references to your tariffs supporting the charges billed to Controlling 911 Authorities.

RESPONSE:

Verizon Florida Inc., General Services Tariff, Section A24, Emergency Reporting Services.

VERIFICATION

STATE OF FLORIDA)
) ss.
COUNTY OF HILLSBOROUGH)

BEFORE ME, the undersigned authority, personally appeared Frank App, who deposed and stated that the answers to the First Set of Interrogatories (Nos. 1-3) served on Verizon Florida LLC by Intrado Communications Inc. in Docket No. 080134-TP were prepared at his request and he is informed that the responses contained therein are true and correct to the best of his information and belief.

DATED at Tampa, Florida, this 8th day of September, 2009.

Frank App

Frank App

Sworn to and subscribed before me this 8th day of September, 2009.

Teresa Ann Scobie

Notary Public
State of Florida

My Commission Expires:

TERESA ANN SCOBIE
MY COMMISSION # DD 566618
EXPIRES: October 21, 2010
Bonded Thru Notary Public Underwriters

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail on September 8, 2009 to:

Theresa Tan, Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Floyd R. Self
Messer Caparello & Self, P.A.
2618 Centennial Place
Tallahassee, FL 32308

Intrado Communications Inc.
Attention: Manager, Regulatory Compliance
1601 Dry Creek Drive
Longmont, CO 80503

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

s/ Dulaney L. O'Roark III