

B. Other Checklist Issues.

Apart from the pricing issues discussed above, just two commenters (one in New Hampshire and one in Delaware) take issue with Verizon's checklist compliance, and only with respect to a few narrow issues. These comments, however, largely rehash claims made and rejected during the state proceedings or in previous section 271 proceedings before this Commission.

Interconnection. As Verizon demonstrated in its Application, Verizon provides the same forms of interconnection in New Hampshire and Delaware that it provides in states that have already received section 271 approval, and provides them using the same processes and procedures that it uses in those states. Moreover, Verizon's performance in providing interconnection to CLECs continues to be excellent in both New Hampshire and Delaware, and in Massachusetts and Pennsylvania where volumes are higher.

No party takes issue with any part of Verizon's performance in providing interconnection trunks to CLECs, which continues to be excellent. For example, in May and June 2002, Verizon met the installation appointments for providing interconnection trunks to CLECs 100 percent of the time in New Hampshire (in Delaware there were no trunk orders). See Lacouture/Ruesterholz NH Reply Decl. ¶ 78; Lacouture/Ruesterholz DE Reply Decl. ¶ 75. During those same months, Verizon also completed 100 percent of CLEC orders for interconnection trunks in Massachusetts and Pennsylvania, where volumes are higher than in New Hampshire and Delaware. See Lacouture/Ruesterholz NH Reply Decl. ¶ 79; Lacouture/Ruesterholz DE Reply Decl. ¶ 76.

Similarly, Verizon's performance in providing collocation also continues to be excellent. In May and June 2002, for example, Verizon completed 100 percent of its physical collocation arrangements and collocation augments on time in New Hampshire,

Delaware, Massachusetts, and Pennsylvania. See Lacouture/Ruesterholz NH Reply Decl. ¶¶ 80-81; Lacouture/Ruesterholz DE Reply Decl. ¶¶ 80-81.

Cavalier is the only CLEC to take issue with this checklist item with respect to Delaware.³⁰ Cavalier, however, simply repeats arguments that it and other CLECs have raised, without success, in prior Verizon section 271 applications. Specifically, Cavalier again complains (at 6-16) about language it agreed to in its interconnection agreement addressing so-called Geographically Relevant Interconnection Points (“GRIPs”). The Delaware PSC, however, considered and rejected these claims in finding that Verizon satisfies Checklist Item 1. See Inquiry Into Verizon Delaware Inc.’s Compliance with the Conditions Set Forth in 47 U.S.C. Section 271 (Filed February 1, 2002), Transcript at 100-02, Docket No. 02-001 (DE PSC June 25, 2002) (Application, App. M-DE, Tab 14); DE PSC Report at 8-9. And this Commission has previously rejected such claims as well. In approving Verizon’s application in Pennsylvania, the Commission expressly found that GRIPs “do[es] not represent a violation of our existing rules” and rejected CLECs’ claims that “Verizon’s policies in regard to the financial responsibility for interconnection facilities fail to comply with its obligations under the Act.” Pennsylvania Order ¶ 100. Because Verizon’s policies in Delaware are the same as those in Pennsylvania, see Lacouture/Ruesterholz DE Decl. ¶ 37, the Commission’s conclusion

³⁰ BayRing complains (at 71-74) about the time it took another CLEC (NetworkPlus) to reach an interconnection agreement with Verizon in New Hampshire. The Commission has stated, however, that it “will not withhold section 271 authorization on the basis of isolated” allegations that Verizon “has engaged in unfair and dilatory tactics in interconnection negotiations,” which in any event are not true here. New York Order ¶ 444 & n.1365.

applies with equal force here.³¹ Moreover, the Commission has held that the issue here — the “allocation of financial responsibility for interconnection facilities” — is currently pending in an ongoing rulemaking proceeding, see Pennsylvania Order ¶ 100, which is the more appropriate forum to address such claims.

