

OFFICIAL FILE

FILE NO. REPORT NO. 0510771

DATE OF REPORT 11/15/05

REPORTER

Date 11/15/05 Reporter tgb

VZ-NCC 1.12

Please identify the percentage of traffic in Illinois that NCC anticipates will be local.

RESPONSE TO VZ-NCC 1.12

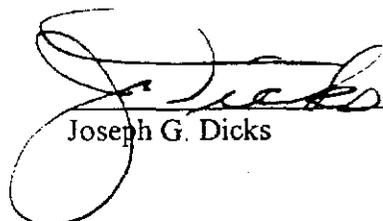
No projections have been made at this time.

CERTIFICATE OF SERVICE

I, Joseph G. Dicks, hereby certify that I served a copy of the **RESPONSES OF NORTH COUNTY COMMUNICATIONS CORPORATION TO VERIZON NORTH, INC. AND VERIZON SOUTH, INC.'S FIRST SET OF DATA REQUESTS** upon the party(s) stated below by email and U. S. Mail on March 22, 2002.

Sarah A. Naumer, Esq.
8000 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606
(312) 876-8000
(312) 876-7934
Counsel for Respondent
Verizon North, Inc. and Verizon South, Inc.

Dated: March 20, 2002



Joseph G. Dicks

VZ-NCC 2.05

Please identify the date on which NCC submitted a completed, error-free Access Service Request with Verizon for interconnection at any location in Illinois.

RESPONSE TO VZ-NCC 2.05

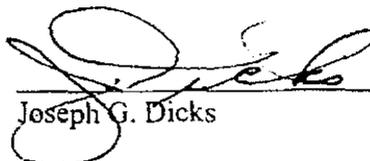
July 24, 2002.

CERTIFICATE OF SERVICE

I, Joseph G. Dicks, hereby certify that I served a copy of the **RESPONSES OF NORTH COUNTY COMMUNICATIONS CORPORATION TO VERIZON NORTH, INC. AND VERIZON SOUTH, INC.'S SECOND SET OF DATA REQUESTS** upon the party(s) stated below by email and U.P.S. on August 1, 2002.

Sarah A. Naumer, Esq.
8000 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606
(312) 876-8000
(312) 876-7934
Counsel for Respondent
Verizon North, Inc. and Verizon South, Inc.

Dated: August 1, 2002



Joseph G. Dicks

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Requested: Verizon North, Inc. and Verizon South, Inc.

Company: North County Communications, Incorporated

Date Submitted: 10/31/02

Date Response: 11/15/02

DATA RESPONSES

VZ-NCC 3.01

Please identify the date(s) on which NCC received prefixes for LATA 364 from NANPA (Neustar).

RESPONSE TO VZ-NCC 3.01

June 4th 2002.

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Requested: Verizon North, Inc. and Verizon South, Inc.

Company: North County Communications, Incorporated

Date Submitted: 10/31/02

Date Response: 11/15/02

DATA RESPONSES

VZ-NCC 3.14

Has NCC routed any traffic over its interconnection facilities with Verizon in Dekalb, Illinois?

RESPONSE TO VZ-NCC 3.14

No.

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Requested: Verizon North, Inc. and Verizon South, Inc.

Company: North County Communications, Incorporated

Date Submitted: 10/31/02

Date Response: 11/15/02

DATA RESPONSES

VZ-NCC 3.27

NCC is obligated to provide continuing and supplemental information when it becomes available. As previously asked in VZ-NCC 1.06, please identify all NCC rate centers located in Illinois and provide addresses for those centers.

RESPONSE TO VZ-NCC 3.27

DeKalb, Lovington and Springfield, Illinois.

CERTIFICATE OF SERVICE

I, Joseph G. Dicks, hereby certify that I served a copy of the **RESPONSES OF NORTH COUNTY COMMUNICATIONS CORPORATION TO VERIZON NORTH, INC. AND VERIZON SOUTH, INC.'S THIRD SET OF DATA REQUESTS** upon the party(s) stated below by email on November 15, 2002.

