

## WILMER, CUTLER &amp; PICKERING

2445 M STREET N.W.

WASHINGTON, DC 20037-1420

TELEPHONE (11) (202) 663-6000

FACSIMILE (11) (202) 663-6363

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October 28, 2003

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**BY HAND**

Ms. Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
c/o Natek, Inc  
236 Massachusetts Avenue, N.E.  
Suite 110  
Washington, DC 20002

**Re:** *WorldCom and AT&T v. Verizon,*  
CC Docket Nos. 00-218, 00-251

Dear Ms. Dortch:

Enclosed for filing please find an original and three copies of Verizon Virginia Inc.'s ("Verizon VA") Declaration of Patrick A. Garzillo, which explains the specific changes Verizon VA made to its cost studies in compliance with the August 29, 2003, Memorandum Opinion and Order (the "*Order*") in the above-captioned proceeding, and the attached summary of rates calculated in compliance with the *Order*.

Verizon VA today is also providing copies of its proprietary cost studies to Commission Staff and the parties to this proceeding, in both hard copy and CD format. The cost studies consist of three CDs containing the following materials:

- CD 1. VCost Development System and Loop Cost Analysis Model<sup>1/</sup>
- CD 2. Verizon VA Compliance Cost Studies
- CD 3: SCIS and CCSICIS models and supporting files

<sup>1/</sup> Pursuant to the *Order*, Verizon VA's Loop Cost Analysis Model ("LCAM") was not used to calculate compliance rates for unbundled loops. However, the VCost model was used as part of Verizon VA's compliance cost studies, and LCAM cannot be extracted from the CD containing Vcost.

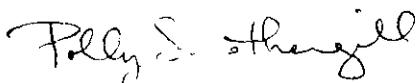
*CP*

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Although these CDs contain primarily proprietary materials, CDs 1 and 3 include certain non-proprietary documents, including cost model user guides and manuals. The proprietary and non-proprietary materials are inextricably linked on the CDs, and thus no non-proprietary version of those CDs can be readily produced for filing. However, Verizon VA previously filed these non-proprietary documents with the Commission (and served them on the parties) on July 2, 2001, with Verizon VA's initial cost study filing. Accordingly, and because the documents are voluminous (totaling over two thousand pages), Verizon VA is not filing a supplemental copy of those documents at this time.

Please call me if you have any questions

Sincerely,



Polly B Smothergill  
*Attorney for Verizon Virginia Inc.*

Enclosures

- cc. Tamara Preiss and Steve Morris (7 proprietary copies, 7 electronic copies, 1 public copy)  
Mark Keffer (1 proprietary copy, 1 electronic copy, 1 public copy)  
Allen Feifield (1 proprietary copy, 1 electronic copy, 1 public copy)  
David Levy (1 proprietary copy, 1 electronic copy, 1 public copy)  
Mark Schneider (1 proprietary copy, 1 electronic copy, 1 public copy)

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Compliance Cost Studies, and Declaration of Patrick Garzillo, were served by hand delivery via courier this 28th day of October, 2003, to:

Tamara Preiss  
Federal Communications Commission  
Pricing Policy Division  
Wireline Competition Bureau  
445 12th Street, SW  
Washington, D C 20554

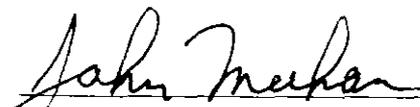
Mark A. Keffer  
Dan W. Long  
Stephante Baldanzi  
AT&T  
3033 Chain Bridge Road  
Oakton, Virginia 22185

Steven Morris  
Federal Communications Commission  
Pricing Policy Division  
Wireline Competition Bureau  
445 12th Street, SW  
Washington, D.C. 20554

Allen Feinfeld, Esq.  
Kimberly Wild  
WorldCom, Inc.  
1133 19th Street, N.W.  
Washington, D C 20036

David Levy  
Sidley, Austin, Brown & Wood  
1501 K Street, N.W.  
Washington, D C 20005

Mark Schneider  
Jenner & Block LLC  
601 Thirteenth Street, N.W  
Washington, D.C. 20005

  
John Mehan