RECEIVED

NOV 16 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DOCKET FILE COPY ORIGINAL

HUNTON & WILLIAMS

RIVERFRONT PLAZA, EAST TOWER
951 EAST BYRD STREET
RICHMOND, VIRGINIA 23219-4074

TEL 804 • 788 • 8200
FAX 804 • 788 • 8218

KELLY L. FAGLIONI
DIRECT DIAL: 804 • 788 • 7334
EMAIL: kfaglioni@hunton.com

FILE NO: 46001.000278

November 16, 2001

By Hand Delivery

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:

Enclosed please find four copies of Verizon VA's Post-Hearing Brief on Non-Cost Issues. Please do not hesitate to call me with any questions.

Sincerely,

Kelly L. Faglioni

Kelly L. Faglioni
Counsel for Verizon

KLF/ar
Enclosures
cc: Dorothy T. Attwood, Chief, Common Carrier Bureau (8 copies) (by hand)
Jeffery Dygert (w/o enclosure) (by mail)
Katherine Farroba (w/o encl.) (by mail)
John Stanley (w/o encl.) (by mail)

With enclosures, via UPS-Saturday Delivery:
Jodie L. Kelley, counsel for WorldCom
Kimberly Wild, counsel for WorldCom
David Levy, counsel for AT&T
Mark A. Keffer, counsel for AT&T

No. of Copies rec'd 0+3
List ABCDE

RECEIVED

NOV 16 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

In the Matter of Petition of WorldCom, Inc. Pursuant to Section 252(e)(5) of the Communications Act for Expedited Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration	)	CC Docket No. 00-218
In the Matter of Petition of Cox Virginia Telecom, Inc. Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc. and for Arbitration	)	CC Docket No. 00-249
In the Matter of Petition of AT&T Communications of Virginia Inc., Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia Corporation Commission Regarding Interconnection Disputes With Verizon Virginia Inc.	)	CC Docket No. 00-251

VERIZON'S POST-HEARING BRIEF ON NON-COST ISSUES
(CATEGORIES I AND III THROUGH VII)

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

RECEIVED

NOV 16 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of Petition of WorldCom, Inc. Pursuant to Section 252(e)(5) of the Communications Act for Expedited Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration	)	CC Docket No. 00-218
In the Matter of Petition of Cox Virginia Telecom, Inc. Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc. and for Arbitration	)	CC Docket No. 00-249
In the Matter of Petition of AT&T Communications of Virginia Inc., Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia Corporation Commission Regarding Interconnection Disputes With Verizon Virginia Inc.	)	CC Docket No. 00-251

VERIZON VA'S POST-HEARING BRIEF ON NON-COST ISSUES (CATEGORIES I AND III THROUGH VII)

Overview

INTRODUCTION

The Commission is being asked to resolve numerous issues in this consolidated arbitration proceeding. In doing so, it should recognize that Verizon VA's interconnection, unbundled element, and resale offerings and practices are generally the same as those offered in other states served by Verizon, such as New York, Massachusetts, Connecticut and Pennsylvania. In the context of Section 271 proceedings in those states, the Commission has repeatedly found that Verizon's offerings and practices fully comply with the requirements of the Act. Indeed, in many respects, Verizon VA offers more than the Act requires in an effort to accommodate its wholesale customers.

While this case has produced an avalanche of paper and testimony, it is critical not to let the trees obscure the forest. As Verizon VA pointed out at the outset of the hearings, this proceeding's focus on unresolved issues should not overshadow the extent to which Verizon VA has stepped up to its

- responsibility to comply with applicable law;
- duty to interconnect;
- duty to provide its network and services at parity and in a non-discriminatory manner; and
- own business risk and responsibilities.

Now, as the Parties approach the concluding phase of this combined arbitration, with the focus squarely on unresolved issues, it is time to consider not what a CLEC might wish to negotiate, but what can be *ordered* for inclusion in the Parties' respective interconnection agreements.

In this proceeding, Petitioners invite this Commission to require Verizon VA to build a different network and develop new processes and procedures, but to bear the risks and costs of doing so. Verizon VA is not, however, required to cater to every whim of the competitive local

exchange carriers. Verizon VA is one company with one telecommunications network. It is obligated to make that existing network available to hundreds of CLECs, each with individual business plans. Verizon VA is also required to provide its network and services at parity and in a non-discriminatory manner to hundreds of CLECs, while continuing to serve as a carrier of last resort to millions of customers. The Commission must therefore reject Petitioners' attempts to micromanage Verizon VA's network, its business processes, and its services, and to obtain more than the law requires.

