ATTACHMENT 14

DECLARATION OF VINTON G. CERF

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Verizon Communications Inc. and	)	
MCI, Inc.	)	WC Docket No. 05-75
Applications for Approval of	)	
Transfer of Control	)	

DECLARATION OF VINTON G. CERF

I, Vinton G. Cerf, declare as follows:

1. As senior vice president of Technology Strategy for MCI, I am responsible for helping to guide corporate strategy development from a technical perspective. I previously served as senior vice president of Architecture and Technology, leading a team of architects and engineers to design advanced networking frameworks including Internet-based solutions for delivering a combination of data, information, voice and video services for business and consumer use. I have been with MCI for eleven years.

MCI'S IP Network

2. MCI operates a global packet-switched Internet protocol (IP) network. It has over 4,500 points of presence (POPs) around the world and carries traffic at speeds up to 10 gigabits per second. MCI is continuing to upgrade its IP network, planning to deploy, for example, new fiber transmission systems and routers in parts of its network.

3. MCI's network is interconnected with other packet-switched IP networks. Through these interconnections, MCI's network becomes part of the "network of networks" called the Internet. Most Internet traffic is exchanged through direct

connections between Internet backbones. A small percentage of Internet traffic is exchanged at network access points (NAPs), where multiple Internet service providers (ISPs) lease space. MCI operates Internet Exchanges through its MAE® Services product offering which provides collocation space for ISPs to interconnect with each other. MCI has MAE facilities in Washington, DC (MAE-East), San Jose, CA (MAE-West), Dallas, TX (MAE-Central), Chicago, IL, Los Angeles, CA, New York, NY, and Miami, FL These facilities support regional exchange and are also interconnected to provide national exchange within the United States. They are also used to interconnect IPv6 test facilities at the University of New Hampshire to ISPs seeking to test their IPv6 capabilities. MCI is committed to implementation of IPv6 during 2005.

MCI's Internet Services

4. MCI offers a variety of Internet connectivity services, including both wired and wireless (fixed, mobile and satellite) options. In particular, MCI offers a range of dedicated high-speed Internet access options, including Ethernet, cable, DSL, T1 and DS3. MCI's dedicated services include access to a router at a network hub near the customer's site, and "always-on" connectivity to MCI's network infrastructure. MCI provides dedicated Internet services to many ISPs (through its wholesale channel) as well as to non-ISP customers. MCI also provides dial-up Internet access service to many ISPs, enabling them to provide local access numbers to customers across the country and internationally. Corporate customers also buy dial-up Internet access from MCI, for small locations with low bandwidth needs, to back-up dedicated connections in case of outages, and to enable traveling employees to connect to the Internet from remote temporary locations. On the residential side, MCI does not offer a retail dial-up service

to consumers, but does offer Internet service over DSL connections to about 25,000 customers.

5. MCI's Internet service offerings include a range of additional features and options, including the following.

- Email capabilities, including servers that store and forward emails to the customer's email server, and back-up services that keep email from being dropped when the customer's email server is not available
- The ability to manage email through the use of multiple domain and subdomain names, as well as IP address allocation options
- News Read (user-initiated) and News Feed (delivered to users) options for providing news content to users
- Flexible pricing options that give customers choices in how to manage changes in usage levels
- Reporting on usage statistics
- Redundancy options which provide back-up or supplemental connectivity to protect against an interruption in the customer's Internet connection
- Service Level Agreements that support performance expectations
- Technical and other customer support
- Customer Premises Equipment (CPE) and related maintenance

MCI's Value-Added Services

6. MCI offers other services that add value to a customer's Internet connectivity, including web hosting, data center services, application hosting, content

delivery, contact center services, managed services, security services, and remote access services.

7. **Web Hosting.** MCI provides custom web hosting -- housing and managing the servers, software and other infrastructure that establish a customer's website on the Internet. In addition to providing a range of redundant, reliable Internet connectivity options, MCI's web hosting services also offer a full suite of related support services, including monitoring, reporting, maintenance, back-up, security, load-balancing, and systems administration, as well as related professional services such as testing, staging, change management and results measurement.

8. **Data Center Services.** MCI's data center services (DCS) offer customers the ability to locate their Internet servers and related equipment in a secure, MCI-managed facility with access to reliable, redundant MCI-provided Internet connectivity. MCI offers related value-added services to its DCS customers, such as onsite technical support (hands and eyes), back-up and restore services, server performance monitoring, hardware and software security advisory services, and Internet traffic load-balancing services.

9. **Application Hosting.** Through its application hosting services, MCI implements, manages and maintains a customer-provided software application so that the customer and its designated end users can access and use that application via the Internet on an on-demand basis.

10. **Content Delivery.** MCI offers content delivery services, which provide customers with the software and hardware they need to distribute content, such as video streaming, to designated recipients via the Internet.

11. **VOIP.** MCI supports the VoIP offerings of certain cable operators, including Time Warner Cable, Bright House Networks, Susquehanna Communications and Armstrong Group of Companies. MCI's Converged Cable Solutions (CCS) is a wholesale product that includes: operations support systems, including order management and provisioning; telephony administration, including number portability and carrier agreements; network infrastructure, including long-haul transport and Class 5 switches; and network administration including quality of service and network monitoring. MCI picks up the cable MSO's traffic at the softswitch or media gateway, and terminates the traffic, as well as providing back office operations, and technical expertise and assistance, including quality of service and network monitoring. These softswitches and media gateways may also be managed by or owned by MCI.

12. **Contact Center Services.** MCI's IP-based call center services enable customers to manage their call center operations entirely over the Internet – managing both their call flow and their call center representatives through web-based tools.

13. **Managed Services.** MCI offers a variety of managed services, consisting principally of the management of CPE supporting the customer's network. Through the use of such managed services, customers can obtain MCI's engineering expertise focused on monitoring, assessing, reporting, and optimizing the performance of their networks (both local and wide area).

14. **Security Services.** MCI offers many value-added security services, such as email filters for spam, viruses, and inappropriate images; firewalls (both hardware and software based); intrusion detection and protection services; denial-of-service mitigation; and security scans. MCI also offers authentication-related security services, such as

managed public-key infrastructure (PKI), authenticating tokens, and IP VPNs. Through its new NetSec subsidiary, MCI has expanded its security consulting services, including vulnerability testing and evaluation, and mitigation plan strategy and design.

15. **Remote Access Services.** As noted earlier, MCI provides a range of remote access services, either to back up a dedicated Internet connection or to enable customers to access the Internet (or a company Intranet) while traveling. These include both dial-up and wireless options. Combined with authentication devices (such as PKI or tokens), security sockets layer (SSL) technology, and/or IP VPN-based security, these services allow remote access users to securely connect to their company Intranets.

MCI's Interconnection Arrangements

16. MCI has adopted and published a peering policy – <http://global.mci.com/uunet/peering> − that establishes a set of performance and other requirements applicable to both parties that are designed to ensure that the peering arrangement will be beneficial to both entities. These requirements include minimum geographic scope, minimum traffic volume, roughly balanced traffic flows, minimum capacity on inter-hub links, and a Network Operations Center open 24 hours a day, 7 days a week.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 9, 2005

Vinton G. Cerf