

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Unbundled Access to Network Elements)	WC Docket No. 04-313
)	
Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers)	CC Docket No. 01-338
)	

REPLY COMMENTS OF NUVOX, INC.

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October 19, 2004

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Carriers)	
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REPLY COMMENTS OF NUVOX, INC.

NuVox, Inc. (“NuVox”), by and through its counsel, submits these reply comments in response to the Notice of Proposed Rulemaking released on August 20, 2004 in the above-captioned proceeding.^{1/} In these reply comments, NuVox addresses the BOC claims that, through channelization, carriers can compete at the DS1 capacity level wherever fiber has been or could be deployed. NuVox also expresses its support for the continuation of a limited UNE-P product for facilities-based carriers.

I. THE PRESENCE OF FIBER DOES NOT DEMONSTRATE THE ABILITY TO SELF-DEPLOY DS1 LOOPS OR THAT DS1 TRANSPORT IS AVAILABLE

The Bell Companies have once again provided evidence purporting to demonstrate the extent of fiber deployment and argue that such deployment is probative

^{1/} *Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338, *Order and Notice of Proposed Rulemaking*, FCC 04-179 (rel. Aug. 20, 2004) (“*Interim Order and NPRM*”).

of the ability of carriers to deploy or obtain at wholesale local loop or interoffice facilities at any capacity level. Even assuming the validity of the Bell Companies' "evidence," which as noted below is highly questionable, fiber deployment provides no insight into the ability of competitive carriers to self-deploy, or obtain as a wholesale product, at the DS1 level capacity. The BOCs' assertions that fiber can be readily "channelized" to any capacity level thus rendering deployment of DS1 capacity "possible" ignores market realities and is flatly contradicted by the sworn statements of carriers that actually have deployed alternative fiber and those in the market attempting to obtain DS1 facilities.

A. BOC Evidence of Fiber Deployment Is Overstated

The BOCs' claims concerning the extent of fiber deployment and "lit" buildings is not credible. *See, e.g.,* AT&T Corp. Comments, Declaration of Lee L. Selwyn ("AT&T Decl."), ¶¶ 36-44;^{2/} Loop and Transport CLEC Transport Coalition, *Ex Parte*, at 3, 5-9 (filed Oct. 15, 2004). NuVox can provide an additional specific example of the BOCs' erroneous assertions. The BOCs claim that there are, on average, 19 fiber networks in each the top 50 MSAs. *UNE Fact Report 2004*, BellSouth Corporation, SBC Communications, Inc., Qwest Communications International Inc., and the Verizon telephone companies, at I-2, I-7, III-3 (filed Oct. 4, 2004) ("*UNE Fact Report 2004*"). The BOCs identify the purported carriers that have deployed their own fiber networks in Attachment D of their *UNE Fact Report 2004*. That report identifies NewSouth and/or

^{2/} All comments or other industry filings cited in these reply comments have been filed in this proceeding unless otherwise noted.

NuVox as one of those fiber network providers in 17 of those MSAs.^{3/} This is patently incorrect because neither NewSouth nor NuVox have deployed any of their own fiber. NuVox Comments, Keith Coker Declaration ¶ 2 (“Coker Decl.”).^{4/}

To make matters worse, NewSouth has previously pointed out this error in the TRO proceeding. *See, e.g.,* NewSouth Reply Comments, *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advanced Telecommunications Capability*, Docket Nos. 01-338, 96-98, 98-147, at 5-6, 44-45 (filed July 17, 2002). For whatever reason, the BOCs insist on ignoring NewSouth’s statement of fact that it has not deployed any of its own fiber and continues erroneously to identify NuVox as a fiber provider. (The BOCs made a similar mistake with respect to Pac-West, erroneously identifying it as having its own fiber network in 14 MSAs). *See* AT&T Decl. ¶ 40.