Sarah A. Naumer, Esq.
8000 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606
(312) 876-8000
(312) 876-7934
Counsel for Respondent
Verizon North, Inc. and Verizon South, Inc.

Dated: November 15, 2002

Joseph G. Dicks

VZ-NCC 4.01

Please identify each and every state where you participated or were involved in any manner in negotiating or implementing an interconnection or potential interconnection between either Verizon Illinois or an affiliate of Verizon Illinois and any other telecommunications carrier.

SUPPLEMENTAL RESPONSE TO VZ-NCC 4.01

I have participated or was involved in negotiating or implementing an interconnection agreement with Verizon Illinois or an affiliate of Verizon Illinois in the following states:

- Illinois
- Maryland
- Pennsylvania
- Virginia
- West Virginia
- Maine
- New Hampshire
- Vermont
- Massachusetts
- New Jersey

VZ-NCC 4.02

If you identified Illinois in response to VZ-NCC 4.01, please state the telecommunications carrier(s) on whose behalf you participated or were involved in the negotiation or implementation of the interconnection(s) or potential interconnection(s) with Verizon Illinois.

SUPPLEMENTAL RESPONSE TO VZ-NCC 4.02

I have participated in negotiating or implementing two interconnection agreements in Illinois with Verizon of Illinois.

VZ-NCC 4.04

Separately for each interconnection identified in response to VZ-NCC 4.02, please describe, in detail, your participation or involvement in the interconnection. Your answer should include your duties and responsibilities, and the material actions you took with respect to the negotiation or implementation of the interconnection.

SUPPLEMENTAL RESPONSE TO VZ-NCC 4.04

In both cases in Illinois, I assisted clients to find a suitable existing interconnection agreement that would suit their needs that they could opt into, thus eliminating the need to negotiate with Verizon of Illinois.

VZ-NCC 4.05

Separately for each interconnection identified in response to VZ-NCC 4.02, please identify and describe in detail any action(s) you allege Verizon Illinois took in bad faith during either the negotiation or implementation of the interconnection.

SUPPLEMENTAL RESPONSE TO VZ-NCC 4.05

None that I am aware of by Verizon, Illinois. Since these CLECs opted into existing agreements, there was no negotiation, per se.

VZ-NCC 4.07

Separately for each interconnection identified in response to VZ-NCC 4.02, please identify and describe in detail any action(s) you allege Verizon Illinois took in contravention to any applicable legal requirement during either the negotiation or implementation of the interconnection.

SUPPLEMENTAL RESPONSE TO VZ-NCC 4.07

None that I am aware of by Verizon, Illinois.

VZ-NCC 4.09

Please state whether, to the best of your knowledge, any complaint(s) was filed against Verizon Illinois based on any alleged action(s) identified in your response to either VZ-NCC 4.05 or VZ-NCC 4.07. If your answer is that a complaint(s) was filed against Verizon Illinois, please identify the forum(s) and docket number(s), and provide copies of any and all pleadings in your possession.

SUPPLEMENTAL RESPONSE TO VZ-NCC 4.09

None that I am aware of.

VZ-NCC 4.27

Referencing VZ-NCC 4.26, please identify any and all other factors that an ILEC should consider when determining whether to "pre-configure" an OC-3 or OC-12 multiplexer at a given location.

SUPPLEMENTAL RESPONSE TO VZ-NCC 4.27

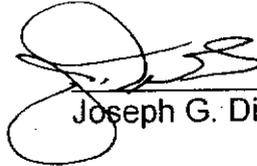
Again, I don't presume to know "all" of the factors that Verizon would use when deciding how to employ facilities. I assume that you look at such things as forecasted demand, past history of facilities at a particular facility, internal Verizon needs and probably many other factors.

CERTIFICATE OF SERVICE

I, Joseph G. Dicks, hereby certify that I served a copy of the **NORTH COUNTY COMMUNICATIONS CORPORATION SUPPLEMENTAL RESPONSES TO VERIZON NORTH, INC. AND VERIZON SOUTH, INC.'S FOURTH DATA REQUESTS DIRECTED TO DOUGLAS DAWSON** upon the party(s) stated below by email and U. S. Mail on May 20, 2003.

