Before the
Federal Communications Commission
Washington, DC

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

COMMENTS OF COX COMMUNICATIONS, INC.

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Cox Communications, Inc. ("Cox"), by its attorneys, hereby submits its comments in the above-referenced proceeding.[1]

I. Introduction and Summary

This is the second of two major wireline merger proceedings now being considered by the Commission. In this proceeding, Verizon Communications Inc. ("Verizon") and MCI, Inc. ("MCI") are asking the Commission to approve the combination of two of the largest providers of telecom services in the country. Verizon is a Regional Bell Operating Company ("RBOC") covering a 29-state region and the majority owner of the nation's second largest mobile carrier, Verizon Wireless, while MCI is the nation's second largest competitive local exchange carrier ("competitive LEC"), the nation's second largest interexchange carrier ("IXC") and a Tier I Internet backbone provider. Together, they will have a dominant presence in the lives of American consumers and in the telecom marketplace. For the reasons set forth below, the public interest mandates the adoption of specific merger conditions to protect consumers against the negative effects of such an overwhelming concentration of power and resources in one entity.

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[1] *See Public Notice*, "Commission Seeks Comment on Applications for Consent to Transfer of Control Filed by Verizon Communications Inc. and MCI, Inc.," DA 05-762 (released Mar. 24, 2005).

Verizon and MCI argue that the horizontal and vertical integration of two of the largest telecommunications companies in the world does not create any public interest concern. However, like the proposed SBC-AT&T merger, the proposed combination of Verizon and MCI does not just replicate the old Bell system for consumers in Verizon's 29-state region, it also extends the new company's market power to the Internet. And the anticompetitive threat posed by this combination will multiply with SBC's acquisition of AT&T.[2] As Cox said in its comments on the SBC-AT&T merger, these two surviving giants will control and manipulate the telecom framework to the detriment of competition and consumers unless the Commission takes decisive action now.

Verizon and MCI contend that eliminating MCI as an independent competitor will have "no adverse effects on competition."[3] In reality, of course, the merger permanently removes MCI as a competitor against incumbent local exchange carriers ("incumbent LECs"), particularly the powerful RBOCs, in the marketplace for local telephone services. Once MCI joins forces with Verizon, it no longer will play a critical role in promoting and protecting the emergence of robust competition in the local telephone marketplace. To the contrary, the merged company will have every incentive to focus its attention on the few remaining competitors in the market and to adopt strategies to create additional anticompetitive delays and further raise costs for competitors. As described below, Verizon's behavior to date reveals its strong desire to make it as difficult as possible for competitive LECs to secure efficient interconnection under the provisions of the Telecommunications Act of 1996 ("1996 Act"). There can be no doubt that its

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[2] *See Public Notice*, "Commission Seeks Comment on Applications for Consent to Transfer of Control Filed by SBC Communications Inc. and AT&T Corp.," DA 05-656 (released Mar. 11, 2005).

[3] Verizon and MCI Application for Transfer of Control, WC Docket No. 05-75, at 35 (filed March 11, 2005) ("*Application*").

ability and incentive to erect obstacles to local competition will increase once it completes its purchase of MCI.

With this transaction, Verizon also is buying MCI's membership in the exclusive club of Tier I Internet backbone providers. This combination similarly presents concerns about the ability of, and incentives for, the merged company to harm its competitors and their customers by raising costs and engaging in other anticompetitive conduct.

MCI has long competed with Verizon and other incumbent LECs, and Verizon has every economic reason to acquire MCI as a means of bolstering its local telephone market dominance and extending its reach in the Internet sector. Absent decisive Commission action, however, the promotion of Verizon's economic interest will be at the expense of the public interest.

