



September 27, 2005

Via Overnight and Electronic Mail

Luly Massaro
Commission Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. 3692; Motion to Intervene of Conversent Communications of Rhode Island, LLC

Dear Luly:

Enclosed are an original and nine copies of the above-referenced Motion. In addition, also attached are three copies of Conversent's First set of data requests to Verizon.

Thank you for your attention to this filing.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan M. Shoer", written over a horizontal line.

Alan M. Shoer
Director of Regulatory Affairs
Conversent communications of Rhode Island, LLC
401-834-3370 phone
ashoer@conversent.com

AS/nj

Enclosures
Cc: Service List

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC
UTILITIES COMMISSION**

**In Re: Successor Alternative Regulation Plan
For Verizon New England Inc, d/b/a Verizon Rhode Island**

Docket No. 3692

Motion to Intervene

Introduction:

Conversent Communications of Rhode Island, LLC ("Conversent") respectfully requests, pursuant to Rule 1.13(b)(2), intervention in the above-referenced docket. This docket has been established for the Commission to evaluate a successor alternative regulatory plan filed by Verizon Rhode Island ("Verizon") on August 19, 2005.

Grounds For Intervention:

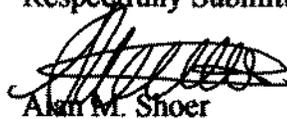
Conversent has a significant interest in this proceeding, which is not adequately represented by other parties. Any decision by the Commission in this proceeding will be directly relevant to Conversent. Specifically, Conversent is a registered CLEC within Rhode Island, competing with Verizon, the incumbent local exchange carrier. The basis for Verizon's filing is that the competitive market has continued to change and that Verizon needs further operating and pricing flexibility, including elimination of any service quality filings or reporting. While Conversent does not compete as Verizon for residential customers, Conversent does rely on Verizon's network to provide services to small business customers in Rhode Island. Verizon's wholesale service quality to Conversent is directly tied to Verizon's retail service quality its own customers. Conversent's ability to compete within the Rhode Island market will accordingly be

directly affected by this proceeding. Further, it is in the public interest to allow a CLEC such as Conversent to intervene in this Docket.

Request for Intervention:

For the above-stated reasons, Conversent hereby requests full intervention in Docket 3692.

Respectfully Submitted,



Alan M. Shoer

Director of Regulatory Affairs

Conversent Communications of Rhode Island, LLC

24 Albion Road

Suite 230

Lincoln, RI 02865

401-834-3370 phone

401-834-3350 fax



Via Overnight Mail and E-Mail

September 27, 2005

Alexander W. Moore, Esq.
Verizon New England
185 Franklin St.
Boston MA 02110

**RE: Rhode Island Docket No. 3692 –
Conversent's First Set of Data Requests to Verizon**

Dear Mr. Moore:

Attached please find the initial data requests filed on behalf of Conversent Communications of Rhode Island, LLC in this matter. Please send responses to my attention and let me know if you have any questions or wish to discuss further.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan M. Shoer", is written over a faint, larger version of the signature.

Alan M. Shoer
Director – Regulatory Affairs
Conversent Communications of Rhode Island, LLC
401-834-3370
ashoer@conversent.com

att.

CC: parties to service list

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

DOCKET NO. 3692

**INITIAL SET OF INFORMATION REQUESTS
FROM CONVERSENT COMMUNICATIONS OF RHODE ISLAND, LLC
TO VERIZON RHODE ISLAND, INC.**

Date of Request: September 27, 2005

Conversent Request No. 1:

Please provide copies of all retail service quality reports submitted by VZ-RI to the R.I. Division and/or R.I. Commission for the last two (2) years.

Conversent Request No. 2

Please identify any and all instances during the last two (2) years in which VZ-RI failed to meet any applicable retail service quality benchmarks in Rhode Island.

Conversent Request No. 3:

Please provide copies of the last 12 monthly wholesale carrier-to-carrier (CLEC aggregate) Rhode Island reports.

Conversent Request No. 4:

Please provide copies of the last 12 monthly Performance Assurance Plan (PAP) Rhode Island reports.

Conversent Request No. 5:

Please provide the amount of investment in Rhode Island local service infrastructure (gross capital construction expenditures) Verizon has made annually for the years 2000, 2001, 2002, 2003, and 2004.