

DT 08-028

**Joint Petition of Hollis Telephone Company, Inc., Kearsarge Telephone Company,
Merrimack County Telephone Company, and Wilton Telephone Company, Inc.,
for Authority to Block the Termination of Traffic from Global NAPs, Inc., to
Exchanges of the Joint Petitioners in the Public Switched Telephone Network**

Global NAPs, Inc. ("Global") by counsel submits the following responses and objections to "Follow-Up" Interrogatories ("Interrogatories") propounded by Staff of the New Hampshire Public Utilities Commission ("PUC").

GENERAL OBJECTIONS APPLICABLE TO ALL INTERROGATORIES

1. Global objects to these Interrogatories to the extent that they purport to call for the production, identification or disclosure of information or documents protected by the attorney-client or other privileges, information or documents protected by the work-product doctrine, or information or documents protected as trial preparation material.
2. Global objects to these Interrogatories to the extent that the definitions and instructions used by GNAPs in its Interrogatories do not comply with the applicable Federal Rules and/or the Discovery Order issued in this docket.

SPECIFIC OBJECTIONS

1. Global objects to these Interrogatories to the extent they appear to call for the production of confidential, company proprietary, customer proprietary information or other competitively sensitive information. Global may consider production of confidential material if the parties can agree on an appropriate confidentiality stipulation or order.
2. Global objects to these Interrogatories to the extent that they call for the production of documents beyond the requirements of the applicable New Hampshire Law/Rules, or for documents not within the possession, custody or control of Global NAPs, Inc.
3. Global objects to these Interrogatories to the extent that they call for Global to produce information or documents that are either publicly available or that are already in the possession, custody or control of the Commission.
4. Global objects to these Interrogatories to the extent that they are overly broad and unduly burdensome.
5. Global objects to these Interrogatories to the extent that they seek information not relevant to the dispute between the parties and not reasonably calculated to lead to the discovery of admissible evidence.
6. Global objects to these Interrogatories to the extent that they seek to have Global create documents not in existence at the time of the Interrogatories.
7. Global objects to these Interrogatories to the extent they are not limited in geographical scope to New Hampshire.

8. Global objects to these Interrogatories to the extent they request information regarding entities, namely affiliates that are neither a party to this proceeding nor regulated by this Commission.
9. Global objects to these Interrogatories to the extent they are not limited in temporal scope.

Global's Responses:

1. If GNAPs considers VoIP telephony service and its associated traffic to be an enhanced service as defined at 47 CFR 64.702, please provide specific provisions from all relevant decisions of authority on which you rely to support this assertion.

Reply: Global objects to these Interrogatories to the extent that they seek information not relevant to the dispute between the parties and not reasonably calculated to lead to the discovery of admissible evidence. Several Orders were distributed at the recent Technical Conference, and additional authority may be supplied in any brief subsequently filed, if required.

2. As a follow-up to GNAPs's response to Staff's request #4 in its round 1 data requests and pursuant to RSA 365:14 and 365:15, please provide any relevant usage data and billing information GNAPs has, however limited, as well as the customer list that GNAPs refers to in its response. If you consider this to be confidential information, please provide a request for confidential treatment with a written justification for such treatment pursuant to RSA 378:43, II.

Reply: Global NAPs requests confidential treatment to the response for follow-up interrogatory 2 based upon the competitively sensitive nature of the information provided. In recognition of such protections afforded it, it responds as follows:

Customer List:

Outbound NH:
Transcom: ESP
Unipoint: ESP
IDT: ESP

CommPartners: ESP
NTERA: ESP

Inbound NH
ColoCentral: ISP
Efax: Faxing Service
MegaNet: ISP
WN/Ziplink: ISP
MobileSphere: Inbound Voice
Pilgrim: Inbound Voice Calling Service
VoicePulse: VOIP Provider

Usage Information:

GNAPs does not monitor its outbound minutes of use terminated to other carriers in New Hampshire from its ESP customers. It does, however, monitor in-bound minutes of use destined for ISP customers. At attached spreadsheet, for which confidentiality is also requested, indicates minutes of use for customers communications to GNAPs' ISP customers.

3. As a follow-up to GNAPs's response to Staff's request #7 in its round 1 data requests, please provide a diagram that shows the flow of traffic carried by GNAPs for its VoIP provider customers, from GNAPs Manchester, NH and Quincy, MA facilities to the Fairpoint tandem. In the diagram, please include how traffic from GNAPs's VoIP provider customers reaches GNAPs, how that traffic flows between GNAPs's facilities in Manchester and Quincy, and how that traffic ultimately reaches Fairpoint's Manchester tandem. In the diagram, please identify locations where the format of traffic is converted from IP to TDM and from TDM to IP.