In any event, Cavalier’s specific dispute with respect to its interconnection agreement is currently pending before the Delaware PSC, which has “instructed Staff to expedite these proceedings.” DE PSC Report at 8; see Lacouture/Ruesterholz DE Reply Decl. ¶ 77. This Commission has repeatedly recognized that such disputes are appropriately addressed by the state commission and not in a section 271 proceeding. See Texas Order ¶ 383 (“[S]ection 271 does not compel us to preempt the orderly disposition of intercarrier disputes by the state commissions.”). Indeed, in the course of the New Jersey proceeding, this Commission has already considered the specific dispute Cavalier raises here, and found that it should be resolved by the state commission. See New Jersey Order ¶ 159 & n.487 (finding that Cavalier’s “dispute concerning conflicting interpretations of an interconnection agreement should be resolved by the New Jersey

³¹ In addition, Verizon’s GRIPs proposal is not the only form of network interconnection available to CLECs in Delaware. See Lacouture/Ruesterholz DE Reply Decl. ¶ 79. Verizon has entered into other interconnection agreements in Delaware that do not contain provisions for geographically relevant interconnection points. See id.; New Jersey Order ¶ 155. For these reasons, the Wireline Competition Bureau’s recent conclusion that certain CLECs’ proposed interconnection language is “more consistent” with the Commission’s rules than Verizon’s GRIP proposal is not relevant here. See Petition of WorldCom, 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 Expedited Arbitration, Memorandum Opinion and Order, CC Docket Nos. 00-218, 00-249 & 00-251, DA 02-731, ¶ 53 n.123 (FCC rel. July 17, 2002) (recognizing that, in the Pennsylvania Order, the Commission found that GRIPs does not violate the Commission’s existing rules).

Board,” and noting that “Cavalier’s allegations are also the subject of an ongoing proceeding in Delaware, where Cavalier’s switch is located”).

Dark Fiber. Verizon demonstrated in its Application that, in Delaware, the processes and procedures used to provide dark fiber are substantially the same as those in Pennsylvania, Connecticut, and Vermont, see Lacouture/Ruesterholz DE Decl. ¶ 243, where the Commission found that Verizon’s provision of dark fiber satisfies the Act, see Pennsylvania Order ¶¶ 109-113; Connecticut Order ¶¶ 49-53; Vermont Order ¶ 56. Verizon also demonstrated that, in New Hampshire, while Verizon provides dark fiber consistent with the Commission’s rules, see Lacouture/Ruesterholz NH Decl. ¶ 245, the PUC also adopted dark fiber requirements that, like the requirements adopted by the Massachusetts DTE and the Rhode Island PUC, go above and beyond those adopted by the Commission in its UNE Remand Order, see id.; see also Vermont Order ¶ 57 (finding that, for purposes of satisfying the checklist, Verizon need not demonstrate compliance with dark fiber requirements like those adopted by the Massachusetts DTE, which go beyond the requirements of the Act).

BayRing is the only party to complain about Verizon’s dark fiber offerings, and only with respect to New Hampshire. BayRing first claims (at 29-30 & n.98) that, between January 2000 and July 2001, Verizon responded to 84 percent of dark fiber inquiries by claiming that there is no dark fiber available. But BayRing has not provided a single example of where Verizon should have provided dark fiber to BayRing, but failed to do so. See Lacouture/Ruesterholz NH Reply Decl. ¶ 96. In accordance with the New Hampshire PUC’s requirements, Verizon provides to BayRing a detailed, written explanation for each denial of a CLEC dark fiber request. See id.; Verizon New

Hampshire, Order Approving in Part and Denying in Part Statement of Generally Available Terms and Conditions Additional Unbundled Network Elements, DT 01-206, Order No. 23,948, at 7-8, 56 (NH PUC Apr. 12, 2002) (Application, App. D-NH, Tab 7). If BayRing believed that any detailed, written explanation Verizon provided for denying BayRing's dark fiber request was inconsistent with Verizon's unbundling obligations, it could have challenged that response, which it has failed to do. See Lacouture/Ruesterholz NH Reply Decl. ¶ 96. In addition, in any instance where a dark fiber inquiry indicates that dark fiber is not available, CLECs may order a Field Survey to have Verizon dispatch technicians to verify Verizon's inventory records. See id. ¶ 97. Tellingly, BayRing has failed to avail itself of this opportunity as well. See id.

