

GROUP EXHIBIT 1

NCC's First, Second and Third Sets of Data Requests to Verizon

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

NORTH COUNTY COMMUNICATIONS CORPORATION,)	
)	
Complainant,)	
)	
vs.)	Docket No. 07-0428
)	
VERIZON NORTH INC. and VERIZON SOUTH INC.)	
)	
Respondents.)	
_____)	

NORTH COUNTY’S FIRST SET OF DATA REQUESTS TO VERIZON

North County Communications Corporation (“North County”), by and through its counsel and pursuant to 220 ILCS 5/13-515(d)(3), hereby submits its First Set of Data Requests to Verizon North Inc. and Verizon South Inc. (collectively, “Verizon”) and requests responses within fourteen (14) days of electronic service, or on or before August 24, 2007.

DEFINITIONS, INSTRUCTIONS & RULES OF CONSTRUCTION

1. The term “Verizon” means Verizon South Inc. and Verizon North Inc., and their affiliates, parent companies, subsidiaries, operating companies, partners, officers, directors, agents, consultants, employees, or any other person or entity acting or purporting to act on Verizon’s behalf.

2. The terms “you” and “your” mean Verizon.

3. The term “North County” means North County Communications Corporation, its affiliates, parent companies, subsidiaries, operating companies, partners, officers, directors,

agents, consultants, employees, or any other person or entity acting or purporting to act on North County's behalf.

4. The terms "document" or "documents" include, without limitation, originals masters, and every copy of writings and printed matter of any kind and description, computer-generated records (including but not limited to electronic mail, computer files, disks, tapes and database records), photographs, graphs, charts and drawings, notes and records of any oral communications, and other compilations from which information can be obtained in the possession, custody or control of Verizon, or known to them, wherever located. The term includes physical objects and things such as research and development samples, prototype devices, production samples and the like. Any translation of a document, as well as any copy of any document that contains any marking not appearing on the original document, that is an alteration of the original in any way, or that is discovered at a different location or in the possession or custody of a different person, is to be considered a separate document.

5. The term "communication" means any transmission or exchange of information (in the form of facts, ideas, inquiries or otherwise) orally, by documents, or by any other medium, including, but not limited to, any of the following: conversations, discussions, interviews, meetings, and conferences, whether in person, by telephone, or by some other medium, letters, memoranda, telegrams, and telexes, mailgrams, electronic mail, and transmission of information by computer or word processing system.

6. The term "Answer" means Verizon's Verified Answer and Affirmative Defenses filed in this proceeding on August 2, 2007.

7. The terms "relate to," "refer to," "referring to" and "relating to" shall be construed in their broadest sense to require information or documents that constitute, concern,

pertain to, mention, evidence, describe, refer to (directly or indirectly), reflect upon, comment upon, or summarize the subject of the request for documents.

8. The terms “all” or “each” shall be construed as “any and each.”

9. The terms “and” or “or” shall be construed either disjunctively or conjunctively, as necessary to bring within the scope of the discovery request any responses that might otherwise be construed to be outside of its scope.

10. The use of the singular form of any word shall include the plural and vice versa.

11. The following requests shall be deemed to be continuing and, if after answering the requests Verizon acquires additional knowledge or information regarding documents or things responsive to the requests, then Verizon shall produce such documents or provide North County with such additional knowledge or information.

12. When asked to “identify” a person, provide that person’s name, job title, last known business and/or home address, telephone number and e-mail address.

13. All documents requested herein are all those in the custody, possession or control of Verizon or its affiliates, parent companies, subsidiaries, operating companies, experts, consultants, agents, employees or representatives (including attorneys), or to which Verizon or its affiliates, parent companies, subsidiaries, operating companies, experts, consultants, agents, employees or representatives (including attorneys) have access.

14. Please furnish all of the information requested for each item in this First Set of Data Requests. If that is not possible, please indicate what information is not being provided and the reason that it cannot be provided.

15. In the event that any document responsive to the following document requests has been destroyed or otherwise disposed of, that document is to be identified by author, addressee,

date, subject matter, number of pages, attachments or appendices, any persons to whom it was distributed, shown or explained, date and manner of destruction or other disposition, the reason for destruction or other disposition, and persons destroying or disposing of the document.

16. In the event that you claim a privilege or any other reason for non-production with respect to any document called for by a request, please provide a detailed log of documents withheld. For each document, the log should specify: (a) the general nature of the document; (b) the name and job title of the document's author; (c) the date that the document was composed or the date appearing on the document; (d) the name and job title of all addressees and others who received a copy of the document; (e) a description of the document's present location; and (f) the basis, privilege or other immunity asserted, upon which the document was withheld.

17. If any part of a document is responsive to any of the following requests, the entire document shall be produced.

18. The response to each data request item should begin on a new page. As part of each response, please identify the data request item to which the response is made by typing it at the top of the page. In addition, provide the name, job title and phone number of the Verizon witness who will be able to answer cross-examination questions concerning the response to each data request item.

