

the plans in effect in New York, Massachusetts, Rhode Island, and Connecticut when the Commission approved Verizon's section 271 applications in those states. The Commission has previously found that this plan provides "strong assurance that the local market will remain open after [Verizon] receives section 271 authorization." New York Order ¶ 429; see Massachusetts Order ¶ 242; Rhode Island Order ¶ 108; Connecticut Order ¶ 76.

Verizon's Maine Plan places approximately \$29 million in annual remedy payments at risk. See Guerard/Canny/Abesamis Decl. ¶ 78.⁹³ Like the plans that the Commission approved in Massachusetts and Rhode Island, that amount is equal to 39 percent of Verizon's net return in Maine. See id. ¶ 73; Massachusetts Order ¶ 241 & n.769; Rhode Island Order ¶ 108 n.336.⁹⁴ The Maine Plan also has a nearly identical structure and allocation of remedy payments as the New York, Massachusetts, Rhode Island, and Connecticut plans, which the Commission found are both "reasonably designed to detect and sanction poor performance when it occurs" and "reasonably self-executing." New York Order ¶¶ 440-441; Guerard/Canny/Abesamis Decl. ¶¶ 11, 74-77.⁹⁵ For all these reasons, the Maine Plan, like the plan in New York, "require[s]

⁹³ This figure includes approximately \$1 million in remedy payments available to CLECs operating in Maine if Verizon's performance under the Maine Change Control Assurance Plan — which is the same as those in effect in Massachusetts, Rhode Island, and New York (which also covers Connecticut) — is unsatisfactory. See Guerard/Canny/Abesamis Decl. ¶¶ 77, 102-104.

⁹⁴ The amount at risk in the Maine Plan is thus greater than the 36 percent of net return the Commission found sufficient in approving Verizon's application in New York and SBC's applications in each of the five SWBT states. See New York Order ¶ 435; Texas Order ¶ 424 & n.1235; Kansas/Oklahoma Order ¶ 274 & n.837; Arkansas/Missouri Order ¶ 129 & n.409.

⁹⁵ The Maine PUC, in approving Verizon's proposed Plan, required Verizon to make certain state-specific modifications. See Guerard/Canny/Abesamis Decl. ¶¶ 73, 80-81, 83, 93, 96; Arkansas/Missouri Order ¶ 129 (noting utility of such modifications); Rhode Island Order ¶ 108. On March 13, 2002, Verizon submitted a revised Plan complying with those conditions. See Guerard/Canny/Abesamis Decl. ¶ 73. The Maine PUC also established a rapid response process to resolve disagreements among competing carriers regarding their obligations under the 1996 Act, as well as penalties — up to \$40,000 — in the event it finds that Verizon has willfully

[Verizon] to achieve service quality that . . . go[es] well beyond the Checklist requirements.”⁹⁶ Indeed, the Plan can require Verizon to make remedy payments despite extremely good performance, whether because Verizon misses a 95-percent benchmark by 1 percentage point (thereby still providing excellent, 94-percent performance) or because a small disparity of 0.1 percentage points is found to be statistically significant. See Guerard/Canny/Abesamis Decl. ¶¶ 86, 106-108.⁹⁷

Finally, Verizon has a strong business interest in providing superior wholesale service in order to encourage other carriers to use its network. See Lacouture/Ruesterholz Decl. ¶ 420. Even aside from this business interest, however, Verizon also is subject to a host of additional safeguards and remedial measures that provide abundant protection against the possibility of anticompetitive conduct. See Pennsylvania Order ¶ 130 (“the PAP is not the only means of ensuring that Verizon continues to provide nondiscriminatory service to competing carriers”); Massachusetts Order ¶ 236; Rhode Island Order ¶¶ 112-113. For example, competing carriers still have recourse to the appropriate regulatory and judicial forums to enforce their legal or contractual rights. Likewise, the Commission itself retains the ability to enforce the requirements of section 271 with penalties, up to and including possible revocation of long distance authority under section 271(d)(6)(A). And it already has made clear that it will not hesitate to invoke that authority.

failed to comply with an order issued by the Rapid Response Process Team. See Guerard/Canny/Abesamis Decl. ¶ 105; Maine PUC 271 Letter at 6 & Att. A.

⁹⁶ NY PSC Evaluation at 3-4.

⁹⁷ Therefore, to avoid making remedy payments, Verizon must provide service that is better than parity and that exceeds the benchmarks.

C. Verizon's Entry Will Increase Long Distance Competition.

It is by now unassailable that "BOC entry into the long distance market will benefit consumers and competition." Pennsylvania Order ¶ 125; accord Massachusetts Order ¶ 234. Indeed, consumer groups have documented these benefits, concluding that consumers in New York who switched to Verizon long distance are saving up to \$284 million annually⁹⁸ and that Verizon's entry in New York has enabled consumers in that state to obtain rate reductions of 20 percent for local and long distance services.⁹⁹ Another recent study, by MIT Professor Jerry Hausman, concludes that, in the first year after a BOC enters the long distance market, consumers in that state experience long distance savings of 10 to 20 percent.¹⁰⁰ Yet, while Verizon and other BOCs are offering customers lower rates, the long distance incumbents have raised their basic rates yet again. Consumer Action recently found that, "[s]ince last year, basic rates at AT&T and MCI-WorldCom increased during evening and weekends by up to 13%," and AT&T, WorldCom, and Sprint "have significantly increased charges, surcharges and fees in other areas."¹⁰¹ Moreover, all three long distance incumbents have just recently raised their rates

⁹⁸ Telecommunications Research & Action Center (TRAC), 15 Months After 271 Relief: A Study of Telephone Competition in New York at 1 (Apr. 25, 2001) (App. I, Tab 4).

⁹⁹ See Consumer Fed'n of Am. & Consumers Union, Lessons from 1996 Telecommunications Act: Deregulation Before Meaningful Competition Spells Consumer Disaster 9-10 (Feb. 2001).

¹⁰⁰ See Hausman, supra note 79.

