

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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

**PETITION FOR RECONSIDERATION AND/OR CLARIFICATION OF THE PACE
COALITION**

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Summary

By this petition, the PACE Coalition requests that the Commission reconsider and/or clarify two aspects of the *Triennial Review Remand Order*. First, the Commission should reassess its transition plan for mass market unbundled local switching and reinstate the transition plan established in the *Triennial Review Order* for unbundled local switching no longer required to be made available pursuant to section 251(c)(3) of the 1996 Act. The transition plan adopted in the *Triennial Review Remand Order* fails to allow carriers to adjust to changing conditions, transition current customers to alternative service arrangements, and to protect consumers from service disruptions.

Second, the Commission should clarify that the ILECs' obligation to continue to provide access to unbundled local switching to CLECs for their embedded customer base throughout the transition period is neither account-specific nor location-specific. Without clarification from the Commission that ILECs are required to provision all service requests for the embedded customer base, such as adding additional UNE-P lines to existing accounts or transferring existing UNE-P service from one location to another, CLECs serving customers through UNE-P arrangements will be unable to serve their embedded customer base during the term of the transition plan.

TABLE OF CONTENTS

	Page
SUMMARY	i
I. INTRODUCTION	2
II. THE COMMISSION SHOULD REINSTATE THE TRANSITION PLAN ADOPTED IN THE TRIENNIAL REVIEW ORDER	3
III. THE COMMISSION SHOULD CLARIFY THAT THE SECTION 251(C)(3) UNBUNDLING OBLIGATIONS THAT APPLY TO THE EMBEDDED CUSTOMER BASE DURING THE TRANSITION PERIOD ARE NEITHER ACCOUNT NOR LOCATION SPECIFIC	10
IV. CONCLUSION.....	12

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PETITION FOR RECONSIDERATION AND/OR CLARIFICATION

The Promoting Active Competition Everywhere (“PACE”) Coalition,¹ pursuant to section 1.429 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,² hereby petitions the Commission to reconsider and/or clarify aspects of its February 4, 2005, Order on Remand in the above-captioned proceedings.³

¹ The PACE Coalition is composed of competitive local exchange carriers (“CLECs”) that provide a variety of telecommunications services to businesses and residential consumers throughout the United States, relying in part on the Unbundled Network Element Platform (“UNE-P”) as well as their own facilities. Each PACE Coalition member company offers a form of bundled local exchange and long distance services, among other services, to residential and small business customers using UNE-P. Therefore, the PACE Coalition, on behalf of its members, has a substantial business interest in the Commission’s decision to eliminate access to unbundled local switching as a section 251(c)(3) UNE at Total Element Long-Run Incremental Cost (“TELRIC”) rates.

² 47 C.F.R. § 1.429.

³ *In the Matter of Unbundled Access to Network Elements*, WC Docket No. 04-313; *Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338, Order on Remand, FCC 04-290 (rel. Feb. 4, 2005) (“*Triennial Review Remand Order*”). The *Triennial Review Remand Order* was published at 70 FR 8940 (Feb. 25, 2005) and became effective March 11, 2005. See also, *Triennial Review Remand Order* at ¶ 235 (setting March 11, 2005, as the effective date).

I. INTRODUCTION

By this petition, the PACE Coalition requests that the Commission reconsider and/or clarify two aspects of the *Triennial Review Remand Order*.⁴ First, the Commission should reassess the transition plan for mass market local switching adopted in the *Triennial Review Remand Order* and should reinstate the transition plan established in the *Triennial Review Order*.⁵ As set forth more fully below, the PACE Coalition submits there is no basis for the Commission to deviate from the transition plan adopted in the *Triennial Review Order*, particularly since the public interest favoring such a plan, as reflected in the number of UNE-P lines in service, is far greater today than when that plan was adopted. As no party to these proceedings challenged the *Triennial Review Order* transition plan,⁶ and consequently the *USTA II*⁷ court did not address the transition plan, the Commission should reinstate the transition plan as adopted in the *Triennial Review Order*. The truncated transition plan in the *Triennial Review Remand Order* fails sufficiently to protect consumers from service disruptions, to permit carriers to adjust to changing conditions, and to facilitate the migration of the millions of lines served by unbundled local switching.

⁴ The issues raised by the PACE Coalition in this petition assume the lawfulness of the Commission's national finding of non-impairment for mass market unbundled local switching. The PACE Coalition understands that several parties have appealed that non-impairment determination and consequently the Coalition does not address that issue in the instant petition.

