



Richard T. Ellis
Director – Federal Affairs

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

September 24, 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 from Deena Shetler, Verizon submits the following clarification to our ex parte of September 23, 2002 concerning benchmarking of New Hampshire non-loop rates.

In its ex parte, Verizon explained that a valid comparison between New York and New Hampshire required benchmarking non-loop rates in the aggregate because the relative proportion of switching and transport costs vary due to differences in the underlying network architecture (e.g., the percentage of remote versus host switches). To clarify, the method for apportioning costs is the same; that is, in both states the additional transport between host and remote switches is included in the switching costs rather than in transport costs. However, because New Hampshire has a substantially higher percentage of remote switches than New York, the actual proportion of costs that get allocated to switching and transport vary between the states.

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