B. The Technical Ability To Channelize Fiber Does Not Demonstrate Availability of DS1 Capacity Circuits

The BOCs claim that, because equipment can be added to fiber to channelize the fiber to different capacity levels, the presence of fiber demonstrates that high capacity

^{3/} The BOCs contend that NewSouth is a fiber network provider in the following top 50 MSAs: Atlanta-Sandy Springs-Marietta, GA; Tampa-St Petersburg-Clearwater, FL; Orlando, FL; Charlotte-Gastonia-Concord, NC-SC; New Orleans-Metairie-Kenner, LA; Nashville-Davidson-Murfreesboro, TN; Memphis, TN-AR-MS; Louisville, KY-IN; Jacksonville, FL; and Birmingham-Hoover, AL. *UNE Fact Report 2004*, Appendix D, at D3-D6. The BOCs make the same contention with respect to NuVox for the following MSAs: Miami-Fort Lauderdale-Miami Beach, FL; Atlanta-Sandy Springs-Marietta, GA; St. Louis, MO-IL; Cincinnati-Middletown, OH-KY-IN; Kansas City, MO-KS; Columbus, OH; Indianapolis, IN; Nashville-Davidson-Murfreesboro, TN; Memphis, TN-AR-MS; Louisville, KY-IN; Jacksonville, FL; Oklahoma City, OK. *Id.* at D2-D6.

^{4/} Verizon also identifies NewSouth as having “lit” buildings in the Tampa-St. Petersburg MSA. As NewSouth has no fiber of its own, this is plainly erroneous.

services can be provided competitively, at every standard increment. *UNE Fact Report 2004* at III-11. This claim, however, simply ignores the reality of the marketplace and is predicated on demonstrably false assumptions, whether in the context of loops or interoffice transport. With respect to loops, the BOCs falsely assume that laterals into buildings passed by fiber can be easily and readily accomplished and that if a single large company is served by fiber in a building, all other tenants in that building can be served at any capacity level. *UNE Fact Report 2004* at III-10. As for transport, the BOCs erroneously assume that collocated fiber equates to the availability of transport at all capacity levels between ILEC wire centers. Finally, the Bells assert that “many” carriers are offering wholesale DS1 capacity. *UNE Fact Report 2004* at III-14. All of these claims have been soundly refuted in the record.

1. **DS1 Loops**

As noted in its initial comments, NuVox has not deployed any of its own fiber and it is uneconomic to self-deploy at the DS1 level. NuVox also noted that wholesale DS1 loops were not available in the market place. The Bell Companies suggest, however, that wholesale DS1 service could be available because carriers can readily and easily extend their fiber networks into buildings and provide DS1 capacity service. The fiber-based carriers have uniformly informed the Commission, however, that constructing laterals from existing fiber rings is enormously costly, difficult and time consuming and *never* economically rational just to serve customers at the DS1 capacity level. For instance:^{5/}

^{5/} Unless otherwise indicated the declaration cites from the following list are drawn from declarations submitted by individual member companies of the Loop and Transport CLEC Coalition and were attached to the Coalition Comments.

