BEFORE THE

# Federal Communications Commission

WASHINGTON, D.C.

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| In the Matter of | ) |
| | ) |
| Implementation of the Local Competition Provisions in the Telecommunications Act of 1996 | ) CC Docket No. 96-98 |
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| | ) |
| | ) |
| Inter-Carrier Compensation for ISP-Bound Traffic | ) CC Docket No. 99-68 |
| | ) |

## REPLY COMMENTS OF CONVERSENT COMMUNICATIONS, LLC

Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036-3384

ATTORNEY FOR CONVERSENT COMMUNICATIONS, LLC.

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## REPLY COMMENTS OF CONVERSENT COMMUNICATIONS, LLC

Conversent Communications, LLC ("Conversent"), by its attorneys, hereby files reply comments in the above-captioned proceeding.

## INTRODUCTION AND SUMMARY

These reply comments address a subsidiary but important aspect of the application of reciprocal compensation to the exchange of ISP-bound traffic: the use of so-called "remote NXXs" by CLECs to serve ISPs. In comments filed in this proceeding, several ILECs, but especially Verizon, have characterized the use of remote NXXs by Conversent and other CLECs as an example of regulatory gamesmanship rather than efficient competition. In so doing, Verizon in particular has gotten both the little and the big things wrong. It has mischaracterized the manner in which Conversent proposes to use remote NXXs to serve ISPs. More importantly, it has incorrectly characterized the use of remote NXXs, especially by CLECs such as Conversent that provide the full range of voice and data telecommunications service over their networks, as wasteful and inefficient behavior. In fact, the use of remote local calling for ISPs is simply an efficient means of serving ISPs, one Verizon itself uses. Application of reciprocal compensation in this context is eminently reasonable. Thus, the Commission should establish a rule in this

proceeding that reciprocal compensation applies to traffic bound for an ISP that uses numbers from remote NXXs. Of course, as the Commission has recognized, to the extent a state determines that a particular fringe CLEC should not be eligible for reciprocal compensation, due to its misuse of remote NXXs or for any other reason, the state may terminate that carrier's certification to provide service in the state.

## DISCUSSION

Conversent agrees with ALTS and other commenters in this proceeding that, as a legal matter, reciprocal compensation should apply to the exchange of ISP-bound traffic. See ALTS Comments. That is, regardless of how ISP-bound traffic has been classified for jurisdictional purposes, "termination" must be understood to be the delivery of calls to non-carrier called parties. As several of the commenters in this proceeding recognize, ISP-bound calls can be both interstate for jurisdictional purposes and local for reciprocal compensation purposes. See, e.g., id. at 4-6; ICG Comments at 12-13. This approach fully addresses the concerns raised by the D.C. Circuit in overturning the Commission's Declaratory Ruling in this proceeding, is consistent with the regulatory status of ISPs as non-carrier users of telecommunications services, and it is consistent with the Commission's definition of termination in Section 51.701(d) of its rules as delivery of traffic to the called party. See WorldCom Comments; ALTS Comments; Global NAPs Comments; Joint Comments of Advanced Telecom Group et al.

Furthermore, the application of reciprocal compensation rates based on forward-looking ILEC costs to ISP-bound traffic results in efficient outcomes. As the Commission has recognized, "LECs incur a cost when delivering traffic to an ISP that originates on another LEC's

network."[1] As with all other customers with an imbalance in traffic flows, ISPs cannot be served by competitive carriers unless those carriers are compensated for the costs incurred in performing the termination function on behalf of the originating LEC. The record in this proceeding demonstrates that the ILECs' forward-looking costs are appropriate bases for determining the reciprocal compensation rate applicable to ISP-bound traffic, just as they are the appropriate basis for setting the exchange rate for all other local traffic. See, e.g., Declaration of Lee Selwyn & Patricia Kravtin, filed as an exhibit to the AT&T Comments.

It may be less obvious to the Commission based on the record created thus far that reciprocal compensation should also apply in the particular case where a LEC terminates traffic bound for an ISP that uses numbers from so-called remote NXXs. These numbers are assigned to a customer from an NXX associated with a particular local calling area in which the customer is not physically located. Parties that are located in one of these local calling areas can dial the local number to reach the remote NXX user, and the call is then carried to the called party's facilities outside the local calling area. By assigning numbers to ISPs from remote NXXs, LECs help ISPs to establish efficient network architectures that avoid the wasteful practice of placing facilities in every local calling area within a State.

In its attempt to characterize CLECs that serve ISPs as merely exploiting a regulatory anomaly to collect reciprocal compensation, Verizon has asserted that the use of remote NXXs by CLECs and in particular by Conversent is a form of "inefficient, socially wasteful behavior." See Verizon Comments at 16. See also SBC Comments at 43 (describing use of remote NXXs as one

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[1] See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Inter-Carrier Compensation for ISP-Bound Traffic, Declaratory Ruling and Notice of Proposed Rulemaking, 14 FCC Rcd 3689, ¶ 29 (1999) ("Declaratory Ruling").

of many CLEC "scams"). In so doing, Verizon has misled the Commission as to Conversent's proposed use of remote NXXs and, more generally, as to the legitimacy of applying reciprocal compensation to traffic bound to ISPs using numbers from remote NXXs.

