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December 7, 2004

Ex Parte

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

**Re: Unbundled Access to Network Elements, WC Docket No. 04-313;
Section 251 Unbundling Obligations for Incumbent Local Exchange
Carriers, CC Docket No. 01-338**

Dear Ms. Dortch:

The purpose of this letter is to correct certain figures previously submitted with respect to percentages of high-capacity facilities purchased by other carriers as special access compared to unbundled elements. As corrected, these figures confirm that carrier customers that use Verizon's high-capacity facilities use predominately special access, not UNEs, to serve their customers.

We have recently discovered that some of the data submitted with Verizon's Comments and Reply Comments inadvertently included Verizon retail data in computing the percentage of high-capacity facilities that carriers purchase as special access and as UNEs. The percentages have been recalculated to correct for this factor, and corrected exhibits reflecting these corrections are attached.

Specifically, Exhibits 10A and 11 submitted with Verizon's Comments previously showed that 93 percent of the DS1 loops carriers purchased from Verizon were purchased as special access, compared to 7 percent purchased as UNEs. As the corrected Exhibits 10A and 11 show, Verizon's carrier customers purchased 91 percent of their DS1 loops as special access, compared to 9 percent purchased as UNEs. When DS1 loops purchased by the three largest IXC's – AT&T, MCI, and Sprint – are removed from the analysis, the data show that 82 percent of the DS1 loops Verizon's carrier customers purchased were purchased as special access, compared to 18 percent purchased as UNEs. And when DS1 loops purchased by the three largest IXC's and by Verizon's wireless carrier customers are removed from the

analysis, the data show Verizon's remaining carrier customers still purchased 72 percent of their DS1 loops as special access, compared to only 28 percent purchased as UNEs.

Similarly, exhibits 10C and 12 submitted with Verizon's Comments previously showed that 99 percent of the DS3 loop facilities Verizon's carrier customers purchased were purchased as special access, compared to 1 percent purchased as UNEs. The corrected Exhibits 10C and 12 show that carriers purchased 98 percent of their DS3 loops as special access, compared to 2 percent purchased as UNEs. When DS3 loops purchased by the three largest IXCs are removed, the data are unchanged and show that carriers purchased 96 percent of their DS3 loops as special access, compared to 4% purchased as UNEs. Finally, when DS3 loops purchased by both the three largest IXCs and wireless carriers are removed from the analysis, the data show carriers purchased 94 percent of their DS3 loops as special access, compared to 6 percent purchased as UNEs.

Finally, the effect of this error on the comparison of Verizon's carrier customers' use of entrance facilities and Verizon's analysis of the effect of UNE orders rejected for lack of facilities on carrier's use of DS1 and DS3 loop facilities is negligible. Corrections to Exhibit 13 submitted with Verizon's Comments show that, instead of 97 percent, carriers purchased 96 percent of the entrance facilities they purchased from Verizon as special access, compared to 4 percent purchased as UNEs. Likewise, corrections to Exhibits 15 and 16 submitted with Verizon's Reply comments show that when UNE orders rejected for lack of facilities are taken into account, carriers still purchased the vast majority of their DS1 and DS3 loops facilities as special access compared to UNEs – 90 percent of their DS1 loops, instead of 93 percent, and 97 percent of their DS3 loops, instead of the 98 percent previously shown.

Please include the attached corrected exhibit (redacted version) in the record in these proceedings.

All inquiries relating to access (subject to the terms of any applicable protective order) to the confidential information submitted by Verizon should be addressed to:

Jennifer L. Hoh
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1515 North Courthouse Road, Suite 500
Arlington, VA 22201-2909
Tel: 703-351-3063
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Ms. Marlene Dortch
December 7, 2004
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Sincerely,

A handwritten signature in black ink, appearing to be "Ed" followed by a stylized flourish.

Attachment (Redacted Version)

c: Jeff Carlisle
Michelle Carey
Tom Navin
Pam Arluk
Gail Cohen
Ian Dillner

Russ Hanser
Marcus Maher
Jeremy Miller
Carol Simpson
Tim Stelzig

**DECLARATION OF JUDY K. VERSES,
RONALD H. LATAILLE, MARION C. JORDAN,
AND LYNELLE J. RENEY**

EXHIBIT 10A
CORRECTED DEC. 7, 2004

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

**DECLARATION OF JUDY K. VERSES,
RONALD H. LATAILLE, MARION C. JORDAN,
AND LYNELLE J. RENEY**

EXHIBIT 10C
CORRECTED DEC. 7, 2004

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**DECLARATION OF JUDY K. VERSES,
RONALD H. LATAILLE, MARION C. JORDAN,
AND LYNELLE J. RENEY**

EXHIBIT 11
CORRECTED DEC. 7, 2004

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**DECLARATION OF JUDY K. VERSES,
RONALD H. LATAILLE, MARION C. JORDAN,
AND LYNELLE J. RENEY**

EXHIBIT 12
CORRECTED DEC. 7, 2004

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REDACTED – FOR PUBLIC INSPECTION

**DECLARATION OF JUDY K. VERSES,
RONALD H. LATAILLE, MARION C. JORDAN,
AND LYNELLE J. RENEY**

EXHIBIT 13
CORRECTED DEC. 7, 2004

REDACTED – FOR PUBLIC INSPECTION

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**REPLY DECLARATION OF
RONALD H. LATAILLE, MARION C. JORDAN,
AND JULIE K. SLATTERY**

EXHIBIT 15
CORRECTED DEC. 7, 2004

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

**REPLY DECLARATION OF
RONALD H. LATAILLE, MARION C. JORDAN,
AND JULIE K. SLATTERY**

EXHIBIT 16
CORRECTED DEC. 7, 2004

REDACTED – FOR PUBLIC INSPECTION

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