

Ruth Nettles

080134-TP

From: Collins, Angela [acollins@cgrdc.com]
Sent: Tuesday, November 17, 2009 1:04 PM
To: Filings@psc.state.fl.us
Subject: Docket No. 080134-TP - Intrado Comm Notice of Serving Objections and Responses to Verizon Florida Interrogatories
Attachments: Docket No. 080134-TP, Intrado Comm Responses to Verizon Interrogatories.pdf

The person responsible for this electronic filing is:

Angela F. Collins, Senior Attorney
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, D.C. 20006
202.862.8930 (telephone)
202.862.8958 (fax)
acollins@cgrdc.com
www.cahill.com

Docket No. 080134-TP – Petition by Intrado Communications Inc. for arbitration to establish an interconnection agreement with Verizon Florida LLC pursuant to Section 252(b) of the Communications Act of 1934, as amended, and Section 364.12, F.S.

This document is being filed on behalf of Intrado Communications Inc.

The total number of pages is 13.

The document is Intrado Communications Inc.'s objections and responses to Verizon Florida LLC's fourth set of interrogatories (Nos. 31–37) and Intrado Communications Inc.'s notice of service with respect to those objections and responses. The certificate of service is attached.

Respectfully submitted,

Angela Collins

DOCUMENT NUMBER-DATE

11389 NOV 17 8

FPSC-COMMISSION CLERK

CAHILL GORDON & REINDEL LLP

SUITE 950

1990 K STREET, N.W.

WASHINGTON, D.C. 20006-1181

EIGHTY PINE STREET
NEW YORK, N.Y. 10005-1702
(212) 701-3000
FAX: (212) 269-5420

TELEPHONE (202) 862-8900
FACSIMILE (202) 862-8958

AUGUSTINE HOUSE
6A AUSTIN FRIARS
LONDON, ENGLAND EC2N 2HA
(011) 44.20.7920.9800
FAX: (011) 44.20.7920.9825

CHÉRIE R. KISER | 202-862-8950 | ckiser@cgrdc.com

November 17, 2009

Via Electronic Filing

Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

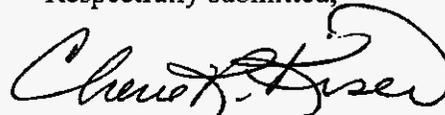
Re: Docket No. 080134-TP

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket is Intrado Communications Inc.'s Notice of Serving its Objections and Responses to Verizon Florida LLC's Fourth Set of Interrogatories. Service has been made as indicated on the Certificate of Service.

Please contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,



Chérie R. Kiser

Counsel for Intrado Communications Inc.

Enclosures

56485.1

DOCUMENT NUMBER-DATE

11389 NOV 17 8

FPSC-COMMISSION CLERK

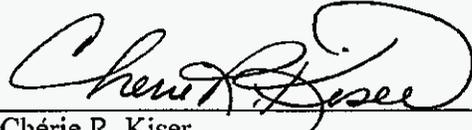
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Intrado Communications Inc.)
for arbitration to establish an interconnection)
agreement with Verizon Florida LLC, pursuant)
to Section 252(b) of the Communications Act)
of 1934, as amended, and Section 364.12, F.S.)

Docket No. 080134-TP
Filed: November 17, 2009

**INTRADO COMMUNICATIONS INC.'S
NOTICE OF SERVICE OF OBJECTIONS AND RESPONSES TO VERIZON FLORIDA
LLC'S FOURTH SET OF INTERROGATORIES (NOS. 31-37)**

Intrado Communications Inc. ("Intrado Comm"), by its attorneys, hereby files and serves Notice that it has served its Objections and Responses to Verizon Florida LLC's Fourth Set of Interrogatories (Nos. 31-37) by electronic mail to de.oroark@verizon.com and U.S. Mail to Dulaney L. O'Roark III, Esq., Verizon Florida LLC, P.O. Box. 110, MCFLTC0007, Tampa, FL 33601 on this 17th day of November, 2009.