The Commission accordingly should address the removal of MCI as an independent entity in the telecom and Internet sectors by adopting specific merger conditions. *First,* the Commission should require the combined Verizon/MCI to provide facilities-based competitors such as Cox with nondiscriminatory and efficient interconnection and collocation on just and reasonable rates and terms, whether such competitors negotiate or arbitrate their own agreements or adopt the agreements of other competitors. *Second,* the Commission should adopt conditions, for a reasonable transition period, to ensure that the merged firm does not raise costs or otherwise act anticompetitively toward competitors that have Internet backbone peering arrangements with Verizon.

II. Merger Conditions Are Necessary To Ensure That the Combined Verizon/MCI Entity Provides Interconnection And Collocation On Just And Reasonable Rates And Terms

The 1996 Act established a statutory framework for the introduction of telecommunications competition through three potential means – resale, use of incumbent LECs' unbundled network elements ("UNEs"), and facilities-based competition. Recent Commission

and court decisions have curtailed competitive LECs' cost-based access to incumbent LEC UNEs and UNE platform ("UNE-P") offerings. The demise of UNE-P and the restrictions on certain UNEs make it even more important to preserve the interconnection rights of facilities-based competitive providers such as Cox. In this environment, facilities-based carriers (including wireless carriers) and voice over Internet Protocol ("VoIP") service providers will offer the only meaningful competitive alternatives to the incumbent LECs' local telephone services. Indeed, Verizon has relied on the promise of competition from these new entrants to convince regulators that access to UNEs should be significantly restricted.[4]

But facilities-based competitive LECs and VoIP service providers cannot provide service without efficient collocation and interconnection with the incumbents' networks to exchange calls between their customers and those of the incumbents. Verizon and other incumbent LECs own the country's only ubiquitous local telephone networks and are the only carriers to interconnect directly with all other incumbent LECs, competitive LECs, rural LECs, IXCs and wireless carriers. Their unique position in the marketplace creates strong incentives for them to impede and delay the introduction and expansion of competitive choices and to inflate interconnection and collocation costs for facilities-based competitors. These incentives will only increase now that the country's largest competitive LECs – AT&T and MCI – are permanently leaving the local telephone market as independent players.[5] Decisive Commission action is thus required to prevent the merged companies from thwarting competition by crippling the

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[4] How meaningful this competition proves to be will depend on the success of surviving competitors in the face of the present expansion of the incumbents' market shares as many UNE-reliant competitors withdraw from the local telephone market.

[5] *See Public Notice*, "Commission Seeks Comment on Application for Consent to Transfer of Control Filed by SBC Communications Inc. and A&T Corp.," DA 05-656 (released Mar. 11, 2005).

remaining competitors' ability to obtain efficient interconnection on just and reasonable rates, terms and conditions.

A. Cox's Experience in the Local Telephone Market Demonstrates the Importance of Protecting Facilities-Based Competitors' Interconnection Rights in the Wake of the Proposed Merger.

Cox's extensive experience in providing fully facilities-based competitive local phone services underscores the importance of efficient interconnection arrangements to local phone competition. Since the mid-1990s, Cox has invested more than $12 billion to upgrade its cable networks to support new and advanced services to the roughly 10 million households in its service footprint. As a result of those investments, more than 97 percent of Cox's networks can carry two-way communications, including Cox High Speed Internet service, circuit-switched telephony and voice over IP services. Cox currently offers telephone service to more than 60 percent of the homes passed by Cox cable systems and that percentage will continue to grow as Cox brings telephone services to new markets.

Cox's success in deploying local phone services to both residences and commercial establishments over its own state-of-the art broadband networks is notable. Over 1.3 million residential customers and over 140 thousand business locations receive their local phone services from Cox Digital Telephone, which provides a complete, high-quality substitute for incumbent LECs' primary services. Cox's efforts to provide a reliable, cost-effective, customer-friendly local telephone experience have not gone unnoticed by consumers. In fact, for the last two years, Cox has received the highest honors in J.D. Power and Associates' Local Residential Telephone Customer Satisfaction Study in the Western Region – beating, among others, SBC and Qwest.[6]

