

ORIGINAL

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February 3, 2003

Mr. Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street SW
Washington DC 20554

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Dear Mr. Powell:

We are writing to urge you and your colleagues *not* to eliminate the unbundled network element **platform** (UNE-P) rules.

We founded Vern Associates in 1994 to work as an adjunct **to** the publishing industry. We now develop, edit, design, and produce **publications** for nonprofit organizations, museums, and corporate clients. Telephone and fax communication is crucial to **business** development and performance of our services.

If the Federal Communications Commission relaxes the rules that presently require incumbent local-exchange carriers to permit use of aspects of their systems such as switches, we will lose one of the few operating-cost advantages that have developed over the life of our company.

Vern Associates uses two telephone lines, one dedicated fax line, and long-distance services. From the company's inception through July 2000, we paid three separate bills per month to Bell Atlantic, as we did to Verizon, once it subsumed Bell Atlantic. **We** also paid two long-distance bills.

In September 2001, we rolled billing for all three lines plus long distance into one by signing up with ICom, Inc., which has exactly the kind of arrangement with Verizon that the Federal Communications Commission is considering ending.

As a two-person corporation, the bookkeeping involved in paying five invoices per month required more time than you might expect. *But much more important is the cost benefit we have* enjoyed since beginning use of ICom. On average, our monthly **bill** for all services is \$122.00, compared with \$186.00 during fiscal years 1999–2001. Saving \$64.00 each month is a big help to us, as it would be for thousands of other Boston-area businesses.

Finally, now that Verizon is no longer "the only game in town," service has improved immeasurably. ICom is a well-run, efficient *business that* emphasizes customer service. In addition, the competition *has* resulted in a great improvement in the line service Verizon now provides. Competition has been good for

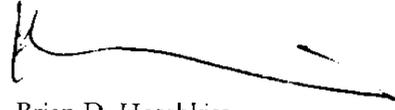
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small businesses. for the telephone services that arose as a result of the UNE-P rules, and, it would seem, the incumbent local-exchange carriers. Please do not weaken these provisions.

Thank you for your attention

Sincerely,

Peter M. Blaiwas
President


Brian D. Hotchkiss
Treasurer

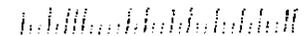
Cc: Senator Daniel K. Inouye, Chairman, Subcommittee on Communications, Senate Committee
on Commerce, Science, and Transportation
Senator John Kerry, Senate Committee on Commerce, Science, and Transportation
K. Dane Snowden, Chief, Consumer and Governmental Affairs Bureau, Federal Communications
Commission

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