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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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FILE NO: 46001.000278

July 20, 2001

**By Hand**

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

***WorldCom, Cox, and AT&T ads. Verizon***  
**CC Docket Nos. 00-218, 00-249, and 00-251**

Dear Ms. Salas:

Following up on yesterday's conference between the Parties and the Commission, enclosed is a chart reflecting which issues the Parties have agreed to address in a mediation process supervised by the Commission.

Moreover, the following are the dates for mediation:

- July 25: General Terms and Conditions Issues VII-16 through VII-22; Miscellaneous Issues V-15, VII-23, 24, 25, and 27, **PLUS** V-5, VII-13, AND VII-15
- July 26: Network Architecture Issues
- July 27: Network Architecture Issues
- July 30: Pricing Terms and Conditions and Resale Issues
- July 31: UNE Issues (*at least* including III-7-a, III-7-b, III-8, **V-5** to ensure coverage of AT&T UNE issues)
- August 1: General Terms and Conditions Issues and Miscellaneous Issues (*this would tentatively include Issue III-15 and V-11, which are the only two in which AT&T joins - otherwise, this is exclusive to WorldCom*)
- August 2: General Terms and Conditions Issues and Miscellaneous Issues, with a concurrent session for Rights of Way Issues

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- August 6: Security Requirements Issues and Business Process Requirements
- August 7: UNE Issues (exclusive to WorldCom)
- August 8: UNE Issues (exclusive to WorldCom)

The Parties understand that the first day of mediation will take place at the Commission, and the Parties will coordinate with respect to a location for the mediation after the first day.

Thank you for your assistance. If you have any questions, please do not hesitate to call me.

Sincerely,



Kelly L. Faglioni  
Counsel for Verizon

KLF/ar  
Enclosures

cc: Dorothy T. Attwood, Chief, Common Carrier Bureau  
Jeffery Dygert  
Katherine Farroba  
John Stanley

Jodie L. Kelley, counsel for WorldCom  
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J.G. Harrington, counsel for Cox  
Carrington F. Philip, counsel for Cox

## ISSUE TRACKS

*WorldCom, Cox, AT&T ads. Verizon*  
(Docket Nos. 00-218, 00-249, and 00-251)

**TRACK 1 = Original or supplemental issues proceeding on regular schedule**

**TRACK 2 = Original or supplemental issues addressed by VZ motion to dismiss (subject to clarification and proceeding on regular schedule)**

**TRACK 3 = Original or supplemental issues on the mediation track (separate testimony schedule)**

**RESOLVED = "RES"**

1	2	3	RES.	Statement of Issue
<b>UNE Pricing</b>				
II-1				Reduction Of UNE Rates
II-1-a				Economic Standard For Setting The Prices Of UNES
II-1-b				Cost Models Or Studies For UNES And Interconnection
II-1-c				Cost Assumptions And Inputs
II-1-d				Rate Schedules And Deaveraging
<b>Non-Recurring Charges</b>				
II-2				NRCs, Including UNE-P Conversions Or Migrations
II-2-a				Economic Standard For Establishing NRCs
II-2-b				Cost Models For NRCs
II-2-c				Cost Assumptions And Inputs
II-2-d				Rate Schedules And Deaveraging
<b>Network Architecture</b>				
I-1				Point of Interconnection
I-2				Direct End-Office Trunking
I-3				Reciprocal Collocation
I-4			<b>I-4</b>	Tandem Exhaustion; <i>resolved w/WorldCom</i>
I-7				Forecasts
III-1				Tandem Transit Service
III-2				Rates For Transit Services
III-3				Mid-Span Fiber Meet Point Interconnection
III-3-a				Mid-Span Fiber Meet Point Interconnection
		III-4		Forecasts
		III-4-a		Forecast Penalties
III-4-b				Underutilized Trunk Groups
IV-1				Third Party Transit Traffic
IV-2				Reaching Mutual Agreement On Two-Way Trunks
		IV-3		Trunk And Facility Augmentation
		IV-4		Interconnection Interval
		IV-5		Compensation For The Lease Of Interconnection Facilities
		IV-6		Meet Point Trunking Arrangements
		IV-7		911/E-911 Traffic
		IV-8		OS/DA Trunks
			IV-9	Signaling Protocol