19. Documents provided as part of a response should be attached to the sheet containing the response or e-mailed with the response. Each page of all documents provided in response to any data request item should be clearly marked with the data request item number, unless stapled together, in which case only the first page need be marked.

20. Electronic responses rather than paper responses are preferred. If data is provided in response to a particular request, such data should be provided in an electronic format that

allows data manipulation (i.e., spreadsheet, database, not .pdf). If a portion of a response needs to be provided in paper, please provide the entire response in paper as well as providing electronically the portion that is able to be provided electronically.

21. Please provide Verizon's responses to this First Set of Data Requests on or before August 24, 2007. To the extent Verizon intends to object to any requests and not provide a response, Verizon should provide those objections to North County no later than August 24, 2007.

22. Copies of Verizon's responses shall be delivered to the North County counsel of record shown below:

Joseph G. Dicks
Dicks & Workman, APC
700 B Street, Suite 2720
San Diego, California 92101
619.685.6800 (tel)
619.557.2735 (fax)
jdicks@dicks-workmanlaw.com (email)

With electronic cc to: Dale Dixon
dale@daledixonlaw.com (email)

DATA REQUESTS

REQUEST NO. 1:

Please produce all documents and identify all communications between Verizon and North County related to discussions and/or negotiations of a LIDB and/or CNAM agreement and/or contract.

REQUEST NO. 2:

Please admit or deny that Verizon has refused to purchase per-query access North County's CNAM and/or LIDB information without requiring North County to store such

information with Verizon or a third-party database provider. If your response is a denial, please state all facts upon which your denial is based.

REQUEST NO. 3:

Please explain in detail Verizon's proposed "direct CNAM/LIDB storage agreement" to which Verizon refers in its Answer at page 8.

REQUEST NO. 4:

Please produce all documents and identify all communications related to Verizon's proposed "direct CNAM/LIDB storage agreement" to which Verizon refers in its Answer at page 8.

REQUEST NO. 5:

Please produce all LIDB and/or CNAM agreements and/or contracts between Verizon North, Inc. and/or Verizon South Inc., on the one hand, and any other telecommunications carrier, including, but not limited to, wireline carriers, wireless carriers, and Verizon affiliates, subsidiaries, and operating companies, on the other hand, under which Verizon North, Inc. and/or Verizon South, Inc. provides their customers' CNAM and/or LIDB information to the other carrier.

REQUEST NO. 6:

Please produce all LIDB and/or CNAM agreements and/or contracts between Verizon North Inc. and/or Verizon South Inc., on the one hand, and any other telecommunications carrier, including, but not limited to, wireline carriers, wireless carriers, and Verizon affiliates, subsidiaries, and operating companies, on the other hand, under which Verizon North Inc. and/or Verizon South Inc. obtains CNAM and/or LIDB information from the other carrier, either

directly from the other carrier's database or indirectly by accessing the carrier's information as stored by a third-party data vendor.

REQUEST NO. 7:

Please provide all documents and identify all communications, including emails, related to Verizon's evaluation of the LIDB and/or CNAM agreement entered into between Verizon and North County on or about February 8, 2007.

REQUEST NO. 8:

Please provide all Verizon communications, including emails, related to Verizon's evaluation of and related response to the LIDB and/or CNAM agreement proposed to Verizon by North County.

REQUEST NO. 9:

Please admit or deny that the LIDB and/or CNAM agreement proposed to Verizon by North County was identical in all respects to the LIDB and/or CNAM agreement entered into by Verizon and North County on or about February 8, 2007, with the sole exception being universal changes of "Verizon" to "North County" and "North County" to "Verizon." If your response is a denial, please state all facts upon which your denial is based.

REQUEST NO. 10:

Please admit or deny that Verizon, in all circumstances, hosts its own LIDB and/or CNAM data in a database that is controlled and owned by Verizon. If your response is a denial, please state all facts upon which your denial is based.

////

////

////

REQUEST NO. 11:

Please state whether Verizon stores LIDB and/or CNAM information for Verizon customers in databases administered by any third-party database providers. If so, please state whether Verizon previously stored that information in a Verizon database.

REQUEST NO. 12:

As a follow-up question to Request No. 11 above, please identify all third-party database providers that store Verizon LIDB and/or CNAM information.

REQUEST NO. 13:

As an additional follow-up question to Request Nos. 11 and 12 above, please provide all agreements and/or contracts between Verizon and any third-party database providers for the storage of Verizon LIDB and/or CNAM information.

REQUEST NO. 14:

Please identify any and all third-party data vendors and/or aggregators from which Verizon obtains CNAM and/or LIDB “look-ups” for the data of other telecommunications carriers.

REQUEST NO. 15:

Please produce any and all agreements and/or contracts between Verizon and any third-party data vendor and/or aggregator from which Verizon obtains CNAM and/or LIDB “look-ups” for the data of other telecommunications carriers.

REQUEST NO. 16:

Please produce all documents and identify all communications supporting Verizon’s affirmative defense number 2, at page 14 of its Answer, that the claims alleged by North County are preempted by federal law.

REQUEST NO. 17:

Please identify the total number of collect calls placed by Verizon end users in Illinois in 2006.