Verizon states that in a proceeding before the New Hampshire Public Utilities Commission, CLECs (including Conversent) argued they should be paid for terminating traffic to "ISPs that are physically located not just in a different local calling area, but even in a different state, from the Verizon customers placing the call." Verizon Comments at 19.[2] In fact, Conversent does not serve any ISPs in New Hampshire at this time. If Conversent were to serve ISPs in New Hampshire, it would use its switch in Nashua, New Hampshire which it uses to serve numerous local voice business customers. Conversent has never suggested that it would use remote NXX numbers to serve an ISP with a physical presence in a different state or even in a different LATA.

The question of whether reciprocal compensation applies to the exchange of traffic bound for ISPs using remote NXXs has arisen, however, in New Hampshire as well as several other states. Verizon has incorrectly dismissed this issue as CLEC regulatory gamesmanship. Nothing could be further than the truth.

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[2] In support of this statement, Verizon cites to a New Hampshire proceeding initiated by a petition filed by New England Voice & Data (Conversent's predecessor in interest) seeking the application of reciprocal compensation to the exchange of ISP-bound traffic. Although the petition in question did not even address the applicability of reciprocal compensation to traffic bound for ISPs using remote NXXs, this issue has arisen in New Hampshire.

To begin with, while Verizon cites a Maine PUC order which held that Brooks Fiber is not permitted to use remote NXXs, that decision is fatally flawed.[3] It was based primarily on the conclusion that remote NXXs result in inefficient use of numbering resources, (at 12-13) even though the imminent implementation of thousands block pooling will eliminate that problem. Moreover, the Maine PUC found that users of remote NXXs seek impermissibly to use ILEC transport facilities to deliver traffic to the remote NXX switch. See id. at 13-16. But rather than attempt to address this problem through appropriate cost-based rates, the Maine Commission chose to forbid the use of remote NXXs entirely.

In contrast, California has held that LECs should be allowed to use remote NXXs because they allow LECs to deliver more efficient service offerings.[4] The California PUC specifically rejected the notions that remote NXX result in inefficient use of numbering resources or are some form of regulatory gamesmanship. See id. at **21-26, 38-43. California did recognize that ILECs should be provided some form of cost-based compensation in appropriate cases for delivering traffic to the switch serving remote NXXs. See id. at **52-56.

Furthermore, there is no risk that Conversent or any other facilities-based carrier using remote NXXs has inefficient incentives to game the reciprocal compensation scheme. Conversent

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[3] See Investigation into the Use of Central Office Codes (NXXs) by New England Fiber Communications LLC d/b/a Brooks Fiber, Order Requiring Reclamation of NXX Codes and Special ISP Rates by ILECs, Docket No. 98-758, Order No. 4 (Maine PUC June 30, 2000).

[4] See Order Instituting Rulemaking on the Commission's Own Motion Into Competition for Local Exchange Service, Order Instituting Investigation on the Commission's Own Motion Into Competition for Local Exchange Service, Decision No. 99-09-029, Rulemaking No. 95-04-043 (Filed April 26, 1995), Investigation No. 95-04-044 (Filed April 26, 1995), 1999 Cal. PUC LEXIS 649, at *24 (Cal. PUC Sept. 2, 1999) ("California Remote NXX Order")

has constructed an extensive network in New Hampshire, consisting of leased dark fiber connecting collocated multiplexers in nine Verizon end offices and the Nashua switch. This network supports the full range of voice and data services. For circuit switched calls, traffic originating from Conversent's business customers is carried over unbundled loops to Conversent's collocated end office equipment, then over interoffice fiber and back to the Conversent switch. If a call is to a Verizon customer located within the same local calling area, pursuant to the parties' interconnection agreement, Conversent hands the call to Verizon at a point of interconnection near the Nashua switch, and Bell Atlantic terminates the call to its customer. For local calls that originate on the Verizon network destined for a Conversent customer, Verizon carries the traffic to the Nashua point of interconnection, and Conversent then transports and terminates the call to its local customer over its fiber/loop leased facilities.[5] Conversent's termination costs are analogous to forward-looking reciprocal compensation rates.

Moreover, the fact that ISPs might collocate at Conversent's switch is irrelevant to Conversent's transport and termination costs. Transport and termination reflects the incremental cost of transporting traffic to the terminating carrier switch and performing switching for call delivery. The cost of the connection between the terminating carrier's customer and its switch is irrelevant. Collocation of ISPs at LEC switches is simply a more efficient means of providing the end user a dedicated connection to LEC switches. Thus, there is no risk that Conversent's network has transport and termination costs so much lower than Verizon's that Conversent would have an inefficient incentive to artificially generate ISP dial-up minutes (as Verizon claims some

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[5] The extensive coverage of Conversent's New Hampshire network offers a concrete response to SBC's glib statement that a carrier using remote NXXs "has no incentive to build out its network." SBC Comments at 43.