Throughout this proceeding, WorldCom has been fond of citing its "right" to "ask for terms and conditions they need."[1] The fact that Petitioners claim they supposedly *need* something – which typically means only that they want it so long as the costs of obtaining it can be imposed on Verizon VA – does not mean that Verizon VA must supply it. Nor is there any merit to WorldCom's frequent complaint that Verizon VA does not act as a voluntary supplier in a "normal commercial relationship."[2] Verizon VA is not a party to a normal commercial relationship as a wholesale supplier to the Petitioners. Verizon VA may not charge market-based prices, as a "voluntary supplier" would. Verizon VA may not treat different types of "buyers" differently, as a "voluntary supplier" would. And Verizon VA may not pick and choose its customers altogether, as a "voluntary supplier" would. When it comes time to arbitrate a result, the standard now must be what the law requires -- not what a supplier in a "normal commercial relationship" might or might not do to achieve a *quid pro quo.*

Verizon VA's proposals comply with the Act – in many instances they *exceed* the duties

---

[1] WorldCom Opening Statement, Tr. at 21.

[2] WorldCom Opening Statement, Tr. at 22.

imposed on Verizon VA by the Act. Indeed, the Commission has already determined that most, if not all, of Verizon's proposals and practices comply with the Act. Verizon respectfully urges the Commission to adopt these proposals in this proceeding and reject the Petitioners' repeated attempts to re-write and expand the law.

Respectfully submitted,

Karen Zacharia
David Hall
1515 North Court House Road
Fifth Floor
Arlington, Virginia 22201
(703) 351-3100

Lydia R. Pulley
600 E. Main St., 11th Floor
Richmond, VA 23233
(804) 772-1547

Attorneys for Verizon VA

Of Counsel:
Michael E. Glover

Richard D. Gary
Kelly L. Faglioni
Hunton & Williams
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219-4074
(804) 788-8200

Catherine Kane Ronis
Samir C. Jain
Wilmer, Cutler & Pickering, LLP
2445 M Street, NW
Washington, DC 20037-1420

Dated: November 16, 2001

CERTIFICATE OF SERVICE

I do hereby certify that the foregoing Post-Hearing Brief was sent as follows this 16th day of November, 2001 by e-mail and overnight, express delivery:

TO WORLDCOM as follows:

Jodie L. Kelley
Jenner & Block LLC
601 Thirteenth Street, N.W.
Washington, D.C. 20005

Kim Wild
WorldCom, Inc.
1133 19th Street, N.W.
Washington, D.C. 20036

TO COX as follows:

J.G. Harrington
Dow, Lohnes & Albertson, P.L.L.C.
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036
(202) 776-2000

Carrington F. Phillip
Vice President Regulatory Affairs
Cox Communications, Inc.
1400 Lake Hearn Drive, N.E.
Atlanta, GA 30319
(404) 269-8842

TO AT&T as follows:

David Levy
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006
(202) 736-8214 (voice)
(202) 736-8711 (fax)

Mark A. Keffer
AT&T
3033 Chain Bridge Road
Oakton, Virginia 22185
(703) 691-6046 (voice)
(703) 691-6093 (fax)

Kelly L. Faglioni

Table of Contents

Table of Contents

Issue No.	Statement of Issue	Page Number
	I. Introduction	
	II. Network Architecture	
I-1	Interconnection	NA-2, 5, 8
I-1-a	Tandem Exhaustion/Direct End Office Trunking	NA-25, 26
I-2	Establishment of IPs/Distance Sensitive Transport	NA-2, 5, 8, 17
I-3	Reciprocal Collocation	NA-16, 18
I-4	Tandem Exhaustion/Direct End Office Trunking	NA-25, 26, 29
I-7	Forecasts	NA-47, 48
III-1	Transit Service	NA-33, 38
III-2	Rates For Transit Service	NA-33, 37, 38
III-3	Mid-Span Meets	NA-42
III-3-a	Memorandum of Understanding	NA-42
III-4	Forecasts	NA-47, 48, 51
III-4-b	Underutilized Trunk Groups	NA-51
IV-1	Transit Service	NA-38
IV-2	Reaching Mutual Agreement On Two-Way Trunks	NA-59
IV-3	Trunk And Facility Augmentation	NA-60
IV-4	Interconnection Interval/Environmental Conditions	NA-63
IV-5	Compensation For The Lease Of Interconnection Facilities	NA-64
IV-6	Access Toll Connecting Trunk Groups	NA-57
IV-8	OS/DA Trunks	NA-66
IV-11	Usage Measurement/CPN	NA-68
IV-37	Meet Point Billing	NA-70
V-2	Interconnection Transport	NA-56
V-16	Reciprocal Tandem Services	NA-41
VI-1(A)	Trunk Types	NA-72
VI-1(B)	Intermediate Hubs (WorldCom)	NA-53
VI-1(C)	Toll Free Traffic	NA-73
VII-1	AT&T Schedule Four	NA-21
VII-3	POI v. IP Distinction	NA-20
VII-4	Transport Offset	NA-2, 5, 8
VII-5	Distance Sensitive Transport	NA-17
VII-6	Intermediate Hubs (AT&T)	NA-53
	III. InterCarrier Compensation	
I-5	Implementation of the Commission's *ISP Remand Order*	IC-2
I-6	Jurisdictional Treatment of Virtual Foreign Exchange Traffic	IC-15
III-5	Payment of Reciprocal Compensation at the Tandem Versus the End Office Switching Rate for Traffic Terminated on the CLEC Network	IC-23
IV-35	Reciprocal Compensation Obligations Generally	IC-29
V-1	Competitive Access Tandem Services	IC-31
V-8	Competitive Access Tandem Services	IC-31
	IV. UNEs	
III-6	UNE Combinations	UNE-3
III-7	Service Conversion to UNEs	UNE-13
III-8	Technically Feasible Points of Interconnection	UNE-28
III-9	Local Switching	UNE-35

