

State Government Relations 205 North Michigan Avenue Suite 700 Chicago, IL 60601

June 28, 2012

VIA E-Filing

Ms. Patty VanGerpen Executive Director South Dakota Public Service Commission 500 East Capitol Avenue Pierre, SD 57501

RE: <u>Verizon Access Transmission Services: Tariff No. 2</u> Responses to First Data Request for Docket TC12-091

Dear Ms. VanGerpen

MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services ("Verizon Access") is filing responses to the first data request for Docket TC12-091 via the South Dakota Public Service Commission's E-Filing system.

1-1) Please provide current a copy of the Company's South Dakota Access Tariff No. 2, Original Page Nos. 56, 57, 65 and 67.

RESPONSE: Attached are Page Nos. 56, 57, 65 and 67 from MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services South Dakota Tariff No. 2.

1-2) Please provide a copy of the Company's Interstate Access Rates as filed with the FCC.

RESPONSE: Attached are Page Nos. 86.1, 87.1 and 88.1 from MCImetro Access Transmission Services LLC Tariff FCC No. 1.

1-3) Please provide any work papers utilized and/or calculations performed for the production of rates on the 1st Revised Page No. 67.

RESPONSE: Attached is Verizon Access' confidential compliance worksheet, marked "Confidential," reflecting the calculations performed to produce the rates on 1st Revised Page No. 67. Verizon Access considers this worksheet – which includes confidential minutes of use and intrastate access revenues — to be trade secret information entitled to confidential handling under S.D. Cod. Laws §§ 37-29-1 et seq. because it derives independent economic value, actual or potential, from not being generally known to, and not readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use, and because it is the subject of reasonable efforts to maintain its secrecy. Verizon Access provides the confidential compliance worksheet under the understanding that the Commission will treat it as such.

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1-4) To the extent the Company relied on any estimates in its calculations, please provide justification for those estimates.

RESPONSE: MCImetro did not utilize any estimates other than the "split" that was used for purposes of estimating the amount of Tandem Connect with Switching usage. As explained in our confidential worksheet, the "split" was based on actual interstate usage. Because only 1% of the usage is assumed to be subject to the higher rate, MCImetro believes the assumption is both defensible and reasonable.

If you have any questions, please call me at (312) 260-3245 or send me an email at shannon.brown@verizon.com.

Respectfully submitted,

/s/ Shannon L. Brown Tariff Manager Verizon

Enclosures