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

In the Matter of	)	
	)	
Applications for Consent to Transfer Control	)	WC Docket No. 05-75
Filed by Verizon Communications Inc. and	)	DA 05-762
MCI, Inc.	)	

REPLY COMMENTS OF CABLEVISION LIGHTPATH, INC.

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Cablevision Lightpath, Inc. ("Lightpath"), through its attorneys, respectfully submits these reply comments concerning the proposed acquisition of MCI, Inc. ("MCI") by Verizon Communications Inc. ("Verizon").

INTRODUCTION AND OVERVIEW

Lightpath is a full service, facilities-based, competitive local exchange carrier ("CLEC") that offers a broad range of services to a wide variety of business and residential customers. Lightpath began offering switched services in July 1994 in New York, and has since expanded its service area to New Jersey and Connecticut. Lightpath provides a competitive alternative for customers throughout New York, New Jersey, and Connecticut with its state-of-the-art network and fully integrated array of data and telecommunications service offerings.

A important component of providing such services as a facilities-based carrier, however, is Lightpath's ability to obtain "key inputs" from and establish critical business arrangements with incumbent local exchange carriers ("ILECs") to offer retail services and to ensure that customers receive seamless service that is of the highest quality. Lightpath, like many competitors, relies on Verizon (and to some extent MCI) for these components, including the facilities needed for the exchange of traffic, efficient arrangements for intercarrier compensation, business-like interconnection agreements, accurate and timely billing, and prompt and efficient number portability.

Lightpath depends on these business arrangements from Verizon in order to compete with Verizon. Verizon's incentive to support these activities diminishes as the success of competitors grows. Other parties that either provided or sought these types of essential arrangements provided critical benchmarking opportunities or, because they could act as intermediaries for such things as tandem transit or interconnection, used their heft to ensure low-cost inputs and business-like coordination on behalf of the entire competitive industry. The loss of potential alternative suppliers of these key components and firms capable of setting business-like standards for the industry, such as MCI and AT&T, will diminish the incentive of Verizon to support, and the ability of competitors to obtain, the services and components required to offer competing retail services.

Indeed, Verizon has shown no signs of a willingness to work with competitors to provide these essential inputs in a manner that would promote a truly competitive market. As the comments demonstrate, the merger will give Verizon and MCI the ability to control access to critical bottleneck voice and broadband facilities. The merger also will increase Verizon's ability to impose onerous conditions on the other critical business arrangements competitors require, such as timely porting of numbers and accurate billing. Indeed, with its ongoing business expansion, Verizon appears emboldened to erect barriers to competition by denying, delaying, or otherwise frustrating access to the key components competitors require while maintaining and strengthening its market power.

Accordingly, as the initial comments in this proceeding reflect, the merged entity may have increased incentive and ability to adversely affect competitors' provision of services. As a result, certain conditions may be warranted, including conditions related to the provision of interconnection, interconnection agreements, intercarrier compensation, number portability, and billing practices. The imposition of such conditions would help alleviate many of the business and operational concerns raised by the commenters.

I. EFFICIENT AND COST-EFFECTIVE INTERCONNECTION PRACTICES ARE NECESSARY TO COMBAT THE MERGED ENTITY'S INCENTIVE AND ABILITY TO DISCRIMINATE AGAINST COMPETITORS

Lightpath has entered into interconnection agreements with Verizon in New York, New Jersey, and Connecticut. These interconnection agreements allow Lightpath to purchase the limited but essential inputs it needs to provide retail services and establishes the operational parameters for Lightpath's exchange of traffic with Verizon and other telecommunications carriers also interconnected to Verizon. Lightpath also has entered into a traffic exchange agreement with MCI, and purchases certain services from MCI pursuant to other agreements.

In previous mergers, the Commission recognized that the merged entities might have the incentive and ability to discriminate against competitors, which could adversely affect competitors' provision of services and may force consumers to pay more for retail services.[1/] As a result, the Commission imposed conditions on the mergers to mitigate the potential for public interest harms.[2/] Given that Lightpath and numerous other competitors rely on both Verizon and MCI for essential inputs and business arrangements, the merged entity may have more incentive and ability to restrict access to those items by increasing prices, imposing onerous conditions, or

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[1/] *See, e.g., Application of GTE Corporation, Transferor, and Bell Atlantic Corporation, Transferee, for Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License*, 15 FCC Rcd 14032, ¶ 173 (2000) ("*BA-GTE Merger Order*"); *Ameritech Corp., Transferor, and SBC Communications, Inc. Transferee, for Consent to Transfer Control of Corporations Holding Commission Licenses and Lines Pursuant to Sections 214, and 310(d) , of the Communications Act and Parts 5, 22, 24, 25, 63, 90, 95 and 101 of the Commissions' Rules*, 14 FCC Rcd 17712, ¶ 186 (1999) ("*SBC-Ameritech Merger Order*").