Issue No.	Statement of Issue	Page Number
III-11	Subloops	UNE-42
III-12	Dark Fiber	UNE-56
IV-14	Applicable Law	UNE-70
IV-15	Applicable Law	UNE-70
IV-18	Multiplexing	UNE-74
IV-19	Network Interface Device	UNE-42
IV-21	Dedicated Transport	UNE-74
IV-23	Line Information Database ("LIDB")	UNE-82
IV-24	Directory Assistance Database	UNE-89
IV-25	Calling Name Database (CNAM)	UNE-98
IV-80	Directory Assistance	UNE-108
IV-81	Operator Services	UNE-108
V-3	UNE-P Routing and Billing	UNE-112
V-4	LATA-Wide Reciprocal Compensation	UNE-112
V-4-a	UNE-P Routing and Billing	UNE-112
V-7	Specific Porting Intervals for Larger Customers	UNE-118
V-12	Off-Hours Porting	UNE-118
V-12-a	Three Calendar Day Porting Intervals	UNE-118
V-13	NPAC Confirmation	UNE-118
VI-1(D)	Number Portability	UNE-118
VI-1(E)	Changes in Law	UNE-70
VI-3(B)	Technical Standards and Specifications	UNE-129
VII-10	Integrated Digital Loop Carrier ("IDLC") Loop Provisioning	UNE-133
VII-11	Ordering Requirements	UNE-13
	V. UNE Advanced Services	
III-10	Line Sharing and Line Splitting	ASP-2
IV-28	Collocation of Advanced Services	ASP-32
V-6	NGDLC Loop Architecture	ASP-33
	VI. Resale	
V-9	Resale of Advanced Services	Resale-2
V-10	Resale of Vertical Features	Resale-6
	VII. Pricing Terms and Conditions	
I-9	Price Caps on Petitioners' Services	PTC-3
III-18	Interplay Between Tariffs and Interconnection Agreement	PTC-26
IV-30	Verizon VA/WorldCom Pricing Attachment	PTC-20
IV-32	Verizon VA/WorldCom Pricing Attachment	PTC-20
IV-36	Verizon VA/WorldCom Pricing Attachment	PTC-20
IV-85	Interplay Between Tariffs and Interconnection Agreement	PTC-26
VII-12	Detailed Billing Information	PTC-11
	VIII. General Terms and Conditions	
I-11	OSS Access	GTC-2
III-15	Intellectual Property	GTC-3
IV-45	Clip-On Fraud	GTC-6
IV-84	Scope Of Agreement	GTC-10
IV-91	OS-DA Branding	GTC-12
IV-95	Responsibility for Costs and Expenses	GTC-14
IV-101	Binding Arbitration	GTC-16
IV-106	Indemnification	GTC-20
IV-110	Migration of Service	GTC-25

Issue No.	Statement of Issue	Page Number
IV-113	Change of Law	GTC-27
IV-120	Cumulative Remedies	GTC-29
IV-121	Performance Metrics	GTC-29
IV-129	Definitions	GTC-30
V-11	Indemnification For Directory Listings	GTC-23
VI-1(N)	Assurance of Payment	GTC-31
VI-1(O)	Default	GTC-34
VI-1(P)	Discontinuance of Service by CLEC	GTC-36
VI-1(Q)	Insurance	GTC-31
VI-1(R)	References	GTC-38
	IX. Business Process	
I-8	Electronic Monitoring of OSS Usage	BP-2
I-11	Termination of OSS Access	BP-2
IV-7	911	BP-13
IV-56	Membership in NCTDE	BP-9
IV-74	Billing Procedures	BP-11
IV-79	911	BP-13
IV-97	Customer Proprietary Network Information	BP-2
	X. Miscellaneous	
VI-1(AA)	Information Services Traffic	Misc-2
	XI. Rights of Way	
III-13	Placement of Terms and Conditions Governing WorldCom's Access to Verizon VA's Poles, Ducts, Conduit and Rights of Way	ROW-2
III-13(h)	Make Ready Work	ROW-6