⁵ See *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*, CC Docket Nos. 01-338, 96-98, 98-147, Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, 18 FCC Rcd 16978 (2003), corrected by *Errata*, 18 FCC Rcd 19020 (2003), reversed and remanded, *United States Telecom Ass'n v. FCC*, 359 F.3d 554 (D.C. Cir. 2004) ("*Triennial Review Order*").

⁶ See *Comments of the PACE Coalition, Broadview Networks, Grande Communications, and Talk America*, WC Docket No. 04-313, CC Docket No. 01-338, at 82 ("*PACE Coalition et al. Comments*").

⁷ *United States Telecom Ass'n v. FCC*, 359 F.3d 554 (D.C. Cir. 2004) ("*USTA II*").

Second, the Commission should clarify that the ILECs' obligation to continue to provide access to mass market unbundled local switching to CLECs for their embedded customer base throughout the transition period is neither account-specific nor location-specific. The ability of CLECs to serve their embedded customer base must include the ability to add additional lines to existing UNE-P accounts, to transfer UNE-P service from one location to another as well as to add or remove features and services to existing accounts. Without clarification from the Commission that ILECs are required to provision such requests for CLECs' embedded customer base, CLECs serving customers through UNE-P arrangements will be unable adequately to serve their existing customers.

II. THE COMMISSION SHOULD REINSTATE THE TRANSITION PLAN ADOPTED IN THE TRIENNIAL REVIEW ORDER

In the *Triennial Review Remand Order*, the Commission determined that CLECs nationwide were no longer impaired under section 251(c)(3) of the 1996 Act⁸ without unbundled access to local switching to serve mass market customers.⁹ Citing to claimed changes in the competitive telecommunications environment since the issuance of the *Triennial Review Order* in 2003, such as the increased numbers of CLEC-deployed switches, the increased capabilities of those switches as well as improved "hot cut" procedures implemented by the ILECs, the Commission concluded that CLECs were no longer impaired without unbundled access to the ILEC's switch at TELRIC rates.¹⁰ Despite comments filed in support of reaffirmation of the transition plan established in the *Triennial Review Remand Order*, the Commission established a dramatically shortened 12-month transition plan for migrating CLECs' embedded customer base

⁸ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, codified at 47 U.S.C. §§ 151 *et seq.* ("1996 Act").

⁹ *Triennial Review Remand Order* at ¶ 199.

¹⁰ *Id.*

from UNE-P arrangements to UNE-L arrangements or other service arrangements.¹¹ The Commission justified the transition plan adopted in the *Triennial Review Remand Order* on the ILECs' "asserted ability to convert the embedded base of UNE-P customer to UNE-L on a timely basis while continuing to meet hot cut demand for new UNE-L customers."¹² In addition, the Commission noted that the new transition plan

provides adequate time for both competitive LECs and incumbent LECs to perform the tasks necessary to an orderly transition, which could include deploying competitive infrastructure, negotiating alternative access arrangements, and performing loop customer cut overs or other conversions.¹³

The Commission failed to provide any explanation as to why the transition plan adopted in the *Triennial Review Order* should not be reaffirmed, nor did it explain how the gating requirement with the longest lead time (the deployment of competitive infrastructure) could be accelerated from that determined in the *Triennial Review Order*. The *Triennial Review Order* transition plan was predicated on a recognition of how important it was "to avoid significant disruption to the existing [UNE-P] customer base,"¹⁴ which at the time was estimated at 10 million lines.¹⁵ There are now approximately 16.6 million UNE-P lines served by unbundled local switching,¹⁶ thereby making it even more important that a transition plan that will allow for a smooth transition from UNE-P to UNE-L or other service arrangements be made available. At the end of 2004, AT&T and MCI collectively accounted for only approximately

¹¹ *Id.* at ¶ 227.

¹² *Id.*

¹³ *Id.* (citations omitted).

¹⁴ *Triennial Review Order* 18 FCC Rcd at 17315-16, ¶ 529.

¹⁵ *Id.*

¹⁶ February 2005 UNE-P Fact Report, PACE Coalition (based on 4th Quarter 2004 Earnings Reports of the Regional Bell Operating Companies).

45% of the UNE-P lines,¹⁷ with over 9 million UNE-P lines being used by small entrepreneurial carriers to offer competitive services.