Chérie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, DC 20006
202-862-8950 (telephone)
202-862-8958 (facsimile)
ckiser@cgrdc.com
acollins@cgrdc.com

Counsel for Intrado Communications Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by U.S. Mail and e-mail this 17th day of November, 2009.

Lee Eng Tan, Esq.
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Kimberly Caswell
P.O. Box 110, 37th Floor
MC FLTC0007
Tampa, FL 33601-0110

Dulaney O'Roark, Esq.
Verizon
P.O. Box 110, MCFLTC0007
Tampa, FL 33601

Mr. David Christian
Verizon Florida LLC
106 East College Avenue, Suite 710
Tallahassee, FL 32301-7721

Rebecca Ballesteros
Intrado, Inc.
1601 Dry Creek Drive
Longmont, CO 80503



Angela F. Collins

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Intrado Communications Inc.)
for arbitration to establish an interconnection)
agreement with Verizon Florida LLC, pursuant)
to Section 252(b) of the Communications Act)
of 1934, as amended, and Section 364.12, F.S.)

Docket No. 080134-TP
Filed: November 17, 2009

**INTRADO COMMUNICATIONS INC.'S
RESPONSE TO VERIZON'S FOURTH SET OF INTERROGATORIES (NOS. 31-37)**

Intrado Communications Inc. ("Intrado Comm") hereby responds and objects to the Fourth Set of Interrogatories (Nos. 31-37) from Verizon Florida LLC ("Verizon") as follows. Any answers provided by Intrado Comm in response to these requests are provided subject to, and without waiver of, the following specific and general objections.

GENERAL OBJECTIONS

1. Intrado Comm reserves all objections as to relevance and materiality. Where Intrado Comm submits responses and produces materials in response to the requests, it does so without conceding the relevancy or materiality of the information or materials sought or produced, or their subject matter, and without prejudice to Intrado Comm's right to object to further discovery, or to object to the admissibility of proof on the subject matter of any response, or to the admissibility of any document or category of documents, at a future time. Any disclosure of information not responsive to the requests is inadvertent and is not intended to waive Intrado Comm's right not to produce similar or related information or documents.

2. Intrado Comm objects to the requests to the extent they seek information protected by the attorney-client privilege, the work-product doctrine, or other applicable privileges and protections. Intrado Comm hereby claims all applicable privileges and protections to the fullest extent implicated by the requests and excludes privileged information and materials from its responses. Any disclosure of such information or materials

as a result of Intrado Comm's responses or otherwise is inadvertent and is not intended to waive any applicable privileges or protections.

3. Intrado Comm objects to the requests to the extent that Verizon attempts to impose upon Intrado Comm obligations different from, or in excess of, those imposed by Florida Public Service Commission ("Commission") orders in this proceeding or Florida law.

Subject to and without waiving the foregoing General Objections, each of which are incorporated by reference into the responses below as if fully restated therein, Intrado Comm provides the following responses to the requests. Intrado Comm's responses are based on the best information presently available, and Intrado Comm reserves the right to amend, supplement, correct or clarify answers if other or additional information is obtained, and to interpose additional objections if deemed necessary.

RESPONSES TO INTERROGATORIES

VERIZON INTERROGATORY #31

Please admit or deny that Intrado's Enterprise E9-1-1 service does not provide the customer with the ability to receive an incoming call. If denied, please explain how a customer can use Intrado's Enterprise E9-1-1 service to receive an incoming call.

INTRADO COMM RESPONSE:

Denied. The facilities and equipment used to provide Intrado Comm's Enterprise E9-1-1 Service can support two-way communications and are capable of being used for two-way traffic purposes. Given the importance of emergency communications, however, Intrado Comm's Enterprise E9-1-1 retail service offering is specifically designed to be used by the enterprise customer to originate a 911 call and have that 911 call delivered to the PSAP designated to receive emergency calls from the geographic location of the enterprise customer. If an enterprise customer sought to use the same facilities and equipment for receipt of incoming calls, Intrado Comm could make such capability available to the enterprise customer as requested.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #32

Please admit or deny that Intrado's Enterprise E9-1-1 service is only able to carry 911/E911 calls in one direction – from the customer to the PSAP – and is not able to carry any calls from the PSAP to the customer of Intrado's Enterprise E9-1-1 service. If denied, please explain how a PSAP can use Intrado's Enterprise E9-1-1 service to place a call to the customer.