Index to Short Cites

INDEX TO SHORT CITATIONS

(Federal Statutes, FCC Orders, Federal Cases, State Commission Orders)

Federal Statutes	
Short Citation	Full Citation
Act	*Telecommunications Act of 1996*, 47 U.S.C. § 151, *et seq.*
FCC Orders	
Short Citation	Full Citation
Access Charge NPRM	*In re Access Charge Reform Price Cap Performance Review for Local Exchange Carriers,* Notice of Proposed Rulemaking, Third Report and Order and Notice of Inquiry, 11 F.C.C.R. 21354 (1996).
Access Charge Order	*In re Access Charge Reform*, First Report and Order, 12 F.C.C.R. 15982 (1997).
Advanced Services Order	*In Re Deployment of Wireline Services Offering Advanced Telecommunications Capability*, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 F.C.C.R. 24011 (1998).
Advanced Services Order II	*In re Deployment of Wireline Services Offering Advanced Telecommunications Capability*, First Report and Order and Further Notice of Proposed Rulemaking, 14 F.C.C.R. 4761 (1999).
Advanced Services Order III	*In re Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147 and In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98*, Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147 and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, 15 F.C.C.R. 17806 (2000).
Advanced Services Second R&O	*In re Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, Second Report and Order, 14 F.C.C.R. 19237 (1999).
BA/NYNEX Merger Order	*In re NYNEX Corp. and Bell Atlantic Corp. for Consent to Transfer Control of NYNEX Corp. and its Subsidiaries*, Memorandum Opinion and Order, 12 F.C.C.R. 19985 (1997).
BA/GTE Merger Order	*In re Application of GTE Corporation, Transferor, and Bell Atlantic Corporation, Transferee, For Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License*, Memorandum Opinion and Order, 15 F.C.C.R. 14032 (2000).
Collocation Remand Order	*In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket 98-

	147, FCC 01-204, Fourth Report and Order (rel. Aug. 8, 2001).
CT Verizon § 271 Order	*In the Matter of Application of Verizon New York Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Connecticut*, CC Docket No. 01-100, Memorandum Opinion and Order (2001).
Directory Listing Order	*In the Matters of Implementation of the Telecommunications Act of 1996, Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Provision of Directory Listing Information*, Third Report and Order in CC Docket no. 96-115, Second Order on Reconsideration in CC Docket No. 96-98, and Notice of Proposed Rulemaking in CC Docket No. 99-273 (rel. Sept. 9, 1999).
Fourth FNPRM	*Implementation of Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Third Report and Fourth Further Notice of Proposed Rulemaking, 15 FCC Rcd 3696 (1999).
Global NAPs I	*Bell-Atlantic Delaware, Inc. v. Global NAPs, Inc.*, FCC Rcd. 12,946 (rel. Dec. 2, 1999), *aff'd on reconsideration*, 15 FCC Rcd. 5997 (rel. March 22, 2000).
Intercarrier Compensation NPRM	*In the Matter of Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, FCC No. 01-132, Notice of Proposed Rulemaking (rel. April 27, 2001).
ISP Remand Order	*In the Matter of the Local Competition Provisions in the Telecommunication Act of 1996; Intercarrier Compensation for ISP-Bound Traffic*, CC Docket Nos. 96-98, 99-68, FCC No. 01-131 (rel. April 27, 2001).
Line Sharing Order	*In re Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147 and In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98*, Third Report and Order in CC Docket No. 98-147 and Fourth Report and Order in Docket No. 96-98, 14 F.C.C.R. 20912 (1999).