¹⁰¹ Consumer Action, Long Distance Rates Survey 2001, Consumer Action News (Fall 2001), at http://www.consumer-action.org/Library/English/Newsletter/NL-I-23_EN/NL-I-23_EN.html; see also Kalpana Srinivasan, Long-Distance Giant Boosts Rate for Millions of Customers, Associated Press, June 2, 2001 ("Nearly half of AT&T's long-distance customers will see their bills go up next month, as the nation's biggest carrier raises its per-minute rates for basic plans. . . . 'Obviously we don't have a lot of competitive forces at work in the long-distance business to pressure AT&T.'") (quoting Gene Kimmelman of Consumers Union).

yet again, with increases as high as 10 to 20 percent.¹⁰²

Verizon's entry will undoubtedly have the same pro-competitive effects in Maine that it has in other states because Verizon will offer the same attractive long distance plans, which are simpler and less expensive than most other carriers'.¹⁰³ Verizon's calling plans have been particularly attractive for the low-volume customers that the long distance incumbents historically have tried to discard or ignore.¹⁰⁴ For example, Verizon not only offers a number of plans with no monthly minimum and no calling plan fee, but also automatically enrolls all of its customers in a calling plan (known as the Timeless plan) that has no minimum usage requirement or monthly plan fee if they fail to choose a plan. The Timeless plan is particularly attractive for low-volume users because it offers a flat, low rate of 10 cents per minute for interstate calls with no monthly calling plan fees or minimum usage fees. In contrast, the long distance incumbents require customers who do not enroll in a plan to pay relatively higher "basic" rates, or they put those customers in default plans with rates considerably higher than their most popular calling plans. And, even when the long distance incumbents do offer a flat-rate plan (*i.e.*, with no monthly plan fee or minimum usage fee) that might otherwise be

¹⁰² Wayne Kawamoto, Qwest Criticizes AT&T Over Rates, CLEC-Planet (Jan. 10, 2002), at <http://www.clec-planet.com/news/01jan2002/1qwest.html> ("AT&T, WorldCom and Sprint recently announced increases of 10 to 20 percent on their basic rate plans."); MCI, Recent Rate, GSA, and Calling Service Updates, at http://www.mci.com/mci_service_agreement/res_most_recent_info.jsp; Sprint, Recent Changes to Sprint Rates, Terms and Conditions, at <http://csg.sprint.com/ratesandconditions/documents/resratechanges.pdf>.

¹⁰³ Moreover, Verizon's real-world experience in New York puts to rest once and for all the claims that the long distance incumbents have rehashed for more than 15 years — based on nothing more than far-fetched theories and hyperbole — that Bell company entry into long distance would have adverse competitive effects. The Commission has already determined that such claims have no place in the review of a section 271 application. See New York Order ¶ 428; see also Texas Order ¶ 419.

¹⁰⁴ See, *e.g.*, Low-Volume Long-Distance Users, Notice of Inquiry, 15 FCC Rcd 6298 (1999).

attractive to low-volume users, their rates typically are substantially higher than those offered by Verizon. For example, AT&T's cheapest flat-rate plan with no monthly fee is its "AT&T One Rate Basic," which, after a recent AT&T rate increase, now offers a flat-rate of 19.5 cents per minute — 95 percent more expensive than Verizon's Timeless plan.¹⁰⁵ Indeed, AT&T has recently acknowledged that "RBOCs consistently appeal to lower-end customers."¹⁰⁶

Both in anticipation of and in response to Verizon's entry into the long distance market, the incumbent long distance carriers have been forced to introduce special, lower-priced bundled services offerings to customers. For example, in New York, WorldCom rolled out a new "One Company Advantage" plan under which its customers receive unlimited local and long distance calls for 7 cents per minute, plus 200 included minutes of long distance calling.¹⁰⁷ In contrast, its "7 Cents Anytime" national plan charges nearly 14 cents per minute for in-state long distance.¹⁰⁸ Likewise, AT&T introduced its "AT&T Local One Rate New York" package, which includes reduced rates of 7 cents per minute for interstate calls and 10 cents per minute for in-state calls, and which drops the monthly fee associated with AT&T's most comparable national plan.¹⁰⁹

In Massachusetts and Pennsylvania, AT&T responded to Verizon's entry by providing its customers in those states with 30 free minutes of long distance calling.¹¹⁰ AT&T made

¹⁰⁵ See AT&T, Domestic Service Guides – AT&T One Rate Basic Plan, at <http://www.serviceguide.att.com/ACS/ext/od.cfm?OID=398&menu=101>.

¹⁰⁶ Betsy Bernard, President and CEO, AT&T Consumer, AT&T Consumer at 6 (Jan. 7, 2002), at http://www.att.com/ir/ae/2001ssb/20020107_bernard.pdf.

¹⁰⁷ See MCI, Local Choice: New York, at http://www.mci.com/home_family/products_services/local/ny/choice.shtml.

¹⁰⁸ See MCI, Local Toll and In-State Long Distance Calling For Your Home, at http://www.mci.com/home_family/products_services/local_toll/index.jsp.

¹⁰⁹ See AT&T, AT&T Long Distance, at <http://www.shop.att.com/tool/rate/state>.

¹¹⁰ See AT&T Press Release, Bay State AT&T Long Distance Customers Get the Message: Thanks for Your Loyalty (May 14, 2001) ("AT&T May 14 Press Release"); see also

consumers aware of this promotion through a special greeting that plays when the customer makes a long distance call.¹¹¹ Massachusetts and Pennsylvania were the only states in Verizon's region in which AT&T has made this promotional offer available, which follows a similar promotion that AT&T made to its customers in Kansas and Oklahoma just two days before SBC was authorized to provide long distance service in those states.¹¹² AT&T has since made the same offer to its customers in Missouri, Arkansas, and Rhode Island shortly before the Commission authorized SBC and Verizon to provide long distance in those states.¹¹³

As this experience makes clear, Verizon's entry not only has promoted additional local competition, but also has produced substantial competitive benefits for long distance and bundled services packages. Consumers in Maine are now entitled to the same benefits.

AT&T Press Release, AT&T to Keystone State Long Distance Customers: Thanks for Your Loyalty (Aug. 14, 2001) ("AT&T August 14 Press Release").

¹¹¹ See AT&T May 14 Press Release; AT&T August 14 Press Release. Moreover, AT&T extended its offer to Massachusetts despite having stated, just weeks earlier, that it had "no immediate plans to extend [the] program to other states." Communications Daily, Mar. 8, 2001, at 9.

