



Ann D. Berkowitz
Associate Director
Federal Regulatory Advocacy

1300 I Street, NW
Suite 400 West
Washington, DC 20005
(202) 515-2539
(202) 336-7922 (fax)
aberkowitz@verizon.com

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Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: New Part 4 of the Commission's Rules Concerning Disruptions to Communications, ET Docket No. 04-35

Dear Ms. Dortch:

Verizon is providing the below responses to questions raised during its July 26, 2004 meeting with members of the Office of Engineering and Technology. The questions specifically address DS3 and SS7 issues in the above proceeding.

DS3:

How does Verizon identify a retail customer DS3? How/when would we know to report an outage?

Verizon would be able to determine a retail customer DS3 by looking for circuits that terminated at either the end user or POP locations using circuit order identification information. Verizon would know by system alarms when a problem occurs, and would know to report the problem once we are aware that we have crossed the threshold for reporting.

SS7:

Staff raised concerns about the possibility of several separate end offices having SS7 failure which did not meet the reporting threshold as individuals but did as a collective group. How would Verizon address these concerns?

Under the current rules if Verizon has a common failure that impacts several separate end offices involving SS7, they are compiled as a group to determine FCC reporting criteria. We consider any SS7 isolation of an end office an FCC reportable event if the sum of the end offices exceeds 30,000 customers for 30 minutes or more. Verizon sees no reason that its process would change under the new proposals.

A concern has been identified for capturing outage report information from third party providers of SS7 who have impacted end offices which separately won't meet reporting criteria, but grouped together would be reportable. Verizon would suggest that the following criteria be adopted to address this concern:

- (1) If a telecommunications provider has the ability to track blocked calls, they will be required to report the outage based on blocked calls; or
- (2) if the telecommunications provider does not have the ability to track blocked calls, such as is the case with third party SS7 providers, the SS7 provider would be required to report the outage based on the new FCC criteria.

Staff also inquired about Verizon's burden, specifically the need to equip the end offices. Would it be feasible to read from the STP instead?

Verizon could equip the STP switches with monitoring equipment, servers, and custom software which would be sufficient to capture ISUP messages. The burden, however, remains significant, as each link that is to be monitored has to be physically connected to the equipment. Verizon currently has in excess of 15,000 SS7 links. Monitoring currently is on demand in real time, with no historical storage available.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Berkow". The signature is fluid and cursive, with a large initial "A" and "B".

cc: Sheryl Wilkerson
Jennifer Manner
Paul Margie
Scott Bergmann
Sam Feder
Jeff Golthorp
Kent Nilsson
John Healy
Whitey Thayer