High-Capacity Loops. The only category of unbundled loops about which any party complains are high-capacity loops. As Verizon demonstrated in its Application, these loops make up only 1.5 percent of the loops provided to competitors in New Hampshire, and only 3 percent of the loops provided to competitors in Delaware. See Application at 45; Lacouture/Ruesterholz NH Decl. ¶ 116; Lacouture/Ruesterholz DE Decl. ¶ 116. Verizon also demonstrated that, despite small monthly volumes, Verizon's performance in providing high-capacity loops to competitors has been strong, both in New Hampshire and Delaware, and in Massachusetts and Pennsylvania where volumes are higher. See Application at 45-46; Lacouture/Ruesterholz NH Decl. ¶¶ 118-119; Lacouture/Ruesterholz DE Decl. ¶¶ 118-119.

BayRing is again the only party to raise issues about Verizon's provision of high-capacity loops, and only with respect to New Hampshire.³² As it did in the state proceeding, BayRing complains (at 37-44) about Verizon's rejection of orders for high-capacity loops where facilities are not available. However, Verizon follows the same practice of unbundling high-capacity loops in New Hampshire as it does in Pennsylvania, which the Commission found to comply with the checklist. See Lacouture/Ruesterholz NH Decl. ¶ 129; Lacouture/Ruesterholz NH Reply Decl. ¶ 32; Pennsylvania Order ¶ 68.

III. VERIZON SATISFIES THE PUBLIC INTEREST TEST.

Verizon demonstrated in its Application that there is significant local competition both in New Hampshire and Delaware; that Verizon's local markets in those states will remain open after Verizon obtains section 271 approval; and that permitting Verizon to provide interLATA service in New Hampshire and Delaware will vastly enhance consumer welfare by increasing both local and long distance competition. See Application at 115-32. Both the New Hampshire PUC and the Delaware PSC have agreed. And while a few parties argue that approving Verizon's Application is not in the

³² BayRing separately complains (at 76-80) about issues that the Commission has repeatedly found are "not relevant to compliance with [the] checklist," such as disputes over reciprocal compensation for Internet traffic, see Connecticut Order ¶ 67; Pennsylvania Order ¶ 119; Massachusetts Order ¶ 215, or that have already been resolved, such as the dispute over EELs that BayRing had ordered, see BayRing at 83 (acknowledging that Verizon adopted a "reasonable position" on this issue), as well as BayRing's claims that Verizon had failed to adopt certain dark-fiber policies, see id. at 86 (Verizon "decided to offer dark fiber terms that conform" to the PUC's order); id. at 89 (Verizon has adopted a "reasonable position" with respect to providing certain dark-fiber information).

public interest because the substantial and growing residential competition in these states is somehow too little, the Commission has repeatedly rejected this very claim.³³

Price Squeeze. AT&T and WorldCom claim that Verizon's UNE rates in Delaware effect a price squeeze, and BayRing makes the same claim with respect to New Hampshire. See AT&T at 36-38; WorldCom at 1-4; BayRing at 54-70. These claims fail on multiple grounds.

As an initial matter, Verizon demonstrated in the Application that there already is extensive local competition both in New Hampshire and in Delaware, which by itself proves that there is no merit to the commenters' price-squeeze claims. As both the D.C. Circuit and this Commission have made clear, "[t]he issue is not guarantees of profitability, but whether the UNE pricing selected here *doomed* competitors to failure." Sprint, 274 F.3d at 554; see Vermont Order ¶ 66 ("We conclude that AT&T and WorldCom have not established the existence of a price squeeze because they have not shown that 'the UNE pricing [at issue] *doom[s]* competitors to failure.'" (quoting Sprint, 274 F.3d at 554).