Line Sharing Reconsideration Order (2001)	*In re Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147, and In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 97-98,* Third Report and Order On Reconsideration In CC Docket No. 98-147, Fourth Report and Order On Reconsideration In CC Docket No. 96-98, Third Further Notice of Proposed Rulemaking in CC Docket No. 98-147, and Sixth Further Notice of Rulemaking in CC Docket No. 96-98, FCC 01-26 (rel. Jan. 19, 2001).
Local Competition Order	*In re Implementation of the Local Competition Provision in the Telecommunications Act of 1996*, First Report and Order, 11 F.C.C.R. 15499 (1996).
MA Verizon § 271 Order	*In the Matter of Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) and Verizon Global Networks Inc., For Authorization to Provide In-Region, InterLATA Services in Massachusetts*, CC Docket No. 01-9, Memorandum and Order, FCC 01-130 (rel. April 16, 2001).
NY Verizon § 271 Order	*In re Bell Atlantic-New York Authorization Under Section 271 of the Communications Act to Provide In-Region InterLATA Service in the State of New York*, Consent Decree, 15 F.C.C.R. 5413 (2000).
PA Verizon § 271 Order	*In the Matter of Application of Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization to Provide In-Region, InterLATA Services in Pennsylvania*, Memorandum Opinion and Order, CC Docket No. 01-128, FCC 01-269 (rel. Sept. 19, 2001).
Reciprocal Compensation Order	*In re Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Inter-Carrier Compensation of ISP-Bound Traffic*, Declaratory Ruling in CC Docket No. 96-98 and Notice of Proposed Rulemaking in CC Docket No. 99-68, 14 F.C.C.R. 3689 (1999), *vacated, Bell Atlantic Tel. Co. v. FCC*, 206 F.3d 1 (D.C. Cir. 2000).
SBC Texas § 271 Order	*In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance*, Memorandum Opinion and Order, CC Docket. No. 00-65, FCC 00-238 (rel. June 30, 2000).
Seventh Report	*In the Matter of Access Charge; Reform of Access Charge Imposed by Competitive Local Exchange Carriers*, CC Docket No. 96-262, Seventh Report and Order and Further Notice of Proposed Rulemaking (rel. April 27, 2001).

Supplemental Order	*In re Implementation of the Local Competition Provisions of The Telecommunications Act of 1996*, CC Docket No. 96-98, Supplemental Order, 15 F.C.C.R. 1760 (1999).
Supplemental Order Clarification	*In re Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, Supplemental Order Clarification, 15 F.C.C.R. 9587 (2000).
TSR Wireless Order	*In re TSR Wireless, LLC, et al. v. U S WEST Communications, Inc. et al.*, Memorandum Opinion and Order, 15 F.C.C.R. 11166 (2000).
TX SBC § 271 order	*In re Application by SBC Communications Inc. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas,* Memorandum Opinion and Order, 15 F.C.C.R. 18354 (2000).
UNE Licensing Order	*In re Petition of MCI for Declaratory Ruling that New Entrants Need not Obtain Separate License or Right-to-Use Agreements before Purchasing Unbundled Elements,* Memorandum Opinion and Order, 15 F.C.C.R. 13896 (2000).
UNE Remand Order	*In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, 15 F.C.C.R. 3696 (1999).
VA (Verizon/AT&T) Arbitration	*In the Matter of Petition of AT&T Communications of Virginia, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996*, CC Docket No. 00-251, Memorandum Opinion and Order (January 26, 2001).
VA (Verizon/Cox) Arbitration Order	*In the Matter of Petition of Cox Virginia Telecom, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996*, CC Docket No. 00-249, Memorandum Opinion and Order (January 26, 2001).
VA (Verizon/WorldCom) Arbitration Order	*In the Matter of Petition of WorldCom, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996*, CC Docket No. 00-218, Memorandum Opinion and Order (Jan. 26, 2001).
Federal Cases	
Short Citation	Full Citation
Bell Atlantic	*Bell Atlantic Telephone Companies v. FCC*, 206 F.3d (1)(D.C. Cir. 2000).
Iowa Utilities I	*Iowa Utilities Board v. FCC*, 120 F.3d 753 (8th Cir. 1997).
Iowa Utilities II	*Iowa Utilities Board v. FCC*, 219 F.3d 744 (8th Cir. 2000).