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[6] J.D. Power and Associates 2003 Local Residential Telephone Customer Satisfaction Study℠ and 2004 Local Residential Telephone Customer Satisfaction Study℠. 2003 Study conducted among 8,560 residential users of local telephone services. 2004 Study conducted among 10,500

Nationwide, customers ranked Cox highest in Customer Satisfaction in J.D. Power and Associates' 2004 Residential Long Distance Telephone Service study for bundled services.[7]

Cox could not have achieved these results without smooth, seamless and efficient interconnection to other carriers. Since the enactment of the 1996 Act, Cox has negotiated, arbitrated or adopted more than 70 incumbent LEC interconnection agreements and amendments to enable Cox to serve its customers. As part of that process, Cox has evaluated literally hundreds of agreements from all of the RBOCs. Cox also has brought eight Section 252 arbitrations before state commissions and successfully litigated a variety of issues in an arbitration resolved by the Commission through pre-emption of the authority of the Virginia State Corporation Commission.[8]

When the Commission adopted its initial local competition rules in 1996, it analyzed the incentives of incumbent LECs to negotiate interconnection agreements in light of the requirements of the 1996 Act. The Commission concluded that incumbent LECs had little or no reason to negotiate with competitive LECs:

> [T]he requirements in Section 251 obligate incumbent LECs to provide interconnection to carriers that seek to reduce the incumbent's subscribership and weaken the incumbent's dominant position in the market. Generally, the new

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residential users of local telephone services. The Western Region includes 16 states. http://www.jdpower.com.

[7] J.D. Power and Associates 2004 Residential Long Distance Customer Satisfaction Study[SM]. Study conducted among 10,500 residential long-distance users. Bundled segment includes residential long-distance customers who are billed for other telecom services on the same statement. http://www.jdpower.com.

[8] Petitions of WorldCom, Inc. et al. Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration, *Memorandum Opinion and Order*, 17 FCC Rcd 27039, 27078-9 ("Virginia Arbitration").

> entrant has little to offer the incumbent. Thus an incumbent LEC is likely to have scant, if any economic incentive to reach agreement.[9]

Nothing has happened in the last eight years to change that conclusion. Indeed, it is widely recognized that, except for the most trivial issues, incumbent LECs generally are unwilling to negotiate the terms of interconnection with competitive LECs. Cox's own experience bears this out. In negotiating with incumbent LECs, Cox typically is presented with a proposed agreement drafted by the incumbent, and any request for substantive change to that template is rejected out of hand. There is no give and take, no "horse trading" and no real negotiation. If Cox deems a particular provision of the agreement to be unacceptable, there is little Cox can do in the negotiation process because the incumbent LEC is unwilling to change (and because Cox has nothing to offer the incumbent to motivate its assent).

It thus is often the case that only arbitration gives Cox the leverage it needs to pry a reluctant incumbent off an unreasonable position. Indeed, Cox has experienced intractable resistance even when the incumbent LEC has proposed terms that explicitly conflicted with the 1996 Act and the Commission's rules. Cox's experience with Verizon has been particularly trying. In the Virginia arbitration mentioned above, for example, Cox was required to arbitrate, among other things, Verizon's unbendable demand that Cox provide physical collocation to Verizon, even though both the 1996 Act and the Commission's rules make crystal clear that only incumbent LECs – and not competitive LECs – bear such an obligation. Not surprisingly, Cox ultimately prevailed on this issue, but not without spending considerable time and resources in protracted proceedings before the Commission.

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[9] Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, *First Report and Order,* 11 FCC Rcd 15499, 15570 (1996) (the *"First Local Competition Order"*).