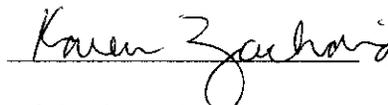
¹¹² See AT&T Press Release, AT&T Long Distance Customers in Kansas Get the Message: Thanks for Your Loyalty (Mar. 5, 2001); see also AT&T Press Release, AT&T Long Distance Customers in Oklahoma Get the Message: Thanks for Your Loyalty (Mar. 5, 2001).

¹¹³ See AT&T Press Release, AT&T to Missouri Customers: Show Me the Minutes (Oct. 22, 2001); AT&T Press Release, AT&T Long Distance Customers in Arkansas Get the Message: Thanks for Your Loyalty (Oct. 22, 2001); AT&T Press Release, AT&T Long Distance Customers in the Ocean State Get the Message: Thanks for Your Loyalty (Feb. 19, 2001).

CONCLUSION

Verizon's Application to provide interLATA service originating in Maine should be granted.

Respectfully submitted,



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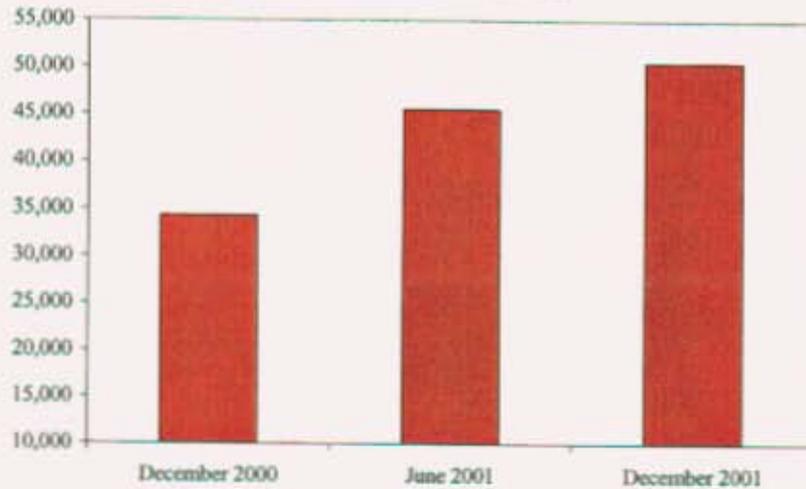
Exhibit 1. Verizon's Checklist Compliance Under the 1996 Act

§ 271 Checklist

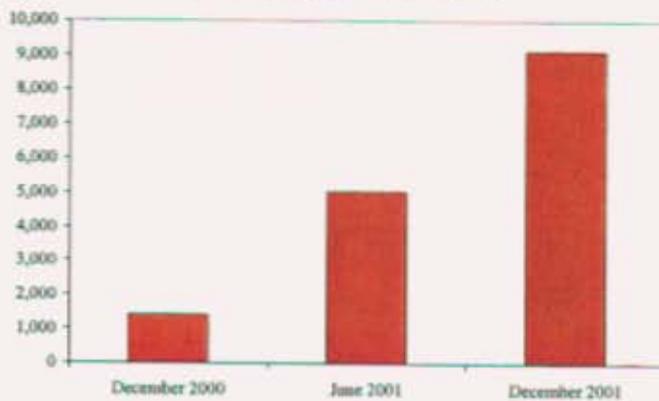
1. Interconnection	⇨	Approximately 10,400 trunks Approximately 90 collocation arrangements in service Approximately 9,100 facilities-based CLEC lines
2. Unbundled Network Elements	⇨	Approximately 14,300 unbundled loops Approximately 2,700 unbundled switching ports
3. Poles, Ducts, Conduits, and Rights of Way	⇨	Approximately 80,000 feet of conduit to 18 communications carriers and 4 other companies Approximately 317,000 pole attachments to 38 communications carriers and 44 other companies
4. Local Loops	⇨	Approximately 14,300 total loops, including approximately 11,600 stand-alone loops plus approximately 2,700 loops provided as part of platforms
5. Transport	⇨	Approximately 170 unbundled dedicated local transport facilities Approximately 2,700 shared transport arrangements 32 orders for dark fiber
6. Switching	⇨	Approximately 2,700 unbundled switching ports
7. 911/E911/DA/Operator Services	⇨	8 CLECs purchasing OS via approximately 190 dedicated trunks 8 CLECs purchasing DA via approximately 190 dedicated trunks 7 CLECs purchasing 911/E911 via approximately 40 dedicated trunks
8. White Pages	⇨	Approximately 21,900 CLEC listings (including resale)
9. Numbering Administration	⇨	More than 760,000 telephone numbers
10. Databases/Signaling	⇨	2 CLECs with access to signaling network 7 CLECs using Calling Name Database 3 CLECs/EXCs using Local Number Portability Database
11. Number Portability	⇨	Approximately 34,000 numbers ported via LNP
12. Dialing Parity	⇨	Local dialing parity available throughout the state
13. Reciprocal Compensation	⇨	5 CLECs, 10 CMRS providers, 1 paging carrier
14. Resale	⇨	Approximately 38,800 resold lines, including approximately 2,500 residential lines and approximately 36,300 business lines