Reply: Please refer to the diagram distributed previously.

4. Please list all equipment in GNAPs's Manchester and Quincy locations that provide information about traffic traversing the GNAPs's network. Information regarding traffic should include, but is not limited to: type and volume of traffic, identification of GNAPs's customers sending and receiving traffic, and time logs of traffic information. For all equipment included on the list, please provide its location, a description of the equipment, a summary of the information that can be monitored, and the equipment's manufacturer, and the specific model.

Reply: TEKNO Telecom captures their proprietary call records from SS7. We use the TEKNO application to store those call records in an Oracle database and

then use an Oracle Script to summarize inbound reciprocal compensation minutes by called NPA. For additional information, please see:

<http://www.teknotelecom.com/Main.htm>

5. Please identify each central office in New Hampshire in which GNAPs is collocated.

Reply: Global NAPs requests that information regarding its network receive confidential treatment.

GNAPs is collocated in the following Fairpoint/Verizon offices:

Manchester--CO --25 Concord St. Manchester, NH
Raymond-CO---5 Floral Ave Raymond NH, 03077
Epping--CO --32 Main St. Epping, NH
Exeter--CO -- 15 Center St. Exeter, NH 03833
Durham--CO --1 McDaniel Dr. Durham, NH 03824
Dover--CO --57 St. Thomas St. Dover, NH 03820
Portsmouth--CO --15 Islington St.

Previously, Global has had collocations in Hampton, Nashua, Hudson, Merrimack, and Salem, but these facilities were no longer necessary under Global's network architecture.

In addition, it has its own facilities located at One Sundial Ave. in Manchester.

6. Please identify each N.H. exchange where GNAPs serves customers physically located within the exchange boundary.

Reply: As our customers are nationally based, they may be using services in New Hampshire at any given time based on their "nomadic" functionality, as referred to by the New York PSC.

7. Please describe the GNAPs facilities in each exchange used to deliver service to GNAPs customers physically located in New Hampshire.

Reply: Please refer to the diagram distributed previously.

8. During the 5/14/2008 Technical Session held in the instant docket, GNAPs identified itself as an "Intermediate Carrier." Please define "intermediate

carrier,” explain how GNAPs meets the criteria of that definition, and explain how being characterized as an “intermediate carrier” impacts GNAPs’s position in this case?”

Reply: We are an intermediate carrier in that we don’t provide service to the actual party originating the communication, nor do we provide service to that receiving it (the called and calling parties). The classification as an “intermediate” carrier should make no difference due to the specific type of traffic carried. However, should the Commission deem such traffic as “toll” or otherwise subject to access charges, then GNAPs should actually be a net recipient of the access charges assessed, as it does not provide the originating caller with service.

9. As a follow-up to GNAPs’s response to Staff’s request #2 in its round 1 data requests, is it GNAPs’s position that it has no obligation to pay terminating access charges, whether the calls are interstate or intrastate for any of the traffic GNAPs carries?

Reply: GNAPs does not carry toll traffic upon which access is assessed. It limits its customers to enhanced service providers and as such, all traffic is exempt from access charges by operation of federal law.

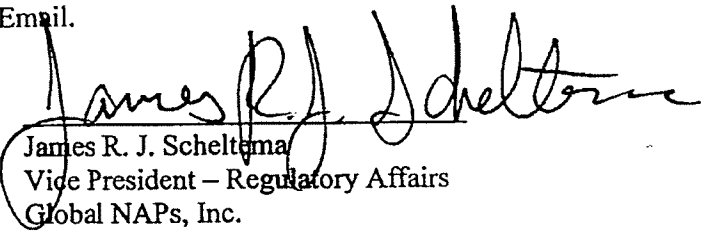
10. As a follow-up to GNAPs’s response to Staff’s request #5 in its round 1 data requests, where it stated:

” ...all our customers are either ISPs or ESPs.”

Does GNAPs have any customers that could be classified as anything other than ISPs or VoIP providers? If so, please list how those customers would be classified.

CERTIFICATE OF SERVICE

I, James R. J. Scheltema, hereby certify that on June 27, 2008, I caused a copy of the foregoing to be served on the attached service list by Email.