- Advanced Telcom Inc. (“ATI”) notes that a typical fiber lateral only ¼ of a mile long connects only approximately 1-2 buildings at an investment cost of approximately \$75,000 to \$100,000, and that such a high per-building cost means that construction of a lateral is only economically justified to the “very largest buildings in the very highest density zones serving enterprise level customers.” Decl. of Dan J. Wigger on behalf of ATI (“ATI Decl.”) ¶ 19. The cost for a ½ mile spur would cost \$100,000 to \$150,000 and is not even considered as a feasible option. *Id.* ¶ 21. In addition to such financial costs, the construction of fiber laterals is impracticable because of the extremely difficult and time consuming process of overcoming permitting, zoning, and rights-of-way problems and because of the lengthy deployment time, which most customers are unwilling or unable to accept. *Id.* ¶¶ 20, 22. Because of the preceding concerns, ATI’s current policy is simply not to add a building to its network except in very limited circumstances, and it would never make sense to add a lateral to serve customers at the DS1 level. *Id.* ¶ 23;
- KMC Telecom Holdings, Inc. (“KMC”) identifies the same problems: difficulties in obtaining rights-of-way, permits, proper zoning, and the extremely high cost of construction, estimated for a typical lateral at approximately \$27,000 to \$30,000 per building for a distance of 800 to 1200 feet from the KMC backbone to the building. Decl. of Mike Duke on behalf of KMC (“KMC Decl.”) ¶¶ 8-10. KMC will not even consider adding a building to its network unless the minimum demand at that location exceeds at least 3 DS-3s of capacity. *Id.* ¶ 11. KMC also explained that its network configuration is not designed to provide wholesale loops. KMC Decl. ¶¶ 21-25.
- SNiP Link, LLC (“SNiP”) has concluded that the economic barriers are too large for them to “construct loop facilities to any location” even though it has deployed a fiber ring. Decl. of Anthony Abate on behalf of SNiP (“SNiP Decl”) ¶ 9;
- XO Communications, Inc. (“XO”) notes that the average building entry is 500 feet long and on average costs \$141,000 in outside plant construction and building access plus \$79,000 for the associated electronics, totaling \$220,000 per building. Decl. of Wil Tirado on behalf of XO (“XO Decl.”) ¶ 17. As do other CLEC carriers, XO also identifies problems with obtaining rights of way, permits, and zoning authority as well as the typically 4 to 6 month deployment period as additional obstacles to its construction of laterals. *Id.* ¶¶ 17-19. XO notes that its policy is not to add a building to its network unless customer demand at that location exceeds at least 3 DS-3s of capacity and passes a careful screening process intended to ensure that the costs of construction can be recovered. *Id.* ¶¶ 20-21 (see Table 1 detailing revenue analysis);

- Xspedius Management Co., LLC (“Xspedius”) estimates that building laterals can cost anywhere from \$21 to \$40 dollars per foot (which translates to \$110,880 to \$211,200 per mile to construct a lateral) and takes a minimum of 10 to 12 months to complete. Decl. of James C. Falvey on behalf of Xspedius ¶¶ 21-25 (“Xspedius Decl.”) (also noting the various administrative barriers described above). Xspedius will not build unless it has at least 3 DS-3s worth of demand. *See id.* ¶ 25; and
- Alpheus Communications L.P. (“Alpheus”) also notes the extreme cost of constructing a lateral, asserting that a lateral may cost from \$100 to \$400 per foot to deploy if it is a moratorium street. Alpheus Comments, Joint Decl. of Eleuterio (Teo) Galvan Jr. and Francisco Maella, ¶¶ 89-90 (“Alpheus Decl.”); *see also id.* ¶¶ 91-94 (describing CLEC construction disadvantages vis a vis incumbent construction).

As a result of the barriers to constructing even short laterals, carriers that deployed their fiber rings serve only a small fraction of the buildings passed by the fiber.

For example:

- Although owning and operating metro rings in 7 markets, ATI has built laterals to only 17 buildings. ATI Decl. ¶ 19.
- Cavalier Telephone, LLC (“Cavalier”) has found it to be economically justifiable to link its own fiber directly to a customer for only perhaps one to two percent of its business customers, and in all other cases it must rely on unbundled ILEC loops, mainly at the DS0 and DS1 level. ALTS Comments, Declaration of Brad A. Evans on behalf of Cavalier, ¶ 13.
- Similarly, XO has fiber rings connected to less than one percent of the potential market. XO Decl. ¶ 16.
- Likewise, less than 2.4 percent of TDS Metrocom, LLC’s (“TDS”) lines are over its own fiber, and many of those lines included within the 2.4 percent are to affiliated companies. Joint Comments of ATX, Blackfoot, BayRing, CTC, Focal, Globalcom, Lightship, Mpower, Niclos, RCN, and TDS, Declaration of Mark A. Jenn (“TDS Decl.”) ¶ 12; and
- A survey of Houston/Seattle markets conducted by Time Warner Telecom showed CLECs served less than 1 percent of buildings. Time Warner Telecom Comments at 5-6;