MCI Telecommunications Corp.	*MCI Telecommunications Corp. v. Bell Atlantic Pennsylvania*, Nos. 00-2257 and 00-2258, 2001 U.S. App. WL 1381590 (3rd Cir. Nov. 2, 2001).
State Commission Orders	
Short Citation	Full Citation
CT Arbitration Order	*DPUC Investigation of the Payment of Mutual Compensation for Local Calls Carried Over Foreign Exchange Service Facilities*, Docket No. 01-01-29, Connecticut DPUC (rel. March 19, 2001).
FL (AT&T/BellSouth) Arbitration Order	*In re: Petition by AT&T Communications of the Southern States, Inc. d/b/a AT&T for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. pursuant to 47 U.S.C. Section 252, Docket No. 000731-TP*, Final Order on Arbitration (Order No. PSC-01-1402-FOF-TP, issued June 28, 2001).
GA Arbitration Order	*In re: Generic Proceeding on Point of Interconnection and Virtual FX Issues*, Georgia Public Service Commission, Docket No. 13542-U (rel. July 23, 2001).
IN (AT&T/Ameritech) Arbitration Order	*AT&T Communications of Indiana TCG Indianapolis, Petition for Arbitration of Interconnection Rates, Terms, and Conditions and Related Arrangements with Indiana Bell Telephone Company, Incorporated d/b/a Ameritech Indiana Pursuant to Section 252(b) of the Telecommunications Act of 1996*, Cause No. 40571-INT-03 (Nov. 20, 2000).
KY (Sprint/BellSouth) Arbitration Order	*In the Matter of Sprint Communications Company, L.P. for Arbitration with BellSouth Telecommunications Inc., Pursuant to Section 252(b) of the Telecommunications Act of 1996*, Order in Case No. 2000-480, Public Service Com'n of Kentucky (June 13, 2001).
MA (MediaOne/Bell Atlantic) Arbitration Order	*Petitions of MediaOne Telecommunications of Massachusetts, Inc. and New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts for Arbitration, Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement and Petition of Greater Media Telephone, Inc. for Arbitration, Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts*, Massachusetts Department of Telecommunications and Energy, D.T.E. 99-42/43, 99-52 (August 25, 1999).
MA (Sprint/Verizon) Arbitration Order	*Petition of Sprint Communications Company L.P., Pursuant to Section 252(b) of the Telecommunications Act of 1996,*

	For Arbitration of an Interconnection Agreement Between Sprint and Verizon-Massachusetts, D.T.E. 00-54, Decision (rel. Dec. 11, 2000).
MD (Sprint/Verizon) Arbitration Order	*In the Matter of the Arbitration of Sprint Communications Company, L.P. vs. Verizon Maryland Inc.*, Pursuant to Section 252(b) of the Telecommunications Act of 1996, Order No. 77320, Case No. 8887 (rel. October 24, 2001).
ME (Brooks/Verizon) Arbitration Order	*Investigation Into Use of Central Office Codes (NXXs) by New England Fiber Communications, Inc., LLC d/b/a/ Brooks Fiber*, Docket No. 98-78, Maine PUC (rel. June 30, 2000).
MO (AT&T/SBC) Arbitration Order	*Application of AT&T Communications of the Southwest, Inc., TCG St. Louis, Inc., and TCG Kansas City, Inc. for Arbitration of Unresolved Interconnection Issues with Southwestern Bell Company*, Missouri Public Service Commission, Arbitration Order (rel. June 14, 2001).
NC (AT&T/BellSouth) Arbitration Order	*In the Matter of Arbitration of Interconnection Agreement Between AT&T Communications of the Southern States, Inc., and TCG of the Carolinas, Inc., and BellSouth Telecommunications, Inc., Pursuant to the Telecommunications Act of 1996*, Docket Nos. P-140, Sub 73, P-646, Sub 7 (March 9, 2001).
NY (AT&T/Verizon) Arbitration Order	*Joint Petition of AT&T Communications of New York, Inc., TCG New York Inc. and ACC Telecom Corp. Pursuant to Section 252(b) of the Telecommunications Act of 1996 for Arbitration to Establish an Interconnection Agreement with Verizon New York Inc.*, Case No. 01-C-0095, Order Resolving Arbitration Issues (rel. July 30, 2001).
NY DSL Reconsideration Order	*In re Digital Subscriber Line Services*, Order Granting Clarification, Granting Reconsideration In Part and Denying Reconsideration in Part, and Adopting Schedule, Case No. 00-C-0127, 2001 WL 322813 (N.Y.P.S.C. Jan. 29, 2001).
NY PSC Local Traffic Order	*Proceeding on Motion of the Commission Pursuant to Section 97(2) of the Public Service Law to Institute an Omnibus Proceeding to Investigate the Interconnection Arrangements Between Telephone Companies*, Case No. 00-C-0789, Order Establishing Requirements for the Exchange of Local Traffic, at 7 (Dec. 22, 2000).
Pacific Bell Opinion	*Application by AT&T Communications of California, Inc., et al. (U 5002 C) for Arbitration of an Interconnection Agreement with Pacific Bell Telephone Company (U 1001 C) Pursuant to Section 252(b) of the Telecommunications Act of 1996*, Decision No. 00-08-011 (rel. Aug. 3, 2000).
PA (Sprint/Verizon) Arbitration	*Petition of Sprint Communication Company, L.P. for an Arbitration Award of Interconnection Rates, Terms and Conditions Pursuant to 47 U.S.C. § 252(b) and Related*

