

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Technology Transitions)	GN Docket No. 13-5
)	
USTelecom Petition for Declaratory Ruling That Incumbent Local Exchange Carriers Are Non-Dominant in the Provision of Switched Access Services)	WC Docket No. 13-3
)	
)	
Policies and Rules Governing Retirement Of Copper Loops by Incumbent Local Exchange Carriers)	RM-11358
)	

**Verizon Request for Clarification, or in the Alternative,
Petition for Waiver of Copper Retirement Notification Rules**

Verizon requests that the Commission clarify its copper retirement notification requirements in 47 C.F.R. § 51.332(b)(2) and (4) to confirm that providers may provide interconnecting entities, state public utility commissions, state governors, tribal entities, and the Secretary of Defense with a paper copy of the notice and a hyperlink to a searchable online list of addresses or locations where copper is to be retired in lieu of a paper copy of the address list. In the alternative, Verizon petitions the Commission to waive any requirement that these parties be served with a paper address list when providers instead provide a copy of the notice and a hyperlink to a searchable online list.¹

¹ To be clear, Verizon will continue to send paper copies of its copper retirement notifications, excluding the address lists, to state public utility commissions, state governors, tribal entities, the Secretary of Defense, and all interconnecting entities operating in the state in which the copper retirement will occur. Notifications to residential customers are not affected by this request.

A. Currently, Verizon Provides Notification of Locations at Which Copper Will be Retired Using Paper Copies of the Addresses

The Commission's rules require the incumbent LEC to provide "a copy" of the copper retirement notice to the interconnecting entities, state public utility commissions, state governors, tribal entities, and the Secretary of Defense.² Each copper retirement notice includes a list of the location(s) at which the changes will occur.³

Today, to comply with the requirement to provide "a copy" of its copper retirement notice, Verizon mails paper copies of the notice to the required parties. The notice today contains what can be a large address list, marked as Exhibit A to the notice. We currently also provide recipients of the notice with a link to our external network disclosures website, where we post the notice and Exhibit A address list.⁴ This link is included on the first page of the copper retirement notice and is labeled in bold and in a conspicuous location.

The paper address list currently provided is often unwieldy for interconnecting parties to search, and can significantly increase the costs of paper and postage. While in some cases a provider may seek to retire copper at the wire center level,⁵ in other instances a provider may instead choose to retire copper at the individual address level.⁶ Thus, depending on the copper retirement notice, the address list may be thousands of discrete locations covering many pages.

² 47 C.F.R. § 51.332(b)(2) and (b)(4).

³ *Id.*, § 51.327(a)(4).

⁴ Located at <http://www.verizon.com/about/terms-conditions/network-disclosures>

⁵ *See, e.g., Wireline Competition Bureau Short Term Network Change Notification Filed by GTE Southwest Inc. D/B/A Verizon Southwest, Public Notice, Report # NCD-1990 (Apr. 29, 2011); Comments Invited on Application of Verizon New England Inc.; Verizon New Jersey Inc.; Verizon New York Inc.; Verizon Pennsylvania LLC and Verizon Virginia LLC to Discontinue Domestic Telecommunications Services, Public Notice, 29 FCC Rcd 10446 (2014).*

⁶ Note that regardless of the method of retirement, we provide customers with the same voice service at the same price, terms, and conditions, over fiber facilities as was offered over copper. In particular, customers may continue to receive Plain Old Telephone Service, or POTS, over the more reliable fiber network.

For example, some of Verizon's September 2016 copper retirement notices contained more than 400 pages of hard copy lists of addresses in Exhibit A. Verizon sent paper copies of the filings to each interconnecting carrier (a total of more than 1,650 across eight states), state public utility commission, and state government, as well as the Secretary of Defense. Even printed double-sided and in a reasonable font, Verizon in total mailed just under two hundred thousand pages.

Following receipt of our copper retirement notice and Exhibit A documents, a number of carriers contacted both Verizon's notice contact person and their respective Verizon account team to ask if they could receive searchable electronic documents to determine if they would be impacted by the copper retirement within a specific wire center. Others explained that paper copies were less convenient for their systems. We provided carriers with both a searchable PDF copy of the notification and pointed them to the Exhibit A address list on our network disclosure website.⁷ We also explained that we will provide each interconnecting entity with additional correspondence further discussing any impact to their specific circuits/services and describing a timeline for migration. We continue to work with interconnecting carriers to help them identify their end users who need to migrate services and to coordinate the timing of those moves.

B. Providing Recipients with an Electronic, Searchable List of Locations Would Improve Their Ability to Access Information in the Copper Retirement Notices and Would Reduce Inefficiencies and Expense

In response to requests from interconnecting parties and to reduce inefficiencies, we would like to replace the paper copies of the address list with a hyperlink to Verizon's website where parties can view an electronic, searchable copy of the address list. We would provide a hard copy to any interconnecting party or other recipient who so requests one. We therefore seek

⁷ See <http://www.verizon.com/about/terms-conditions/network-disclosures>.

confirmation that a hyperlink as described satisfies the “copy of the notice” requirement of § 51.332(b)(2) and (4). Alternatively, Verizon seeks a waiver of any determination that § 51.332(b)(2) and (4) require a paper hard copy in lieu of a hyperlink or other electronic, searchable notification of the list of locations.⁸

In today’s electronic environment, information is more useful in electronic form via web-based access than in cumbersome paper copies. Providing an electronic copy is also a “greener” solution and providing interconnecting carriers with easily accessible searchable documents increases the efficiency for them as they notify end users.