Moreover, the additional reasons that the Commission provided in the *Triennial Review Order* for the transition plan it adopted there are even more valid now as when the Commission adopted that order:

There is also a need for an orderly transition to afford sufficient time for carriers to implement any necessary business and operational plans and practices to account for the changed regulatory environment, including the need to modify or revise their interconnection agreements. For example, competitive LECs may need to develop new UNE-L provisioning systems, including hiring, training, and equipping loop provisioning and switch technicians; purchase and collocate new equipment; create additional customer service and trouble maintenance groups; revise wholesale billing systems; and develop capabilities for E911 and local number portability. Moreover, our transition plan must require the incumbent LEC to unbundle its local circuit switching facilities for some limited period *after* a state commission has found “no impairment,” because otherwise a competitive LEC would be forced to halt its advertising and customer acquisition activities between the time the state commission issued its findings and the time the competitive LEC was able to serve its customers using alternative facilities.¹⁸

None of these conclusions has changed since adoption of the *Triennial Review Order*. CLECs continue to face the obstacles identified by the Commission when transitioning their embedded customer base from ILEC provisioned facilities to CLEC provided facilities. The largest purchasers of UNE-P are smaller carriers that today operate in an environment where capital is simply not available quickly to adjust to abrupt changes in regulatory policy.

¹⁷ See *In the Matter of Verizon Communications Inc. MCI, Inc. Applications for Approval of Transfer of Control*, WC Docket No. 05-75, Declaration of Wayne Huyard at 11, ¶ 23 (Mar. 11, 2005) (noting that at the end of January 2005, MCI had “3.2 million customer UNE-P lines in service”); see also *In the Matter of SBC Communications Inc. and AT&T Corp. Applications for Approval of Transfer of Control*, WC Docket No. 05-65, Declaration of John Polumbo at ¶ 36 (Feb. 22, 2005) (noting as of December 2004, AT&T had “approximately 4.2 million local residential customers”)

¹⁸ *Triennial Review Order* 18 FCC Rcd at 17315-16, ¶ 529 (citations omitted).

Because it is impossible to establish local network footprints in the time provided by the *Triennial Review Remand Order* transition plan,¹⁹ the only practical option is to establish alternative service arrangements with the incumbent. This is not a simple task. There is significant time and costs associated with establishing alternative service arrangements with the ILECs (assuming such arrangements are available through tariff or interconnection agreement, or that a commercial agreement can be successfully negotiated). In addition, time may be needed to revise and modify existing business practices to implement such service arrangements. Alternatively, in some places, CLECs may attempt to enter into arrangements with other CLECs who already have switches and other facilities in place to serve customers in a given location.²⁰ Because such arrangements are likely to require service configurations relying on different technology (such as IP-based services, to the extent such are viable for the customer segment being affected), the 12-month transition period established in the *Triennial Review Remand Order* does not provide sufficient time for CLECs to conduct each of the tasks involved in utilizing either alternative. On the other hand, the 27-month transition plan adopted in the *Triennial Review Order* provided the necessary time frames as well as the necessary procedural steps to smooth the transition to another service arrangement, with limited service disruptions to customers.

Moreover, in those instances where CLECs can successfully establish alternative network arrangements, the *Triennial Review Remand Order* transition plan requires ILECs to cut over large quantities of UNE-P lines in a very limited period of time. Indeed, some ILECs have

¹⁹ Even those PACE Coalition member companies with complimentary facilities-based strategies to serve larger business customers would have to make significant modifications to their networks to accommodate analog loop based services, as well as to dramatically expand the geographic reach of their networks to serve those customers that they serve using UNE-P today.

²⁰ See Letter from Ruth Milkman, counsel for MCI, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 04-313, CC Docket No. 01-338 at 1-2 (filed Dec. 7, 2004).

claimed that *all* lines must be transitioned within 12 months of the effective date of the *Triennial Review Remand Order*.²¹ Assuming *arguendo* that the ILECs' claims regarding their improved hot cut capabilities prove correct, it will still take significant time to transition all existing UNE-P lines to CLEC switches or alternative service arrangements. The problems with the hot cut process, specifically the basic fact that it is largely a manual process requiring physical disconnection and rewiring,²² will not magically disappear notwithstanding ILEC promises of improved procedures. Truncating the period for transitioning away from ILEC provided local switching, as the Commission did in the *Triennial Review Remand Order*, will simply exacerbate the problem.

Unlike the truncated plan adopted in the *Triennial Review Remand Order*, the transition plan adopted in the *Triennial Review Order* included the following time line and milestones, initiated with a finding of non-impairment:

1. Within two months, CLECs and ILECs must commit to an implementation plan with the appropriate incumbent LEC and file the plan with the state commission.
2. Within five months, CLECs may no longer request access to unbundled local circuit switching at TELRIC rates for new customers.
3. Within 13 months, each CLEC must submit orders for one-third of all of its unbundled local switching end user customers.
4. Within 20 months, each CLEC must submit orders for half of its remaining unbundled local circuit switching end user customers.
5. Within 27 months, each CLEC must submit orders for its remaining unbundled local circuit switching end user customers.

