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#### VIA EIECTRONIC & OVERNIGHT DELIVERY

February 8, 2007

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



**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 is Verizon New Hampshire's ("Verizon NH") response in compliance with the Commission's Procedural Order No. 24,705 issued November 29, 2006 and subsequently revised procedural schedule issued January 12, 2007.

The November 29, 2006 Procedural Order directed each party seeking reparations pursuant to RSA 365:29 to submit an estimate of the general order of magnitude of the disputed charges. It also directed Verizon NH to provide an estimate of the potential financial impact to Verizon NH if it were ultimately decided that Verizon NH had not properly applied the tariff. That estimate is to include the total amount and, to the extent practicable, individual calculations for BayRing and each intervenor. The Order also required Verizon NH to provide an estimate of the annual impact to Verizon NH if the disputed revenue is no longer collected.

The assumptions and methodology used in calculating the estimates are contained in the non-proprietary enclosures. Verizon NH's overall estimates, worksheets illustrating how the calculations were made, and individual intervenor estimates are contained in the proprietary enclosures.

The requested proprietary enclosures, which have been marked "confidential," pertain to the provision of competitive services; set forth trade secrets or other confidential information falling within the scope of RSA 378:43, II(b); and are not general public knowledge or published elsewhere, Verizon NH having taken measures to prevent dissemination of the information in the ordinary course of business. Copies of proprietary information specific to a particular carrier will be provided to the particular carrier and other proprietary (non carrier-specific) information will be provided to the parties in accordance with duly executed protective agreements.

Thank you for your attention to this matter.

Very truly yours,

Victor D. Del Vecchio

**Enclosures** 

cc: Service List (email)

<sup>&</sup>lt;sup>1</sup> The individual carrier calculations for minutes of use and revenues are customer proprietary and pertain to the provision of competitive services among the respective competitors. Disclosure would set forth confidential financial, commercial and market information of customer and product-specific data on usage and revenues not otherwise publicly available nor reflected in tariffs of general application. Likewise, the aggregate information when combined with the carrier specific information would disclose confidential financial, commercial and potential market-share information not otherwise publicly available nor reflected in tariffs of general application.

# Attachment I ESTIMATED IMPACTS -- METHODOLOGY & ASSUMPTIONS

To estimate the potential financial impacts to Verizon New Hampshire for Carrier Common Line switched access service charges billed to carriers, where the end-user is not a Verizon New Hampshire customer using a Verizon loop, Verizon New Hampshire examined intrastate switched access minutes of use billed for the 22-month period January 2005 through October 2006, representing the most current billing information available on which to base its estimated impacts. To estimate Carrier Common Line minutes that are not associated with switched access usage originated from or terminated to a Verizon New Hampshire end-user, comparisons were made between the quantity of Local Switching minutes billed and Carrier Common Line minutes billed. The logical assumption is that the difference in quantities represents Carrier Common Line minutes for calls where Verizon New Hampshire end office Local Switching is not employed and thus does not originate from or terminate to an end-user using a Verizon New Hampshire loop.

For example, on the BayRing Attachment IV worksheet, originating Carrier Common Line minutes in column "G" and originating Local Switching minutes in column "I" were summed to get a total for each month. The total Local Switching minutes where then subtracted from total Carrier Common Line minutes to calculate the Carrier Common Line minutes being disputed in BayRing's complaint (cell "G34"). The same procedure applied to terminating minutes in columns "H" and "J" and the difference is calculated in cell "H34." The estimated dollar amount for a two-year period is calculated by multiplying the Carrier Common Line \$0.026494 rate per minute by the total Carrier Common Line differences (cells "G35" and "H35") and summed in cell "I35."

Several adjustments were necessary in the process described above. First, September and October 2006 billing contain Local Switching minutes that were inadvertently billed in error for switched access routing to or from a Remote end office, as explained in Verizon New Hampshire's Reply to AT&T 1-4. The calculation makes an adjustment to remove the double-counted minutes (e.g., see BayRing worksheet row 26). Because actual billing data was not available for November and December 2006, Verizon New Hampshire developed an estimate assuming the usage for the two months would be approximately equal to the prior two months, as adjusted for the Local Switching minutes above. The BayRing worksheet shows this estimate on row 27.

To estimate the annual impact to Verizon New Hampshire if the disputed revenue is no longer collected on a going-forward basis, the calculation uses the average monthly Carrier Common Line difference (CCL-LS) based on September and October 2006 (as adjusted for the Local Switching billing error), multiplied by 12 to estimate the annual impact. The calculation is shown in cells "J34:J35" of the BayRing worksheet.

## Attachment II ESTIMATED IMPACT - SUMMARY

#### **Estimated Total Impact**

Verizon New Hampshire estimates that Carrier Common Line charges of about [Redacted] were billed to carriers under tariff NHPUC No. 85 for intrastate switched access service where an end-user was not a Verizon New Hampshire customer using a Verizon New Hampshire loop for the 2-year period of January 2005 through December 2006. See Attachment III worksheet (cell "E1103").

#### **Estimated Impact by Intervenor**

Verizon New Hampshire estimates that Carrier Common Line charges billed to carriers under tariff NHPUC No. 85 for intrastate switched access service where an enduser was not a Verizon New Hampshire customer using a Verizon New Hampshire loop for the 2-year period of January 2005 through December 2006 are:

BayRing	[Redacted]
AT&T	[Redacted]
One Communications	[Redacted]
Otel Telekom	[Redacted]
RNK	[Redacted]
segTEL	[Redacted]

[See Attachment IV, individual intervenor worksheets, for details.]

#### Estimated Annual Impact

Verizon New Hampshire's estimate of the annual impact to Verizon New Hampshire if the disputed revenue is no longer collected on a going-forward basis is about [Redacted] per annum. See Attachment III worksheet (cell "J1100").

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