Finally, contrary to BOC claims that “many” carriers are offering DS1 wholesale loops, the record demonstrates that wholesale DS1 loop availability is extremely limited, and in many areas simply unavailable at all. For instance,

- Eschelon Telecom, Inc. (“Eschelon”) notes that “third-party provided high-capacity loops are not available to serve the vast majority of [its] customers.” Loop and Transport CLEC Coalition Comments, Decl. of David A. Kunde on behalf of Eschelon (“Eschelon Decl.”) ¶ 16;
- XO has found that CLECs offer DS-1 and DS-3 loops on a wholesale basis to fewer than five percent of the buildings that XO seeks to serve. XO Decl. ¶ 21;
- Xspedius has also found that it is rarely able to purchase DS-1 loop facilities from CLECs in any of its markets across the nation. Xspedius Decl. ¶ 26;
- Cbeyond Communications LLC (“Cbeyond”) notes that it has “not been able to find a single non-ILEC wholesale provider of DS-1 loops in the four markets in which it operates.” ALTS Comments, Declaration of Richard Batelaan on behalf of Cbeyond (“Cbeyond Decl.”) ¶ 6;
- Despite extensive efforts, OneEighty Communications Inc. (“OneEighty”) has likewise been unable to find any wholesale DS1 loops from third parties. Joint Comments of ATX, Blackfoot, BayRing, CTC, Focal, Globalcom, Lightship, Mpower, Niclos, RCN, and TDS, Decl. of Brent Johnson on behalf of OneEighty (“OneEighty Decl.”) ¶¶ 5, 9;
- TDS has also found that a wholesale loop market does not exist, noting that – outside of the downtown areas of major metropolitan areas – it has seen no evidence of any carriers offering wholesale access to loops. TDS Decl. ¶ 9;
- BayRing Communications (“BayRing”) has come to the same conclusion. Joint Comments of ATX, Blackfoot, BayRing, CTC, Focal, Globalcom, Lightship, Mpower, Niclos, RCN, and TDS, Decl. of Steven A. Wengart on behalf of BayRing Communications (“BayRing Decl.”) ¶ 9 (no wholesale loops available from third parties);
- McLeodUSA Telecommunications Services, Inc. declares that in the overwhelming number of markets within its 25-state footprint, McLeod has been unable to locate any wholesale DS1 loop alternatives.

McLeodUSA Telecommunications Services, Inc. Comments, Decl. of Todd M. Lechtenberg (“McLeodUSA Decl.”) ¶ 4.

- ATI contends that wholesale DS1 loops are available in only one of its markets and represent only about 10 percent of ATI’s loops. ATI Decl. ¶ 24.

2. Transport

The BOCs’ claim that the presence of a fiber carrier demonstrates an ability to obtain wholesale DS1 interoffice transport is equally spurious. A number of fiber-based carriers have explained that just because they have fiber does not mean they do or can provide DS1 capacity transport. *See e.g.*, ATI Decl. ¶ 39 (noting that ATI has not made, nor does it believe it is economically rational to make, wholesale transport available over its fiber rings.); KMC Decl. ¶¶ 16-20; *see also* BayRing Decl. ¶ 14.

Fiber carriers typically have not deployed fiber between ILEC central offices, but rather to transport that carrier’s traffic between an ILEC central office and that carrier’s switch or an IXC POP. KMC Decl. ¶¶ 16-20; Alpheus Decl. ¶ 26. *See* AT&T Decl. ¶¶ 57-59 (explaining CLEC fiber architecture). Moreover, the fact that a carrier terminates fiber into two or more ILEC wire centers does not mean that it can provide transport between those wire centers. KMC Decl. ¶ 19 (explaining substantial network modifications and expense required to provide wholesale transport between ILEC wire centers); Alpheus Decl. ¶ 26 (stating that the fiber systems it has reviewed did not have fiber between ILEC central offices).