Sarah A. Naumer, Esq.
8000 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606
(312) 876-8000
(312) 876-7934
Counsel for Respondent
Verizon North, Inc. and Verizon South, Inc.

Dated: May 20, 2002



Joseph G. Dicks

VZ-NCC 5.15

Separately for each Request to Admit that you deny in whole or in part, please identify each and every basis for your denial. Please follow the instructions for these data requests when providing your answer.

RESPONSE TO VZ-NCC 5.15

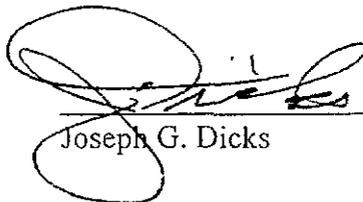
2.16: test traffic has been transmitted; and

CERTIFICATE OF SERVICE

I, Joseph G. Dicks, hereby certify that I served a copy of the **RESPONSES OF NORTH COUNTY COMMUNICATIONS CORPORATION TO VERIZON NORTH, INC. AND VERIZON SOUTH, INC.'S FIFTH SET OF DATA REQUESTS** upon the party(s) stated below by email and U. S. Mail. on April 22, 2003.

Sarah A. Naumer, Esq.
8000 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606
(312) 876-8000
(312) 876-7934
Counsel for Respondent
Verizon North, Inc. and Verizon South, Inc.

Dated: April 22, 2003



Joseph G. Dicks

VZ-NCC 5.11

On lines 3-4 of page 18 of your direct testimony, you briefly identify an alleged conversation with Dianne McKernan. Please provide the information listed in paragraph 7 of the specific instructions for these data requests with respect to the alleged conversation.

SUPPLEMENTAL RESPONSE TO VZ-NCC 5.11

e. if the communication occurred in connection with or was in any way related to an interconnection(s) or potential interconnection(s) with Verizon Illinois or an affiliate of Verizon Illinois, the state(s) where the interconnection(s) took place or was intended to have potentially taken place.

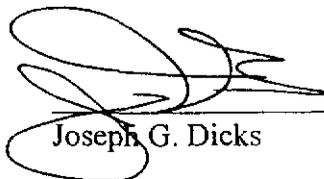
At the time, we were discussing interconnecting in West Virginia . Ms. McKernan told me what Verizons policy was. She did not say the policy applied only to West Virginia.

CERTIFICATE OF SERVICE

I, Joseph G. Dicks, hereby certify that I served a copy of the **RESPONSES OF NORTH COUNTY COMMUNICATIONS CORPORATION TO VERIZON NORTH, INC. AND VERIZON SOUTH, INC.'S FIFTH SET OF DATA REQUESTS** upon the party(s) stated below by email and U. S. Mail. on April ~~30~~^{May}, 2003.

Sarah A. Naumer, Esq.
8000 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606
(312) 876-8000
(312) 876-7934
Counsel for Respondent
Verizon North, Inc. and Verizon South, Inc.

Dated: ~~April 30~~^{May 3}, 2003



Joseph G. Dicks

Request for Admission TL-2.16

NCC has not transmitted any traffic over its interconnection with Verizon Illinois.

Response to Request for Admission TL-2.16

Deny.

Request for Admission TL-2.18

NCC has not sought interconnection with the telecommunications carrier that is the ILEC in Leaf River, Illinois.

Response to Request for Admission TL-2.18

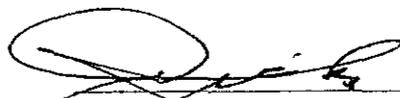
Admit, except to request interconnection with Verizon. Illinois.

CERTIFICATE OF SERVICE

I, Joseph G. Dicks, hereby certify that I served a copy of the **RESPONSES OF NORTH COUNTY COMMUNICATIONS CORPORATION TO VERIZON NORTH, INC. AND VERIZON SOUTH, INC.'S SECOND SET OF DATA REQUESTS DIRECT TO TODD LESSER** upon the party(s) stated below by email and U. S. Mail on April 22, 2003

Sarah A. Naumer, Esq.
8000 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606
(312) 876-8000
(312) 876-7934
Counsel for Respondent
Verizon North, Inc. and Verizon South, Inc.

