

ATTACHMENT EG-1R

NCC's Responses to Verizon's Fourth Set of Data Requests

SUPPLEMENTAL RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO VERIZON DATA REQUEST NO. 55, DATED SEPTEMBER 10, 2007 DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please state whether NCC has undertaken any analysis of the potential impact of any kind, including, but not limited to (1) the impact on NCC's customers, (2) the impact on the public at large, (3) the impact on NCC in the regulatory realm, (4) the impact on NCC in the competitive realm, etc., of any decision by NCC, whether current or anticipated, to cease to store its Calling Name ("CNAM")/Line Information Database ("LIDB") data with Verisign. If your response is no, please explain why NCC is considering such actions without analyzing their impact. If your response is yes, please provide all facts, communications and documents reflecting such analysis.

RESPONSE: NCC objects to this request on the basis that it seeks proprietary, confidential and trade secret information. Furthermore, NCC objects to this request on the grounds that it seeks irrelevant information and that it is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, NCC objects to this request on the basis that it is overbroad and intended to harass NCC.

The case is about Verizon's anticompetitive and discriminatory business practices against NCC, not NCC's internal analysis of its business and plans. Absent a Verizon interest to invest in NCC, this request is wholly inappropriate and irrelevant.

SUPPLEMENTAL RESPONSE: Notwithstanding and without waiving the above-noted objections, NCC states that it has analyzed the impact of forcing Verizon to cease its unlawful, anticompetitive and discriminatory behavior with regard to Verizon's dictating the manner in which NCC may store its data and the terms under which NCC must make its data available. NCC states that, although cost and profitability are important issues in this dispute for both Verizon and NCC (after all, NCC, by being forced to host its data with a third party, must give up 60% of its revenue to the third party host, an expense that is totally unnecessary, but for Verizon's market controlling demands) this dispute is not simply a matter of profitability for NCC. In addition, with regard to costs, because Verizon requires that NCC host its data with either Verizon or a Verizon-approved third party (if NCC wishes to have its LIDB/CNAM information queried by Verizon), NCC, unlike Verizon, must pay the third party to access NCC's own data.

Beyond costs, the benefits of being able to host one's own data include: the protection of proprietary customer information; speed and efficiency; quality control; maintenance and repair; updating of records; and, better use of Verizon and NCC network, administrative and engineering resources insofar as the same resources that NCC will use to purchase Verizon's CNAM/LIBD data can and should be used by Verizon to purchase NCC's CNAM/LIBD data. Like Verizon, NCC wishes to store its data in the same manner Verizon stores its data.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO
VERIZON DATA REQUEST NO. 56, DATED SEPTEMBER 10, 2007
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please provide all facts, communications and documents reflecting the anticipated economic impact on NCC of NCC's decisions to (1) seek a contract with Verizon for Verizon's direct purchase of NCC's CNAM/LIDB information, (2) NCC's purported decision to host and store its own CNAM/LIDB data, and (3) NCC's purported anticipated withdrawal of its CNAM/LIDB data from Verisign.

RESPONSE: NCC objects to this request on the basis that it seeks proprietary, confidential and trade secret information. Furthermore, NCC objects to this request on the grounds that it seeks irrelevant information and that it is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, NCC objects to this request on the basis that it is overbroad and intended to harass NCC.

The case is about Verizon's anticompetitive and discriminatory business practices against NCC, not NCC's internal analysis of its business and plans. Absent a Verizon interest to invest in NCC, this request is wholly inappropriate and irrelevant.

Notwithstanding and without waiving its objections, NCC states that it intends to store its own LIDB/CNAM data in its own databases. Although cost and profitability are important issues in this dispute for both Verizon and NCC (after all, NCC, by being forced to host its data with a third party, must give up 60% of its revenue to the third party host, an expense that is totally unnecessary, but for Verizon's market controlling demands) this dispute is not simply a matter of profitability for NCC. In addition, with regard to costs, because Verizon requires that NCC host its data with either Verizon or a Verizon-approved third party (if NCC wishes to have its LIDB/CNAM information queried by Verizon), NCC, unlike Verizon, must pay the third party to access NCC's own data.

Beyond costs, the benefits of being able to host one's own data include: the protection of proprietary customer information; speed and efficiency; quality control; maintenance and repair; updating of records; and, better use of Verizon and NCC network, administrative and engineering resources insofar as the same resources that NCC will use to purchase Verizon's CNAM/LIBD data can and should be used by Verizon to purchase NCC's CNAM/LIBD data. Like Verizon, NCC wishes to store its data in the same manner Verizon stores its data.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO
VERIZON DATA REQUEST NO. 57, DATED SEPTEMBER 10, 2007
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please provide all facts, communications and documents that support NCC's assertion at ¶ 27 of the Verified Complaint that it is "far more cost-effective to populate, store, update, query and transmit its end user line and CNAM information in its own databases, using its own resources and facilities."

RESPONSE: NCC objects to this request on the basis that it seeks proprietary, confidential and trade secret information. Furthermore, NCC objects to this request on the grounds that it seeks irrelevant information and that it is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, NCC objects to this request on the basis that it is overbroad and intended to harass NCC.

The case is about Verizon's anticompetitive and discriminatory business practices against NCC, not NCC's internal analysis of its business and plans.

