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PUBLIC UTILITIES COMMISSION

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of PUBLIC UTILITIES COMMISSION Instituting a Proceeding to Implement the Federal Communications Commission's ("FCC") *Triennial Review Order*, FCC No. 03-36.	))))))))	Docket No. 03-0272

VERIZON HAWAII INC.'S

FIRST SET OF REQUESTS FOR INFORMATION TO

PACIFIC LIGHTNET, INC.

and

CERTIFICATE OF SERVICE

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VERIZON HAWAII INC.

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Pursuant to Prehearing Order No. 20762, issued by the Public Utilities Commission of the State of Hawaii on January 15, 2004 and governing this docket, Verizon submits the following Information Requests.

I. DEFINITIONS AND INSTRUCTIONS

1. "Verizon" refers to Verizon Hawaii Inc.

2. The terms "PLNI," "you" or "your company" shall mean the Pacific LightNet, Inc., including, but not limited to, all of PLNI's predecessor companies, PLNI's present and former officers, attorneys, employees, servants, agents, and representatives, and any person acting on PLNI's behalf.

3. The term "including" means "including, but not limited to."

4. "List," "describe," "explain," specify," or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which PLNI or its agents or representatives have knowledge which is relevant to the answer called for by the Request.

5. The terms "document" or "documents" shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless

of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, diagrams, schemata, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs and any other pictorial representations, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

A. are now or were formerly in your possession, custody or control; or

B. are known or believed to be responsive to these Requests, regardless of who has or formerly had custody, possession or control.

6. The term "date" shall mean the exact day, month and year, if ascertainable, or if not, the best approximation thereof, including relationship to other events.

7. The term "person" or "persons" means and includes any individual, committee, task force, division, department, company, contractor, state, federal or local government agency, corporation, firm, association, partnership, joint venture or any other business or legal entity.

8. The terms "identify" and "identity" when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone number, present or last known place of employment, position or business affiliation, his or her

position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.

9. The terms "identify" and "identity" when used with respect to any other entity mean to state its full name, the address of its principal place of business and the name of its chief executive officers.

10. The terms "identify" and "identity" with respect to a document mean to state the name or title of the document, the type of document (*e.g.*, letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it, the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was but is no longer in PLNI's possession or subject to its control, state what disposition was made of it and explain the circumstances surrounding, and the authorization for, such disposition, and state the date or approximate date thereof.

11. The terms "identify" and "identity" with respect to any non-written communication mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner and place of the communication, and the topic or subject matter of the communication.

12. If PLNI files a timely objection to any portion of a request, definition, or instruction, it shall respond to or comply with the remaining portion(s).

13. In these requests the singular shall also be treated as plural and vice-versa.

14. Each response should include the name of the person(s) providing the response and the witness(es) who will be testifying on behalf of PLNI and who will be prepared to answer questions relating to the response.

15. If any part of a document is responsive to any request, the whole document is to be produced, with the responsive portion clearly identified.

16. Please identify each and every document to which you assert a claim of privilege or objection to production by stating in writing a general description of the document, its title, number of pages, date of preparation, person(s) who prepared the document, any person(s) who received or reviewed the document in original or other form, and the current custodian(s) of the document, and state in writing the nature and basis for each claim of privilege or objection asserted for the document.

17. If PLNI claims that any portion of a document is privileged, PLNI should provide those portions of the document to which PLNI is not claiming a privilege until such claim of privilege is resolved. This instruction shall not waive any rights Verizon may have in connection with challenging any claim of privilege asserted by PLNI.

18. If in any response to these requests, PLNI refers to a publicly available document or a document that has been filed by PLNI or any third party in any state or federal jurisdiction, please attach a copy of all such referenced documents.

19. These requests are continuing in nature and, thus, PLNI is under a continuing duty to promptly supplement, correct or revise any response provided when the passage of time or change of circumstances would require a response to be supplemented, corrected or revised.

20. Each request should be answered in writing on a separate page. Each response should contain the question being answered.

II. REQUESTS FOR INFORMATION

VZ-IR-PLNI-1 Please provide the largest number of actual individual, voice-grade DS0 loops over which you are currently providing local exchange service using your own switch to any single residential customer at a single address in Hawaii.

VZ-IR-PLNI-2 Please provide the largest number of actual individual, voice-grade DS0 loops over which you are currently providing local exchange service using your own switch to any single business customer at a single address in Hawaii.

VZ-IR-PLNI-3 Have you, or anyone at your direction or under your supervision, conducted any studies, analysis, or assessments to determine the appropriate "cross-over" point "where it makes economic sense for a multi-line customer to be served via a DS1 loop?" *Triennial Review Order* ¶ 497. If so, provide a copy of such non-privileged studies, analyses, or assessments and any supporting workpapers.

VZ-IR-PLNI-4 Provide a copy of any operational or engineering guidelines or policy documents maintained by your company that are used in whole or in part by your employees or agents in making decisions regarding whether to serve a multi-line customer using a DS1 loop versus multiple DS0 loops.

VZ-IR-PLNI-5 Please provide your calculation, estimate, or view of the economic crossover point, in terms of number of DS0/voice grade lines to a single customer premises, at which you offer service at a DS1 level rather than using a number of analog lines, and provide the basis for that crossover point (e.g., equivalency point of analog service rates and DS1 service rates, consideration of whether the customer premises equipment can accept a DS1 interface, etc.).

DATED: Honolulu, Hawaii, January 26, 2004.

Respectfully submitted,

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PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of	)	
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PUBLIC UTILITIES COMMISSION	)	Docket No. 03-0272
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CERTIFICATE OF SERVICE

VERIZON HAWAII INC.'S
FIRST SET OF REQUESTS FOR INFORMATION TO
PACIFIC LIGHTNET, INC.

I certify that on the 26th day of January, 2004, Verizon Hawaii Inc.'s First Set of Requests for Information to Pacific LightNet, Inc. in the above-captioned proceeding was served on the following parties:

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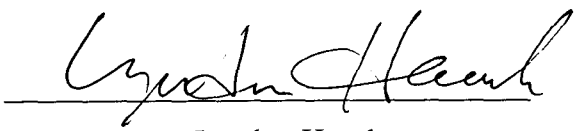

Lyndon Haack