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September 5, 2002

## Ex Parte

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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:

Per request of the staff, Verizon is providing information regarding its calculation of monthly per-line minutes of use in New York, New Hampshire and Delaware.

Verizon described the process by which it calculated per-line minutes of use (“MOUs”) in its section 271 applications for New Hampshire and Delaware. *See Hickey/Garzillo/Anglin Decl.* ¶ 60 & Attachment 3; *Martin/Garzillo/Sanford Decl.* ¶ 75 & Attachment 3. This filing further describes that methodology.

Verizon began with total year 2000 dial equipment minutes (“DEMs”), reflecting *all* local, toll, and access usage for *all* lines, including residence, business, public, retail, resale, official and UNE-P lines, served by Verizon switches. *See Hickey/Garzillo/Anglin Decl.* ¶ 60; *Martin/Garzillo/Sanford Decl.* ¶ 75. These total year 2000 DEM MOUs equal 280,824,320,892 in New York, 19,863,088,707 in New Hampshire, and 14,308,023,256 in Delaware. These figures represent total usage over the course of the year, not averages.

Verizon then divided the total 2000 DEM MOUs by the average number of in-service access lines for year 2000. This figure includes all switched residence, business, public, retail, resale, official and UNE-P lines. *See Hickey/Garzillo/Anglin Decl.* ¶ 60; *Martin/Garzillo/Sanford Decl.* ¶ 75. It does not include non-switched lines (for example, private lines or special access lines) or wholesale offerings that do not employ a Verizon switch (for example, stand-alone UNE loops).

Verizon derived the “average” number of lines by computing the mean of the month-end line count for every month in calendar year 2000. Verizon obtained this line count data from its internal systems, which -- unlike any ARMIS report or other publicly available source -- account for all of the line types listed above. The average line counts used in the per-line MOU calculation were 12,329,345 for New York, 848,212 for New Hampshire, and 607,008 for Delaware.

The result of this calculation was a per-line monthly MOU figure of 1898 for New York, 1951 for New Hampshire, and 1964 for Delaware. *Hickey/Garzillo/Anglin Decl.* ¶ 60; *Martin/Garzillo/Sanford Decl.* ¶ 75.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard Telli".

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