Therefore, we ask the Commission to confirm that the rules pertaining to copper-retirement notification allow a carrier to disclose the list of locations at which the changes will occur by providing a hyperlink to a searchable electronic list of addresses or locations where copper is to be retired in lieu of a paper copy. In the alternative, Verizon seeks a waiver of the Commission’s rules pertaining to copper retirement notification to permit a carrier to disclose the list of locations at which the changes will occur by providing a hyperlink to a searchable electronic list of addresses or locations where copper is to be retired in lieu of a paper copy. Verizon will continue to send paper copies of its copper retirement notifications, excluding the address lists, to state public utility commissions, state governors, tribal entities, the Secretary of Defense, and all interconnecting entities operating in the state in which the copper retirement will occur. The only change would be replacing paper copies of the lengthy Exhibit A address lists with a hyperlink included in the body of the notice and also in a one-page attachment to the notice that includes the following information:

⁸ This petition would apply solely to interconnecting carriers, state public utility commissions, state governors, tribal entities, and the Secretary of Defense; residential and business customers would still receive individual written notifications of the retirement of their copper facilities and migration to fiber.

- Searchable PDF copies of the address lists for the specific wire centers impacted by this copper retirement may be found at Verizon’s Network Disclosure website.⁹
- Identification of the unique ID, if applicable, for the specific copper retirement notice that will connect to the list of addresses for that particular filing.
- A notification that a recipient who would like a hard copy of the address list may request one separately.

Inclusion of a hyperlink here is not new, as we included a clearly labeled hyperlink in all 2016 copper retirement notices already.¹⁰ Each interconnecting entity that receives this general notice will also receive subsequent communications from Verizon that both provide more detail than the location address (including the entity’s specific circuits impacted by the copper retirement) and providing a specific timeline for migration before the facilities are retired. Attachment 1 to this petition includes a draft template of Verizon’s proposed copper retirement notice and one-page Exhibit A for future copper retirement postings.

William H. Johnson
Of Counsel

Respectfully submitted,

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December 15, 2016

⁹ See <http://www.verizon.com/about/terms-conditions/network-disclosures>.

¹⁰ Note that the Commission’s rules expressly contemplate use of a “clearly labeled and described” hyperlink. 47 C.F.R. § 51.332(c)(2)(iv)(C).

Attachment 1

DRAFT Template for Future Verizon Copper Retirement
Notices

STRICTLY ILLUSTRATIVE



6929 N. Lakewood Avenue
Tulsa, OK 74117

PUBLIC NOTICE OF COPPER RETIREMENT UNDER RULE 51.332
Copper Retirement ID No. 2017-01-A-MA

February xx, 2017

Carrier: Verizon New England Inc., 125 High Street – Oliver Tower, 7th Floor, Boston, MA 02110

Contact: For additional information on these planned network changes, please contact:

Janet Gazlay Martin
Director – Network Transformation
Verizon Communications
230 W. 36th Street, Room 802
New York, NY 10018
1-844-881-4693

Implementation Date: On or after February xx, 2018

Planned Network Change(s) will occur at the following wire center areas in Massachusetts:

Wire Center	Address	CLLI
WC Name, MA	Address, MA 02339	CLLI

Exhibit A to this copper retirement notification provides information about the specific addresses at which the copper network facilities will be retired. Exhibit A addresses may viewed on Verizon’s website at <http://www.verizon.com/about/terms-conditions/network-disclosures>

Description of the planned network change(s):

Verizon intends to retire a number of copper facilities in the name, name, MA wire centers serving locations listed in the Exhibit A and provide services over a fiber network infrastructure. Verizon has deployed its fiber-to-the-home network in the areas identified in Exhibit A.

Description of reasonably foreseeable impact(s) of the planned change(s):

After the retirement of the copper facilities, Verizon will: (1) no longer offer services over copper facilities; and (2) cease maintaining the copper facilities.

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Description of any changes in prices, terms or conditions that will accompany the planned change(s):

As a general matter, the retirement of copper facilities will not result in changes to rates, terms and conditions in cases where the affected service is converted to a like-for-like service that is available on fiber facilities. Interconnecting entities, however, should review the applicable tariff or agreement for certain terms that may apply specifically in cases where the service is provisioned on fiber. In cases where interconnecting entities elect to replace the affected service with an alternative service that Verizon offers on fiber facilities, the rates, terms and conditions will be as set forth in the tariff or agreement under which Verizon offers the replacement service that the interconnecting entity selects. Verizon, separately from this notice, will provide interconnecting entities with further information regarding service migration options that Verizon offers.

**Exhibit A – Address List for Each Wire Center Impacted by
Copper Retirement ID No. 2017-01-A-MA**

The complete and searchable list of specific addresses impacted by Copper Retirement ID No. 2017-01-A-MA may viewed on Verizon's website at:
<http://www.verizon.com/about/terms-conditions/network-disclosures>.

If you would like a hard copy of the list of addresses, please make a request to the contact person listed below.

Please look for the Copper Retirement ID no. 2017-01-A-MA to find the addresses for the Massachusetts wire centers where Verizon plans to retire copper facilities.

Each interconnecting entity that has received this general notice will also receive a subsequent letter from Verizon: 1) notifying the entity of its specific circuits to be impacted by the copper retirement, and 2) providing a specific timeline for interconnecting entity action before the facilities are retired.

Specific questions may be directed to your account manager or to:
Janet Gazlay Martin
Director – Network Transformation
Verizon Communications
230 W. 36th Street, Room 802
New York, NY 10018
1-844-881-4693

SAMPLE: FOR ILLUSTRATIVE PURPOSES ONLY