Notwithstanding and without waiving its objections, NCC states that, although cost and profitability are important issues in this dispute for both Verizon and NCC (after all, NCC, by being forced to host its data with a third party, must give up 60% of its revenue to the third party host, an expense that is totally unnecessary, but for Verizon's market controlling demands) this dispute is not simply a matter of profitability for NCC. In addition, with regard to costs, because Verizon requires that NCC host its data with either Verizon or a Verizon-approved third party (if NCC wishes to have its LIDB/CNAM information queried by Verizon), NCC, unlike Verizon, must pay the third party to access NCC's own data.

Beyond costs, the benefits of being able to host one's own data include: the protection of proprietary customer information; speed and efficiency; quality control; maintenance and repair; updating of records; and, better use of Verizon and NCC network, administrative and engineering resources insofar as the same resources that NCC will use to purchase Verizon's CNAM/LIBD data can and should be used by Verizon to purchase NCC's CNAM/LIBD data. Like Verizon, NCC wishes to store its data in the same manner Verizon stores its data.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO
VERIZON DATA REQUEST NO. 58, DATED SEPTEMBER 10, 2007
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please provide all facts, communications and documents that demonstrate that NCC would be capable of selling its CNAM/LIDB data directly to other telecommunications carriers today if those carriers asked to purchase that data directly from NCC.

RESPONSE: NCC objects to this request on the basis that it seeks proprietary, confidential and trade secret information. In addition, NCC objects to this request to the extent it seeks information protected by the attorney-client and work-product privileges. Furthermore, NCC objects to this request on the grounds that it seeks irrelevant information and that it is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, NCC objects to this request on the basis that it is overbroad and intended to harass NCC.

The case is about Verizon's anticompetitive and discriminatory business practices against NCC, not NCC's internal analysis of its business and plans. Absent a Verizon interest to invest in NCC, this request is wholly inappropriate and irrelevant.

Notwithstanding and without waiving its objections, NCC states that it intends to store its own LIDB/CNAM data in its own databases. Whether other carriers purchase that data directly from NCC or by accessing NCC's LIDB/CNAM data through a third party will be a decision to be made by those carriers. Should carriers elect to purchase directly from NCC, NCC will negotiate with those carriers for such purchase.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO
VERIZON DATA REQUEST NO. 59, DATED SEPTEMBER 10, 2007
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please state all reasons why NCC executed the CNAM/LIDB Contract referenced in ¶ 11 of the Verified Complaint, and provide all facts, communications and documents that support your response.

RESPONSE: NCC objects to this request on the basis that it seeks proprietary, confidential and trade secret information. In addition, NCC objects to this request to the extent it seeks information protected by the attorney-client and work-product privileges. Furthermore, NCC objects to this request on the grounds that it seeks irrelevant information and that it is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, NCC objects to this request on the basis that it is overbroad and intended to harass NCC.

The case is about Verizon's anticompetitive and discriminatory business practices against NCC, not NCC's internal analysis of its business and plans.

Notwithstanding and without waiving its objections, NCC states that it executed the LIDB/CNAM Contract for the purposes stated within the contract, which speaks for itself.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO
VERIZON DATA REQUEST NO. 60, DATED SEPTEMBER 10, 2007
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please admit or deny that NCC is not obligated to purchase the CNAM/LIDB data of telecommunications carriers operating in Illinois (regardless of whether those carriers house such data in their own CNAM/LIDB databases, or store their CNAM/LIDB data with third party aggregators). If your response is anything other than an unqualified admission, please provide all facts, communications and documents that support your response.

RESPONSE: NCC objects to this request on the basis that the request seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The case is about Verizon's anticompetitive and discriminatory business practices against NCC, not NCC's LIDB/CNAM obligations.

Notwithstanding and without waiving its objections, NCC denies on the basis that consumers expect to receive Caller ID information (including Calling Party Name information) when they receive calls and have their Caller ID information (including Calling Party Name information) transmitted when they place calls. Indeed, Verizon has noted that reality in its own discovery responses (See Verizon documents produced in response to NCC DR-28). In addition, for NCC's end users to place collect or third-party billed calls, NCC must access the LIDB data of the carrier's called party to verify the acceptance of such charges for the called number, as required by NCC's tariff. Thus, in order to provide services demanded and expected by consumers, NCC is obligated to purchase the CNAM/LIDB data of telecommunications carriers operating in Illinois. Furthermore, failure to access the applicable CNAM/LIDB data would violate NCC's tariff and constitute false and misleading advertising with respect to the services NCC offers to its customers.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

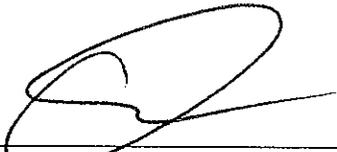
STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

NORTH COUNTY COMMUNICATIONS)
CORPORATION,)
)
Complainant,)
)
vs.)
)
VERIZON NORTH, INC. and VERIZON)
SOUTH, INC.,)
)
Respondents.)
_____)

Docket No. 07-0428

CERTIFICATE OF SERVICE

I, Alfonso Rivera, certify that I caused the foregoing "North County's Responses to Verizon's Fourth Set of Data Requests" to be served upon all parties on the attached service list on this 24th day of September, 2007, by electronic mail.



Alfonso Rivera

SERVICE LIST

ICC Docket No. 07-0428

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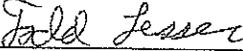
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VERIFICATION

I, Todd Lesser, President of North County Communications, have read the foregoing Responses to the Fourth Set of Data Requests submitted by Verizon North Inc. and Verizon South Inc. (collectively, "Verizon"), and know the contents thereof.

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

Executed on September 24, 2007, at San Diego, California.



Todd Lesser, President of North
County Communications