The facts on the ground show that, far from being doomed to failure, competitors in New Hampshire and Delaware have been able to thrive. In both states, competitors are serving residential and business customers using all three modes of entry available under the Act. See Application at 116-17; Torre Decl. Att. 1 ¶ 6 & Table 1; id. Att. 2 ¶ 6 &

³³ See, e.g., Pennsylvania Order ¶ 126 ("[g]iven an affirmative showing that the competitive checklist has been satisfied, low customer volumes or the failure of any number of companies to enter the market in and of themselves do not undermine that showing."); AT&T at 41-44; Sprint at 11-12; BayRing at 63-64. The Commission also has repeatedly rejected Sprint's claim (at 4-10) that Verizon's Application should be denied because of the supposed "crisis" in the CLEC industry and the alleged failure of Bell companies to compete with each other. See, e.g., Rhode Island Order ¶ 106; Vermont Order ¶ 64; Maine Order ¶ 60; New Jersey Order ¶ 168 & n.516.

Table 1. In New Hampshire, competitors served a total of 144,000 lines — including 38,000 residential lines — as of March 2002. See Torre Decl. Att. 1 ¶ 6, Table 1.

Although most competition for both residential and business customers in New Hampshire is facilities-based, competitors also are serving both kinds of customers through UNEs and resale as well. See id. In Delaware, competitors served a total of 49,000 lines — including 12,000 residential lines — as of March 2002. See id. Att. 2 ¶ 6, Table 1. And, as in New Hampshire, most of this competition for both residential and business customers is facilities-based, but competitors also are serving both kinds of customers through UNEs and resale. See id.

As the standard set forth by the D.C. Circuit and this Commission makes clear, there cannot be a price squeeze when (among other things) there are alternative ways to serve customers. Here, the facts show that facilities-based competition is one such alternative, and that it is being used extensively. Moreover, the Commission has acknowledged that “the Act contemplates . . . and addresses . . . potential price squeezes through the availability of resale,” which “provides a profit margin” even where — as is not the case here — “the costs of individual elements exceed the retail rate.” Vermont Order ¶ 69; see Georgia/Louisiana Order ¶ 287. As the Commission has explained, the availability of resale is dispositive of price-squeeze claims even where — although not the case here — the gap between resale and retail rates is not wide enough to accommodate an efficient carrier’s internal costs. See Vermont Order ¶ 69 (“AT&T and WorldCom contend that it is inappropriate to consider the availability of resale as a competitive option because the margin is insufficient. We disagree.”).

In any event, even apart from the various legal infirmities, the price-squeeze claims still fail. No party demonstrates that the UNE prices in New Hampshire and Delaware result in a price squeeze that “doom[s] competitors to failure” based on the exacting standards that the Commission has established for advancing such a claim. Vermont Order ¶ 66 (quoting Sprint, 274 F.3d at 554); see also Georgia/Louisiana Order ¶ 284.

The Commission has held that, in “examining allegations of price squeeze,” it “will look beyond a negative margin for the provision of residential service in high-cost areas using the UNE-Platform.” Vermont Order ¶ 68. The Commission will instead look at the profitability of using each of the Act’s three modes of entry (resale, UNE, and facilities-based) to provide various kinds of services (e.g., local, intraLATA toll, and long distance) to each customer segment (e.g., business and residential) on a statewide basis (e.g., in rural, urban, and suburban areas). See id. ¶¶ 67-71; Georgia/Louisiana Order ¶¶ 286-288. The Commission also has made clear that determining whether a price squeeze exists requires “far more than determining what is sufficient for a particular carrier to make a profit,” and that the “pertinent question” is instead “what is a sufficient profit for an *efficient* competitor.” Vermont Order ¶ 70 (emphasis added). Commenters that wish to make a price-squeeze claim must accordingly provide, at a minimum, “cost and other data” to address this. Id. A price-squeeze claim also must prove that “any difficulty entering the residential market profitably through the UNE-Platform” is not simply the “the result of subsidized local residential rates.” Id. ¶ 68.