INTRADO COMM RESPONSE:

Denied - please see Intrado Comm's Response to Verizon Interrogatory No. 31. It is also important to note that a PSAP would not subscribe to Intrado Comm's Enterprise E9-1-1 Service as contemplated by this Interrogatory.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #33

Please admit or deny that Intrado's Enterprise E9-1-1 service requires that the customer have a private switch that can originate a 911/E911 call. If denied, please explain how a customer without a private switch can originate a 911/E911 call using Intrado's Enterprise E9-1-1 service.

INTRADO COMM RESPONSE:

Denied on the basis that the term "private switch" is vague and undefined. Intrado Comm's Enterprise E9-1-1 Service is targeted to large business users utilizing multi-line telephone serving arrangements, such as a private branch exchange ("PBX") or another type of customer call collection platform, e.g., Bank of America or OnStar. Intrado Comm's Enterprise E9-1-1 Service enables end users to originate 911 calls that will identify the station number and location of the 911 caller (as opposed to the PBX or customer call collection center location) and have those calls delivered to the appropriate PSAP whether the PSAP is served by Intrado Comm or another carrier.

RESPONSIBLE PERSON:

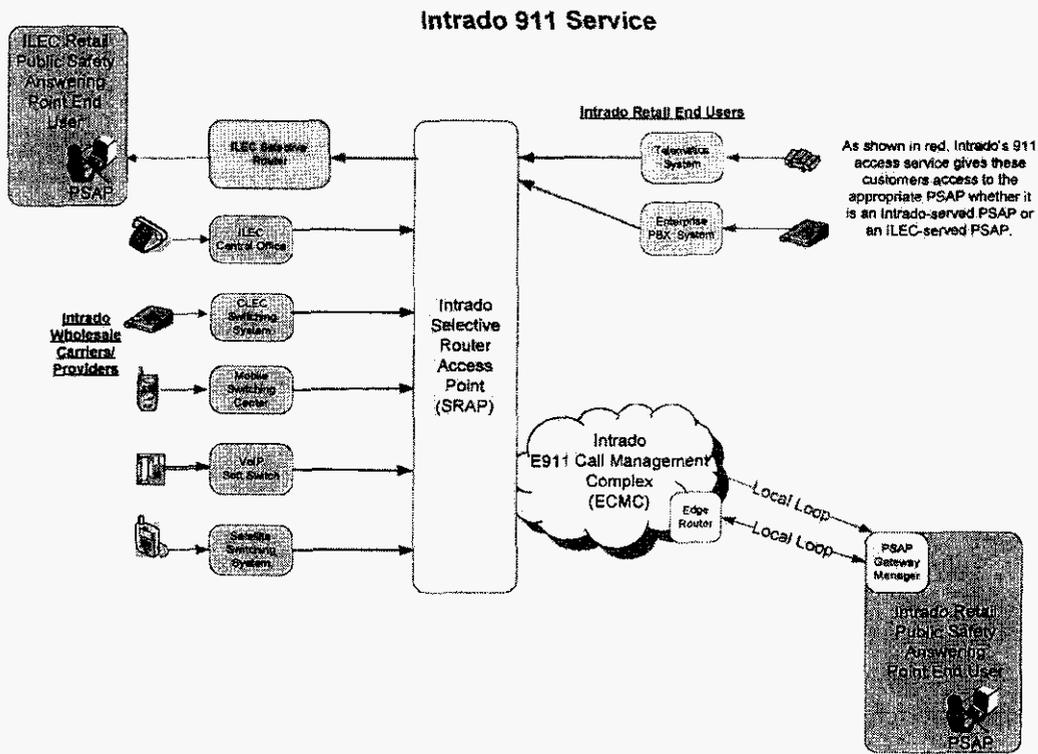
Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #34

Please admit or deny that Intrado currently has the ability to provide its Enterprise E9-1-1 service in Verizon's ILEC service territory. If denied, please explain why Intrado does not currently have the ability to provide its Enterprise E9-1-1 service in Verizon's ILEC service territory.

