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

**Ex Parte: Deployment of Wireline Services Offering Advanced Telecommunications
Capability – CC Docket No. 98-147**

**Implementation of the Local Competition Provisions in the
Telecommunications Act of 1996 - CC Docket No. 96-98**

Dear Ms. Salas:

In comments previously submitted in the Commission's *Advanced Services* proceedings addressing collocation, Verizon has demonstrated that it is not inconsistent with the Commission's rules for an incumbent local exchange carrier to require collocators to terminate their facilities on a Point of Termination bay, or "POT bay."¹ Verizon has a particular interest in this subject because Verizon's use of a POT Bay is essential in meeting its merger commitments regarding the timely installation and repair of unbundled network elements as well as the national standard installation intervals for collocation established by the Commission. As a result, Verizon requests that the Commission clarify that a requirement for a POT Bay is a reasonable practice and that it does not violate the Commission's rules

The POT bay constitutes a point of direct connection to Verizon's network, similar to the demarcation point that Verizon installs between its network and the networks of other carriers or the equipment of end user customers. The POT bay provides a physical demarcation between interconnected carriers for installation, trouble isolation, testing and maintenance. As one of the largest providers of collocation services in the country, it is important for Verizon's operations to use the most efficient means of terminating cables to collocation arrangements. The POT bay increases both collocator and Verizon efficiency by terminating all of a collocator's cables at a single location.

When the POT bay is used, all of the necessary operational support system work, cable installation testing, and stenciling of the cables for identification purposes can be performed without

¹ See Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147, Reply Comments of Verizon (filed Nov. 14, 2000), pp. 14-16.

the collocator being present. If neither Verizon nor the collocator installed a POT bay, Verizon would be hindered in meeting its merger commitments regarding the timely installation and repair of unbundled network elements. See Merger Conditions, Appendix D, Attachment A. For both installation and repair, Verizon would have to do much of the work with the collocator present, which could add additional delay due to the need to coordinate schedules. With the POT bay, each party can do its work separately, and the collocator can install and maintain its equipment without a Verizon escort.

The Commission has previously found that the POT bay is "an effective physical demarcation point between the respective networks to which the parties may physically connect their respective cables." See *Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection Through Physical Collocation for Special Access and Switched Transport*, 12 FCC Rcd 18730, ¶ 106 (1997). In the *Advanced Services Order* (at ¶ 42), the Commission stated that "[i]ncumbent LECs may not require competitors to use an intermediate interconnection arrangement in lieu of direct connection to the incumbent's network if technically feasible, because such intermediate points of interconnection simply increase collocation costs without a concomitant benefit to incumbents." This was codified in section 51.323(k)(2) of the Commission's rules. Notably, the Commission has characterized the POT bay as the point of interconnection between the two carrier's networks, not as an intermediate interconnection point that prevented direct connection to the incumbent's network.

The Commission should make it clear that neither Section 51.323(k)(2) nor any other rule prohibits a carrier from requiring POT Bays for collocation. The Commission can clarify this in an order dealing with the outstanding issues in its August 10, 2000 Further Notice in Docket 98-147, where the issue was explored in comments and reply comments. Such a clarification would not result in any change in the manner in which Verizon provides collocation to other carriers.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, an original and one copy of this letter are being submitted to the Office of the Secretary. Please associate this notification with the record in the proceedings indicated above. If you have any questions regarding this matter, please call me at (202) 515-2530.

Sincerely,



W. Scott Randolph

Attachment

cc: Michelle Carey
William Kehoe
Kimberly Cook