Exhibit 2. Local Competition in Maine

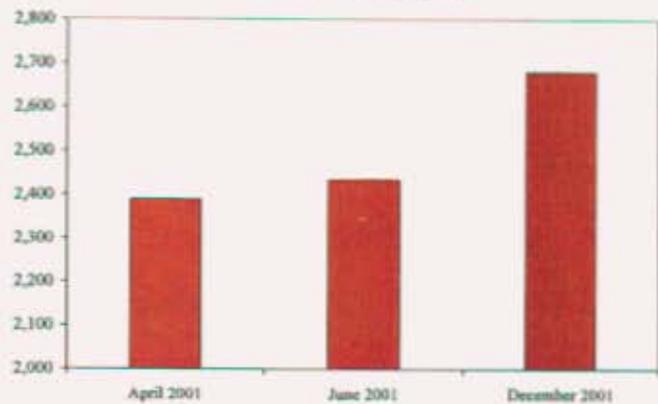
Total CLEC Lines



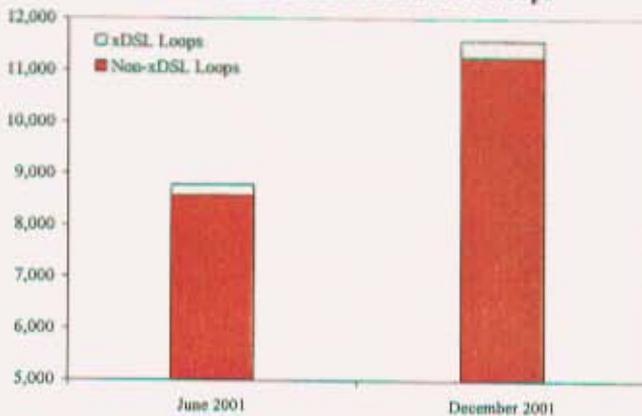
CLEC Facilities-Based Lines



CLEC UNE Platforms



CLEC Stand-Alone Unbundled Loops



CLEC Ported Numbers

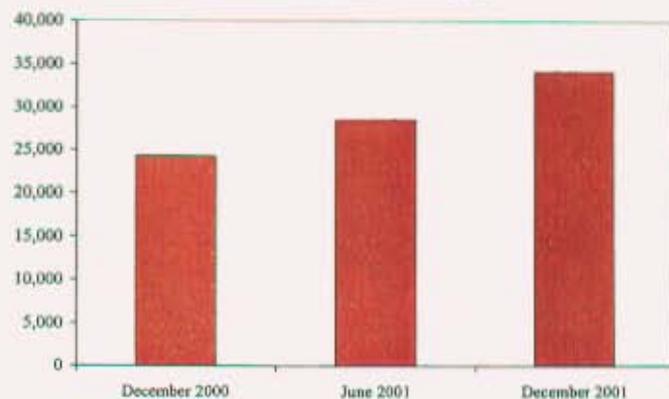
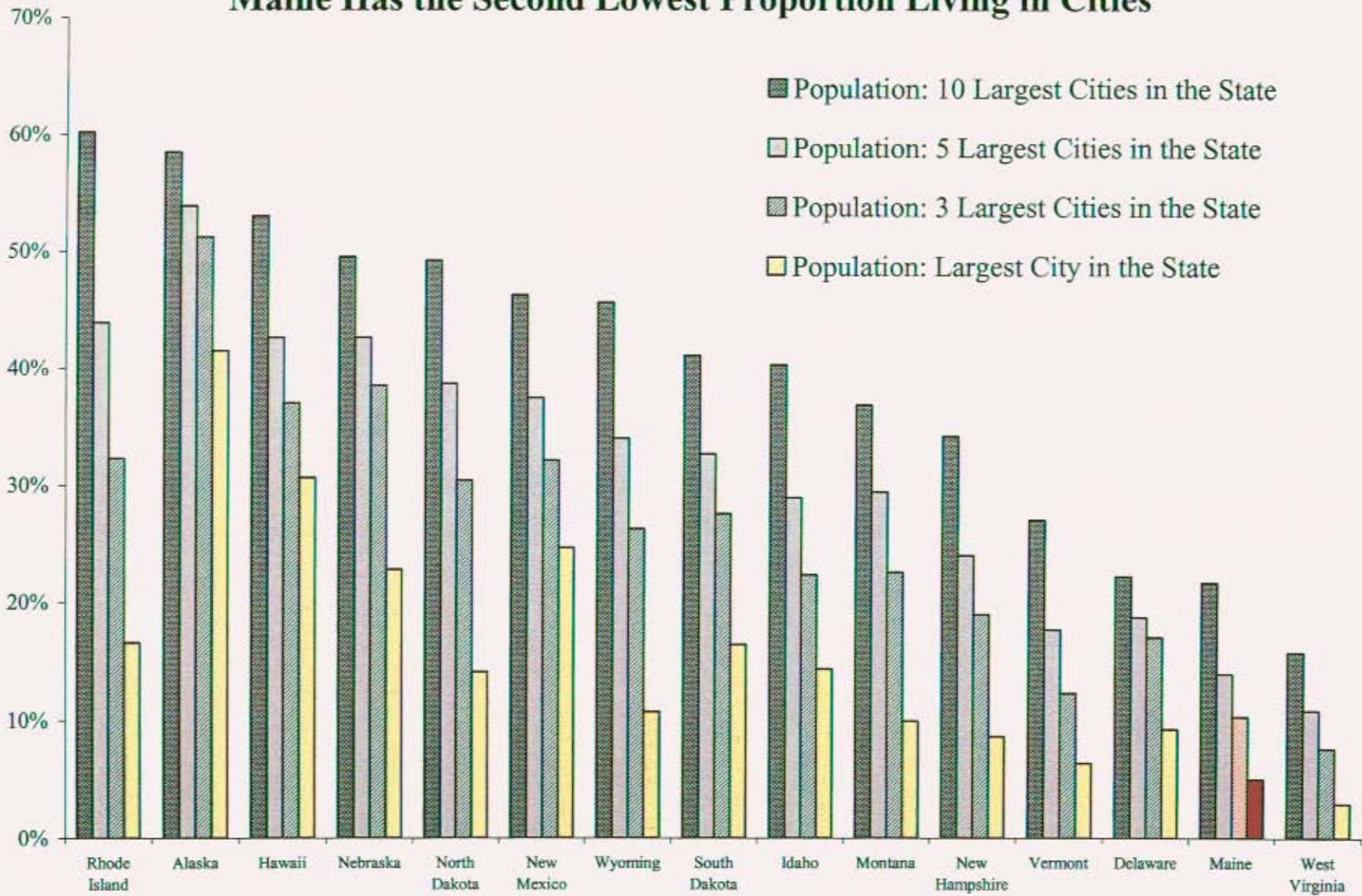