Further, Verizon's performance elsewhere reveals a pattern of similar behavior: Verizon has repeatedly forced competitive LECs to arbitrate proposed terms that explicitly conflict with the 1996 Act and the Commission's rules. It is particularly telling that four different competitive LECs were required to arbitrate the very same physical collocation issue with Verizon, and that Verizon lost the issue each and every time – including twice before bringing the issue to the Commission in the Virginia arbitration proceeding:

- In October, 1999, Sprint Communications Company L.P. (operating as a competitive LEC in New York) included in its arbitration with Verizon, then operating as Bell Atlantic-New York, (Docket CASE 99-C-1389[10]) an issue regarding Verizon's insistence that the interconnection agreement include terms that obligated the competitive LEC to provide to Verizon both unbundled network elements (UNEs) and collocation at Sprint's central offices. The New York commission ruled against Verizon.

- In April, 1999, MediaOne Telecommunications of Massachusetts, Inc. and Greater Media Telephone, Inc. (competitive LECs in Massachusetts) included in their respective arbitrations with Verizon, then operating as Bell Atlantic-Massachusetts, (Cases D.T.E. 99-42 and 99-43[11]) an issue regarding Verizon's insistence that the competitive LECs provide the incumbent with collocation arrangements within the competitive LECs' central offices. In resolving this issue, the Department ruled in favor of the competitive LECs, noting that while the competitive LECs had a general duty as a telecommunications carrier under §251(a) of the Act to interconnect directly or indirectly with the facilities and equipment of other telecommunications carriers, the specific obligation to provide collocation applies only to ILECs, such as Verizon, and not to competitive LECs.

- Three years later, in 2002, Global NAPS, Inc. (a competitive LEC in Massachusetts) was forced to fight Verizon Massachusetts' attempt to obtain an unconditional right to collocate at GNAPs's central office(s) (Case D.T.E. 02-

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[10] Petition of Sprint Communications Company L.P., Pursuant to Section 252(b) of the Telecommunications Act of 1996, for Arbitration to Establish an Intercarrier Agreement with Bell Atlantic-New York.

[11] Petitions of MediaOne Telecommunications of Massachusetts, Inc. and New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts for arbitration, pursuant to Section 252(b) of the Telecommunications Act of 1996 to establish an interconnection agreement; Petition of Greater Media Telephone, Inc. for arbitration, pursuant to Section 252(b) of the Telecommunications Act of 1996 to establish an interconnection agreement with New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts.

> 45[12]). In its order, the Department noted that it had previously dealt with reciprocal collocation rights (citing the MediaOne arbitration above) and ruled in favor of the competitive LECs, noting (again) that the specific obligation to provide collocation applies only to ILECs, such as Verizon and not to competitive LECs.

It goes without saying that competitive LECs such as Cox would prefer to obtain interconnection through negotiation, rather than arbitration, because arbitration is expensive, time consuming and needlessly diverts resources that would better be deployed bringing competitive services to market.[13] Arbitration is particularly wasteful when Cox must deal with an intransigent incumbent such as Verizon, which has no qualms about forcing competitive LECs to litigate and re-litigate the same issue across the country (or even in the same jurisdiction). In some cases, therefore, Cox has found that the better course is to adopt the previously arbitrated agreements (and/or sections of such agreements) of AT&T and MCI.[14] As the nation's largest competitive LECs, AT&T and MCI have devoted significant resources to securing interconnection arrangements with incumbent LECs that address many of the critical issues involving Sections 251 and 252 of the Communications Act. Opting into all or some portion of these agreements often is preferable from a cost-benefit analysis, because the agreements usually include state commission decisions that have resolved key issues important to Cox. In a number of cases, these issues have been resolved in a way that promotes local competition over the objections of the incumbent LEC and thus squarely meets Cox's needs. Yet

[12] Petition of Global NAPs, Inc., pursuant to Section 252(b) of the Telecommunications Act of 1996, for arbitration to establish an interconnection agreement with Verizon New England, Inc. d/b/a Verizon Massachusetts f/k/a New England Telephone & Telegraph Co. d/b/a Bell Atlantic-Massachusetts.

[13] As noted above, however, Cox was forced to arbitrate in eight proceedings where negotiations failed and adoption of another carrier's agreement was not a tenable alternative.