CLECs have). Indeed, there is every reason that the tandem reciprocal compensation rate should apply to traffic bound for ISPs collocated at Conversent's switch. Conversent's switch performs precisely the same kind of tandem functions performed by Verizon's tandem switches. Moreover, Conversent's Nashua switch serves an area that is at least comparable to Verizon's New Hampshire tandems. See 47 C.F.R. § 51.711(a)(3) (requiring application of ILEC tandem rates for CLEC transport and termination where the CLEC's switch serves a geographic area comparable to the ILEC's tandem switch).

Furthermore, in order to deliver traffic to Conversent for transport and termination to an ISP using remote NXX numbers, Verizon would perform precisely the same originating functions it performs today for all other local traffic delivered to Conversent for termination to Conversent's local business voice customers. Verizon would avoid the costs of terminating the traffic in question. To the extent that existing reciprocal compensation rates in New Hampshire cover the costs of these call terminating functions, Bell Atlantic should therefore be indifferent to whether the traffic is bound for a Conversent voice business customer or an ISP.[6] Of course if the reciprocal compensation rate is not sufficient, that is a matter for the state regulators.

Finally, Verizon has itself recently begun marketing a service called "Enhanced ISDN-PRI Hubbing Service" in New Hampshire and in other states that treats calls to an ISP customer that purchases the service as local, regardless of the physical location of the calling party.[7] Conversent

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[6] Conversent recognizes, however, that in some cases it may be appropriate for a LEC to be compensated for transporting remote NXX traffic to Conversent's switch. Such compensation can be determined through the Section 252 interconnection agreement process.

[7] See Letter from Georgene Horton, Bell Atlantic Director - Account Management, Wholesale Markets to James A. Canepa, New England Voice and Data (June 26, 2000), attached as an Exhibit to these reply comments. In addition, Verizon has recently begun

asks only that the same local classification for this kind of traffic extend to the reciprocal compensation context. Given that Verizon would incur no more costs in delivering traffic to Conversent's ISP customers using remote NXXs than it currently does in delivering traffic to Conversent's other local customers, Verizon's refusal to classify remote NXX traffic as local is the true regulatory gamesmanship at work here

As the Commission no doubt realizes, denying reciprocal compensation simply because an ISP's telephone number is associated with a rate center (the so-called rating point) that is different from the routing point for ISP-bound calls prevents CLECs from deploying efficient network architectures for the purpose of serving ISPs. It in effect leaves Verizon as the only facilities-based carrier capable of serving ISPs in New Hampshire. Indeed, Conversent does not market its service to ISPs in New Hampshire precisely because it cannot be sure that it will be able to recover the cost of terminating traffic to its ISP customers.[8]

Nevertheless, Conversent understands that a blanket rule requiring the application of reciprocal compensation to traffic bound for an ISP using remote NXXs could create inefficient incentives for some carriers with no intent to deploy facilities or to serve any customers other than ISPs. But as the Commission recognized in the Declaratory Ruling, "the state commissions are capable of assessing whether and to what extent these and other anomalous practices are

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marketing a service in Rhode Island that allows a customer located in Providence to be reached via a local call from anywhere in the state

[8] Nor does Conversent market service to ISPs in Maine since, as mentioned, the Maine PUC held that Brooks Fiber was not permitted to use remote NXXs to service ISPs. Conversent's inability to provide service to ISPs in either New Hampshire or Maine is poignant evidence that Verizon is dead wrong that competition for serving ISPs will continue even if the Commission were to rule that reciprocal compensation does not apply to the exchange of ISP-bound traffic See Verizon Comments at 22-27.

inconsistent with the statutory scheme (e.g., definition of a carrier) and thereby outside the scope of any determination regarding inter-carrier compensation." Declaratory Ruling, ¶ 24 n.78. Based on the foregoing, the Commission should establish a rule that reciprocal compensation applies where an ISP uses remote NXXs. That is, for purposes of remote NXX calls to ISPs, the Commission should mandate that the relevant local calling area is determined by the rating point of the ISP (its telephone number), not the routing point for ISP-bound traffic (its physical location). Where a state has determined that a particular LEC should not be eligible to use NXXs in this fashion because it has engaged in "anomalous practices . . . inconsistent with the statutory scheme," it can revoke the LEC's authority to provide local service in the state. In this way, the Commission could diminish the chilling effect of ILEC refusals to pay reciprocal compensation on remote NXXs without either ignoring the possibility of inefficient behavior or depriving the states of the authority to decide when a firm should be ineligible to use remote NXXs.

## CONCLUSION

For the reasons described herein, the Commission should rule that Section 251(b)(5) applies to the exchange of ISP-bound traffic Furthermore, the Commission should establish a rule that reciprocal compensation applies where an ISP uses numbers from remote NXXs.

