

February 14, 2003

EX PARTE

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

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

Dear Ms. Dortch:

On February 13, 2003, Scott Sawyer and Dave Graham of Conversent Communications, LLC (“Conversent”) and I met with Jennifer McKee and Jeffrey Dygert of the Wireline Competition Bureau’s Pricing Policy Division. During the meeting, Conversent representatives responded to the arguments raised by Verizon in its *ex parte* letter dated February 7, 2003 in which Verizon disputed Conversent’s prior estimates of the financial impact on Conversent of Verizon’s requested withdrawal of its federal physical collocation tariff.¹ In the Verizon February 7 Letter, Verizon asserts that Conversent’s description of the manner in which it orders power in a recent Conversent *ex parte*² does not make sense. While it is not entirely clear how Verizon reached this conclusion, it is apparently based on its (incorrect) understanding that Conversent needs a total of 40 amps of power for each fuse panel associated with collocated equipment. Verizon asserts that it is not “realistic” to assert, as Conversent did in the Conversent January 29 Letter, that Conversent has reduced the volume of fused amps ordered under the federal tariff to 30 amps per feed. *See* Verizon February 7 Letter at 2. This is

¹ See Letter from Joseph DiBella Verizon, to Marlene H. Dortch, WC Docket No. 02-237, Verizon Telephone Companies Section 63.71 Application to Discontinue Expanded Interconnection Service Through Physical Collocation (February 7, 2003) (Public Version) (“Verizon February 7 Letter”).

² See Letter from Scott Sawyer to Marlene H. Dortch, WC Docket No. 02-237, Verizon Telephone Companies Section 63.71 Application to Discontinue Expanded Interconnection Service Through Physical Collocation (January 29, 2003) (Public Version) (“Conversent January 29 Letter”).

because, Verizon asserts, if one of the feeds were to go down, a single feed would be fused only to handle 30 amps, and it could not therefore carry the full 40 amps needed by Conversent. *Id.* at 2-3. Verizon's argument seems to be based on Conversent's statement in footnote 7 of the Conversent January 29 Letter, in which Conversent stated that "Conversent estimates that its equipment may draw up to 40 amps." Conversent January 29 Letter n. 7. However, in a subsequent letter, Conversent clarified that footnote 7 should have stated "that its equipment may draw up to 40 amps per *collocation arrangement (includes two fuse panels)*."³ Conversent generally assumes that it will need up to 20 amps of power for each fuse panel. Conversent has ordered the full amount of power needed for a panel (20 amps) on each feed (20 amps on the A feed and 20 amps on the B feed) because it has understood Verizon to require this practice. With each feed fused at 30 amps, this leaves Conversent enough fused capacity on a backup feed if one of the feeds goes down.

During the meeting, we did not discuss whether it is reasonable to assert that Conversent could reduce the number of amps it purchases in this scenario by two thirds, as Verizon claims. *See* Verizon February 7 Letter at 3. Conversent plans to address that issue as well as any associated financial consequences in a filing in this proceeding within the next few days.

In accordance with the Commission's rules, an electronic version of this letter is being filed in the record of the above-referenced dockets.

Sincerely,

/s/

Thomas Jones
Counsel for Conversent Communications, LLC

cc: Jennifer McKee
Jeffrey Dygert

³ See Letter from Scott Sawyer to Marlene H. Dortch, WC Docket No. 02-237, Verizon Telephone Companies Section 63.71 Application to Discontinue Expanded Interconnection Service Through Physical Collocation (February 7, 2003) at 2 (emphasis added).