[14] Cox has adopted agreements (or portions of agreements) arbitrated by AT&T and/or MCI in California, Connecticut, Kansas, Oklahoma and Virginia.

even where the arbitrated result is not ideal from Cox's perspective, Cox will nonetheless sometimes adopt an arbitrated term because it is uneconomic for the company to re-arbitrate an issue that already has been resolved.

In short, as two large telephone companies with longstanding experience in the interconnection wars, AT&T and MCI have been at the forefront in enforcing, through arbitration and litigation, incumbent LEC compliance with Sections 251 and 252, particularly the crucial provisions of Section 251(c).[15] As a result of their efforts, smaller and less experienced competitive LECs have been aided significantly in their own attempts to achieve efficient interconnection arrangements. The loss of AT&T and MCI as independent voices in the competitive marketplace will inevitably change the dynamics by which competitive LECs secure efficient interconnection arrangements. Moreover, the effects of their proposed mergers will extend well beyond the states in which their RBOC partners serve as the incumbent LEC.

B. Post-Merger, Verizon Would Have Greater Capabilities and Incentives to Increase the Interconnection Costs of Its Remaining Competitors.

Stripped of the ability to rely on AT&T's and MCI's arbitrated interpretations of the requirements of Sections 251 and 252 and forced to arbitrate (and re-arbitrate) these terms, Cox and other competitive providers' costs of dealing with Verizon and other incumbent LECs would increase significantly, thereby undermining their ability to provide efficient service to customers. Indeed, the negative effect on Cox and other competitive providers would grow significantly following the proposed merger as Verizon and the other RBOCs become even more relentless in their efforts to resist the requirements of Sections 251 and 252 and to maintain their market dominance.

[15] 47 U.S.C. §§ 251, 252.

AT&T's and MCI's technical, operational, financial and legal expertise and resources have provided a measure of balance against the extensive resources and network advantages of Verizon and the other RBOCs. The independent existences of AT&T and MCI have been vital to the regulatory framework of checks and balances established since the break-up of Ma Bell. Yet, even with its superior experience and resources, MCI has found competition against the RBOCs to be so costly and difficult that it has been forced to sell itself to Verizon, just as AT&T is about to sell itself to another RBOC. Without the balance provided by AT&T and MCI, it will be more difficult and costly for the competitive providers remaining in the market to survive. Verizon and other RBOCs will face much less opposition, both in their push before federal and state legislatures and agencies for the relaxation or outright elimination of their legal obligations to interconnect efficiently with local competitors, and in their efforts to raise barriers and costs for competitors in individual interconnection negotiations. When such roadblocks force a competitor to succumb, consumer choice is reduced, to the detriment of the public.

It would be naïve and dangerous to expect that market forces alone will cause Verizon and other RBOCs to voluntarily provide efficient and nondiscriminatory collocation and interconnection on just and reasonable rates and terms to competitive providers. Commission action to streamline the procedures, including negotiation, arbitration and adoption, by which facilities-based competitors obtain interconnection agreements with incumbents is essential to prevent a combined Verizon/MCI from overwhelming the remaining competitors in the market. If Verizon and MCI are to gain approval for their combination, the Commission must impose conditions to protect local telephone customers from the anticompetitive ramifications discussed above.

Perhaps anticipating these very concerns, Verizon and MCI argue that the removal of MCI as an independent competitor would have no negative effect on the mass market because that business "is in a continuing and irreversible decline due to a variety of factors including not only the growth of [] intermodal competition, but also other changes such as the elimination of UNE-P."[16] MCI's President stated that the company "made a decision to exit the consumer business," last year, signaling its abandonment of a UNE-based approach to providing local phone service to residential customers.[17]

Despite these claims, it would be disingenuous to pretend that MCI's decision to move away from the UNE platform – a decision stemming directly from its unsuccessful litigation with the RBOCs – permanently removed MCI as a factor in the mass market. Indeed, the application indicates that MCI was planning to offer VoIP service, with a trial beginning this spring.[18] This suggests a reorientation of MCI's mass market offerings, not an end to MCI's efforts in that area.