Respectfully submitted,

Thomas Jones

**WILLKIE FARR & GALLAGHER**
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036
(202) 328-8000

ATTORNEY FOR CONVERSENT
COMMUNICATIONS LLC

August 4, 2000

**EXHIBIT**

ll Atlantic Network Services
0 Summit Lake Drive
oor 4
lhalla, NY 10595
4 741-7412 Fax 914 747-1055

Georgene Horton
Director - Account Management
Wholesale Markets

(24)

Bell Atlantic

June 26, 2000

Mr James A. Canepa
New England Voice and Data
2 Bedford Farms, Kilton Rd
Bedford, NH 03110

Dear Mr Canepa:

Bell Atlantic is introducing Enhanced ISDN-PRI Hubbing Service in Delaware, Maryland, Virginia and West Virginia. It is already available in Pennsylvania. We expect to introduce the service in Massachusetts in Mid July and in New York in mid August. Introductions for the remaining Bell Atlantic jurisdictions are pending.

The service will be available for the following Switch types:

- SESS
- DMS 100
- Siemens

Enhanced ISDN-PRI Hubbing Service will provide Information Service Providers (ISPs), Information Service Remote Access Providers and their end users with a LATA-wide integrated voice/data communications capability for transmitting circuited-switched voice and data signals.

The service will allow ISPs and Information Service Remote Access Providers to provide their end users with single-number dial access. It will also allow these providers to use existing telephone numbers to gain access over ISDN-PRI Sector Hub pipes to the ISP's premise location. With the use of 500-699 or NPA-555 numbers, callers will only be charged for local calls. No tolls will be charged within the LATA. Calls to the ten-digit telephone numbers will bill according to the normal local or toll rates.

Enhanced ISDN-PRI Hubbing Service will use two types of Bell Atlantic facilities: the Sector Hub and the Interconnection Hub. Each LATA has up to six Central Offices designated as Sector Hubs. An ISP must have at least one ISDN-PRI from each Sector Hub. (The Sector Hubs appear under the Dependencies section of this letter.)

The PRI's go back to the Interconnection Hub using Bell Atlantic Interoffice DS3 facilities. The service requires a high-speed facility (e.g.. a DS3 or -SONET to the ISPs premises from one designated Interconnection Hub per LATA) to provide the loop portion to the customer's location. You must order the high-speed facility separately; it is not included in this service offering. DS1 service can only be used in cases where there are insufficient quantities of PRIs to make a DS3 cost effective...

In LATA 228 (Pennsylvania-Delaware) and LATA 240 (Maryland-West Virginia), applicable tariffs require Bell Atlantic to provide one Interconnection Hub in each state.

If applicable, mileage charges will appear on the high-speed facility to the Interconnecting Hub. No Foreign Exchange (FX) mileage will bill in the PRI arrangement between the PRI Sector Hub and the Interconnection Hub.

**Enhanced ISDN-PRI Hubbing provisioning options**
Bell Atlantic will provision Enhanced ISDN-PRI Hubbing in the following ways:

- Individual Ten Digit Numbers will always be assigned.
- One Number Dialing uses a number assigned by either Bell Atlantic (500-699-XXXX) or NANPA (XXX 555-XXXX) which will also access the customer network using an AIN trigger pointed at the hubbed ISDN-PRI facilities. When a calling party uses these numbers, the call will be toll free within the LATA. Local message or measured rates will apply for the call. Flat rated lines will have no charges for calls to these numbers.

  One Number Dialing Service is provisioned through the Advanced Intelligent Network (AIN). In AIN, the switch interacts with an external data base known as the Integrated Service Control Point (ISCP) where call processing instructions are stored. Service Logic Programs (SLPs) outside the Central Office switch control the services. The switch sends a message to the ISCP to check switching options for the number dialed. If there are special instructions about the routing of the number dialed, the AIN will handle the call using those instructions.

- A new DS3 facility* or an existing DS3 facility established from a predetermined interconnection hub can carry the ISDN-PRI pipes to the premises.

  DS3 service is a basic transport service offering customers large capacity transmission capabilities on a full time basis for multiple uses. The service can transmit voice, low and high-speed data, video signals, electronic mail, facsimile and any other service where a signal is digitally encoded by appropriate terminal equipment.

  In this scenario, DS3 offers a multiplexed 44.736 Mbps transmission path that can support 28 channelized subtending services.

- A new or existing SONET/SALT facility* to the add/drop multiplexer at the ISP's premises or their local Central Office can provide a dedicated path for the ISDN-PRI pipes.
- If an ISP has a large imbedded customer base, it may leave the existing telephone numbers currently used to access its network in place and build AIN triggers against them to point them at the hubbed ISDN-PRIs. Bell Atlantic recommends that the ISP migrate its customers to the new SNS 500 699 or XXX 555 number. However, they may choose to release the SNS numbers only to new clients.
  (Due to permissive dialing constraints, this variable is not available in New York in the 347, 631 and 646 NPAs.)