Dated: April 22, 2003



Joseph G. Dicks

Request for Admission TL-2.08

You have no knowledge of any instance when Verizon Illinois has built a new dedicated multiplexer pair for a CLEC interconnection despite existing capacity and the technical feasibility for the interconnection on existing facilities.

Response to Request for Admission TL-2.08

Correct. Only Verizon knows if it has violated the Telecom Act of 1996 in other instances and tried to bill the cost of an unnecessary buildout to the Rate Payers of Illinois by fraudulently abusing Rate of Return regulations.

Supplemental Response to Request for Admission TL-2.08

Substitute "Admit" for "Correct".

Request for Admission TL-2.09

You have no knowledge sic [on] any instance when Verizon Illinois has built a "special wholesale facility" (as that term is used in your direct testimony at page 5) for a CLEC interconnection despite existing capacity and the technical feasibility for the interconnection on existing facilities.

Response to Request for Admission TL-2.09

Correct. Only Verizon knows if it has violated the Telecom Act of 1996 in other instances and tried to bill the cost of an unnecessary buildout to the Rate Payers of Illinois by fraudulently abusing Rate of Return regulations.

Supplemental Response to Request for Admission TL-2.09

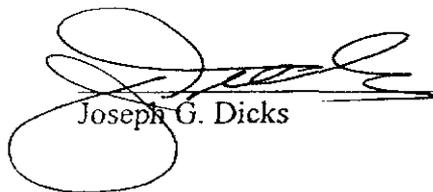
Substitute "Admit" for "Correct".

CERTIFICATE OF SERVICE

I, Joseph G. Dicks, hereby certify that I served a copy of the **SUPPLEMENTAL RESPONSES OF NORTH COUNTY COMMUNICATIONS CORPORATION TO VERIZON NORTH, INC. AND VERIZON SOUTH, INC.'S SECOND SET OF DATA REQUESTS DIRECT TO TODD LESSER** upon the party(s) stated below by email and U. S. Mail on May 30, 2003

Sarah A. Naumer, Esq.
8000 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606
(312) 876-8000
(312) 876-7934
Counsel for Respondent
Verizon North, Inc. and Verizon South, Inc.

Dated: May 30, 2003


Joseph G. Dicks

Request for Admission DD 1.11

A CLEC cannot provide telecommunications service in Illinois before the CLEC has a tariff(s) on file with the ICC to provide service.

Supplemental Response to Request for Admission DD-1.11

Admit.

Request for Admission DD 1.19

You have no knowledge that NCC waited for a fiber facility to be built for interconnection with Verizon Illinois.

***Supplemental* Response to Request for Admission DD-1.19**

Admit.

Request for Admission DD 1.22

Irrespective of any allegations with respect to NCC's request to interconnect in Illinois, you have no knowledge that Verizon Illinois has ever refused to permit a CLEC to interconnect to a copper facility when the copper facility had sufficient capacity for the CLEC's interconnection.

Supplemental Response to Request for Admission DD-1.22

Admit that as to Verizon Illinois. I have no knowledge of any other CLEC being refused.

CERTIFICATE OF SERVICE

I, Joseph G. Dicks, hereby certify that I served a copy of the **NORTH COUNTY COMMUNICATIONS CORPORATION SUPPLEMENTAL RESPONSES TO VERIZON NORTH, INC. AND VERIZON SOUTH, INC.'S FIRST SET OF REQUESTS TO ADMIT DIRECTED TO DOUGLAS A. DAWSON** upon the party(s) stated below by email and U. S. Mail on May ___, 2003.

Sarah A. Naumer, Esq.
8000 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606
(312) 876-8000
(312) 876-7934
Counsel for Respondent
Verizon North, Inc. and Verizon South, Inc.

Dated: May ___, 2003

Joseph G. Dicks

DOCUMENTI

