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September 23, 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:

In response to a question raised by Jordan Goldstein, Verizon is providing the following answer.

The New Hampshire and New York switching rates were based on different network architecture assumptions. For example, the New Hampshire rates are based on an architecture in which approximately 84% of the switches are "remote modules," rather than standalone, host switches. The New York rates assume approximately 56% remote and 44% host switches. In states where remotes are used more extensively, as they are in the New Hampshire network architecture assumptions, the additional transport between the host and the remotes is typically included in switch costs, rather than transport costs. As a result of such differences and the effect they have on how switching and transport costs are apportioned, a valid comparison between the states requires benchmarking non-loop rates in the aggregate.

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 black ink that reads "Richard T. Ellis".

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