REQUEST NO. 18:

Please identify the total number of third-party billed calls placed by Verizon end user customers in Illinois in 2006.

REQUEST NO. 19:

Please identify the total number of Caller ID Name “look ups” that Verizon performed or obtained in Illinois in 2006.

REQUEST NO. 20:

As a follow-up question to Request No. 19 above, please identify the number of “look ups” by operating company and the company or entity that hosts the data obtained through such “look ups.”

REQUEST NO. 21:

Please state whether Verizon charges the same per-query LIDB “look-up” rates to all telecommunications carriers. If Verizon does not charge the same per-query LIDB “look-up” rates to all telecommunications carriers, please identify each different rate and the carrier(s) that pay those rates.

REQUEST NO. 22:

Please state whether Verizon charges the same per-query CNAM “look-up” rates to all telecommunications carriers. If Verizon does not charge the same per-query CNAM “look-up” rates to all telecommunications carriers, please identify each different rate and the carrier(s) that pay those rates.

REQUEST NO. 23:

Please admit or deny that a telecommunications carrier may obtain LIDB validation services from Verizon by purchasing such services from the Verizon FCC tariff and without entering into a specific LIDB agreement. If your response is a denial, please state all facts upon which your denial is based.

REQUEST NO. 24:

Please admit or deny that Verizon considers its LIDB and CNAM data and information to be highly confidential and proprietary information. If your response is a denial, please state all facts upon which your denial is based.

REQUEST NO. 25:

Please identify all instances in which Verizon has refused to offer a contract for CNAM validation services to a telecommunications carrier requesting such services.

REQUEST NO. 26:

Please identify the percentage of Verizon end user customers currently receiving and/or subscribing to Caller ID services.

REQUEST NO. 27:

Please identify all telecommunications carriers that purchase CNAM and/or LIDB data from Verizon but from whom Verizon does not purchase CNAM and/or LIDB data.

REQUEST NO. 28:

Please produce all documents and identify all communications supporting Verizon's conclusion, as stated in the March 27, 2005, email from Julie K. McCall, "that it is far more cost-effective to use third-party aggregators than to enter into direct arrangements with a multitude of individual carriers."

REQUEST NO. 29:

Please produce all documents and identify all communications supporting the affirmative defenses alleged by Verizon in its Answer at pages 14 and 15.

REQUEST NO. 30:

Does Verizon provide telecommunications services to any customers in Illinois that operate as telemarketers? If so, please identify how many such business customers Verizon currently has in Illinois.

REQUEST NO. 31:

As a follow up to Request No. 30, if Verizon provides telecommunications services to customers in Illinois that operate as telemarketers, does Verizon provide service to those telemarketing companies so that the telemarketing company's name is transmitted to a called-party where the called-party has Caller ID service? If so, how does Verizon ensure that the telemarketing company's name is transmitted via Caller ID to the called party?

REQUEST NO. 32:

Please admit or deny that the LIDB database is a single database that contains information for alternate billing arrangements, Originating Line Number Screening (OLNS) and Calling Name Delivery (CNAM). If your response is a denial, please state all facts upon which your denial is based and explain how the denial does not conflict with Verizon's marketing materials set forth at <http://www22.verizon.com/wholesale/solutions/solution/LIDB.html>.

REQUEST NO. 33:

Please produce all documents relating to all Caller ID and/or Calling Name service promotional and marketing materials used by Verizon to solicit end user subscriptions to such services over the past ten years.

REQUEST NO. 34:

Please produce all documents relating to training materials that Verizon has provided over the past ten years to its employees concerning the promotion, marketing and sale of Caller ID and/or Calling Name services.

REQUEST NO. 35:

Please produce all documents relating to marketing and telemarketing scripts provided to and used by Verizon employees in the promotion, sale and marketing of Caller ID and/or Calling Name services.

REQUEST NO. 36:

Please produce all documents relating to Verizon information or materials stating, informing or otherwise disclosing that Calling Name information will not always be transmitted to an end user's Caller ID unit.

REQUEST NO. 37:

Please identify how many complaints of any kind that Verizon has received from its end users regarding the following circumstances, and please produce all documents and records relating to such complaints:

- (a) Calling-Party Name ("CNAM") information not appearing on their Caller ID units;
- (b) Not being able to place collect calls to non-Verizon end users; and
- (c) Not being able to place third-party billed calls to non-Verizon end users.

REQUEST NO. 38:

Please produce all documents and identify all communications, including, but not limited to, technical publications used or distributed by Verizon relating or otherwise describing the

technical nature of the manner in which third-party data vendors and/or aggregators interconnect with or otherwise obtain LIDB and/or CNAM information stored by Verizon in its own related database(s).

REQUEST NO. 39:

Please identify how many complaints of any kind that Verizon has received from non-Verizon telecommunications carriers regarding the following circumstances, and please produce all documents and records relating to such complaints:

- (a) Calling-Party Name (“CNAM”) information for the non-Verizon end users not being transmitted to Verizon end user’s Caller ID units.