*ISPs order DS3 and SONET/SALT from the FCC tariff.

**Enhanced ISDN-PRI Hubbing Optional Features**
The following features will be available with the PRI portion of the Enhanced PRI Hub Service:

- Back-up D Channel – a Back-up D channel automatically takes over for a failed D channel in case of trouble. It must be associated with a full 23B+D pipe.

- Calling Line Identification – Allows the user to have access to the directory number of the calling party.

- Calling Line Identification with Name – Allows the user to have access to the directory number and the name of the calling party.

- Redirecting Number – Provides the ability to pass the called party numbers plus the calling party number when a call is forwarded or redirected. The party who transfers the call is billed for the call.

- Modified Redirecting Number – Provides the ability to transfer a call and has the transferred party number passed as if the call was not transferred.

- 2 B Channel Transfer – Providers the ability to transfer a call between two B Channels and release one channel.

**Restrictions**

Ten Digit Triggers in New York NPAs 347, 631 and 646

Bell Atlantic Enhanced ISDN-PRI Hubs with One Number Dialing that have a large imbedded base may leave the existing telephone numbers currently used to access their network in place. Or they may build 10 digit AIN triggers against them to point them at the hubbed ISDN-PR's.

Due to permissive dialing constraints in New York, Bell Atlantic can not provision 10 digit triggers from the 347, 631 and 646 NPA's. If you have service in these three NPA's, you must use a 500 699-XXXX number or an XXX 555-XXXX number.

Wireless, CLEC and ITC Calls – Wireless calls and calls originating from facility based Competitive Local Exchange Carriers (CLECs) and Independent Telephone Companies (ITCs) may require special arrangements for call completions.

A Wireless provider, CLEC or ITC must:

- Open up the NPA code (500) or the NXX code (555) in its switch.

- Input the NPA-NXX into the AIN tables so that when the query is launched from the end office to the ISCP, the ISCP would recognize the NPA-NXX and forward to the correct forward to number. If not, it would be default routed.

LATA Wide Service – Calls will only be completed if the service is available in the LATA in which the calling party makes the call. Calls will not be completed across LATA boundaries. If the service is not available in the LATA, the call will not be completed.

**Network Availability**

Enhanced IntellilinQ PRI Hub Service will be subject to the availability of the Advanced Intelligent Network capability, network facilities and billing capabilities.

No mass calling type service will be permitted until Network Management capability is available.

**Dependencies**

**Sector Hubs**

Specific sector hubs supply ISDN-PRI – there are two to six sector hubs per LATA. You must purchase at least one ISDN-PRI from each sector hub in order to obtain this service.

| NORTHERN SECTOR HUBS | | | |
|---|---|---|---|
| LATA NUMBER | LATA NAME | CENTRAL OFFICE | C.O. CLLI CODE |
| LATA 120 | MAINE | AUGUSTA | AGSTMESTDS0 |
| | | BANGOR | BNGRMEPADS0 |
| | | PORTLAND | PTLDMEFODS0 |
| | | PRESQUE ISLE | PRISMESEDS0 |
| LATA 122 | NEW HAMPSHIRE | DOVER | DOVRNHTHDS0 |
| | | MANCHESTER | MNCHNHCODS2 |
| | | NASHUA-W.PEARL ST | NASHNHWPDS1 |
| LATA 124 | VERMONT | BURLINGTON | BURLVTMADS0 |
| | | WHITE RIVER JUNCTION | WRJTVTGADS0 |
| LATA 126 | WESTERN MASS | AMHERST-FEARING ST | AMHRMAFEDS0 |
| | | SPRINGFIELD | SPFDMAWODS2 |
| LATA 128 | EASTERN MASS | BOSTON-FRANKLIN ST | BSTNMAFRDS0 |
| | | CAMBRIDGE-BENT ST | CMBRMABEDS1 |
| | | BROCKTON | BRTNMACRDS1 |
| | | FRAMINGHAM | FRMNMAUNDS8 |
| | | WORCESTER | WRCSMACEDS3 |
| | | BILLERICA | BLRCMAANDS0 |
| LATA 130 | RHODE ISLAND | WASHINGTON ST | PRVDRIWADS2 |
| | | EAST PROVIDENCE | EPRVRINBDS0 |
| LATA 132 | NEW YORK | DEER PARK | DRPKNYDPDS0 |
| | | GARDEN CITY | GRCYNYGCDS0 |
| | | WEST 18TH STREET | NYCMNY18DS2 |
| | | BRIDGE STREET | NYCKNYBRDS0 |
| | | NEW ROCHELLE | NWRCNYNRDS0 |
| | | WHITE PLAINS | WHPLNYWPDS0 |
| LATA 133 | POUGHKEEPSIE | PGHKPSIE-HAMILTON | PGHKNYSHDS0 |
| | | KINGSTON | KGNTNYKGDS0 |
| LATA 134 | ALBANY | ALBANY -WASHINGTON | ALBYNYWADS0 |
| | | GLENN FALLS | GLFLNYGFDS0 |
| LATA 136 | SYRACUSE | ITHACA-PLEASANT GROVE RD | ITHCNYPGDS0 |
| | | SYRACUSE-STATE ST | SYRSNYSUDS3 |
| | | UTICA-GENESEE ST | UTICNYUTDS0 |
| | | WATERTOWN | WTTWNYUNDS0 |