²¹ It is our view that the *Triennial Review Remand Order* requires that orders be placed within 12 months and that transitional rates will apply for however long it takes the ILEC to migrate a line. Even so, the 12-month window to complete all the groundwork needed to provide an operating network to migrate the line is too short to protect consumers.

²² *Triennial Review Remand Order* at fn. 527.

The above framework was and still is a reasonable compromise that protects customers and provides CLECs a meaningful opportunity to adjust their businesses to compete in a different regulatory structure. The transition plan in the *Triennial Review Remand Order* ignores this balance and terminates the ILECs' unbundling obligation under section 251(c)(3) before CLECs have had a realistic opportunity to modify their business practices, thereby putting millions of residential and small business consumers at risk of service disruption. The Commission provided no justification as to why it chose to deviate from the careful balance struck in the *Triennial Review Remand Order*. Since the release of the *Triennial Review Order* and throughout the period of regulatory uncertainty that continues to this day, CLECs have begun adjusting business plans in order to transition away from traditional UNE-P arrangements under section 251(c)(3). The Commission should afford them a reasonable opportunity to complete this process by reinstating the transition plan adopted in the *Triennial Review Remand Order*.

The potential harm caused to CLECs and their customers by shortening the transition period by 15 months outweighs any alleged benefits to ILECs by more quickly eliminating section 251(c)(3) unbundled access to mass market local switching. In this regard, it is important to keep in mind that during the transition plan the ILECs are receiving an amount for each local switching port in service that is \$1.00 (which on average is 20%) above the UNE rate (which by definition includes a reasonable profit) and the existing rate already provides the ILEC a contribution above direct expense far greater than its other services.²³

The transition plan adopted in the *Triennial Review Remand Order* is inconsistent with Commission precedent. When the Commission eliminated the line sharing obligation, it

²³ See *Reply Comments of the PACE Coalition, Broadview Networks, Grande Communications, and Talk America*, WC Docket No. 04-313, CC Docket No. 01-338, at 12-13 (Oct. 18, 2004) (“*PACE Coalition et al. Reply Comments*”).

provided the affected CLECs 36 months to adjust, even though the number of line sharing arrangements (and affected CLECs) was far smaller than those impacted by the de-listing of mass market local switching.²⁴

Further, it bears mention that the ILECs' failed to appeal or seek reconsideration of the transition plan adopted in the *Triennial Review Order*, presumably in recognition of its reasonableness. Accordingly, the PACE Coalition submits that the Commission should reconsider the transition plan included in the *Triennial Review Remand Order* and reinstate the transition plan adopted in the *Triennial Review Order*.

To the extent the Commission declines to modify the transition plan contained in the *Triennial Review Remand Order*, the Commission must, at a minimum, clarify that CLECs that submit orders for the migration of UNE-P lines in a time-frame that would provide for their conversion (applying standard provisioning intervals) before the end of the transition period are entitled to continue to pay transition plan rates (*i.e.*, TELRIC plus \$1.00) for any of those lines that the ILEC has been unable to migrate by the end of the transition period. This clarification is necessary to prevent the overreaching exhibited recently by ILECs. For example, it is Verizon's position that it gets to decide whether a CLEC has placed a timely order for discontinuance or conversion and if, in its sole discretion, it determines that an order has not been timely placed, it will discontinue UNE-P service at the end of the transition period.²⁵ Clearly, CLECs have the obligation to submit the order for migration, but a CLEC cannot be penalized if, having

²⁴ *Triennial Review Order*, 18 FCC Rcd at 17137-39, ¶¶ 264-266. In setting a 36 month transition plan for line sharing, the Commission noted it had "established transition periods of this length in the past" (citing to intercarrier compensation for ISP-bound traffic as an example). *Id.* at 18 FCC Rcd at 17139, ¶ 266.

²⁵ *See e.g.*, *Notice of Proposed Tariff Revisions to Verizon Tariff M.D.T.E. No. 17*, Mass. DTE, TT-05-16, § 6.1.1.A.3 (filed Feb. 18, 2005).

submitted an order during the transition period, an ILEC such as Verizon is unable to fulfill it before the end of the transition period.