REQUEST NO. 40:

Please identify by jurisdiction, court name, case number and case caption, any complaint actions or administrative proceedings, including, but not limited to rulemakings and adjudications, where Verizon has submitted comments or information regarding its stance with respect to LIDB and/or CNAM services, including, but not limited to, the technical nature of the offerings.

REQUEST NO. 41:

For those actions and proceedings identified in response to Request No. 39 above, please produce copies of all comments and pleadings submitted by Verizon.

REQUEST NO. 42:

Please produce all documents that Verizon intends to use at hearing.

REQUEST NO. 43:

Please identify any and all experts Verizon intends to call as witnesses at hearing.

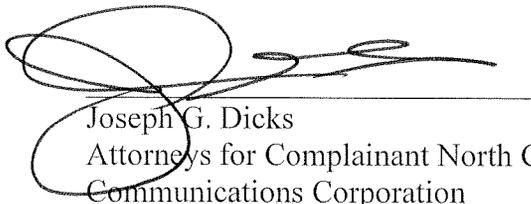
////

REQUEST NO. 44:

Please provide your responses to any and all data requests received from any other party.

DICKS & WORKMAN
A Professional Corporation

Dated: August 10, 2007



Joseph G. Dicks
Attorneys for Complainant North County
Communications Corporation

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**DECLARATION OF SERVICE
STATE OF CALIFORNIA, COUNTY OF SAN DIEGO**

I, Alfonso Rivera, declare as follows:

I am employed with the Law Offices Joseph G. Dicks, A.P.C., whose address is 750 "B" Street, Suite 2720, San Diego, California 92101. I am readily familiar with the business practices of this office for collection and processing of correspondence for mailing with the United States Postal Service; I am over the age of eighteen (18) and I am not a party to this action.

On August 10, 2007, I caused to be served the following:

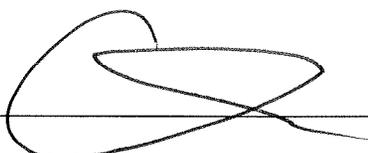
NORTH COUNTY'S FIRST SET OF DATA REQUESTS TO VERIZON

on the interested parties on the attached Service List in this action by:

 X by sending a copy via electronic mail.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Diego, California, on Friday, August 10, 2007.



Alfonso Rivera

SERVICE LIST

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

John D. Albers
Administrative Law Judge
Illinois Commerce Commission
527 East Capitol Ave.
Springfield, IL 62701
jalbers@icc.illinois.gov

Stefanie R. Glover
Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle St., Ste. C-800
Chicago, IL 60601
sglover@icc.illinois.gov

Matthew L. Harvey
Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle St., Ste. C-800
Chicago, IL 60601
mharvey@icc.illinois.gov

Philip J. Wood Jr., Vice President
Public Affairs Policy & Communications
Verizon North/South Inc.
1312 E. Empire St., ILLARA
P.O. Box 2955
Bloomington, IL 61702
philip.j.wood.jr@verizon.com

James Zolnierek
Illinois Commerce Commission
527 East Capitol Ave.
Springfield, IL 62701
jzolnier@icc.illinois.gov

Deborah Kuhn
Verizon
205 North Michigan Avenue, 11th Floor
Chicago, Illinois 60601
deborah.kuhn@verizon.com

A. Randall Vogelzang
Verizon
HQE02J27
600 Hidden Ridge
Irving, TX 75038
randy.vogelzang@verizon.com

1 Document Processor
2 North County Communications Corporation
3 National Registered Agents, Inc.
4 200 W. Adams St., Ste. 2007
5 Chicago, IL 60606
6 llofton@nrai.com

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

NORTH COUNTY COMMUNICATIONS CORPORATION,)	
)	
Complainant,)	
)	
vs.)	Docket No. 07-0428
)	
VERIZON NORTH INC. and VERIZON SOUTH INC.)	
)	
Respondents.)	
<hr/>		

NORTH COUNTY’S SECOND SET OF DATA REQUESTS TO VERIZON

North County Communications Corporation (“North County”), by and through its counsel and pursuant to 220 ILCS 5/13-515(d)(3), hereby submits its Second Set of Data Requests to Verizon North Inc. and Verizon South Inc. (collectively, “Verizon”) and requests responses within fourteen (14) days of electronic service, or on or before September 11, 2007.

DEFINITIONS, INSTRUCTIONS & RULES OF CONSTRUCTION

1. The term “Verizon” means Verizon South Inc. and Verizon North Inc., and their partners, officers, directors, agents, consultants, employees, or any other person or entity acting or purporting to act on Verizon’s behalf.
2. The terms “you” and “your” mean Verizon.
3. The term “North County” means North County Communications Corporation, its partners, officers, directors, agents, consultants, employees, or any other person or entity acting or purporting to act on North County’s behalf.

4. “DPC” means Destination Point Code.

5. The term “ICA” means the existing Illinois interconnection agreement between Verizon and NCC pursuant to 47 U.S.C. §§ 251, 252.

6. “NPAC” means the Number Portability Administration Center.

