Richard T. Ellis
Director – Federal Affairs

1300 I Street, NW
Suite 400 West
Washington, DC 20005
(202) 515-2534
(202) 336-7866 (fax)

September 5, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th H Street, SW, Portals
Washington, DC 20554

Re: *Joint Application by Verizon for Authorization To Provide In-Region, InterLATA Services in States of Delaware and New Hampshire*, Docket No. 02-157

Dear Ms. Dortch:

At the request of staff, Verizon provides this further information on Verizon's dark fiber practices in New Hampshire.

Verizon does not "reserve" fibers for itself. Verizon assigns maintenance fibers to itself so that it can respond to maintenance and repair situations, and it assigns available fibers to its own lit fiber optic systems. These lit fiber optic systems may provide capacity for the overall network growth of many services, for modernization of existing older transport technology (such as DS-1 circuits currently served on copper facilities), or for specific customer retail or wholesale orders, including other types of transport ordered by CLECs. Typically, Verizon assigns available fibers to its own lit fiber optic systems at the beginning of the engineering design work to implement a specific new lit fiber optic system.

Verizon assigns a reasonable quantity of fiber strands as maintenance strands to ensure the survivability and reliability of its fiber network for the benefit of its own retail and wholesale customers, as well as the CLECs' customers. Maintenance fibers typically are used for rapid emergency service restoration of "lit" (high capacity) fiber optic systems that fail when a fiber optic cable or strand is damaged or broken. Fiber optic cables and strands can be damaged or broken during storms, vehicular accidents or construction activity. The ready availability of maintenance spares enables Verizon to restore service quickly on a fiber optic system while a new fiber cable is constructed and thereby minimize any service interruption. It is for these

reasons that Verizon's Engineering Guidelines contain specific standards for assigning maintenance spares. These maintenance spares are available and could be used to restore both Verizon and CLEC transmission systems and services interrupted by cable damage. These levels of fiber maintenance strands have been in use for a number of years, prior to the FCC's requirement to provide dark fiber as an unbundled network element. For loop fiber, the guidelines require that four fiber strands be assigned for maintenance purposes in each fiber termination point. For interoffice fiber, the guidelines require that the number fiber strands assigned for maintenance purposes be based on the terminated fiber cable size connecting the central offices, as shown in the chart below.

Terminated Cable Size	**Number of Maintenance Fibers**
Up to 24 fibers	4
25-48 fibers	6
49-96 fibers	8
97-144 fibers	10
145-432 fibers	12
>432 fibers	24

Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 02-1497.

Sincerely,

cc: H. Thaggert
V. Schlesinger
G. Remondino
T. Wilson