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Joseph Mulieri  
Vice President  
Federal Regulatory Advocacy



July 28, 2004

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1515 N. Court House Road  
5th Floor  
Arlington, VA 22201

703 351-3096  
703 351-3652 fax

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

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JUL 28 2004

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: AT&T Petition for Rulemaking to Reform Regulation for Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM No. 10593**

Dear Ms. Dortch:

On July 13, 2004, Verizon placed on the record in this proceeding data describing the state of competition for high-capacity services in the largest MSAs where Verizon provides service as the incumbent local exchange carrier.<sup>1</sup> The evidence contained in that submission included detailed maps graphically depicting the scope of competition as well as white papers, declarations, and other supporting materials all of which demonstrate that competing carriers are not dependent upon incumbent special access services to serve customers in these markets. This high-capacity services data is part of a larger body of evidence previously submitted to the Commission in several proceedings<sup>2</sup>, focusing on the current state of competition in the marketplace as it relates to high-capacity services and mass-market switching availability.

The purpose of this letter is to supplement the high-capacity services data submitted on July 13, 2004 with additional evidence describing the widespread deployment of competing voice telephone services by cable companies and Voice over Internet Protocol ("VoIP") providers, as well as increasing competition from wireless and other intermodal providers and competitors that have deployed their own circuit switches. These developments conclusively show that competition is not impaired without access to unbundled mass market switching both as a general matter and in the specific areas served by Verizon. This evidence, which is enclosed, includes detailed maps

<sup>1</sup> See Letter from Joseph Mulieri, Verizon, to Marlene H. Dortch, FCC, RM No. 10593, filed July 13, 2004.

<sup>2</sup> See Letter from Dee May, Verizon, to Marlene H. Dortch, FCC, CC Docket Nos. 01-338, 98-147 and 96-98 at 10, 15 (filed June 24, 2004); Letter from Michael E. Glover, Verizon, to Marlene H. Dortch, FCC, CC Docket Nos. 01-338, 98-147 and 96-98 at 19, 29 (filed July 2, 2004).

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Ms. Dortch  
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graphically depicting the scope of competition as well as white papers, declarations, and other supporting materials.

Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Joe Mulieri". The signature is written in black ink and includes a stylized flourish at the end.

Enclosures

cc: T. Preiss  
S. Morris  
D. Shetler

DOCKET NO. *RM-10593*

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