James R. J. Scheltema
Vice President – Regulatory Affairs
Global NAPs, Inc.
4475 Woodbine Road
Suite 7
Pace, FL 32571

New Hampshire

Global NAPS VERIZON

Feb-99	52643718	
Mar-99	85717279	
Apr-99	102627773	
May-99	111795207	
Jun-99	143199633	
Jul-99	165893113	
Aug-99	180133482	
Sep-99	191754398	
Oct-99	220471663	
Nov-99	234004925	
Dec-99	236799298	
TOTAL	1725040489	

Global NAPS VERIZON

Jan-00	247692738	173054584	
Feb-00	251738947	89872235	
Mar-00	255184194	92516811	
Apr-00	255205854	100517280	
May-00	103532798	98980093	
Jun-00	106638781	93571691	
Jul-00	98980093	92736601	
Aug-00		95634069	VZ number revised 9/22/00
Sep-00	94190088	92487036	
Oct-00		97647988	
Nov-00		90278596	
Dec-00	85830028	82261917	
TOTAL	1498993521		

Global NAPS VERIZON

Jan-01	89512273	87557273	
Feb-01	82771849	81210674	
Mar-01	97731544	95904531	
Apr-01	86817928	82572037	VZ figure revised 6/29/01
May-01	86446860	86446860	VZ accepted GN number 6/29/01
Jun-01	89076375	83700776	
Jul-01	93586718	93368689	
Aug-01	97636653	96981261	
Sep-01	89236743	90832455	
Oct-01	89776786	87752199	
Nov-01	88441250	86016277	
Dec-01		94441628	
TOTAL	991034979		

Global NAPS VERIZON

Jan-02	100729057	100203635
Feb-02	87933457	86998819
Mar-02	101057708	100033505
Apr-02	86446860	84298814
May-02	81775763	79382981
Jun-02	76019654	75859869
Jul-02	75544731	74514640
Aug-02	77616003	77108472
Sep-02	no dispute	75302890
Oct-02	no dispute	77563017
Nov-02	76921543	73128097
Dec-02	88548566	82620440
TOTAL	852593342	

Global NAPS VERIZON

Jan-03	97836664	91321857
Feb-03	93322989	88319834
Mar-03	96336853	92246293
Apr-03	80913189	76275405
May-03	85026574	80464168
Jun-03	86411336	81509065
Jul-03	96006418	86995493
Aug-03	88027718	83781143
Sep-03	73564883	68131269
Oct-03	69979135	64246308
Nov-03	69700423	65464301
Dec-03	73258279	68899175
TOTAL	1010384461	

Global NAPS VERIZON

Jan-04	79585561	72412201
Feb-04	72060334	64605368
Mar-04	71402596	64983509
Apr-04	61907628	55828606
May-04	60913633	56466312
Jun-04	62078401	57383431
Jul-04	72012262	63163704
Aug-04	73923311	67497789
Sep-04	68572619	62033947
Oct-04	70707308	64500187
Nov-04	69622361	62763635
Dec-04	6810097	62055319
TOTAL	769596111	753694008

Global NAPS VERIZON

Jan-05	70340805	65922619
Feb-05	63432661	58476628

Mar-05	69289701	64178611
Apr-05	61980929	56946190
May-05	66829283	61072412
Jun-05	67110323	61245441
Jul-05	72683438	65714203
Aug-05	73467897	66182628
Sep-05	69798769	63879974
Oct-05	74222941	66050878
Nov-05	72235916	64022922
Dec-05	68883544	65958103
TOTAL	830276207	759650609

Global NAPS VERIZON		
Jan-06	67260327	60826529
Feb-06	57505904	52107003
Mar-06	59389740	53855843
Apr-06	44477257	40825082
May-06	41937189	38664063
Jun-06	40535179	36425437
Jul-06	35953617	32007793
Aug-06	29060327	26194357
Sep-06	25173658	22798497
Oct-06	18232721	16528940
Nov-06	6425140	5782507
Dec-06	5651873	5123380
TOTAL	431602932	391139431

Global NAPS VERIZON		
Jan-07	5669835	5325297
Feb-07	4809416	4459205
Mar-07	5204548	4724020
Apr-07	3653557	3236848
May-07	3417352	2942705
Jun-07	3296594	2852217
Jul-07	3221491	2806363
Aug-07	2926581	2506923
Sep-07	2596143	2191660
Oct-07	2511448	2126851
Nov-07	2558395	2210359
Dec-07	2406999	2191544
TOTAL	42272359	37573992

Global NAPS VERIZON		
Jan-08	2653885	2286424
Feb-08	2448988	2067418
Mar-08	2494546	2111072
Apr-08	2238338	1827045
TOTAL	9835757	8291959