



January 29, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

Ex-Parte

Re: WC Docket No. 02-237, Verizon Section 63.71 Application to Discontinue Expanded Interconnection Service Through Physical Collocation

Dear Ms. Dortch:

In its Comments in the above captioned proceeding, Conversent Communications, LLC ("Conversent") opposed Verizon's application on the basis that Verizon's proposal to discontinue federally tariffed physical collocation would impose unjust and unreasonable cost increases on Conversent.¹ In its Reply Comments, Verizon asserted that "(a)ssuming a two-thirds reduction in the number of amps to which the power charges would apply, almost all of the commentors in this proceeding would enjoy substantial reductions in their charges for DC power."² In Conversent's case, Verizon estimated a cost reduction of ****begin proprietary**** ****end proprietary****, or ****begin proprietary**** ****end proprietary**** per year.

Verizon's estimated cost reduction for Conversent was summarized in a six-line attachment, with virtually no information about underlying assumptions. In contrast to Verizon's combined estimated cost reduction for Conversent if its proposal were approved, Conversent estimates that its combined costs would *increase* by approximately ****begin proprietary**** ****end proprietary****, an increase of approximately ****begin proprietary**** ****end proprietary****.³

¹ See, Comments of Conversent Communications, LLC, WC Docket No. 02-237 (filed September 18, 2002).

² Verizon Reply Comments, dated October 3, 2002, p. 10.

³ See attached table of Conversent's combined estimated monthly/annual rate impact summary. Note that Conversent's DC power costs alone would increase by ****begin proprietary**** ****end proprietary**** per year, an increase of ****begin proprietary**** ****end proprietary**** percent.

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Conversent can not be certain but believes the reason for this discrepancy is that Verizon may be assuming erroneously that Conversent is still ordering 40 amps on the A-feed and 40 amps on the B-feed for collocation arrangements ordered under federal tariff.

It is true that, historically, Conversent's practice was to order 40 amps for the A-feed and 40 amps for the B feed for each of the two fuse panels in its federal collocation arrangements.⁴ It is also true that Verizon bills for DC power on a fused basis for each feed under its federal tariff. As a result, while Conversent historically ordered only 40 amps per feed, it was billed for 60 amps per feed for a total of 120 amps per month for each fuse panel for each federal collocation arrangement.⁵ After Conversent learned of this billing practice, instead of arguing with Verizon about whether it was permissible to bill Conversent on a fused amp basis instead of a per amp basis, Conversent merely reduced the amps that it orders for each feed for collocation ordered under Verizon's FCC tariff.⁶ Accordingly, Conversent's current practice is to order 20 amps on the A-feed and 20 amps on the B-feed, which is fused at 30 amps on each feed (for a total of 60 fused amps per fuse panel) at Verizon's current standard of fusing at 1.5 times load. Verizon's bill for DC power associated with the 58 physical collocation arrangements Conversent has ordered under federal tariff amounts to ****begin proprietary**** ****end proprietary**** per month, or approximately ****begin proprietary**** ****end proprietary**** per year.

The amount of amps Conversent orders is important because it appears that Verizon's estimate of the cost reductions that it claims carriers will receive are based on an assumption that there will be a two-thirds reduction in the number of amps to which the power charges would apply. This is simply not the case with Conversent. If Conversent were required to convert its FCC arrangements to state arrangements, it would not be in a position to reduce the amps that it orders.⁷ The only change would be in the number of amps that would be billed by Verizon. That is, Verizon would bill Conversent for only 40 amps per fuse panel (20 amps on the A-feed and 20 amps on the B-feed) to account for the fact that Verizon charges for DC power under its state

⁴ There are two fuse panels in each of Conversent's collocation arrangements. Conversent requests two electric conduits, or "power feeds", to deliver power from the fuse panel to the collocated equipment. One feed is known as the A-feed and the other as the B-feed.

⁵ Conversent can find no express language in Verizon's FCC tariff that permits Verizon to bill requesting carriers on a fused amp basis.

⁶ Conversent also reduced the amps it orders under state collocation arrangements to 20 amps on the A-feed and 20 amps on the B-feed. Verizon does not bill on a fused amp basis under state collocation tariffs so Conversent is only billed for 40 amps per feed under such state arrangements.

⁷ This is because Conversent estimates that its equipment may draw up to 40 amps.

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collocation tariffs on a per load amp basis, instead of on a fused amp basis. This would result in a one-third reduction (not two-thirds) of the amps for which Conversent would be billed, but at rates that are generally three to four times higher than the rates in Verizon's FCC tariff. The bottom line is that

Conversent's monthly bill for DC power would increase from ****begin proprietary**** ****end proprietary**** a month to ****begin proprietary**** ****end proprietary**** per month, an increase of ****begin proprietary**** ****end proprietary**** percent!⁸

Pursuant to Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1), a copy of this letter is being filed electronically for inclusion in the public record of the above-referenced proceeding.

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/

Scott Sawyer

Vice President-Regulatory Affairs
Conversent Communications, LLC

SS/pf

Cc: Joseph DiBella
Jennifer McKee
Tamara Preiss
Jeff Dygert

Enclosure

⁸ When factoring in the amortized credit and certain space/bay rental fees, Conversent's monthly costs would increase from ****begin proprietary**** ****end proprietary**** to ****begin proprietary**** ****end proprietary****, an increase of 71 percent.

Attachment Redacted
Contains Confidential Information