

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Amendment of Parts 1 and 63 of the	)	IB Docket No. 04-47
Commission's Rules	)	
	)	

**COMMENTS OF VERIZON<sup>1</sup>**

The FCC should adopt the International Bureau's proposal—in the *2002 IB Biennial Review Staff Report*<sup>2</sup>—to reduce the notification period for discontinuance of international services from 60 days to 30 days, consistent with the requirements for discontinuing domestic service.<sup>3</sup>

Verizon agrees with the International Bureau that amending section 63.19 of the Commission's rules<sup>4</sup> to shorten the notice period for non-dominant carriers discontinuing international services from 60 days to 30 days would eliminate customer confusion resulting from disjointed notices currently required when a non-dominant carrier discontinues both its international and domestic services. In addition, as Verizon pointed out in its *2002 Biennial*

---

<sup>1</sup> The Verizon 214 Licensees ("Verizon") are various subsidiaries and affiliates of Verizon Communications Inc. holding international Section 214 authorizations, listed in Attachment A.

<sup>2</sup> *International Bureau Federal Communications Commission Biennial Regulatory Review 2002, Staff Report*, 18 FCC Rcd 4196 (2002) ("*2002 Biennial Review Staff Report*"). In making this recommendation, the Bureau agreed with Verizon that, when a carrier that provides both domestic and international service seeks to discontinue service, the different requirements for discontinuance of the two services places unnecessary burdens on the carrier and the Commission, which can lead to confusion for the carrier's customers. *2002 Biennial Review Staff Report*, 18 FCC Rcd at 4239 (Appendix VI ¶ 19).

<sup>3</sup> *Amendment of Parts 1 and 63 of the Commission's Rules*, Notice of Proposed Rulemaking, 19 FCC Rcd 4231, ¶ 13 (2004) ("NPRM") and summarized at *Amendment of the Commission's Rules*, 69 Fed. Reg. 13276 (Mar. 22, 2004) (Notice of Proposed Rulemaking).

<sup>4</sup> 47 C.F.R. § 63.19(a)(1) (2003).

*Review* comments,<sup>5</sup> this change will make the Commission's rules more consistent. Finally, shortening the notice period is consistent with the increasingly competitive market for international services, which has only grown more competitive since Verizon originally made its proposal to shorten the notice period in 2002. As Verizon noted then, the FCC originally required a longer notice period for international routes because of a lack of competitiveness in the international market, which made it more difficult for customers to replace discontinued international services than to replace discontinued domestic services. Given the competitiveness of international markets today,<sup>6</sup> however, a 30 day notification period provides sufficient time for customers to find new providers of international service.

For the foregoing reasons, Verizon urges the Commission to adopt the International Bureau's proposals to reduce the notification period for discontinuance of international services from 60 days to 30 days.

---

<sup>5</sup> See *Biennial Review 2002 Comments of Verizon*, IB Docket No. 02-309, at 11-12 (filed Oct. 18, 2002).

<sup>6</sup> See, e.g., *International Settlement Policy Reform International Settlement Rates*, Notice of Proposed Rulemaking, 17 FCC Rcd 19954, 19955-56, 19964, 19966-67 (2002).

Respectfully submitted,

VERIZON

Leslie V. Owsley  
VERIZON  
1515 N. Courthouse Road, Suite 500  
Arlington, VA 22201-2909  
(703) 351-3158

*Counsel for Verizon*

May 6, 2004

By: /s/ Peter D. Shields  
Peter D. Shields  
Heather O. Dixon  
Ann E. Broeker  
WILEY REIN & FIELDING LLP  
1776 K Street, NW  
Washington, DC 20006  
(202) 719-7000

*Counsel for Verizon*

## ATTACHMENT A

### THE VERIZON TELEPHONE COMPANIES

The Verizon 214 Licensees ("Verizon") are various subsidiaries and affiliates of Verizon Communications Inc. holding international Section 214 authorizations. These are:

Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance  
CANTV USA, Inc.  
Codetel International Communications Incorporated  
GTE Pacifica Incorporated d/b/a Verizon Pacifica  
GTE Railfone LLC  
GTE Wireless Incorporated  
Iusatel USA, Inc.  
NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions  
PRT Larga Distancia, Inc.  
Verizon Airfone Inc. (formerly GTE Airfone Incorporated)  
Verizon Global Solutions Inc.  
Verizon Hawaii International Inc.  
Verizon Select Services Inc.