INTRADO COMM RESPONSE:

Denied. Please see the diagram below. Intrado Comm's Enterprise E9-1-1 Service allows enterprise and telematics customers to originate a 911 call and have it delivered to the appropriate PSAP whether the PSAP is served by Intrado Comm or another carrier, such as Verizon. Thus, Intrado Comm cannot offer its Enterprise E9-1-1 Service without interconnecting to Verizon to ensure Intrado Comm can hand-off 911 calls for termination to Verizon-served PSAPs. Absent interconnection between Verizon and Intrado Comm, Intrado Comm's enterprise customers would be unable to complete their 911 calls destined for PSAPs served by Verizon. Also, please see Intrado Comm Response to Verizon Interrogatory No. 20.



RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

INTRADO COMM RESPONSES TO VERIZON FOURTH SET (NOS. 31-37)

VERIZON INTERROGATORY #35

Please admit or deny that Intrado can provide its Enterprise E9-1-1 service without interconnecting with Verizon. If denied, please explain why Intrado can not provide its Enterprise E9-1-1 service without interconnecting with Verizon.

INTRADO COMM RESPONSE:

Denied. Please see Intrado Comm Response to Verizon Interrogatory No. 34 and Intrado Comm Response to Verizon Interrogatory No. 20.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

INTRADO COMM RESPONSES TO VERIZON FOURTH SET (NOS. 31-37)

VERIZON INTERROGATORY #36

Please admit or deny that Intrado's Enterprise E9-1-1 service does not require the use of interconnection facilities or arrangements with Verizon. If denied, please explain how Intrado's Enterprise E9-1-1 service requires the use of interconnection facilities or arrangements with Verizon.

INTRADO COMM RESPONSE:

Denied. Please see Intrado Comm Response to Verizon Interrogatory No. 34 and Intrado Comm Response to Verizon Interrogatory No. 20.

RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

VERIZON INTERROGATORY #37

Please admit or deny that there is no difference between the way Intrado handles a 911/E911 call from a customer using Intrado's Enterprise E9-1-1 service and the way Intrado handles a 911/E911 call from a landline customer of an interconnected carrier. If denied, please explain all differences in the way Intrado handles a 911/E911 call from a customer using Intrado's Enterprise E9-1-1 service and the way Intrado handles a 911/E911 call from a landline customer of an interconnected carrier.

INTRADO COMM RESPONSE:

Denied. Intrado Comm's Enterprise E9-1-1 Service is a retail service offered to end users that permits them to place 911 calls from the end user station to the appropriate designated PSAP. 911 calls from end users of other interconnected carriers are handled pursuant to Intrado Comm's wholesale interconnection arrangements with carriers. Intrado Comm does not have a relationship with the interconnected carrier end user. These 911 calls are exchanged between Intrado Comm's network and the network of the carrier pursuant to an interconnection agreement. Please see the diagram set forth in Intrado Comm's Response to Interrogatory No. 34.

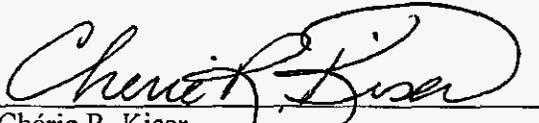
RESPONSIBLE PERSON:

Thomas Hicks, Director - Carrier Relations

Respectfully submitted this 17th day of November, 2009.

Respectfully submitted,

INTRADO COMMUNICATIONS INC.



Chérie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, DC 20006
202-862-8950 (telephone)
202-862-8958 (facsimile)
ckiser@cgrdc.com
acollins@cgrdc.com

Craig W. Donaldson
Senior Vice President, Regulatory &
Government Affairs, Regulatory Counsel

Rebecca Ballesteros
Assistant General Counsel

Intrado Communications Inc.
1601 Dry Creek Drive
Longmont, CO 80503
720-494-5800 (telephone)
720-494-6600 (facsimile)

Its Attorneys