

ORIGINAL

Clint Odom
Director
Federal Regulatory

EX-107-01-001 LATE FILED



1300 I Street, NW, Suite 400 West
Washington, DC 20005

December 28, 2001

RECEIVED

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Ex Parte

DEC 28 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

RE: Application by Verizon-New Jersey Inc. for Authorization To Provide In-Region, InterLATA Services in State of New Jersey, Docket No. 01-347 – REDACTED

Dear Ms. Salas:

Per the request of the CCB staff, attached hereto is a list of carriers in New Jersey that provide local service on a resale basis. The attachment also contains the number of business and residential resale lines served by each carrier meeting this description.

In preparing the attachment, we discovered an inadvertent error in one of the sentences in our Application. Page 79 states that "There also are more than **** resellers in New Jersey, including at least **** carriers reselling service to residential customers." As the attachment demonstrates, that should read "There also are approximately **** resellers in New Jersey, including approximately **** carriers reselling service to residential customers."

The entirety of the attachment is proprietary and is subject to confidential treatment. A redacted version of this letter also is being filed without an attachment. Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-2746.

Sincerely,

Clint Odom
CO

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REDACTED – FOR PUBLIC INSPECTION

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RE: Application by Verizon-New Jersey Inc. for Authorization To Provide In-Region, InterLATA Services in State of New Jersey, Docket No. 01-347

Dear Ms. Salas:

This letter responds to questions submitted to Verizon by FCC staff in connection with the above-referenced application.

For purposes of this response, we assume that all CLEC calls route over the Verizon shared transport network. This assumption is consistent with actual practice in New Jersey, where thus far all CLECs have chosen Option B in the Network Design Request ("NDR") process. Option B utilizes the Verizon routing and trunking network for local traffic. For intralata toll traffic, CLECs inform Verizon in their local service request ("LSR") forms whether this toll traffic will be routed on Verizon's network or an IXC's network. Details of Verizon's billing of usage rate elements can be found in the CLEC Handbook Volume III, Section 10.3, which was attached to Verizon's New Jersey application at App. J, Tab 5. As noted in the declaration filed by Patrick A. Garzillo and Marsha S. Prosini, *see Joint Declaration of Patrick A. Garzillo and Marsha S. Prosini* at ¶ 25, this document is also available online at www22.verizon.com/wholesale/handbooks/section/0,,c-3-10-10_3,00.html.

FCC #1:

Verizon's unbundled local switching per minute of use rates for originating and terminating calls are \$.002773 and \$.002508, respectively. For a local intra-switch call from a UNE-P CLEC end user to a Verizon end user, does the CLEC pay \$.002773 times originating minutes of use for local switching, or \$.002773 plus \$.002508 times originating minutes of use? If neither is the case, what switching per minute of use rates apply to such traffic and how many times do they apply?

Verizon Response:

For a local intra-switch call from a UNE-P CLEC end user, the originating UNE-P CLEC is charged originating minutes of use times the per-minute Unbundled Local Switching Originating rate and originating minutes of use times the per-minute Unbundled Local Switching Terminating rate.

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FCC #2:

For a local inter-switch call from a UNE-P CLEC end user to a Verizon end user, does the CLEC pay \$.002773 plus \$.002508 times originating minutes of use? If not, what switching per minute of use rates apply to such traffic and how many times do they apply?

Verizon Response:

For an inter-switch call originated from a UNE-P CLEC end user which terminates to a Verizon end user, the UNE-P CLEC is currently charged originating minutes of use times the Unbundled Local Switching Originating rate, originating minutes of use times the Unbundled Common Transport Fixed rate, originating minutes of use times the Unbundled Local Switching Terminating rate and originating minutes of use times airline miles times the Unbundled Common Transport Per Mile rate. Verizon also intends to recover the costs associated with tandem switching for the tandem-routed portion of this traffic; additional system modifications are required to apply this rate element.