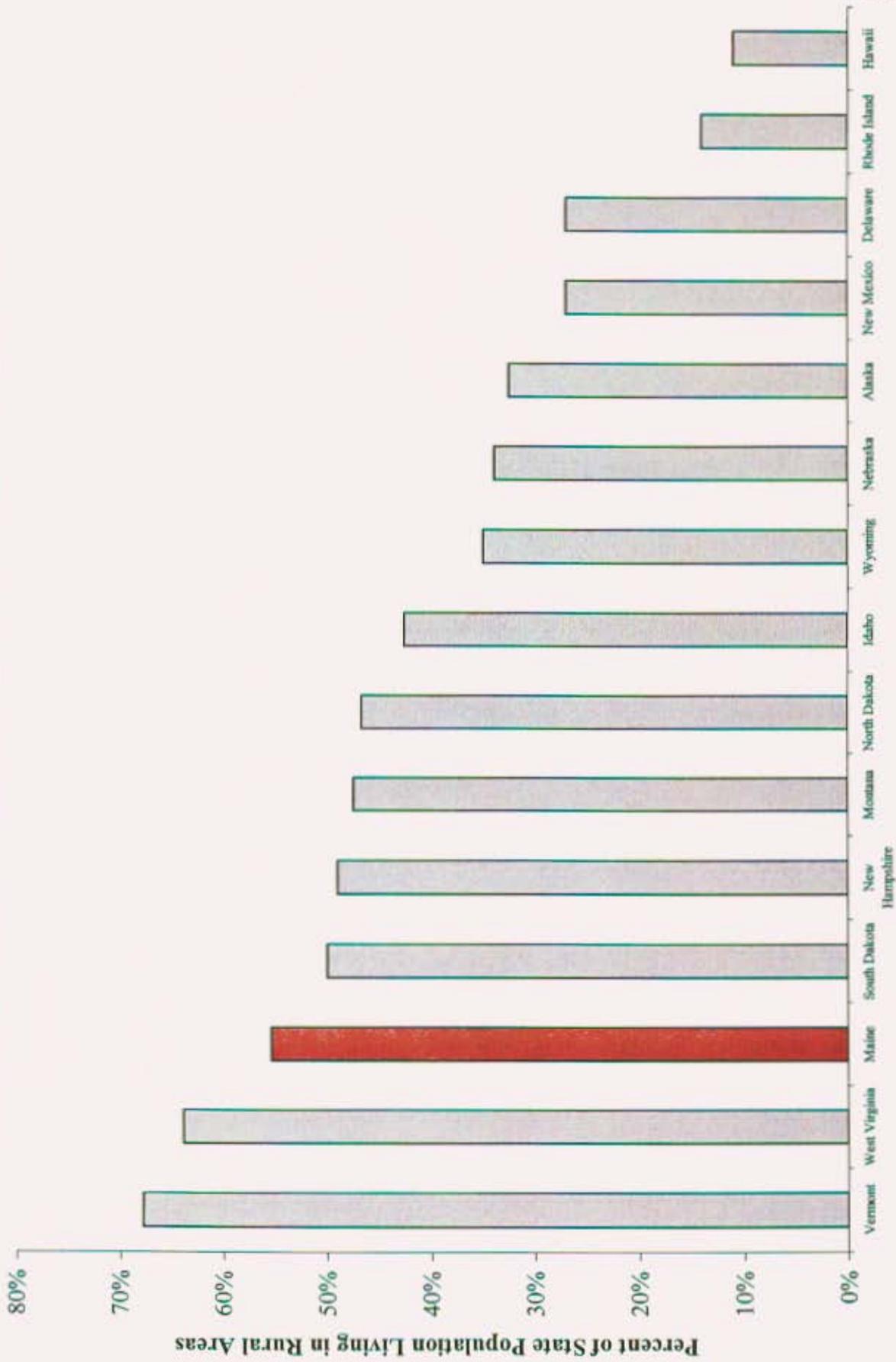
Exhibit 3. Of the 15 Least Populous States, Maine Has the Second Lowest Proportion Living in Cities



Source: United States Census Bureau, *Census 2000 Redistricting Data*, <http://www.census.gov/clo/www/redistricting.html>.

Verizon, Maine 271
March 21, 2002

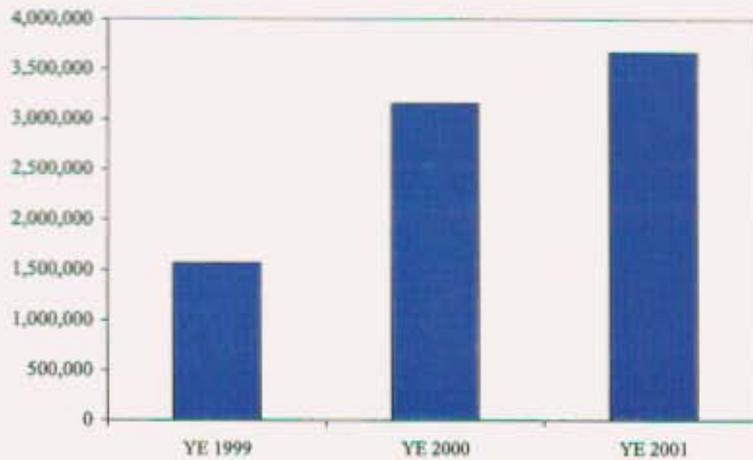
Exhibit 4. Rural Population of the 15 Least Populous States



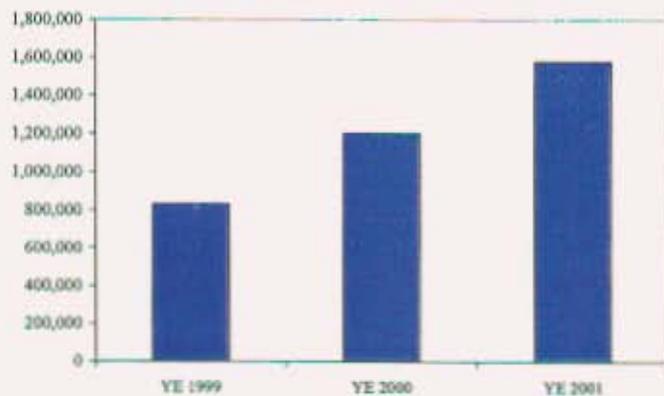
Source: United States Census Bureau, *Urban and Rural Population: 1900 to 1990* (rel. Oct. 1995), <http://www.census.gov/population/censusdata/urpop0090.txt>.