| | | | |
|---|---|---|---|
| LATA 138 | BINGHAMPTON | B'HMPTN-HENRY ST<br>ELMIRA | BNGHNYHYDS1<br>EMIRNYEMDS0 |
| LATA 140 | BUFFALO | BUFFALO-FRANKLIN ST<br>HAMBURG<br>LOCKPORT | BFLONYFRDS2<br>HMBGNYHBDS0<br>LCPTNYLKDS0 |

| SOUTHERN SECTOR HUBS | | | |
|---|---|---|---|
| LATA NUMBER | LATA NAME | CENTRAL OFFICE | C.O. CLLI CODE |
| LATA 220 | ATLANTIC COASTAL<br>(NJ) | PLEASANTVILLE<br>OCEAN CITY | PSVLNJPLDS6<br>OCCYNJOCDS5 |
| LATA 222 | DELAWARE VALLEY<br>(NJ) | CAMDEN<br>MOUNT HOLLY<br>EWING<br>VINELAND | CMDNNJCEDS6<br>MTHLNJMHDS5<br>ENVLNJEWDS5<br>VNLDNJVLDS5 |
| LATA 224 | NORTH JERSEY<br>(NJ) | TOMS RIVER<br>NEW BRUNSWICK<br>BERNARDSVILLE<br>IRONBOUND<br>RUTHERFORD | TMRVNJTRDS5<br>NBWKNJNBDS6<br>BRVLNJBEDS5<br>NWRKNJIRDS5<br>RTFRNJRUDS5 |
| LATA 226 | CAPITOL<br>(PA) | HARRISBURG<br>MILLERSVILLE<br>LEBANON | HRBGPAHADS0<br>MIVLPAMIDS0<br>LBNNPAESDS0 |
| LATA 228 | PHILADELPHIA<br>(PA) | DOYLESTOWN<br>HATBORO<br>PHILA-MARKET<br>READING<br>NEWARK(DE)<br>WAYNE | DYTWPADBDS0<br>HTBOPAHBDS0<br>PHLAPAMKDS0<br>RDNGPAREDS0<br>NWRKDENBDS0<br>WAYNPAWYDS0 |
| LATA 230 | ALTOONA<br>(PA) | ALTOONA<br>STATE COLLEGE<br>WARREN | ALNAPAALDS1<br>STCGPAESDS0<br>WRRNPAWADS0 |
| LATA 232 | NORTHEAST<br>(PA) | WILLIAMSPORT<br>SCRANTON<br>WILKESBARRE | WLPTPAWIDS0<br>SCTNPASCDS1<br>WLBRPAWBDS0 |

| | | | |
|---|---|---|---|
| LATA 234 | PITTSBURGH<br>(PA) | BEAVER FALLS<br>GREENSBURG<br>PERRYSVILLE<br>MONROEVILLE<br>PGH-DOWNTOWN<br>ROBINSON TWP. | BVFLPABFDS0<br>GNBGPAGRDS0<br>PYVLPAPEDS0<br>MOVLPAMODS0<br>PITBPADTDS1<br>RBTPPARTDS0 |
| LATA 236 | WASHMET<br>(MDVW) | ARLINGTON<br>METRO/DOWNTOWN<br>SILVER SPRING<br>RESTON-FOXMILL<br>WALDORF | ARTNVAARDS0<br>WASHDCMODS0<br>SLSPMDSSDS0<br>RSTNVAFMDS0<br>WDRFMDWDDS0<br><District of Columbia, Virginia> |
| LATA 238 | BALTIMORE<br>(MDVW) | ANNAPOLIS<br>CHARLES STREET<br>COLUMBIA<br>TOWSON | ANNPMDANDS0<br>BLTMMDCHDS3<br>CLMAMDCBDS0<br>TWSNMDTWDS0 |
| LATA 240 | HAGERSTOWN<br>(MDVW) | FEDERICK<br>CUMBERLAND<br>MARTINSBURG | FRDRMDFRDS0<br>CMLDMDCMDS0<br>MRBGWVBUDS0 |
| LATA 242 | SALISBURY<br>(MDVW) | SALISBURY<br>EASTON (MARYLAND) | SLBRMDSBDS1<br>ESTNMDESDS0 |
| LATA 244 | ROANOKE, VA<br>(MDVW) | NORTON<br>ROANOKE – LUCK AVE | NRTNVANODS0<br>RONKVALKDS0 |
| LATA 246 | CULPEPER, VA<br>(MDVW) | CULPEPER<br>FREDERICKSBURG<br>LEESBURG | CLPPVACUDS0<br>FRBGVAFBDS0<br>LSBGVALBDS0 |
| LATA 248 | RICHMOND, VA<br>(MDVW) | PEMBERTON ROAD<br>GRACE STREET | RCMDVAPEDS0<br>RCMDVAGRDS0 |
| LATA 250 | LYNCHBURG, VA<br>(MDVW) | LYNCHBURG<br>DANVILLE | LYBGVACHDS0<br>DAVLVADADS0 |
| LATA 252 | NORFOLK, VA<br>(MDVW) | BUTE STREET<br>INDIAN RIVER<br>JEFFERSON | NRFLVABSDS0<br>VRBHVAIRDS0<br>NWNWVAJFDS0 |
| LATA 254 | CHARLESTON, WV<br>(MDVW) | BECKLEY<br>CHARLESTON<br>PARKERSBURG | BCKLWVWDDS0<br>CHTNWVLEDS0<br>PRBGWVKTDS0 |

