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VIA EXPRESS MAIL

July 25, 2007

Ms. Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301

**CONFIDENTIAL
MATERIAL
IN COMM FILE**



**Re: DT 06-067, Complaint of Freedom Ring Communications, LLC d/b/a
BayRing Communications Against Verizon New Hampshire re: Access
Charges**

Dear Ms. Howland:

Enclosed for filing are seven copies of Verizon New Hampshire's Third Supplemental Reply to Staff 1-19¹ in the above-referenced matter. The Third Supplemental Reply provides billing information (bills and summary billing output) from Verizon NH's carrier access billing system from 2001 through 2004, responsive to Staff's request.

Verizon NH commenced a special study prior to the July 2007 hearings to determine whether additional billing information was available responsive to Staff's request. That study was only recently completed.²

¹ Staff 1-19 sought copies of the oldest bills to BayRing or AT&T which Verizon NH could produce showing either (1) Verizon CCL charges billed to an interexchange carrier for toll calls routed through a Verizon tandem where another (non-Verizon) carrier's end office local switch was used to originate (or presumably to terminate) the call to a non-Verizon end-user, or (2) Verizon CCL charges billed to a competitive local exchange carrier for its toll calls routed through a Verizon tandem where another (non-Verizon) carrier's end office local switch was used to terminate the call to a non-Verizon end-user. Verizon NH's First and Second Supplemental Replies to Staff 1-19 provided examples of billing information responsive to the request.

² Obtaining copies of bills has been difficult because Verizon does not typically retain actual copies of printed bills in the normal course of business. Thirteen months of carrier access billing information is retained "live" (on-line) for use by Verizon carrier services personnel in billing inquiry and receivables matters. Six years of historical billing data are stored (off-line) in archives, so the oldest billing data would

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N.H. Admin. Rules, Puc 203.09(k), requires that "[w]hen a party has provided a response to a data request, and prior to the issuance of a final order in the proceeding, the party shall have a duty to reasonably and promptly amend or supplement a response if the party obtains information which the party would have been required to provide in such response had the information been available to the party at the time the party served the response." Because Verizon NH's duty to supplement the request is ongoing until issuance of a final Commission Order, Verizon NH is updating its response to reflect the recently available information.

The parties agreed at the hearings that supplements to discovery requests introduced into evidence as part of the en masse groups of responses should be included. Please include the enclosed Third Supplemental Reply, which supplements the Second Supplemental Reply to Staff 1-19, as part of Exhibit 17.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink that reads "Victor D. Del Vecchio/maj". The signature is written in a cursive, flowing style.

Victor D. Del Vecchio

cc: Service List (email distribution)
Enclosure

² Obtaining copies of bills has been difficult because Verizon does not typically retain actual copies of printed bills in the normal course of business. Thirteen months of carrier access billing information is retained "live" (on-line) for use by Verizon carrier services personnel in billing inquiry and receivables matters. Six years of historical billing data are stored (off-line) in archives, so the oldest billing data would be from 2001. For the time period of the oldest billing records requested, the data was compressed and stored on magnetic tapes. Verizon NH undertook a special project to search the compressed archived tapes, load them in a data center, decompress the files, locate examples of the requisite billing information, and provide them in a printed bill format. The results of this effort were not available in time for the hearing and have just been completed.