Theresa L. O'Brien
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March 17, 2006

Ms. Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. 3721 – Division's Second Set of Data Requests

Dear Ms. Massaro:

Enclosed please find an original and three copies of Verizon RI's response to the Division's second set of data requests in the above referenced proceeding.

Thank you for your assistance in this matter.

Sincerely,

Vice President – Regulatory Affairs

Respondent: Theresa L. O'Brien
Title: Vice President – RI Regulatory

REQUEST: Division of Public Utilities and Carriers - Set 1

DATED: March 3, 2006

ITEM: DIV 2-1   Please clarify the answer to question 1 from the Division's first data request, where Verizon states:

> **…"Verizon RI's option to disconnect arrangements
> would likely be exercised only in the event that a
> CLEC fails to pay its special access bill."**

Our interpretation of the above, the disconnection of the customer would be for non-payment of services and <u>not for entering an order on time or not at all</u>, for conversion/migration to non-UNE special access for DS1 or DS3 services and rather it becomes a debt collection problem.

Is the above summary correct as to the policy Verizon – Rhode Island will be using to terminate customers under tariff modifications filed on January 13, 2006?

REPLY: To the extent a CLEC has not transitioned de-listed DS1 or DS3 loops or transport to alternative arrangements as of March 10, 2006, Verizon intends to migrate the remaining embedded base of facilities to analogous special access services. Verizon RI intends to disconnect only those CLEC customers that subsequently fail to pay any such special access bills. Verizon does not intend to disconnect arrangements for failure of the customer to submit a timely conversion order.