III. THE COMMISSION SHOULD CLARIFY THAT THE SECTION 251(C)(3) UNBUNDLING OBLIGATIONS THAT APPLY TO THE EMBEDDED CUSTOMER BASE DURING THE TRANSITION PERIOD ARE NEITHER ACCOUNT NOR LOCATION SPECIFIC

During the *Triennial Review Remand Order* transition plan, ILECs must continue providing unbundled access to mass market local switching at TELRIC rates plus \$1.00 for the embedded customer base.²⁶ In limiting this continuing obligation to the embedded customer base,²⁷ the Commission should clarify that the obligation during the transition period is neither account specific nor location specific. A CLEC's ability to serve its embedded customer base must include the ability to add additional lines to existing UNE-P accounts, to transfer UNE-P service for an existing customer from one location to another as well as to add or remove features to existing accounts until the transition is complete. It is illogical to require ILECs to continue to offer unbundled local switching to permit CLECs to continue to meet the service needs of a specific set of customers and then limit the ability of those customers to modify or transfer their service. CLECs must be able to fully service their embedded customer base and provide the telecommunications services requested by those customers during the transition period. To deny CLECs this flexibility is tantamount to denying CLECs any transition plan at all.

A number of state commissions have recognized that the only equitable interpretation of the *Triennial Review Remand Order* is to permit CLECs to continue fully to

²⁶ *Triennial Review Remand Order* at ¶¶ 199, 216.

²⁷ *Id.* at ¶ 227.

service existing customer accounts during the transition period. For example, the Michigan Public Service Commission has held as follows:

Likewise, the Commission finds that Talk and XO have correctly interpreted the intent of the *TRO Remand Order* with regard to move, add, and change orders necessary **to meet the needs of its embedded customer base** during the transition period established by the FCC . . . SBC insists that its interpretation is supported by paragraphs 5 and 227 of the TRO Remand Order, which refer to UNE arrangement, not customers. SBC's position might be more persuasive had the FCC specified that on or after March 11, 2005, the embedded base that should benefit from the transition period was limited to existing lines and UNE arrangements. However, the FCC did not take such a limited approach in its rules. Rather, the FCC chose to require that an ILEC 'shall provide access to local circuit switching on an unbundled basis for a requesting carrier to serve **its embedded base of end-user customers.**' . . . By focusing on the needs of the embedded base of end-user customers rather than on lines, the FCC has ensured that the transition period will not serve as a means for an ILEC to frustrate a CLEC's end-user customers by denying the CLEC's efforts to keep its customers satisfied.²⁸

At the same time, at least one state commission staff has concluded that while there is "sufficient justification for the Commission to make a finding that BellSouth and Verizon are obligated to continue to accept 'new add' orders for delisted UNEs while parties implement their 'change-of-law' clauses and enter into good faith negotiations,"²⁹ there is other language in the *Triennial Review Remand Order* that could support a contrary conclusion. Staff in that state has stated that it "believes it would be most appropriate for a party to file a petition for reconsideration and/or clarification with the FCC to address this matter."³⁰

²⁸ *In the Matter on the Commission's Own Motion to Commence a Collaborative Proceeding to Monitor and Facilitate Implementation of Accessible Letters Issued by SBC Michigan and Verizon*, Mich. PSC Case No. U-14447, Order at 10-11 (Mar. 9, 2005) (emphasis in original).

²⁹ *Petition to Establish Generic Docket to Consider Amendments to Interconnection Agreements Resulting from Changes in Law*, By Bellsouth Telecommunications, Inc., Fla. PSC Docket No. 041269-TP, Memorandum at 13 (Mar. 24, 2005).

³⁰ *Id.* at 14.

The PACE Coalition therefore requests that the Commission clarify the application of the ILECs' mass market local switching obligations to CLECs' embedded customer base to include the provisioning of additional lines, the transferring of current services from location to another, the ordering of additional features, or the removal of specific features during the duration of the transition period. Without such clarification, CLECs' ability to provide telecommunications services to their current customers could be seriously impeded.

IV. **CONCLUSION**

Consistent with the foregoing, the Commission should grant the request for reconsideration and/or clarification contained herein on an expedited basis.

Respectfully submitted,



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March 28, 2005

CERTIFICATE OF SERVICE

I, Erin W. Emmott, hereby certify that on this 28th day of March 2005, a true and correct copy of the foregoing Petition for Reconsideration and/or Clarification was electronically delivered upon the following:

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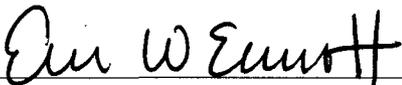
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