

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

In the Matter of

Implementation of the Local Competition  
Provisions of the Telecommunications Act of  
1996

Numbering Resource Optimization

CC Docket No. 96-98

CC Docket No. 99-200

**REPLY OF VERIZON**

The commentors have made a number of good suggestions about how the Commission should clarify and modify its proposed Audit Program in ways that will permit the Commission to get the information it needs to ensure compliance with its regulations without unduly burdening the carriers being audited. Verizon urges the Commission to adopt these recommendations. For the Commission's convenience, attached to this reply is the proposed Audit Program showing these changes. Verizon and other commentors<sup>1</sup> explained why no purpose would be served by auditing aging, intermediate and administrative and urged that those procedures be eliminated entirely. If the Commission does not accept that suggestion, we urge that it at least make the changes shown on Lines 20, 22, 28 and 30 of the attached to make these provisions consistent with the Commission's rules and to simplify the process.

The Commission should reject one set of comments, however. Two commentors seem to suggest that they should be exempt from being audited and urge the Commission only to subject incumbents to random audits.<sup>2</sup> CLEC compliance with number resource conservation

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<sup>1</sup> See, e.g., AT&T at 4; Dobsen at 3-5; SBC at 2-4; Verizon Wireless at 1, 4.

<sup>2</sup> North County Communications at 3; AT&T at 4.

requirements is every bit as important as ILEC and CMRS compliance, and there is no justification for exempting any class of carriers.

Verizon, therefore, asks the Commission to modify its proposed Audit Program as suggested on the above.

Respectfully submitted,

/S/

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