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|---|---|---|---|
| LATA 255 | CLARKSBURG, WV<br>(MDVW) | CLARKSBURG<br>MORGANTOWN<br>WHEELING | CLBGWVMADS0<br>MGTNWVFYDS0<br>WLNGWVCPDS0 |

**Interconnection Hubs**
A DS3 or a SONET connection transports ISDN-PRI Hubbing Service to the customer premises. This service must provision from a specific Interconnection Hub to the customer premises. You may only have ONE Interconnection Hub per LATA except in LATA 228 where there must be an Interconnection Hub in Pennsylvania and one in Delaware and LATA 240 where there must be an Interconnection Hub in both Maryland and West Virginia due to tariff issues.

| NORTHERN INTERCONNECTION HUBS | | | |
|---|---|---|---|
| LATA NUMBER | LATA NAME | CENTRAL OFFICE | C.O. CLLI CODE |
| LATA 120 | MAINE | AUGUSTA<br>BANGOR<br>PORTLAND | AGSTMEST<br>BNGRMEPA<br>PTLDMEFO |
| LATA 122 | NEW HAMPSHIRE | DOVER<br>MANCHESTER<br>NASHUA-W.PEARL ST | DOVRNHTH<br>MNCHNHCO<br>NASHNHWP |
| LATA 124 | VERMONT | BURLINGTON<br>WHITE RIVER JUNCTION | BURLVTMA<br>WRJTVTGA |
| LATA 126 | WESTERN MASS | AMHERST-FEARING ST<br>SPRINGFIELD | AMHRMAFE<br>SPFDMAWO |
| LATA 128 | EASTERN MASS | BOSTON-FRANKLIN ST<br>CAMBRIDGE-BENT ST<br>BROCKTON<br>FRAMINGHAM<br>WORCESTER | BSTNMAFR<br>CMBRMABE<br>BRTNMACR<br>FRMNMAUN<br>WRCSMACE |
| LATA 130 | RHODE ISLAND | WASHINGTON ST<br>EAST PROVIDENCE | PRVDRIWA<br>EPRVRINB |
| LATA 132 | NEW YORK | DEER PARK<br>GARDEN CITY<br>13TH STREET<br>BRIDGE STREET<br>WHITE PLAINS | DRPKNYDP<br>GRCYNYGC<br>NYCMNY13<br>NYCKNYBR<br>WHPLNYWP |

| | | | |
|---|---|---|---|
| LATA 133 | POUGHKEEPSIE | PGHKPSIE-HAMILTON<br>KINGSTON | PGHKNYSH<br>KGNTNYKG |
| LATA 134 | ALBANY | ALBANY – WASHINGTON<br>GLENN FALLS | ALBYNYWA<br>GLFLNYGF |
| LATA 136 | SYRACUSE | ITHACA-<br>PLEASANT GROVE RD<br>SYRACUSE-STATE ST<br>UTICA-GENESEE ST | <br>ITHCNYPG<br>SYRSNYSU<br>UTICNYUT |
| LATA 138 | BINGHAMPTON | B'HMPTN-HENRY ST<br>ELMIRA | BNGHNYHY<br>EMIRNYEM |
| LATA 140 | BUFFALO | BUFFALO-FRANKLIN ST<br>HAMBURG<br>LOCKPORT | BFLONYFR<br>HMBGNYHB<br>LCPTNYLK |