7. The terms “document” or “documents” include, without limitation, originals masters, and every copy of writings and printed matter of any kind and description, computer-generated records (including but not limited to electronic mail, computer files, disks, tapes and database records), photographs, graphs, charts and drawings, notes and records of any oral communications, and other compilations from which information can be obtained in the possession, custody or control of Verizon, or known to them, wherever located. The term includes physical objects and things such as research and development samples, prototype devices, production samples and the like. Any translation of a document, as well as any copy of any document that contains any marking not appearing on the original document, that is an alteration of the original in any way, or that is discovered at a different location or in the possession or custody of a different person, is to be considered a separate document.

8. The term “communication” means any transmission or exchange of information (in the form of facts, ideas, inquiries or otherwise) orally, by documents, or by any other medium, including, but not limited to, any of the following: conversations, discussions, interviews, meetings, and conferences, whether in person, by telephone, or by some other medium, letters, memoranda, telegrams, and telexes, mailgrams, electronic mail, and transmission of information by computer or word processing system.

9. The term “Answer” means Verizon’s Verified Answer and Affirmative Defenses filed in this proceeding on August 2, 2007.

10. The terms “relate to,” “refer to,” “referring to” and “relating to” shall be construed in their broadest sense to require information or documents that constitute, concern, pertain to, mention, evidence, describe, refer to (directly or indirectly), reflect upon, comment upon, or summarize the subject of the request for documents.

11. The terms “all” or “each” shall be construed as “any and each.”

12. The terms “and” or “or” shall be construed either disjunctively or conjunctively, as necessary to bring within the scope of the discovery request any responses that might otherwise be construed to be outside of its scope.

13. The use of the singular form of any word shall include the plural and vice versa.

14. The following requests shall be deemed to be continuing and, if after answering the requests Verizon acquires additional knowledge or information regarding documents or things responsive to the requests, then Verizon shall produce such documents or provide North County with such additional knowledge or information.

15. When asked to “identify” a person, provide that person’s name, job title, last known business and/or home address, telephone number and e-mail address.

16. All documents requested herein are all those in the custody, possession or control of Verizon or its affiliates, experts, consultants, agents, employees or representatives (including attorneys), or to which Verizon or its affiliates, experts, consultants, agents, employees or representatives (including attorneys) have access.

17. Please furnish all of the information requested for each item in this Second Set of Data Requests. If that is not possible, please indicate what information is not being provided and the reason that it cannot be provided.

18. In the event that any document responsive to the following document requests has

been destroyed or otherwise disposed of, that document is to be identified by author, addressee, date, subject matter, number of pages, attachments or appendices, any persons to whom it was distributed, shown or explained, date and manner of destruction or other disposition, the reason for destruction or other disposition, and persons destroying or disposing of the document.

19. In the event that you claim a privilege or any other reason for non-production with respect to any document called for by a request, please provide a detailed log of documents withheld. For each document, the log should specify: (a) the general nature of the document; (b) the name and job title of the document's author; (c) the date that the document was composed or the date appearing on the document; (d) the name and job title of all addressees and others who received a copy of the document; (e) a description of the document's present location; and (f) the basis, privilege or other immunity asserted, upon which the document was withheld.

20. If any part of a document is responsive to any of the following requests, the entire document shall be produced.

21. The response to each data request item should begin on a new page. As part of each response, please identify the data request item to which the response is made by typing it at the top of the page. In addition, provide the name, job title and phone number of the Verizon witness who will be able to answer cross-examination questions concerning the response to each data request item.

22. Documents provided as part of a response should be attached to the sheet containing the response or e-mailed with the response. Each page of all documents provided in response to any data request item should be clearly marked with the data request item number, unless stapled together, in which case only the first page need be marked.

23. Electronic responses rather than paper responses are preferred. If data is provided

in response to a particular request, such data should be provided in an electronic format that allows data manipulation (i.e., spreadsheet, database, not .pdf). If a portion of a response needs to be provided in paper, please provide the entire response in paper as well as providing electronically the portion that is able to be provided electronically.

24. Please provide Verizon's responses to this Second Set of Data Requests on or before September 11, 2007. To the extent Verizon intends to object to any requests and not provide a response, Verizon should provide those objections to North County no later than September 11, 2007.

25. Copies of Verizon's responses shall be delivered to the North County counsel of record shown below:

Joseph G. Dicks
Dicks & Workman, APC
700 B Street, Suite 2720
San Diego, California 92101
619.685.6800 (tel)
619.557.2735 (fax)
jdicks@dicks-workmanlaw.com (email)

With an electronic copy to: Dale Dixon
dale@daledixonlaw.com (email)

DATA REQUESTS

REQUEST NO. 45:

Please provide all facts and documents supporting Verizon's assertion, as stated at page 2 of its Reply in Support of its Motion to Dismiss, that "NCC does not even presently have the capability to offer the service at issue."

REQUEST NO. 46:

Please produce any and all agreements and/or contracts between Verizon and any third-party data aggregators that address such aggregators' "dipping" or querying Verizon's LIDB and/or CNAM data.