	Arrangements With Verizon Pennsylvania, Inc., Opinion and Order, A-310183F002 (rel. October 14, 2001).
SC (AT&T/BellSouth) Arbitration Order	*In re Petition of AT&T Communications of the Southern States, Inc. for Arbitration of Certain Terms and Conditions of a Proposed Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. Section 252*, Docket No. 2000-527C, Order No. 2001-079, (Jan. 30, 2001).
TX Recip. Comp. Order	*Proceeding to Examine Reciprocal Compensation Pursuant to Section 252 of the Federal Telecommunications Act of 1996*, Arbitration Award, Texas Public Utilities Commission, Docket No. 21982 (rel. July 13, 2000).
VA Collocation Order	*Application of Verizon Virginia, Inc. f/k/a Bell Atlantic-Virginia, Inc., for Approval of its Network Services Interconnection Tariffs*, SCC-Va-218, Order, Case No. PUC990101 (rel. Oct. 12, 2001).

INDEX TO NETWORK ARCHITECTURE ISSUES

	Page
Issue I-1: Interconnection	NA-2, 5, 8
Issue I-1-a: Tandem Exhaustion/Direct End Office Trunking	NA-25, 26
Issue I-2: Establishment of IPs/Distance Sensitive Transport	NA-2, 5, 8, 17
Issue I-3: Reciprocal Collocation	NA-16, 18
Issue I-4: Tandem Exhaustion/Direct End Office Trunking	NA-25, 26, 29
Issue I-7: Forecasts	NA-47, 48
Issue III-1: Transit Service	NA-33, 38
Issue III-2: Rates For Transit Service	NA-33, 37, 38
Issue III-3: Mid-Span Meets	NA-42
Issue III-3-a: Memorandum of Understanding	NA-42
Issue III-4: Forecasts	NA-47, 48, 51
Issue III-4-b: Underutilized Trunk Groups	NA-51
Issue IV-1: Transit Service	NA-38
Issue IV-2: Reaching Mutual Agreement On Two-Way Trunks	NA-59
Issue IV-3: Trunk And Facility Augmentation	NA-60
Issue IV-4: Interconnection Interval/Environmental Conditions	NA-63
Issue IV-5: Compensation For The Lease Of Interconnection Facilities	NA-64
Issue IV-6: Access Toll Connecting Trunk Groups	NA-57
Issue IV-8: OS/DA Trunks	NA-66
Issue IV-11: Usage Measurement/CPN	NA-68
Issue IV-37: Meet Point Billing	NA-70
Issue V-2: Interconnection Transport	NA-56
Issue V-16: Reciprocal Tandem Services	NA-41
Issue VI-1(A): Trunk Types	NA-72
Issue VI-1(B): Intermediate Hubs (WorldCom)	NA-53
Issue VI-1(C): Toll Free Traffic	NA-73
Issue VII-1: AT&T Schedule Four	NA-21
Issue VII-3: POI v. IP Distinction	NA-20

Page

Issue VII-4: Transport Offset NA-2, 5, 8

Issue VII-5: Distance Sensitive Transport NA-17

Issue VII-6: Intermediate Hubs (AT&T) NA-53

TABLE OF CONTENTS TO NETWORK ARCHITECTURE ISSUES

Page

INTRODUCTION 1

I. INTERCONNECTION CHOICES (Issues I-1, I-2, I-3, VII-1, VII-3, VII-4, VII-5) 2

A. Verizon VA's VGRIP Proposal Is Fair To The CLECs While More Equitably Allocating The Costs Caused By the CLECs' Interconnection Decisions. (Issues I-1, I-2, and VII-4). 5

B. Verizon VA's VGRIP Proposal Is Consistent With This Commission's Rules. (Issues I-1, I-2, and VII-4) 8

C. If The Commission Does Not Adopt VGRIP, The Commission Should Not Allow The CLECs To Charge Verizon VA Distance Sensitive Rates For Transport. (Issues I-2, I-3, and VII-5) 16

(1) The CLECs Should Not Be Permitted To Charge Verizon VA Distance Sensitive Rates For Transport. (Issues I-2 and VII-5). 17

(2) Verizon VA Should Have Comparable Choices To Interconnect With The CLECs By Collocating At Their Premises. (Issue I-3) 18

D. AT&T Issues VII-1 and VII-3 20

(1) The Commission Should Recognize The Distinction Between POI And IP. (Issue VII-3). 20

(2) The Commission Should Reject Inclusion Of AT&T's Proposed Schedule Four In The Parties' Interconnection Agreement. (Issue VII-1). 21