| SOUTHERN INTERCONNECTION HUBS | | | |
|---|---|---|---|
| LATA NUMBER | LATA NAME | CENTRAL OFFICE | C.O. CLLI CODE |
| LATA 220 | ATLANTIC COASTAL<br>(NJ) | PLEASANTVILLE<br>OCEAN CITY | PSVLNJPL<br>OCCYNJOC |
| LATA 222 | DELAWARE VALLEY<br>(NJ) | CAMDEN<br>MOUNT HOLLY<br>EWING<br>VINELAND | CMDNNJCE<br>MTHLNJMH<br>ENVLNJEW<br>VNLDNJVL |
| LATA 224 | NORTH JERSEY<br>(NJ) | TOMS RIVER<br>NEW BRUNSWICK<br>ROCHELLE PARK<br>IRONBOUND | TMRVNJTR<br>NBWKNJNB<br>RCPKNJ02<br>NWRKNJIR |
| LATA 226 | CAPITOL<br>(PA) | HARRISBURG<br>MILLERSVILLE<br>LEBANON | HRBGPAHA<br>MIVLPAMI<br>LBNNPAES |
| LATA 228<br>********* | PHILADELPHIA<br>(PA) | PHILA-MARKET<br>READING<br>WILMINGTON<br>WAYNE | PHLAPAMK<br>RDNGPARE<br>WLMGDEWL<br>WAYNPAWY |

| | | | |
|---|---|---|---|
| LATA 230 | ALTOONA<br>(PA) | ALTOONA<br>STATE COLLEGE | ALNAPAAL<br>STCGPAES |
| LATA 232 | NORTHEAST<br>(PA) | WILLIAMSPORT<br>SCRANTON<br>WILKESBARRE | WLPTPAWIDS0<br>SCTNPASCDS1<br>WLBRPAWBDS0 |
| LATA 234 | PITTSBURGH<br>(PA) | GREENSBURG<br>PERRYSVILLE<br>PGH-DOWNTOWN<br>ROBINSON TWP. | GNBGPAGR<br>PYVLPAPE<br>PITBPADT<br>RBTPPART |
| LATA 236 | WASHMET<br>(MDVW) | ARLINGTON<br>METRO/DOWNTOWN<br>SILVER SPRING<br>SUITLAND | ARTNVAAR<br>WASHDCMO<br>SLSPMDSS<br>STLDMDSL |
| LATA 238 | BALTIMORE<br>(MDVW) | ANNAPOLIS<br>CHARLES STREET<br>COLUMBIA<br>TOWSON | ANNPMDAN<br>BLTMMDCH<br>CLMAMDCB<br>TWSNMDTW |
| LATA 240<br>********** | HAGERSTOWN<br>(MDVW) | FEDERICK<br>CUMBERLAND<br>MARTINSBURG | FRDRMDFR<br>CMLDMDCM<br>MRBGWVBU |
| LATA 242 | SALISBURY<br>(MDVW) | SALISBURY<br>EASTON (MARYLAND) | SLBRMDSB<br>ESTNMDES |
| LATA 244 | ROANOKE, VA<br>(MDVW) | NORTON<br>ROANOKE – LUCK AVE | NRTNVANODS0<br>RONKVALKDS0 |
| LATA 246 | CULPEPER, VA<br>(MDVW) | CULPEPER<br>FREDERICKSBURG<br>LEESBURG | CLPPVACU<br>FRBGVAFB<br>LSBGVALB |
| LATA 248 | RICHMOND, VA<br>(MDVW) | PEMBERTON ROAD<br>GRACE STREET | RCMDVAPE<br>RCMDVAGR |

| | | | |
|---|---|---|---|
| LATA 242 | SALISBURY<br>(MDVW) | SALISBURY<br>EASTON (MARYLAND) | SLBRMDSB<br>ESTNMDES |
| LATA 244 | ROANOKE, VA<br>(MDVW) | NORTON<br>ROANOKE – LUCK AVE | NRTNVANODS0<br>RONKVALKDS0 |
| LATA 246 | CULPEPER, VA<br>(MDVW) | CULPEPER<br>FREDERICKSBURG<br>LEESBURG | CLPPVACU<br>FRBGVAFB<br>LSBGVALB |
| LATA 248 | RICHMOND, VA<br>(MDVW) | PEMBERTON ROAD<br>GRACE STREET | RCMDVAPE<br>RCMDVAGR |
| LATA 250 | LYNCHBURG, VA<br>(MDVW) | LYNCHBURG<br>DANVILLE | LYBGVACH<br>DAVLVADA |
| LATA 252 | NORFOLK, VA<br>(MDVW) | BUTE STREET<br>INDIAN RIVER<br>JEFFERSON | NRFLVABS<br>VRBHVAIR<br>NWNWVAJF |
| LATA 254 | CHARLESTON, WV<br>(MDVW) | BECKLEY<br>CHARLESTON<br>PARKERSBURG | BCKLWVWD<br>CHTNWVLE<br>PRBGWVKT |
| LATA 255 | CLARKSBURG, WV<br>(MDVW) | CLARKSBURG<br>MORGANTOWN<br>WHEELING | CLBGWVMA<br>MGTNWVFY<br>WLNGWVCP |

********** **In LATAs 228 and 240, you must establish 2 Interconnection Hubs – one for each state**

**Billing Options**
Two billing options are available for Enhanced PRI Hubbing with One Number Dialing. They are month-to-month and three year term contract rates.

**Minimum Service Period**
There will be a minimum 1-year service period requirement in New York and New England.

If you have questions on this or any other service, please contact your Account Manager.

Very truly yours,

Georgene Gordon