REQUEST NO. 47:

Please provide all rates and charges that Verizon assesses to third-party data aggregators for such aggregators' "dipping" or querying Verizon's LIDB and/or CNAM data. For each rate provided, please identify the charge to which it applies and each aggregator that pays the listed rate.

REQUEST NO. 48:

Please admit or deny that the ICA does not govern the terms, conditions and rates for LIDB and/or CNAM services between Verizon and NCC. If your response is anything other than an unqualified admission, please provide all facts and documents supporting your response.

REQUEST NO. 49:

Please admit or deny that the dispute resolution provisions of the ICA do not govern disputes between the parties concerning LIDB and/or CNAM services. If your response is anything other than an unqualified admission, please provide all facts and documents supporting your response.

REQUEST NO. 50:

With regard to Verizon's Response to Staff DR No. JZ VZ-11, please provide all facts and documents supporting Verizon's statement that LIDB and/or CNAM agreements do not have to be filed with the Illinois Commerce Commission.

REQUEST NO. 51:

Please admit or deny that the issues in dispute in this proceeding are not governed by the ICA. If your response is anything other than an unqualified admission, please provide all facts and documents that support your response.

REQUEST NO. 52:

Please admit or deny that the ICA does not include references to “calling name,” “calling party name,” or CNAM information. If your response is anything other than an unqualified admission, please provide all facts and documents that support your response.

REQUEST NO. 53:

Please provide all facts and documents supporting Verizon’s assertion, as stated at page 11 of its Reply in Support of its Motion to Dismiss, that “NCC presently lacks CNAM/LIDB hosting, storage and transmission capacity.”

REQUEST NO. 54:

Please admit or deny that Verizon never obtained information from NCC regarding NCC’s CNAM/LIDB hosting, storage and transmission capacity prior to rejecting the LIDB/CNAM contract proposed by NCC. If your response is anything other than an unqualified admission, please provide all facts and documents that support your response.

REQUEST NO. 55:

Please state, in an actual dollar amount, how much more Verizon would pay on a per-query basis to obtain NCC’s LIDB/CNAM information from NCC under the LIDB/CNAM contract proposed by NCC versus the current manner in which Verizon obtains NCC’s LIDB/CNAM information.

REQUEST NO. 56:

Please provide all facts and documents supporting Verizon's assertion, as stated at page 12 of its Reply in Support of its Motion to Dismiss, that, "even if Verizon agreed today to purchase NCC's CNAM/LIDB data directly from NCC, it would be impossible to do so."

REQUEST NO. 57:

Please provide all facts and documents supporting Verizon's assertion, as stated at page 12 of its Reply in Support of its Motion to Dismiss, that "NCC presently has no means by which to sell its CNAM/LIDB data directly to Verizon."

REQUEST NO. 58:

Please admit or deny that the enumerated list of *per se* unlawful impediments at 220 ILCS 5/13-514 is not an exhaustive list.

REQUEST NO. 59:

Please admit or deny that the NPAC controls all ported numbers in the U.S. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 60:

Please admit or deny that NPAC rules allow only one DPC for the CNAM database of each telephone number and only one DPC for the LIDB of each telephone number. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 56:

Please provide all facts and documents supporting Verizon's assertion, as stated at page 12 of its Reply in Support of its Motion to Dismiss, that, "even if Verizon agreed today to purchase NCC's CNAM/LIDB data directly from NCC, it would be impossible to do so."

REQUEST NO. 57:

Please provide all facts and documents supporting Verizon's assertion, as stated at page 12 of its Reply in Support of its Motion to Dismiss, that "NCC presently has no means by which to sell its CNAM/LIDB data directly to Verizon."

REQUEST NO. 58:

Please admit or deny that the enumerated list of *per se* unlawful impediments at 220 ILCS 5/13-514 is not an exhaustive list.

REQUEST NO. 59:

Please admit or deny that the NPAC controls all ported numbers in the U.S. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 60:

Please admit or deny that NPAC rules allow only one DPC for the CNAM database of each telephone number and only one DPC for the LIDB of each telephone number. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 61:

Please admit or deny that in order to find the DPC for the CNAM and/or LIDB database of a particular telephone number, all local exchange carriers in the country must dip the NPAC/Service Order Administration database. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 62:

Please admit or deny that Verizon dips one database for CNAM and another database for LIDB for each particular number. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 63:

Please admit or deny that carriers cannot store and/or host their CNAM information for a particular telephone in more than one database nor can they store their LIDB information for a particular telephone number in more than one database . If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 64:

Please admit or deny that Verizon only uses one LIDB DPC and one CNAM DPC per telephone number belonging to Verizon end users. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 65:

Is Verizon aware of any telecommunications carrier in the entire United States that stores or hosts LIDB and/or CNAM data in more than one location using more than one DPC? If so, please identify those carriers.