Exhibit 5. Growth of Local Competition in New York (§ 271 Authorization Granted December 1999)

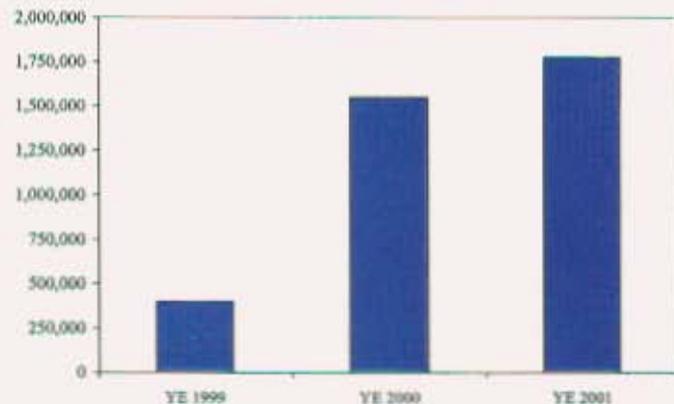
Total CLEC Lines



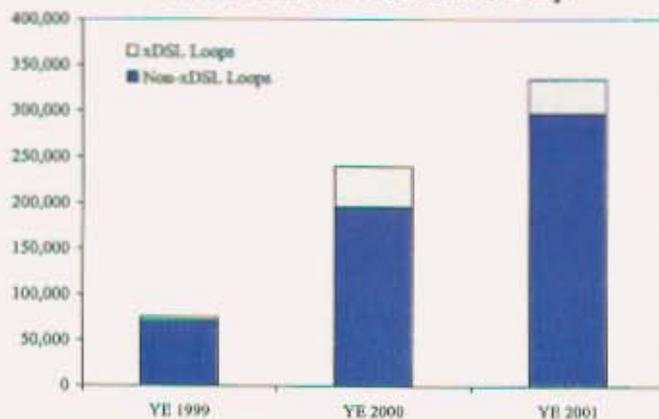
CLEC Facilities-Based Lines (E911 Listings)



CLEC UNE Platforms



CLEC Stand-Alone Unbundled Loops



CLEC Ported Numbers

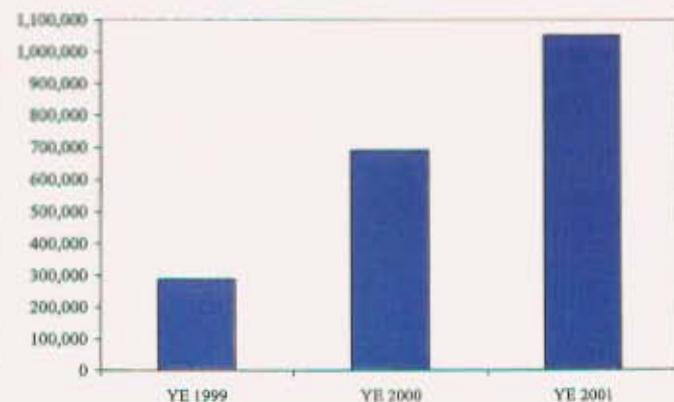
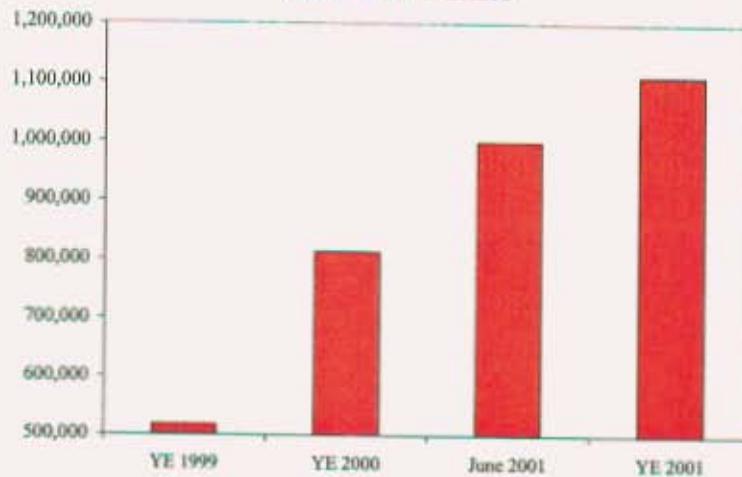
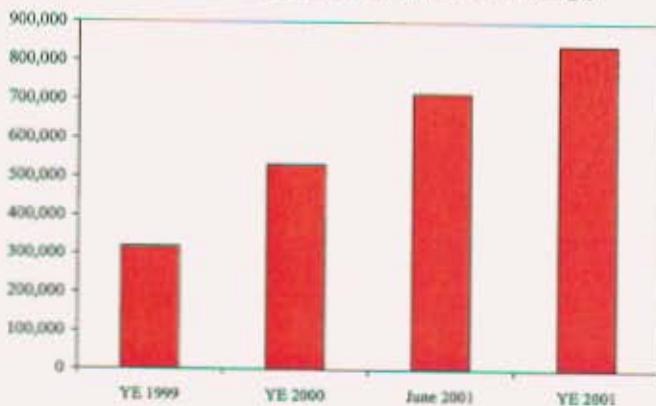


Exhibit 6. Growth of Local Competition in Massachusetts (§ 271 Authorization Granted April 2001)

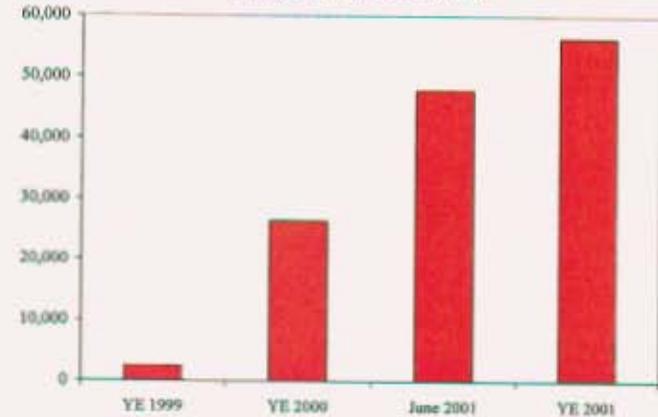
Total CLEC Lines



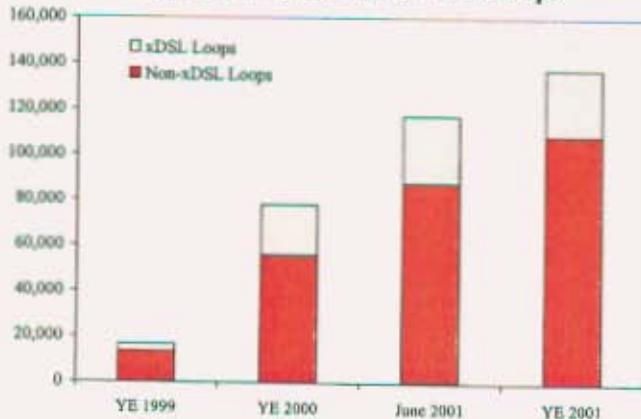
CLEC Facilities-Based Lines (E911 Listings)



