

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
2000 Biennial Regulatory Review of Part) CC Docket No. 99-216
68 of the Commission’s Rules and)
Regulations)

COMMENTS OF VERIZON ON PETITIONS FOR RECONSIDERATION¹

The Commission should deny the request of the American National Standards Institute (“ANSI”) to include all three of the ANSI methods of accreditation for standards development organizations (“SDOs”) that are given the right to establish the technical criteria for terminal equipment. ANSI at 5.

The Commission held that SDOs that are accredited under two of ANSI’s accreditation methods – the Organization Method or the Standards Committee Method – may establish such criteria. *Report and Order*, FCC 00-400, & 22 (rel. Dec. 21, 2000) (“R&O”). But ANSI wants the Commission to include the Accredited Canvass Method as a permitted accreditation method as well. This method, however, does not involve open participation in the standards development process until after a draft standard has been developed. The Commission properly found that only those organizations which meet the due process requirements set by ANSI for either Organizations or Standards Committees should have the right to establish the technical criteria for terminal equipment and denied use of the Accredited Canvass Method. *Id.* at & 58. Those methods allow open participation at an early stage in the development process, to ensure

¹ The Verizon telephone companies (“Verizon”) are the local exchange carriers affiliated with Verizon Communications Inc. identified in the attached list.

that interested parties have a voice in drafting the standard. Yet ANSI wants the Commission to allow SDOs that fall short of those due process requirements to be permitted to establish technical criteria for terminal equipment. There is no justification for doing so, and ANSI's request should be denied.

The reconsideration requests of the American Council of Independent Laboratories (ACIL) and Teccor Electronics regarding testing of products that are subject to Part 68 requirements should be granted, as should BellSouth's request to retain Type B surge requirements in the rules.

ACIL requests that the Commission adopt specific testing and certification provisions for products that fall under the Hearing Aid Compatibility & Volume Control requirements of Part 68, because many testing laboratories are unfamiliar with those requirements and are unable or unwilling to include the needed specialized tests when certifying a product. Verizon agrees that authorized testing and certification of such equipment should be performed only by laboratories qualified to test such products.

Teccor requests that the Commission delete the Supplier's Declaration of Conformity from its rules and rely only on certification by Telecommunications Certification Bodies or Certificates of Conformity (showing independent laboratory testing) for equipment that may lawfully be connected to the network under Part 68. Requiring independent testing of equipment is particularly appropriate here, because an accredited independent laboratory will use testing methods that are generally recognized as reliable to ensure that the equipment meets the required parameters. By contrast, while some manufacturers' laboratories are accredited and use recognized testing methods, this may not always be the case. As a result, the Commission and

the public cannot be confident that a Supplier's Declaration of Conformity ensures that the equipment meets the approved standards.

Finally, BellSouth demonstrates how retaining the Type B surge requirements will protect the public from service disruptions, just as the Commission found it appropriate to retain other key regulations, such as the inside wiring, hearing aid compatibility, and volume control rules in order to protect the public. As BellSouth points out, since the advent of those rules in December 1999, the number of complaints about service disruptions caused by the failure of CPE to withstand lightning surges has dropped dramatically. This shows a continued need for rules in this area.

Respectfully submitted,

/S/

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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 the South, Inc. d/b/a Verizon Mid-States
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.