Absent this merger, MCI would have remained as an independent player among competitive service providers, well-equipped to negotiate and arbitrate interconnection terms, drive regulatory and technology changes, and serve as a model or an ally for Cox and others seeking to compete against Verizon and other incumbent LECs in the provision of phone services. If the merger is consummated, MCI will not fulfill that role. In light of the merger, the Commission must take concrete steps to protect the rights of the remaining facilities-based competitors to economically efficient interconnection, for the benefit of consumers who deserve a choice in their service provider.

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[16] Application at 35.

[17] Application at 4. The credibility of that statement is uncertain, however, as it was not made until the Congressional hearings concerning the merger. *Id.* at 47.

[18] Application at 51.

III. Merger Conditions Are Necessary to Ensure that the Combined Verizon/MCI Entity Does Not Take Anticompetitive Actions Such as Raising Costs for Internet Backbone Peering

While the consolidation of the retail telephone market has captured more public attention, Verizon's acquisition of MCI and SBC's acquisition of AT&T also will result in a sea change in the Internet sector. When the two largest RBOCs merge with the two largest Tier I Internet backbones and providers of wholesale transport, the Commission should take prophylactic action to protect competition.

Today, there are six Tier I Internet backbone providers that other providers must ultimately pay for Internet transit – MCI, AT&T, Sprint, Level 3, Qwest and Global Crossing. The Tier I providers can extract payment from others because, like the incumbents in the local exchange market, they alone interconnect directly with all other Internet backbones. By contrast, non-Tier I Internet backbone providers such as Cox and Verizon enter economic arrangements with other non-Tier I players, by which they exchange traffic on a settlement-free basis because they are mutual beneficiaries of peering.

Following the merger and the integration of the Verizon backbone into the MCI backbone, the combined Verizon/MCI will obtain a substantial cost advantage over its competitors. As one of the six Tier I backbones, Verizon will no longer need to pay any transit costs to other Tier I backbones. Non-Tier I players that used to exchange traffic with Verizon on a settlement-free basis, however, will now have to pay Verizon transit rates to carry that traffic. In this fashion, the balance will tip toward Verizon and away from the remaining non-Tier I companies.

The issue, however, is not that non-Tier I companies seeking to exchange backbone traffic with the merged Verizon/MCI backbone will face higher transit costs post-merger. Rather, the concern is that the merged company would have an increased capability and

incentive to raise or maintain its transit rates at supra-competitive levels or engage in other anticompetitive conduct, because such actions would have the external effect of raising the costs for Cox and other IP service providers to compete against Verizon's core retail services. Whereas a pre-merger MCI would be concerned about a potential loss in wholesale revenue if other Tier I Internet providers offered lower transit rates, Verizon could afford to sacrifice such wholesale revenue to protect its core retail service revenues. Cox and other customers of MCI's transit services could not readily respond by switching to another Tier I Internet backbone provider and certainly could not switch without suffering a loss, given that they already have spent substantial time, money and resources to install connections to MCI's backbone facilities. Consequently, to protect competition and prevent the combined Verizon/MCI from obtaining an unfair cost advantage by imposing supra-competitive transit rates on Cox and other IP service providers, the Commission must adopt merger conditions to preserve the existing settlement-free Internet peering arrangements during a reasonable transition period.

IV. Conclusion

The proposed combination of Verizon and MCI will harm the public interest unless it is subject to merger conditions consistent with these comments.

Respectfully submitted,

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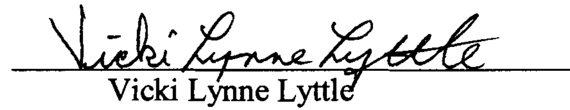

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