REQUEST NO. 66:

Please admit or deny that Verizon prohibits caching of its LIDB and CNAM data when dips or queries of the data are performed. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 67:

Please admit or deny that all Verizon CNAM/LIDB data is stored in Verizon-owned and Verizon-controlled database(s). If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 68:

Please admit or deny that all dips or queries for Verizon CNAM and/LIDB data, regardless of the SS7 provider utilized to initiate such dips or queries, are directed and sent to Verizon's CNAM/LIDB databases. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 69:

Please admit or deny that Verizon owns its CNAM and LIDB data. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 70:

Please admit or deny that carriers who do not purchase Verizon CNAM and Verizon LIDB data directly from Verizon must use another SS7 provider that in turn must dip or query Verizon's databases to obtain the CNAM/LIDB data. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 71:

Please admit or deny that Verizon determines the price it charges for CNAM and LIDB lookups. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 72:

Please admit or deny that the industry has no technical solution to allow a carrier to host a number's LIDB information with more than one database provider. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 73:

Please admit or deny that the industry has no technical solution to allow a carrier to host a number's CNAM information with more than one database provider. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 74:

Please admit or deny that if a carrier does not have a direct SS7 connection to Verizon's CNAM and LIDB databases, the carrier must use a third party SS7/database provider to obtain Verizon's LIDB/CNAM data from Verizon's CNAM and LIDB databases. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 75:

Please admit or deny that third party SS7/database providers do not actually host Verizon's LIDB/CNAM data but merely query Verizon's CNAM and/or LIDB database to obtain such information. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 76:

Please admit or deny Verizon offers consumers the ability to purchase Verizon's Caller ID with name delivery in order to allow the consumer to view calling party name when someone with an unblocked number calls that consumer. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 77:

Please admit or deny that the only way to access Verizon's LIDB/CNAM data is by either direct or indirect connection to Verizon's CNAM and/or LIDB database. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 78:

Please admit or deny that, in addition to acting as a local exchange carrier, Verizon is also an Internet Service Provider. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 79:

Please admit or deny that Verizon provides voicemail services. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 80:

Please explain how Verizon determines whether the pricing for its CNAM and LIDB data services is competitive.

REQUEST NO. 81:

Please state all facts and provide all documents supporting Verizon's position that it may determine the rate for its CNAM/LIDB data but NCC should not be permitted to set NCC's LIDB/CNAM rates.

REQUEST NO. 82:

Please state all facts and provide all documents supporting Verizon's position that it may choose DPCs and corresponding database computers to host its CNAM/LIDB information but NCC should not be permitted to choose DPCs and corresponding database computers to host NCC's LIDB/CNAM data.

REQUEST NO. 83:

Does Verizon track complaints its customer service and repair representatives receive concerning the absence of calling party name information? If so, please provide all documents identifying the procedures that Verizon provides to its employees with respect to tracking and reporting such complaints.

REQUEST NO. 84:

Please identify each DPC, including the location of each such DPC, that Verizon utilizes to host its LIDB data.

REQUEST NO. 85:

Please identify each DPC, including the location of each such DPC, that Verizon utilizes to host its CNAM data.

REQUEST NO. 86:

Please state whether Verizon markets its telephone services to end users that are call centers, high volume accounts, VoIP providers and voicemail providers (as those terms have been defined by NCC in response to Verizon's data requests).

REQUEST NO. 87:

Please identify the carriers and/or third-party database companies with whom Verizon has declined to enter into an agreement to buy the CNAM and/or LIDB data stored and/or hosted by such carrier or third-party database company.

REQUEST NO. 88:

Please identify the carriers and/or third-party database companies for which Verizon refuses to dip CNAM and/or LIDB data.

REQUEST NO. 89:

Has Verizon disputed invoices issued by any carrier, third-party database provider or customer of a third-party database provider for LIDB and/or CNAM data query charges? If so, please identify the entity that issued a disputed invoice.

REQUEST NO. 90:

Please admit or deny that Verizon provides multiple lines to customers that operate as call centers and/or phone banks. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 91:

Please admit or deny that the Verizon/NCC CNAM/LIDB Contract allows for either direct or indirect Dipping of CNAM and LIDB information. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 92:

Please admit or deny that the Verizon is in the process of moving its CNAM and/or LIDB database information currently stored with third-party database providers to Verizon's own databases. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 93:

Please admit or deny that the primary reason Verizon is moving its CNAM and/or LIDB database information currently stored with third-party database providers to Verizon's own databases is to increase its profit or to decrease its costs. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 94:

Please state the definition of "Pass Thru rate" as used in Verizon's CNAM/LIDB contracts with third-parties.

REQUEST NO. 95:

Please admit or deny that Verizon signed a contract with a third-party database provider to obtain all its off-net CNAM and LIDB queries. (The term “off net” is defined as Verizon uses the term in its contract with the third party data base provider referred to in Verizon’s responses to NCC’s first set of data requests.) If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 96:

Please admit or deny that Verizon signed a contract with a third-party database provider that has a quantity discount or CAP on the CNAM Gateway charges, but no discounts on the pass-through charges. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 97:

Please admit or deny that the Verizon/NCC CNAM/LIDB Contract executed between Verizon and NCC allows for NCC to use any CNAM/LIDB Gateway or SS7 provider of its choice. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 98:

Please provide all of Verizon’s back-up analysis regarding the impact on its customers when it terminates existing CNAM/LIDB contracts

REQUEST NO. 99:

Please provide all of Verizon’s back-up analysis regarding the regulatory restrictions related to Verizon’s exiting existing CNAM/LIDB contracts.

