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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Verizon Cost Allocation Manual Revisions

WCB Docket No. 04-22

**REPLY OF VERIZON¹ TO AT&T COMMENTS
ON VERIZON'S COST ALLOCATION MANUAL REVISIONS**

AT&T has completely misinterpreted Verizon's proposed revisions to its cost allocation manual ("CAM"), filed May 6, 2004. AT&T complains that these revisions do not implement the requirements of the Commission's order modifying its rules to permit the former Bell operating companies ("BOCs") to share operating, installation, and maintenance ("OI&M") services with their section 272 separate affiliates.² They were not intended to. As Verizon explained in the cover letter, these revisions primarily reflect service changes and general housekeeping matters.³ They do not include the CAM changes that would be needed to assign costs to any OI&M services that would be provided by the BOC to the section 272 affiliates. As required by

¹ The Verizon telephone companies ("Verizon") are the affiliated local telephone companies of Verizon Communications Inc. These companies are listed in Attachment A.

² See Matters of Section 272(b)(1)'s "Operate Independently" Requirements for Section 272 Affiliates, Report and Order in WC Docket No. 03-228 Memorandum Opinion and Order in CC Docket Nos. 96-149, 98-141, 01-337, 19 FCC Rcd 5102 (2004) ("OI&M Order").

³ Specifically, Verizon added a new nonregulated service, Call Management Signaling Service, and related cost pools, which has nothing to do with OI&M. Verizon also deleted services that were no longer offered as nonregulated and expanded the definition of National Directory Assistance to include International Directory Assistance. Finally, Verizon made minor technical changes to improve clarity and consistency.

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paragraph 20 of the *OI&M Order*, Verizon plans to file CAM modifications in the future to address specifically any OI&M services that will be shared with the section 272 affiliates and it will submit those changes to the Commission for review before providing such services.

Accordingly, the Commission should reject AT&T's criticisms of Verizon's CAM revisions.

Respectfully submitted,

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Dated: July 30, 2004

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.