None of the price-squeeze analyses submitted here comes close to satisfying any of these factors. WorldCom has ignored these requirements entirely, and has submitted a

version of the same one-page analysis that the Commission has rejected numerous times in the past. See WorldCom at 3-4 & Att. 1. BayRing likewise flouts the Commission's instructions.³⁴ For example, in support of its price-squeeze allegations, BayRing submits a price-squeeze analysis that was submitted in the state pricing proceeding and that it concedes (at 57) "did not consider access revenue or toll revenue," which renders its analysis meaningless under this Commission's standards. See Vermont Order ¶ 71.³⁵ And while BayRing has submitted an updated analysis prepared for this proceeding, it repeats the same fatal error. See BayRing at 61-62; BayRing Thayer Decl. Att. 2; see Hickey/Garzillo/Anglin Reply Decl. ¶¶ 48-49. Moreover, despite the fact that BayRing serves a significant number of business customers in New Hampshire, see Torre Decl. Att. 1 ¶ 27, BayRing ignores the Commission's directive to analyze its ability to "leverage [its] presence in . . . business markets . . . into an economically viable residential telephone service business," Vermont Order ¶ 71; see BayRing at 61 (analyzing only "residential revenue"); id. at 66-67 (arguing that proper price-squeeze analysis is of "average residential customer"). Likewise, BayRing greatly overstates its costs of obtaining UNEs in a number of respects, provides no cost data or evidence of any kind to support its estimates of its own internal costs, and wholly fails to demonstrate

³⁴ BayRing claims (at 69) that the New Hampshire PUC found that the rates it adopted create a price squeeze, but that is not the case. As the PUC notes here, "[t]he conditions accepted by Verizon NH for implementation in New Hampshire address the concerns we raised regarding Verizon NH's Section 271 application in terms of meeting the public interest standard." NH PUC Report at 17-18; see also Hickey/Garzillo/Anglin Reply Decl. ¶¶ 52-55.

³⁵ BayRing's rationales for excluding these revenue categories entirely — "access revenues are steadily decreasing" and toll revenues are "increasingly speculative" — are misplaced. See BayRing at 57-58. Indeed, even other CLECs here acknowledge that BayRing is wrong. See AT&T at 50 (including these revenues in its analysis); see also Hickey/Garzillo/Anglin Reply Decl. ¶¶ 38-42 (addressing BayRing's individual claims in detail).

that these costs are those of an “efficient carrier.” See Hickey/Garzillo/Anglin Reply Decl. ¶ 48.

While AT&T claims (at 37) that its analysis responds to the factors the Commission identified in the Vermont Order, it also falls far short. Indeed, AT&T here has modified only slightly the analyses that it has submitted numerous times in the past, and which this Commission has repeatedly found lacking. This is hardly surprising, given that AT&T has previously conceded that it *can* provide service in two of the three zones in Delaware — which contain 85 percent of the states’ residential end users — at a positive gross margin. See Martin/Garzillo/Sanford Decl. ¶ 79 (citing Supplemental Declaration of E. Christopher Nurse on Behalf of AT&T Corp., Inquiry Into Verizon Delaware Inc.’s Compliance with the Conditions Set Forth in 47 U.S.C. § 271(c), Docket No. 02-001, ¶¶ 9-10 (Apr. 11, 2002) (Application, App. M-DE, Tab 13)). And, as the Commission has recognized, evidence that a competitor may not be able to earn a positive margin in *all* of a state’s geographic areas, particularly its rural ones, is insufficient to demonstrate that a price-squeeze exists. See Vermont Order ¶ 68 (“[W]e will look beyond a negative margin for the provision of residential service in high-cost areas using the UNE-Platform when examining allegations of price squeeze”); see also id. ¶ 68 (the inability to earn a gross profit margin in rural areas “may be the result of subsidized local residential rates in one or more zones and not the fact that UNE rates are not at an appropriate point in the TELRIC range.”); id. ¶ 69 (a competitor can always use resale to serve rural areas); id. ¶ 67 (a proper profit-margin analysis must look at the “statewide average margin,” not the margin available in any one zone.); Martin/Garzillo/Sanford Reply Decl. ¶ 75.

