

ATTACHMENT EG-3R

Verizon's Response to DR NCC-118

September 18, 2007

**Verizon North Inc. and Verizon South Inc.
Data Responses to
NCC's Data Requests 111-176
Docket No. 07-0428**

DATA REQUEST NO. NCC-118:

Please admit or deny that Verizon will not query and/or dip NCC's LIDB/CNAM data unless NCC stores such data with Verizon or a third party with whom Verizon has an existing agreement for LIDB/CNAM querying/dipping. If your response is anything other than an unqualified admission, please provide all facts and documents that support your response.

RESPONSE:

Verizon objects to this request to the extent that it seeks information that is neither relevant nor material to the subject matter of this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. This case is not about Verizon's agreements with third party CNAM/LIDB data vendors. Verizon further objects to this request because it is predicated upon the erroneous assumption that Verizon is not presently capable of dipping NCC's CNAM/LIDB data, which is not the case. Without waiving these objections, and subject to them, Verizon admits that it has no contract, nor an obligation, to purchase NCC's LIDB/CNAM information directly from NCC. Verizon further admits that it currently accesses other carriers' CNAM/LIDB data through agreements with third party vendors. Should NCC make a business decision to remove its data from its existing third party aggregator and host its own CNAM/LIDB data, Verizon will not be in a position to query NCC's data. Please see Verizon's Responses to DRs NCC-28 and NCC-110.

Responsible Witnesses: Edward Googe, Director, Consumer Voice Services/Retail Markets,
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