CLEC UNE Platforms



CLEC Stand-Alone Unbundled Loops



CLEC Ported Numbers

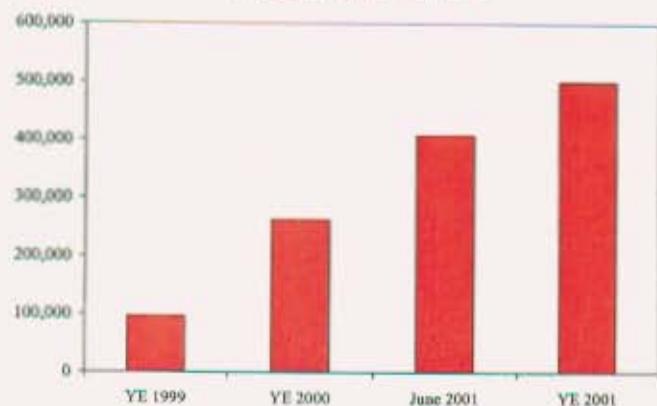
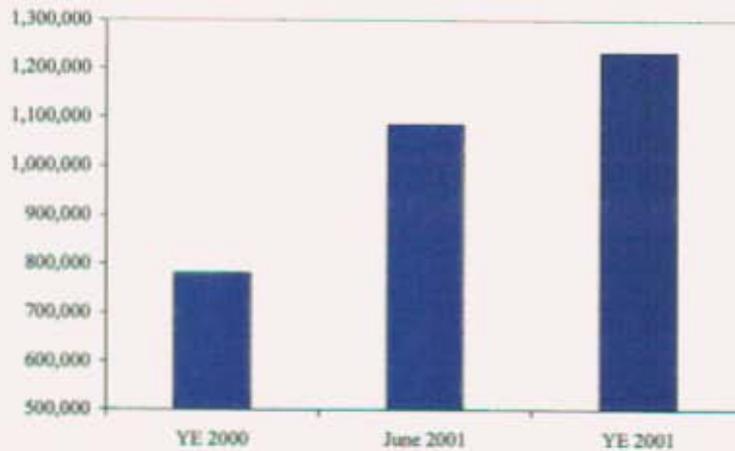
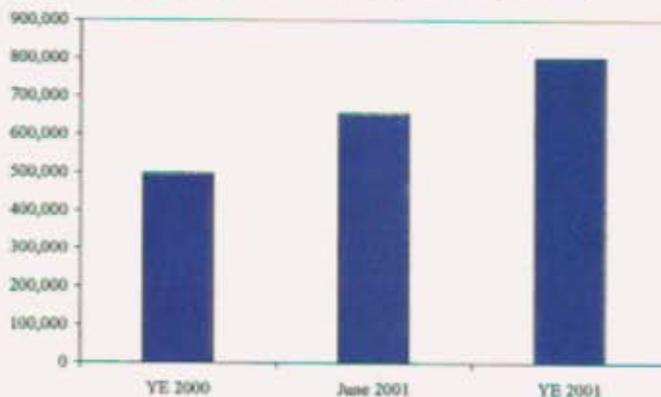


Exhibit 7. Growth of Local Competition in Pennsylvania (§ 271 Authorization Granted September 2001)

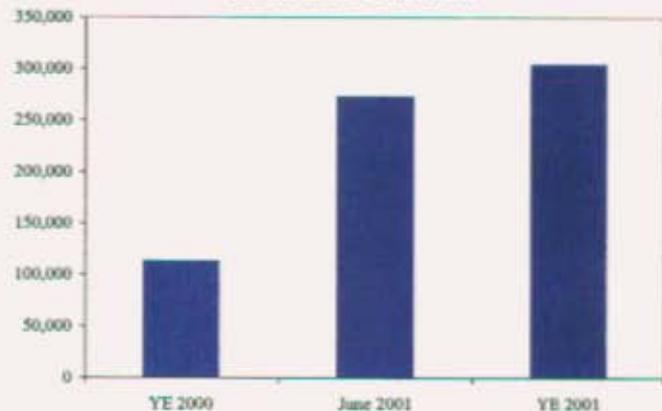
Total CLEC Lines



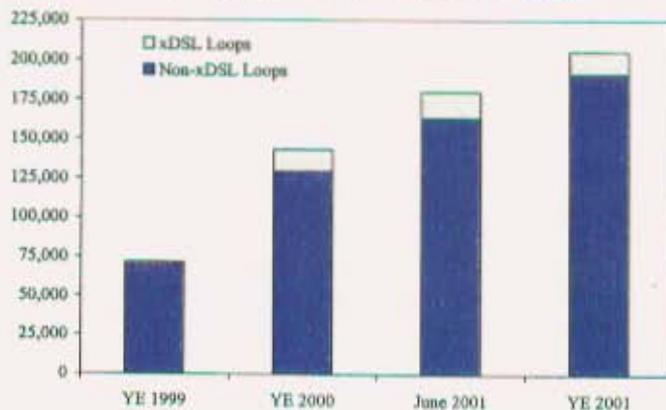
CLEC Facilities-Based Lines (E911 Listings)



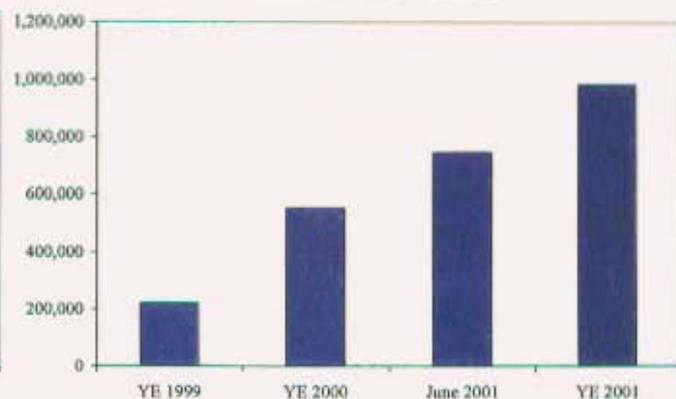
CLEC UNE Platforms



CLEC Stand-Alone Unbundled Loops



CLEC Ported Numbers



Required Statements

Pursuant to the Commission's March 23, 2001 Public Notice entitled Updated Filing Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act, DA 01-734 (rel. March 23, 2001), Verizon states as follows:

- (a) pages i-iv of this Brief contain a table of contents;
- (b) pages 1-3 of this Brief contain a concise summary of the substantive arguments presented;
- (c) pages 4-9 of this Brief contain a statement identifying how Verizon meets the requirements of section 271(c)(1), including a list of the specific agreements on which Verizon bases its application; page 10 n.12 of this Brief describes the status of federal-court challenges to the agreements pursuant to section 252(e)(6);
- (d) pages 11-12, 86-87 of this Brief contain a statement summarizing the status of the Maine Public Utility Commission's proceeding examining Verizon's compliance with section 271;
- (e) this Brief contains all legal and factual arguments that the three requirements of section 271(d)(3) have been met, and is supported as necessary with selected excerpts from the supporting documentation (with appropriate citations): pages 10-75 address the requirements of section 271(d)(3)(A); pages 75-80 address the requirements of section 271(d)(3)(B); and pages 80-99 address the requirements of section 271(d)(3)(C);
- (f) pages iii-iv of and Attachment C to this Brief contain a list of all appendices (including declarations) and the location of and subjects covered by each of those appendices has been included;
- (g) inquiries relating to access (subject to the terms of any applicable protective order) to any confidential information submitted by Verizon in this application should be addressed to: Steven McPherson, Verizon, 1515 North Court House Road, Suite 500, Arlington, Virginia 22201, (703) 351-3083;
- (h) Anti-Drug Abuse Act certifications as required by 47 C.F.R. § 1.2002 are appended hereto;
- (i) certifications signed by an officer or duly authorized employee certifying that all information supplied in this application is true and accurate to the best of his or her information and belief are appended hereto.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications, Inc.)
(d/b/a Verizon Long Distance), NYNEX)
Long Distance Company (d/b/a Verizon)
Enterprise Solutions), Verizon Global)
Networks Inc., and Verizon Select)
Services Inc., for Authorization To)
Provide In-Region, InterLATA Services)
in Maine)

CC Docket No. _____

**DECLARATION AND VERIFICATION OF EDWARD B. DINAN
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF VERIZON MAINE**

1. I, Edward B. Dinan, am President of Verizon Maine. I am authorized to make this declaration on behalf of Verizon Maine.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Maine, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Verizon Maine is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on March 8, 2002.

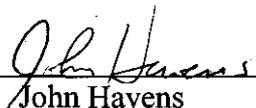

Edward B. Dinan

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications, Inc.)
(d/b/a Verizon Long Distance), NYNEX) CC Docket No. _____
Long Distance Company (d/b/a Verizon)
Enterprise Solutions), Verizon Global)
Networks Inc., and Verizon Select)
Services Inc., for Authorization To)
Provide In-Region, InterLATA Services)
in Maine)

**DECLARATION AND VERIFICATION OF JOHN HAVENS
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
NYNEX LONG DISTANCE COMPANY (d/b/a VERIZON ENTERPRISE SOLUTIONS)**

1. I, John Havens, am President and Chief Executive Officer of NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions). I am authorized to make this declaration on behalf NYNEX Long Distance Company.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Maine, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that NYNEX Long Distance Company is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on March 20, 2002.



John Havens

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications, Inc.)
(d/b/a Verizon Long Distance), NYNEX) CC Docket No. _____
Long Distance Company (d/b/a Verizon)
Enterprise Solutions), Verizon Global)
Networks Inc., and Verizon Select)
Services Inc., for Authorization To)
Provide In-Region, InterLATA Services)
in Maine)

**DECLARATION AND VERIFICATION OF JOHN HAVENS
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF BELL ATLANTIC COMMUNICATIONS, INC. (d/b/a VERIZON LONG
DISTANCE)**

1. I, John Havens, am President and Chief Executive Officer of Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance). I am authorized to make this declaration on behalf of Bell Atlantic Communications, Inc.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Maine, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that of Bell Atlantic Communications, Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on March 20, 2002.



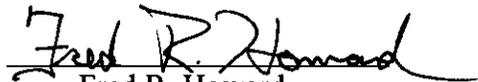
John Havens

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications, Inc.)
(d/b/a Verizon Long Distance), NYNEX) CC Docket No. _____
Long Distance Company (d/b/a Verizon)
Enterprise Solutions), Verizon Global)
Networks Inc., and Verizon Select)
Services Inc., for Authorization To)
Provide In-Region, InterLATA Services)
in Maine)

**DECLARATION AND VERIFICATION OF FRED R. HOWARD
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF VERIZON GLOBAL NETWORKS INC.**

1. I, Fred R. Howard, am Executive Director of Verizon Global Networks Inc. I am authorized to make this declaration on behalf of Verizon Global Networks Inc.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Maine, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Verizon Global Networks Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on March 11, 2002.

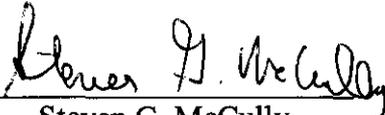

Fred R. Howard

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications, Inc.)
(d/b/a Verizon Long Distance), NYNEX) CC Docket No. _____
Long Distance Company (d/b/a Verizon)
Enterprise Solutions), Verizon Global)
Networks Inc., and Verizon Select)
Services Inc., for Authorization To)
Provide In-Region, InterLATA Services)
in Maine)

**DECLARATION AND VERIFICATION OF STEVEN G. MCCULLY
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF VERIZON SELECT SERVICES INC.**

1. I, Steven G. McCully, am President - Enterprise Long Distance of Verizon Select Services Inc. I am authorized to make this declaration on behalf of Verizon Select Services Inc.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Maine, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Verizon Select Services Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on March 11, 2002.


Steven G. McCully

02-61

**APPLICATION BY VERIZON NEW ENGLAND
FOR AUTHORIZATION TO PROVIDE IN-REGION
INTERLATA SERVICES IN MAINE**

RECEIVED

MAR 21 2002

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

BRIEF ATTACHMENT C

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**APPLICATION BY VERIZON NEW ENGLAND
FOR AUTHORIZATION TO PROVIDE IN-REGION,
INTERLATA SERVICES IN MAINE**

APPENDIX A

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