In any event, AT&T's latest analysis is riddled with flaws. As an initial matter, AT&T also limits its analysis to only a "residential entry strategy," AT&T at 50, despite the fact that AT&T and other competitors already serve a significant number of business customers in Delaware, see Torre Decl. Att. 2 ¶¶ 23-28. As noted above, the Commission has previously rejected this approach, which dooms AT&T's analysis.³⁶ Another fatal error is that AT&T fails to consider serving residential customers using its own switches together with unbundled loops, which is the entry strategy that Cavalier is using in Delaware today, and that AT&T has endorsed elsewhere.³⁷ AT&T also fails to explain how it calculates its expected revenues from the provision of intraLATA- and interLATA-toll services, does not provide the data supporting its calculations, excludes the revenues it can expect to earn from non-recurring charges (but includes the cost), and makes no attempt to account for the revenues from other services that AT&T could readily bundle with local service, such as DSL and wireless. See Martin/Garzillo/Sanford Reply Decl. ¶ 78; Comments of AT&T Corp., CC Docket Nos. 01-338, 96-98 & 98-147, at vi (FCC filed Apr. 5, 2002) ("AT&T is now offering residential customers . . . a combined package of voice and DSL-based services using UNE-P"). Likewise, AT&T provides no cost data or evidence of any kind to support its estimates of its own internal

³⁶ See Arkansas/Missouri Order ¶ 66 (rejecting AT&T's price-squeeze analysis because "AT&T does not provide any evidence with respect to business lines, where we expect the profitability is even greater"); Vermont Order ¶ 71 (requiring price-squeeze allegations to contain data showing how "competitors such as AT&T" could "leverage their presence in . . . business markets . . . into an economically viable residential telephone service business."); see also DE PSC Report at 12 ("Verizon-DE's approach of averaging residential and business customers is much more reflective of the realities of pricing for local exchange services.").

³⁷ See Cavalier at 16 (Cavalier is a "UNE loop provider that serves residential customers in Delaware"); New Jersey Order ¶ 67 ("AT&T stated that it had planned to implement its [UNE-loop] market entry strategy in New Jersey when Verizon charged \$32.16 to perform a hot cut."); AT&T Lieberman Decl. ¶ 23.

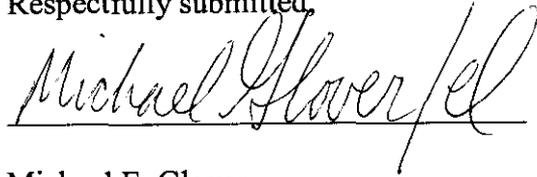
costs, and wholly fails to demonstrate that these costs are those of an “efficient competitor.” See Martin/Garzillo/Sanford Reply Decl. ¶¶ 83-84; Vermont Order ¶ 70; AT&T Bickley Decl. ¶¶ 2, 4; AT&T Lieberman Decl. ¶ 24.