1	2	3	RES.	Statement of Issue
		IV-10		Network Management Protocols
		IV-11		Usage Measurement
		IV-12		Network Coordination
		IV-13		Traffic Data
		IV-18		Multiplexing/Concentrating Equipment Specifications
		IV-34		Multi-Jurisdictional traffic over one trunk group
		IV-37		meet point billing arrangements
V-1				Competitive Tandem Services
V-2				Interconnection Transport
V-16				Reciprocal Tandem Services
		VI-1(A)		Trunk types
		VI-1(B)		Transmission and routing of telephone exchange access service traffic
VI-1(C)		VI-1(C)		toll free service access code traffic ( <i>WCom's Answer says "resolved" – Verizon believes there remains a dispute over contract language</i> )
		VI-3(A)		compensation mechanism
VII-1				AT&T's "new" language (Schedule 4)
		VII-2		Demand management forecasts (previous agreement)
VII-3				Interconnection points/points of interconnection (definitions) -- related to issue I-1
VII-4				recip comp rates or intercarrier rates paid by ATT if ATT fails to establish IP
VII-5				rates paid by Verizon for transport to ATT IP
VII-6				interconnection facilities and hubbing at COs other than per NECA 4 tariff
		VII-7		untranslated 8YY traffic
<b>InterCarrier Compensation</b>				
	I-5			ISP Reciprocal Compensation
I-6				Reciprocal Compensation (Call Jurisdiction (NPA-NXXs Or End-Points))
III-5				Tandem Rate (Geographic Coverage Of CLEC Switch)
V-8				Meet Point Traffic
VII-8				end office rate vs. tandem rate
VII-9				rates for special access or private line
<b>UNE Issues</b>				
I-11				Termination Of Access To OSS
	III-6			UNE Combinations – Rates, Terms, Conditions
	III-7			Service Conversion To UNEs
		III-7-a		Service Conversion To UNEs – Alteration Of Equipment Or Facilities
		III-7-b		Service Conversion To UNEs – Ordering Process
III-7-c				Service Conversion To UNEs – Termination Liability
		III-8		Technically Feasible Point Of Interconnection
	III-9			Local Switching (Four Or More Lines Exception )
	III-10			Line Splitting And Line Sharing
III-11				Subloop
III-12				Dark Fiber
		IV-14		UNEs Generally (Contract Language Re: Commission's Decisions In UNE Remand, Advanced Services And Line Sharing Proceedings)
		IV-15		UNEs Generally (Contract Language Re Obligation To Provide

1	2	3	RES.	Statement of Issue
				UNEs)
		IV-16		Connection Of WCom Facility/Third Party Facilities With UNEs
		IV-17		UNE BFR Process
		IV-19		Network Interface Device
		IV-20		Unbundled Local Switching
		IV-21		Unbundled Shared And Dedicated Transport
		IV-22		Signaling System
		IV-23		Call-Related Databases
		IV-24		Directory Assistance Database
		IV-25		Calling Name (CNAM) Database
		IV-26		Tandem Switching
		IV-27		Testing Procedures At Parity
	IV-28			Collocation Of Advanced Services Equipment (DSLAMs)
		IV-29		Access To Inside Wire
		IV-80		Directory Assistance Service
		IV-81		Operator Services ("OS")
V-3				UNE-P Routing And Billing
V-4				UNE-P Routing And Billing (LATA-Wide Calling At One Rate)
V-4-a				UNE-P Routing And Billing
		V-5		Customized Routing
	V-6			DSL/Line Sharing/Line Splitting
V-7				Local Number Portability
V-9				DSL/Line Splitting/Line Sharing (Affiliate/Successors)
V-12				Number Porting (Off Hours)
V-12-a				Number Porting (Three Calendar Day Porting Interval)
V-13				Port Confirmation
		VI-1(D)		number portability
		VI-1(E)		changes in applicable law
		VI-1(F)		customer not ready work activity
		VI-1(G)		Verizon's provision of UNEs
		VI-1(H)		maintenance of UNEs
		VI-1(I)		rates and charges
		VI-3(B)		technical standards and specifications
		VI-3(C)		synchronization
VII-10				provision of loops (IDLC)
VII-11				ordering requirements for provision of combined UNEs
<b>RIGHTS OF WAY</b>				
		III-13		Rights of Way
		III-13(a)		Definitions
		III-13(b)		Contract Language Re: Poles, Conduits Or Rights Of Way – Parity
		III-13(c)		Contract Language Re: Attachment/Occupancy Fees; Non-Payment Or Late Payment Of Fees; Bond Requirement; Notice Of Changes In Fees
		III-13(d)		Contract Language Re: Advance Payments
		III-13(e)		Contract Language Re: Placement Of Communications Facilities; Violation; Notification; Dispute Resolution
		III-13(f)		Contract Language Re: Rights/Obligations
		III-13(g)		Contract Language Re: Licensing Procedure
		III-13(h)		Pre-License Survey And Make-Ready Work Requirements And Procedures
		III-13(i)		Construction, Maintenance And Removal Of Communications