II. TANDEM ISSUES (Issues I-4 (I-1-a), III-1, III-2, IV-1, V-16) 25

A. The CLECs Should Establish Direct End Office Trunking Once Their Traffic Reaches The DS-1 Level At The Tandem As An Appropriate, Non-Discriminatory Limitation. (Issue I-4) 26

B. WorldCom Tandem Exhaust Issues: Direct End Office Trunking, The Inter-Tandem Routing Issues, And The 240 Trunk To The Tandem Limitation. (Issue I-4). 29

(1) The Commission Should Adopt Verizon VA's Direct End Office Trunking Language. (Issue I-4). 29

(2) WorldCom Should Not Be Allowed To Route Its LATA-Wide Traffic Through One Tandem. (Issues I-1 and I-4). 31

(3) The Commission Should Adopt Verizon VA's 240 Trunk To The Tandem Limitation. (Issue I-4). 33

C. AT&T and WorldCom Should Establish A Direct Connection With Third-Party Carriers Once The Level Of Traffic To That Third-Party Carrier Reaches The DS-1 Threshold. (Issues III-1, III-2). 33

D. Once The Level Of Traffic Goes Above The DS-1 Level, Verizon VA Should Be Permitted To Charge Market-Based Rates. (Issue III-2). 37

E. The Commission Should Order WorldCom And The Other CLECs To Enter Into Billing Arrangements With Third-Party Carriers With Whom They Exchange Traffic. (Issues III-1, III-2, and IV-1). 38

F. AT&T Should Have A Reciprocal Duty To Provide Transit Services To Verizon VA. (Issue V-16). 41

III. MID-SPAN MEETS (Issues III-3 and III-3-a) 42

IV. FORECASTS AND TRUNK DISCONNECTIONS (Issues I-7, III-4, III-4-b) 47

A. Cox And AT&T Should Provide Verizon VA With Good Faith Traffic Forecasts. (Issues I-7 and III-4). 48

B. The Commission Should Adopt Verizon VA's Trunk Forecasting Language In The Verizon VA-WorldCom Interconnection Agreement. (Issue III-4). 51

C. Verizon VA Should Be Permitted To Disconnect Underutilized Trunk Groups Between AT&T And Verizon VA When Those Trunk Groups Fall Below 60% Utilization. (Issue III-4-b) 51

V. INTERMEDIATE HUBS (Issues VI-1(B) and VII-6) 53

VI. ACCESS-RELATED ISSUES (V-2, IV-6) 55

A. AT&T Should Not Be Permitted To Purchase Transport At UNE Rates When The Transport Is Purchased From Verizon's Access Tariff. (Issue V-2). 56

B. The Commission Should Adopt Verizon VA's Proposed § 8 Of Its Interconnection Attachment Because This Provision Allows WorldCom To Purchase Access Toll Connecting Trunks From Verizon VA For The Transmission And Routing Of Exchange Access Traffic. (Issue IV-6). 57

VII. WORLDCOM ISSUES (IV-2 through IV-5, IV-8, IV-11, IV-37, VI-1(A), and VI-1(C)) 59

A. The Commission Should Adopt Verizon VA's Proposed Language For Two-Way Trunking. (Issue IV-2). 59

B. The Commission Should Reject WorldCom's Proposed Sections 1.1.6 *Et Seq.* Relating To Facilities Augmentation. (Issue IV-3). 60

C. WorldCom's Proposed Contract Language For Issue IV-4 Places An Onerous And Undue Burden On Verizon VA And Should Be Rejected. (Issue IV-4). 63

D. The Commission Should Reject WorldCom's Proposed Contract Language For Issue IV-5 And Order Inclusion Of Verizon VA's Proposed Contract Language. (Issue IV-5). 64

E. Because Verizon VA Cannot Identify or Track WorldCom Line Status Verification Requests If Sent Over Local Interconnection Trunks, The Commission Should Order Inclusion Of Verizon VA's Operator Services

Trunking Arrangement, Directory Service Trunking Arrangements, and Line Status Verification Proposals. (Issue IV-8).....66

F. When Either Party Passes Calling Party Number ("CPN") Information On Less Than 90% Of Its Calls, The Receiving Party May Bill Access Rates For The Traffic That Is Passed Without CPN. (Issue IV-11).....68

G. The Commission Should Adopt Verizon VA's Proposed Meet Point Billing Language. (Issue IV-37).....70

H. The Commission Should Adopt Verizon VA's Proposed §§ 2.2 *Et Seq.* (Issue VI-1(A)).....72

I. The Commission Should Adopt Verizon VA's Proposed Language For Toll Free Access Code Traffic. (Issue VI-1(C)).....73

VIII. CONCLUSION 74