Finally, while the Commission is under no legal obligation to perform a profit-margin analysis here, the facts show that the Delaware and New Hampshire rates permit competitors to earn a substantial gross profit. As noted above, AT&T concedes that the UNE rates in New Hampshire in Delaware enable competitors to earn a gross profit in two of the three density zones in both states. See Hickey/Garzillo/Anglin Decl. ¶ 66; Martin/Garzillo/Sanford Decl. ¶ 79. Moreover, when the commenters’ analyses are corrected for various flaws, the statewide average margin available in both New Hampshire and Delaware is at least *** ** percent or more. See Hickey/Garzillo/Anglin Decl. ¶ 66; Martin/Garzillo/Sanford Decl. ¶ 79; Hickey/Garzillo/Anglin Reply Decl. ¶ 51; Martin/Garzillo/Sanford Reply Decl. ¶ 86.

CONCLUSION

Verizon's Application to provide interLATA service originating in New Hampshire and Delaware should be granted.

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GLOSSARY OF 271 ORDERS

- Arkansas/Missouri Order Joint Application by SBC Communications Inc., et al. Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Arkansas and Missouri, Memorandum Opinion and Order, 16 FCC Rcd 20719 (2001), appeal pending, AT&T Corp. v. FCC, No. 01-1511 (D.C. Cir.)
- Connecticut Order Application of Verizon New York Inc., et al., for Authorization to Provide In-Region, InterLATA Services in Connecticut, Memorandum Opinion and Order, 16 FCC Rcd 14147 (2001)
- Georgia/Louisiana Order Joint Application by BellSouth Corp., et al., for Provision of In-Region, InterLATA Services In Georgia and Louisiana, Memorandum Opinion and Order, 17 FCC Rcd 9018 (2002)
- Kansas/Oklahoma Order Joint Application by SBC Communications Inc., et al., for Provision of In-Region, InterLATA Services in Kansas and Oklahoma, Memorandum Opinion and Order, 16 FCC Rcd 6237 (2001), aff'd in part and remanded, Sprint Communications Co. v. FCC, 274 F.3d 549 (D.C. Cir. 2001)
- Maine Order Application by Verizon New England Inc., et al., for Authorization To Provide In-Region, InterLATA Services in Maine, Memorandum Opinion and Order, CC Docket No. 02-61, FCC 02-187 (rel. June 19, 2002)
- Massachusetts Order Application of Verizon New England Inc., et al., For Authorization to Provide In-Region, InterLATA Services in Massachusetts, Memorandum Opinion and Order, 16 FCC Rcd 8988 (2001), appeal pending, WorldCom, Inc. v. FCC, No. 01-1198 (and consolidated cases) (D.C. Cir.)
- Michigan Order Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Michigan, Memorandum Opinion and Order, 12 FCC Rcd 20543 (1997)

- New Jersey Order Application by Verizon New Jersey Inc., et al., for Authorization To Provide In-Region, InterLATA Services in New Jersey, Memorandum Opinion and Order, WC Docket No. 02-67, FCC 02-189 (rel. June 24, 2002)
- New York Order Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York, Memorandum Opinion and Order, 15 FCC Rcd 3953 (1999), aff'd, AT&T Corp. v. FCC, 220 F.3d 607 (D.C. Cir. 2000)
- Pennsylvania Order Application of Verizon Pennsylvania Inc., et al. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania, Memorandum Opinion and Order, 16 FCC Rcd 17419 (2001), appeal pending, Z-Tel Communications, Inc. v. FCC, No. 01-1461 (D.C. Cir.)
- Rhode Island Order Application by Verizon New England Inc., et al., for Authorization To Provide In-Region, InterLATA Services in Rhode Island, Memorandum Opinion and Order, 17 FCC Rcd 3300 (2002)
- Texas Order Application by SBC Communications Inc., et al., Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services In Texas, Memorandum Opinion and Order, 15 FCC Rcd 18354 (2000)
- Vermont Order Application by Verizon New England Inc., et al., for Authorization To Provide In-Region, InterLATA Services in Vermont, Memorandum Opinion and Order, 17 FCC Rcd 7625 (2002), appeal pending, AT&T Corp. v. FCC, No. 02-1152 (D.C. Cir.)