1	2	3	RES.	Statement of Issue
				Facilities
		III-13(j)		Termination Of Licenses
		III-13(k)		Inspection Of Facilities
		III-13(l)		Unlicensed Attachment
		III-13(m)		Security Interest
		III-13(n)		Liabilities, Rights And Responsibilities In The Event Of Damage
		III-13(o)		Type, Amount And Terms Of Insurance
		III-13(p)		Non-Exclusivity; Assignment Or Transfer
		III-13(q)		Termination Of License, Responsibilities And General Term Of Licenses
		V-14		Record Access
<b>PRICING TERMS AND CONDITIONS</b>				
I-9				Price Caps on CLEC Services
		III-18		Tariffs v. Interconnection Agreements
		IV-30		Pricing Table v. Tariff Rates
		IV-31		Rates for Exchange Access Services
		IV-32		Subsequent Rates
		IV-33		Resale Under Tariffs
		IV-35		reciprocal compensation terms
		IV-36		itemized charges
		VI-1(J)		Section 271 (pricing attachment)
			VI-1(K)	Regulatory review of prices
		VI-3(D)		billing contact numbers
			VI-3(E)	compensation for intraLATA toll calls
			VI-3(F)	intraLATA toll free service
VII-12				detailed industry billing information (CICs)
		VII-13		Collocation billing
VII-14				reference to OBF
<b>RESALE</b>				
		IV-38		Resale Of Centrex, Federal And State Programs, N11 Service, Grandfathered Services, Contract Service Arrangements, Special Arrangements, And Promotions, Voicemail Service, Hospitality Service, And Telephone Line Number Calling Cards
		IV-39		Resale Generally
		IV-40		Exclusivity Of List Of Services
		IV-41		Restrictions On Resale
		IV-42		Reduced Charge Programs For The Handicapped, Indigent, Etc.; Processes For Law Enforcement And Service Annoyance Calls
V-10				Resale Of Vertical Features
		VI-1(L)		responsibility for charges
			VI-1(M)	operations matters
			VI-3(G)	700 number test lines
		VII-15		summaries of customer specific offerings
<b>SECURITY REQUIREMENTS</b>				
		IV-43		Physical Security
		IV-44		Contract Network Security
		IV-46		Law Enforcement Interface
<b>BUSINESS PROCESS REQUIREMENTS</b>				
I-8				Customer Proprietary Network Information
		III-16		Referral Announcements
		IV-47		Contact With Subscribers

1	2	3	RES.	Statement of Issue
			IV-48	Escalation And Work Center Interface Procedures And Subscriber Contact Information
			IV-49	Notification Of Changes To Retail Service Offerings
			IV-50	Essential Services And Deaf And Disabled Services
			IV-51	Application-To-Application OSS Interfaces -- Compliance With Industry Standards
			IV-52	Change Management And Control Procedures
			IV-53	Preordering, Ordering, And Provisioning Business Support At Parity
			IV-54	Help Desk/Single Point Of Contact ("SPOC")
			IV-55	Pre-Ordering, Ordering And Provisioning Order Types And Functions Per OBF Guidelines And Business Rule
		IV-56		Participation In The National Consumers Telecommunications Data Exchange ("NCTDE") For Exchange Of Information On Subscribers' Payment History
			IV-57	Single Order For Local Service, IntraLATA And InterLATA Service Per OBF Guidelines
			IV-58	Number Administration And Number Reservations
		IV-59		Electronic Copies Of Universal Service Order Codes, Alpha-Numeric Descriptions, And Feature Identifications
			IV-60	Blocking Services
			IV-61	Compliance W/OBF Guidelines And Processes
			IV-62	Premature Disconnects
			IV-63	Coordinate Cut-Overs (Hot Cuts)
		IV-64		Expedited Service Requests
		IV-65		Subscriber Premises Inspections
			IV-66	Firm Order Confirmations
			IV-67	Order Rejections
			IV-68	Service Order Changes
			IV-69	Order Completion
			IV-70	Loss Notification, Provisioning And Billing Completion Notices
			IV-71	Ordering Network Elements
			IV-72	Application-To-Application OSS Interfaces
			IV-73	Ordering And Provisioning For Resale Services And Network Elements
		IV-74		Interim, Standard And Collocation Billing
			IV-75	Access Charges Under Interim Number Portability
			IV-76	Billing Format
			IV-77	Recorded Usage Data ("RUD")
			IV-78	Repair, Maintenance, Testing And Surveillance
		IV-79		911 And E911
			IV-82	Directory Assistance And Listings Service Requests (settled except for limited for which WorldCom joints Issues V-11)
			VI-3(H)	notification of long distance carrier
			VI-3(I)	fulfillment process
		VI-3(J)		specialized routing
		VI-3(K)		cooperative testing
<b>GENERAL TERMS AND CONDITIONS</b>				
I-10				Termination
		III-15		Intellectual Property
		IV-45		Fraud Prevention
			IV-83	Scope Of The Agreement