In stark contrast to the BOCs’ claim that “many” carriers offer wholesale DS1 transport capacity, numerous carriers have echoed NuVox’s testimony that they are not

aware of wholesale DS1 transport in their service areas, despite the presence of fiber carriers. For example:

- SNiP asserts that it “has not found any provider that would sell DS1 transport using its own facilities.” SNiP Decl. ¶ 19;
- Talk America, Inc. (“Talk America”) it is not aware of *any* alternate providers that offer DS-1 transport in its service area, and it estimates that there are multiple alternate DS-3 providers on only approximately 35 percent of its routes. Loop and Transport CLEC Coalition Comments, Decl. of Warren Brasselle on behalf of Talk America Decl. ¶ 9;
- Similarly, Lightship Telecom (“Lightship”) contends that it is unaware of any alternate providers that offer DS-1 transport in its service areas and that alternate DS-3 providers exist on only approximately ten percent of its routes. ALTS Comments, Declaration of Rainer Gawlick on behalf of Lightship, Exh. A (“Lightship Decl.”) ¶ 9;
- Cbeyond also states that it “has not been able to find a single non-ILEC provider of wholesale DS-1 interoffice transport in the markets in which it operates.” Cbeyond Decl. ¶ 12;
- BayRing asserts that alternative transport is available only between five of New Hampshire’s 117 wire centers, and only at DS3 level and above. BayRing Decl ¶ 8;
- McLeodUSA similarly contends that “While we wholesale DS1 transport along some routes in the larger MSAs in our footprint, there are no wholesale alternatives on DS1 transport routes in the majority of our markets”). McLeodUSA Decl. ¶ 7.

II. TRANSITION FOR SWITCHING AND UNE-P

NuVox supports efforts to ensure a reasonable transition for local switching and UNE-P. An important aspect of the Commission's effort to promote facilities-based competition is to recognize that even facilities-based providers must use UNEs, including some use of UNE-P to fill needs that cannot be satisfied by their own facilities. For instance, NuVox utilizes UNE-P to serve a multi-location customer that wants to use a single provider but which, alone, would not have sufficient traffic to justify a DS1 at every location. The economical way for NuVox to serve such a customer is to rely on UNE-P. Similarly, NuVox in some instances utilizes UNE-P to meet a customer's request for a redundant line. Despite the fact the NuVox's reliance on UNE-P is limited (*i.e.*, less than three percent of NuVox's revenues stem from the use of UNE-P),^{6/} its availability is essential to NuVox's ability to provide full and complete service to its customers. NewSouth therefore supports a transition for UNE-P that will foster and encourage facilities-based competition. *See, e.g.*, ALTS Comments at 91-98.

The transition must allow carriers to establish sufficient demand to warrant building collocation arrangements and obtaining transport. Once sufficient demand is established (*see, e.g.*, ATLS Comments at 97-98), the Commission should allow sufficient time to actually replace existing UNE-P lines with an unbundled loop or alternative loop facility. As does ALTS, NuVox urges the FCC to adopt a transition period for a CLEC's embedded base of UNE-P lines in a given central office that is roughly consistent with the *Triennial Review Order's* transition period for mass market

^{6/} Reply Declaration of Amy L. Gardner on behalf of NuVox, Inc. ¶ 2 ("NuVox Reply Decl."), attached hereto as Exh. A.

customers.^{7/} Thus, NuVox supports ALTS' suggestion that a CLEC would have 27 months to complete the conversion of its UNE-P customers to UNE L.^{8/} At least this amount of time is necessary to ensure a reasonably smooth transition in light of the extensive changes to infrastructure that elimination of UNE-P would necessitate.