REQUEST NO. 100:

Please provide all of Verizon's back-up analysis regarding public affairs issues related to Verizon's exiting existing CNAM/LIDB contracts

REQUEST NO. 101:

Please admit or deny that Verizon is concerned about line loss and customer complaints if it stops dipping the CNAM of its competitors. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 102:

Please admit or deny that Verizon charges the non-RBOCs more to purchase CNAM data than it charges the RBOCs. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 103:

Please admit or deny that there are no additional hardware and/or circuit requirements imposed on Verizon if Verizon dips NCC's CNAM/LIDB data indirectly through a third party database gateway or SS& provider as allowed in the contract NCC proposed to Verizon. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 104:

Please admit or deny that Verizon is continuing to offer competitors the CNAM/LIDB contract entered into between Verizon and NCC on February 8, 2007. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 105:

Please admit or deny that Verizon may have to purchase more hardware when it signs a CNAM/LIDB contract that allows its competitors to buy Verizon's data. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 106:

Please admit or deny that Verizon changed its LIDB/CNAM rate schedule just days after NCC asked Verizon to start purchasing the NCC data using the same rates terms and conditions set forth in the NCC/Verizon LIDB/CNAM Contract. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 107:

Please admit or deny that Verizon has not signed any LIDB/CNAM contracts with any competitive local exchange carriers using Verizon's new rates that became effective March 30, 2007. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 108:

Please state what additional facilities or hardware would be required for Verizon to purchase NCC's LIDB/CNAM data directly.

REQUEST NO. 109:

Please state what additional facilities or hardware would be required for Verizon to purchase NCC's LIDB/CNAM indirectly as the contract allows.

REQUEST NO. 110:

Please admit or deny that Verizon could still obtain its quantity discounts from the third-party CNAM/LIDB provider it signed a contract with, even if Verizon enters into the proposed contract with NCC and indirectly routes the queries through the third party. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 111:

Please admit or deny that Verizon charges the “Smaller guys” (as that term is used by Verizon in its responses to NCC’s first set of data requests) more to purchase CNAM data than it charges the RBOCs. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 112:

In the Verizon LIDB and CNAM Database Validation Contract in section 3.2 it mentions using existing D-Links for LIDB and CNAM DIPS. Admit that the exact same facilities that NCC will use to DIP Verizon's CNAM and LIDB data can be used by Verizon to DIP NCC's data. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 113:

Admit that there are cases where Verizon is not displaying the name on its customer’s caller ID box, even though the call is not a message from a call made outside specially equipped areas. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 114:

Admit that there are cases where Verizon is not displaying the name on its customer's caller ID box, even though the call is not a call made through an operator. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

REQUEST NO. 115:

Admit that in some cases, the reason that Verizon is not displaying the CNAM information on its customer's caller ID box is because it is choosing not to Dip the CNAM data of the originating caller's phone company. If your response is anything other than an unqualified admission, please provide all the facts and documents supporting your response.

DICKS & WORKMAN

A Professional Corporation



Joseph G. Dicks

Attorneys for Complainant North County
Communications Corporation

Dated: August 28, 2007

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**DECLARATION OF SERVICE
STATE OF CALIFORNIA, COUNTY OF SAN DIEGO**

I, Jessica Burke, declare as follows:

I am employed with Dicks & Workman, APC, whose address is 750 "B" Street, Suite 2720, San Diego, California 92101. I am readily familiar with the business practices of this office for collection and processing of correspondence for mailing with the United States Postal Service; I am over the age of eighteen (18) and I am not a party to this action.

On August 28, 2007, I caused to be served the following:

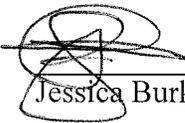
North County's Second Set of Data Requests to Verizon

on the interested parties on the attached Service List in this action by:

by sending a copy via electronic mail.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Diego, California, on Tuesday, August 28, 2007.



Jessica Burke

SERVICE LIST

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Stefanie R. Glover
Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle St., Ste. C-800
Chicago, IL 60601
sglover@icc.illinois.gov

Matthew L. Harvey
Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle St., Ste. C-800
Chicago, IL 60601
mharvey@icc.illinois.gov

Philip J. Wood Jr., Vice President
Public Affairs Policy & Communications
Verizon North/South Inc.
1312 E. Empire St., ILLARA
P.O. Box 2955
Bloomington, IL 61702
philip.j.wood.jr@verizon.com

James Zolnierек
Illinois Commerce Commission
527 East Capitol Ave.
Springfield, IL 62701
jzolnier@icc.illinois.gov

Deborah Kuhn
Verizon
205 North Michigan Avenue, 11th Floor
Chicago, Illinois 60601
deborah.kuhn@verizon.com

A. Randall Vogelzang
Verizon
HQE02J27
600 Hidden Ridge
Irving, TX 75038
randy.vogelzang@verizon.com