1	2	3	RES.	Statement of Issue
		IV-84		Scope Of Agreement - Alteration Of Network
		IV-85		ICA vs Tariff
			IV-86	Use Of Services
			IV-87	Non-Waiver
		IV-88		Assignments And Delegations
			IV-89	Audits
			IV-90	Billing Disputes
		IV-91		Branding
			IV-92	Branding - Service Marks, Trademarks, Etc.
		IV-93		Identification of Employees On Premises Visit, Marketing Materials
		IV-94		Charges, Billing And Payment Procedures
		IV-95		Responsibility For Costs And Expenses
			IV-96	Compliance With Applicable Law
		IV-97		Confidential Information
		IV-98		Sharing Confidential Information With Retail
			IV-99	Rules Of Construction
		IV-100		Dispute Resolution
		IV-101		Binding Arbitration
			IV-102	Entire Agreement
			IV-103	Environmental Contamination
			IV-104	Good Faith Cooperation
			IV-105	Choice Of Law
		IV-106		Indemnification
		IV-107		Intellectual Property Rights
			IV-108	Use Of Logo, Trademark, Or Service Mark
			IV-109	Interconnection Agreement Is Joint Work Product
		IV-110		Migration Of Service
			IV-111	Notice Of Network Changes
			IV-112	Regulatory Approval
		IV-113		Negotiations Prompted By Changes In Law
			IV-114	Requesting New Services
			IV-115	Submission Of Agreement For Approval
		IV-116		Submission Of Agreement for Approval - Appeals
			IV-117	Costs For Obtaining Rights And Privileges
			IV-118	Relationship To Parties
		IV-119		Remedies - Equity
		IV-120		Remedies - Available Remedies
		IV-121		Remedies - Performance Standards, Metrics, And Self-Executing Remedies
			IV-122	Severability
			IV-123	Subcontracting
			IV-124	Subcontracting And Use Of Affiliates
			IV-125	Successors And Assigns
		IV-126		Taxes
			IV-127	Third Party Beneficiaries
			IV-128	Fail Waiver
		IV-129		Definitions Section
		V-11		Indemnification For Directory Listings (WorldCom joins this issue as a result of settlement on Issue IV-82)
		VI-1(N)		assurance of payment
		VI-1(O)		default

1	2	3	RES.	Statement of Issue
		VI-1(P)		discontinuance of service by CLEC
		VI-1(Q)		insurance
		VI-1(R)		references
		VI-1(S)		survival of the interconnection agreement
		VI-1(T)		technology upgrades
		VI-1(U)		territory
		VI-1(V)		use of service
		VI-1(W)		warranties
		VI-1(X)		withdrawal of services
			VI-2(A)	limitation of liability provision
			VI-2(B)	force majeure provision
		VII-16		Assurance of payment
		VII-17		transfer of telephone operations
	VII-18			performance metrics
		VII-19		Language already withdrawn by AT&T
		VII-20		billing credit for hot cut rescheduling -- <i>move to business process</i>
		VII-21		Force Majeure
		VII-22		ATT requirements for central office technician (prior agreement?)
<b>PERFORMANCE METRICS</b>				
	III-14			Performance Plans :
	IV-130			<del>Performance Plans - Performance Reports, Standards And Benchmarks</del>
<b>MISCELLANEOUS</b>				
		V-15		Sales of Exchanges
		VI-1(Y)		alternate billed calls
			VI-1(Z)	dialing parity -- section 251(b)(3)
		VI-1(AA)		information services traffic
			VI-1(BB)	telephone numbers
		VII-23		tariff vs. interconnection agreement (definition of terms)
		VII-24		tariff vs. interconnection agreement (definition of tariff)
		VII-25		tariff vs. interconnection agreement
VII-26				compensation when Verizon denied access to AT customer premises
		VII-27		resolved issues