

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
2000 Biennial Regulatory Review)	IB Docket No. 00-202
Policy and Rules Concerning the)	
International, Interexchange Marketplace)	

COMMENTS OF VERIZON¹

The Commission should wait at least a year after domestic mandatory tariffing is in place before it institutes a new international detariffing requirement. The move away from domestic long distance tariffs is proving to be complicated and it will undoubtedly be some time before consumers and carriers fully adjust to detariffing. It makes no policy sense to further complicate matters with additional detariffing requirements now. A period of permissive international detariffing will provide an opportunity for the Commission to evaluate the impact of its domestic detariffing policy. The marketplace will be the ultimate judge as to whether the Commission's detariffing policies will have the desired effect. The Commission should therefore give sufficient time of at least a year to allow for that judgment.

¹ This filing is made on behalf of the Verizon telephone companies, which are the local exchange carriers affiliated with Verizon Communications Inc. (listed in an attachment) as well as the Verizon Long Distance Companies which include Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long Distance, Inc. d/b/a Verizon Enterprise Solutions, Verizon Hawaii International Inc., Verizon Select Services Inc. and GTE Pacifica Inc. d/b/a Verizon Pacifica -- collectively, "Verizon."

The justification for choosing to make international detariffing mandatory rests on the Commission's prior conclusions in the domestic long distance detariffing order. Notice, ¶ 15. But those conclusions remain untested. The transition to mandatory domestic detariffing was originally required by January 31. That transition now has been extended until April 30, 2001 for mass market long distance service, which impacts the vast majority of long distance customers. *See* Public Notice, "Common Carrier Bureau Extends Transition Period for Detariffing Consumer Long Distance Services," CC Dkt. No. 96-61 (rel. Nov. 6, 2000). This means that mandatory detariffing of domestic long distance services has not even begun, much less been tested and evaluated. As the Commission recognized, detariffing will dramatically change the way carriers interact with their customers and should have significant implications over time on the marketplace as well. It is reasonable to wait a sufficient time to allow for such evaluation before expanding mandatory detariffing to international services based on conclusions surrounding the domestic policy.

At least initially, the potential for customer confusion is high as each carrier will need to establish some sort of service agreement with its existing customer base as well as with its new customers. Moreover, that confusion is compounded when customers switch long distance carriers. Carriers will undoubtedly use different approaches and service agreements to accommodate detariffing. Whether these customer confusions outweigh the benefits of contract-based services will be tested in the months after the domestic long distance detariffing requirement goes into effect. What is clear now, however, is that it does not make sense to compound that confusion by introducing the new complication of mandatory detariffing for international services.

While the Commission's economic conclusions may ultimately turn out to be sound, it is the actual marketplace that will determine whether mandatory detariffing results in greater customer choice, or merely greater customer confusion. The Commission should therefore wait at least one year after the required detariffing of domestic long distance service before requiring the detariffing of international services. This will give the Commission, carriers and consumers time to experience detariffing and to assess its impact on the marketplace. Until that assessment is made, requiring the detariffing of international services is not in the public interest.

Conclusion

The Commission should allow permissive international detariffing until at least one year after mandatory domestic detariffing has been in place.

Respectfully submitted,

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THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of Minnesota, Inc. d/b/a Verizon Minnesota
Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Alaska Incorporated d/b/a Verizon Alaska
GTE Arkansas Incorporated d/b/a Verizon Arkansas
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.