FCC #3:

Does Verizon's unbundled tandem switching rate of \$.000674 per minute of use apply to a tandem-routed local call from a UNE-P CLEC end user to a Verizon end user? If not, what tandem-switching rate applies to such tandem-routed local traffic?

Verizon Response:

Yes. Unbundled Tandem Switching does apply to a tandem-routed local call from a UNE-P CLEC end user to a Verizon end user. Verizon is not currently charging for Unbundled Tandem Switching. Verizon intends to recover the costs associated with tandem switching for the tandem-routed portion of this traffic; additional system modifications are required to apply this rate element.

FCC #4:

Does Verizon's unbundled tandem switching rate per minute of use apply to tandem-routed access traffic between a UNE-P CLEC end user and an IXC POP? If not, what tandem switching rate applies to such tandem-routed access traffic? Does this tandem switching rate apply to tandem-routed intralata toll traffic between a UNE-P CLEC end user and a Verizon end user? If not, what tandem switching rate applies to such tandem-routed intralata toll traffic?

Verizon Response:

Unbundled Tandem Switching charges apply to tandem-routed access traffic between a UNE-P CLEC end user and IXC POP.

Unbundled Tandem Switching charges also apply to tandem-routed intralata toll traffic originating from a UNE-P CLEC end user and terminating to a Verizon end user. Verizon is not currently charging for Unbundled Tandem Switching. Verizon intends to recover the costs associated with tandem switching for the tandem-routed portion of this traffic; additional system modifications are required to apply this rate element.

FCC #5:

How many times do Verizon's unbundled common transport rates (\$.000085 per minute of use and \$.0000006 per minute of use per mile) apply to a tandem-routed local call from a UNE-P CLEC end user to a Verizon end user? How many times do Verizon's unbundled common transport rates apply to direct-routed local call from a UNE-P CLEC end user to a Verizon end user? Do Verizon's proposed unbundled common transport rates apply to tandem-routed access traffic between a UNE-P CLEC end user and an IXC POP? If not, what common transport rates apply to such tandem-routed access traffic? Do these common transport rates apply to tandem-routed intralata toll traffic between a UNE-P CLEC end user and a Verizon end user? If not, what common transport rates apply to such tandem-routed intralata toll traffic? Do these common transport rates apply to direct-routed intralata toll traffic?

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between a UNE-P CLEC end user and a Verizon end user? If not, what common transport rates apply to such direct-routed intralata toll traffic?

Verizon Response:

For an inter-switch tandem-routed local call from a UNE-P CLEC end user to a Verizon end user, the UNE-P CLEC is charged originating minutes of use times the Unbundled Common Transport Fixed rate and originating minutes of use times airline miles times the Unbundled Common Transport Per Mile rate.

The Unbundled Common Transport elements are applied in the same manner whether or not the inter-switch local call is direct-routed routed through a tandem.

The same Unbundled Common Transport rates apply to tandem-routed IXC-carried access calls originating from or terminating to a UNE-P CLEC end user.

The same Unbundled Common Transport rates also apply to tandem-routed intralata toll traffic originating from a UNE-P CLEC end user and terminating to a Verizon end user.

The same Unbundled Common Transport rates also apply to direct-routed intralata toll traffic originating from a UNE-P CLEC end user and terminating to a Verizon end user.

FCC #6:

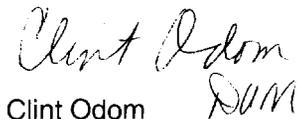
What unbundled signaling rates apply to a local call from a UNE-P CLEC end user to a Verizon end user and how many times do they apply? What unbundled signaling rates apply to intralata toll traffic between a UNE-P CLEC end user and a Verizon end user and how many times do they apply? What unbundled signaling rates apply to access traffic between a UNE-P CLEC end user and an IXC POP and how many times do they apply?

Verizon Response:

For CLECs purchasing UNE-P, the costs associated with signaling are included in the Unbundled Local Switching Originating and Terminating rates.

Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-2746.

Sincerely,


Clint Odom

CC: Alex Johns
S. Pie