Finally, but critically, the Commission must ensure that carriers are not saddled with excessive costs if required to convert UNE-P lines to ILEC resale. It is NuVox's understanding that BellSouth and SBC would impose substantial non-recurring charges on such conversions, despite the fact that they would simply involve a billing change. Even the conversion of NuVox's limited UNE-P base to resale would entail significant cost under BellSouth's and SBC's existing policies, in the range of \$1.3 million.^{9/} NuVox urges the Commission preclude ILECs from charging excessive non-recurring costs for the conversion of UNE-P lines to resale. NuVox recommends that, at most, ILECs be able to assess a charge equal the charge associated with a PIC change, currently \$5.00.

^{7/} ALTS Comments at 99.

^{8/} *Id.*

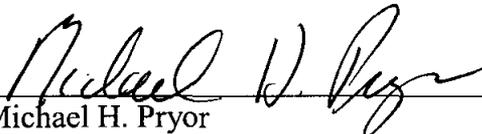
^{9/} NuVox Reply Decl. ¶ 3.

III. CONCLUSION

For the reasons set forth above, the Commission should reject the Bell Company claims that the presence of fiber in discrete locations demonstrates lack of impairment for DS1 loops and DS1 EELs. Additionally, the Commission should continue to make UNE-P available as described herein.

Respectfully submitted,

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Exhibit A

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Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers)	CC Docket No. 01-338

**REPLY DECLARATION OF AMY L. GARDNER ON BEHALF OF NUVOX,
INC.**

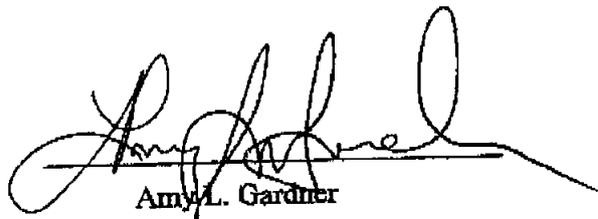
1. I am currently Vice President of Revenue Assurance and Cost Optimization of NuVox, Inc. (“NuVox”), the parent company of several operating companies including NewSouth Communications Corp, (“NewSouth”) and NuVox Communications. Prior to my assumption of that position following the merger of NewSouth and NuVox Communications, I held the Vice President of Network Planning and Provisioning position at NewSouth dating back to 1998. In my previous positions, I had responsibilities for planning, cost management, design, and engineering of NewSouth’s network, including the installation and project management of NewSouth’s switches throughout the Southeastern United States. In my current position, I am responsible for accurately analyzing and reporting all COGS (“Cost of Goods Sold”) and Revenue for the combined network, overseeing all activities that affect cost and revenue for the company.

2. NuVox supports efforts to ensure a reasonable transition for local switching and UNE-P. Despite the fact the NuVox’s reliance on UNE-P is limited (*i.e.*,

less than three percent of NuVox's revenues stem from the use of UNE-P), its availability is essential to NuVox's ability to provide full and complete service to its customers.

3. In particular, the Commission must ensure that carriers are not saddled with excessive costs if required to convert UNE-P lines to ILEC resale. It is NuVox's understanding that the ILECs would impose substantial non-recurring charges on such conversions, despite the fact that they would simply involve a billing change. Even the conversion of NuVox's limited UNE-P base to resale would entail significant cost under ILEC existing policies, in excess of \$1.3 million.

I declare under penalty of perjury that the foregoing is true and correct. Executed
on October 19, 2004.



Amy L. Gardner

CERTIFICATE OF SERVICE

I, Michelle C. Gardner, hereby certify that on this 19th day of October 2004, the foregoing Reply Comments of NuVox Communications were filed electronically through the Federal Communications Commission's Electronic Comment Filing System ("ECFS") and courtesy copies were sent via electronic mail to the following as indicated:

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