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March 4, 2005

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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:

On March 3, 2005, Dee May, Ed Shakin, Tom Bausch, and I, representing Verizon, met with Michelle Carey, Jeremy Miller, Pam Arluk, and Ian Dillner of the Wireline Competition Bureau and Russ Hanser of the Office of General Counsel. The purpose of the meeting was to discuss the methodology Verizon employed in preparing its lists of wire centers that satisfy the Commission's Tier 1 and Tier 2 criteria for dedicated transport and the non-impairment thresholds for DS1 and DS3 loops. Verizon had provided these lists to the Commission on February 18, 2005, in response to a request by Wireline Competition Bureau Chief Jeffrey Carlisle on February 4, 2005. Verizon also discussed the decision in the Commission's most recent unbundling order that, as of March 11, 2005, ILECs have no obligation to provide unbundled elements for those services and in those areas where the Commission has made a no impairment finding.

To determine business line count, Verizon relied on the business lines reported in its 2003 ARMIS 43-08 report [Table 3, columns (fc)+(fd)+(fe)], which included business UNE-P lines. Verizon then added the number of UNE loops and EELs loops (on a DS0 equivalent basis) to determine the total business line count, as defined in the Commission's order, for each wire center.

To determine the fiber-based collocation count, Verizon relied on physical inspections of carrier collocation arrangements in our wire centers that were performed from late June 2003 to August 2003. The procedures for these inspections were previously described in the Verses/Lataille/Jordan/Reney Declaration [Attachment 1A, Tab B, paragraphs 9-14] that Verizon submitted with its comments in these proceedings on October 4, 2004.

Ms. Marlene Dortch  
March 4, 2005  
Page 2

Then, to update this data, Verizon eliminated instances where collocation service had been terminated since the inspections. Verizon also reduced the collocation count, per the Commission's order, to reflect the number of providers rather than the number of collocation arrangements. Verizon analyzed the list of providers to ensure no double-counting existed in any wire center due to separate arrangements between a parent and an affiliate.

Please place this notice in the record of the above proceedings.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed", followed by a period and another handwritten signature.

c: Jeff Carlisle  
Michelle Carey  
Tom Navin  
Jeremy Miller  
Pam Arluk  
Ian Dillner  
Russ Hanser