[2/] *BA-GTE Merger Order* ¶ 351; *SBC-Ameritech Merger Order* ¶ 421.

limiting access to efficient interconnection arrangements and the porting of numbers. Accordingly, "carefully targeted" conditions should be adopted to address the types of discrimination the merger is likely to produce.[3/]

A. Competitors Will Be Unable to Compete Against the Merged Entity without Pro-Competitive Interconnection Agreements and Network Architecture Arrangements

MCI and AT&T have devoted significant resources to securing interconnection agreements with incumbent providers that address many of the critical issues involving Sections 251 and 252 of the Act.[4/] MCI and AT&T have been able to set an objective standard of "fair dealing" in interconnection negotiations because they have been large enough and vocal enough to demand reasonable treatment.[5/] As U.S. Cellular points out, "when AT&T and MCI disappear as independent companies, their absence in regulatory proceedings and industry negotiations will substantially strengthen the advocacy and negotiating position of [Verizon and SBC] and other national carriers in such matters."[6/] Thus, the loss of MCI, along with AT&T will significantly change the dynamic with which competitors secure effective interconnection agreements. Indeed, as some commenters point out, the mergers will eliminate the "coattail effect" other

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3/ *BA-GTE Merger Order* ¶ 359; *SBC-Ameritech Merger Order* ¶ 429.

4/ Cox Verizon Comments at 9-10.

5/ *See, e.g.*, New Jersey Division of Ratepayer Advocate Verizon Comments at 11-2; Independent Alliance Verizon Comments at 5 ("Whereas in the past some degree of Verizon's market power may have been neutralized by MCI's market strength, and Verizon may have wielded similar power when negotiating with MCI, the combination of those companies would eliminate, to the detriment of smaller carriers, any check or balance to their respective power in their markets. . . . If MCI is absorbed into Verizon, there will no longer be a large IXC presence to challenge the BOC in negotiations; small and independent carriers will be left with little leverage to achieve fair pricing.").

6/ U.S. Cellular Verizon Comments at 2-3.

competitors have enjoyed as a result of MCI's and AT&T's strong and effective competitive voices.[7/]

Even with "assistance" from MCI and AT&T, reaching an interconnection agreement that both complies with the law and meets Lightpath's business and operational needs is often a lengthy and tedious process.[8/] Verizon continually attempts to impose onerous conditions on Lightpath that are inconsistent with Verizon's requirements under the law. Typically, Verizon's strategy amounts to brazen attempts to raise its rivals' costs to compete both through imposing arduous interconnection terms or, failing that, requiring competitors to litigate even the most business-like arrangements in order to raise transaction costs. In most cases, Lightpath has been required to arbitrate these agreements merely to obtain what it is plainly entitled to under the law. For example, under current law, competitors are entitled to establish a single point of interconnection ("POI") per LATA in order to interconnect with the incumbent.[9/] Despite this long-standing rule, Verizon consistently attempts to require competitors to establish multiple POIs rather than a single POI or be subject to financial penalties for failing to do so. The only alternative to acquiescing to this costly "requirement" is to litigate it, often at substantial cost. As the comments demonstrate, other competitors have had similar experiences.[10/]

7/ *See*, *e.g.*, Cox Verizon Comments at 9 ("In some cases, Cox has found that the better course is to adopt the previously arbitrated [interconnection] agreements (and/or sections of such agreements) of AT&T and MCI.").

8/ *Cf.* Cox Verizon Comments at 7 ("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 is unwilling to change (and because Cox has nothing to offer the incumbent to motivate its assent).").

9/ 47 U.S.C. § 251(c)(2); 47 C.F.R. § 51.305(a); *Petition of WorldCom, Inc. 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, et al.*, 17 FCC Rcd 27039, ¶ 52 (2002) ("Under the Commission's rules, competitive LECs may request interconnection at any technically feasible point. This includes the right to request a single point of interconnection in a LATA.").

10/ Cox Verizon Comments at 7 ("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.").

Further, because interconnection agreements expire every two to three years, Lightpath generally is engaged in a constant circle of negotiation and arbitration. Lightpath spends significant time and resources to reach a fair and equitable business arrangement with Verizon that is consistent with their relationship as interconnected co-carriers. When the time for renegotiation approaches, however, Verizon routinely offers as the starting point for negotiations its generic, multistate, template agreement, which does not reflect the specific network architecture arrangement between the carriers or their existing day-to-day operations and is riddled with unreasonable one-sided provisions. Proceeding under these templates would require Lightpath to substantially rework its business and its existing physical interconnection with Verizon. Thus, rather than engage in unnecessary negotiations, Lightpath has sought repeatedly to extend its existing agreements (only making those revisions necessary to reflect changes in technology and law). Verizon has refused to operate in this manner, using instead its position as a keeper of critical inputs to raise costs through tedious interconnection negotiations and arbitration. This has also been noted by other commenters.[11/]

Without the competitive pressures from MCI (and AT&T), Verizon will have greater ability and incentive to increase the interconnection or transaction costs of its remaining competitors post-merger,[12/] which would significantly undermine competitors' ability to provide efficient service to customers. Facilities-based competitors cannot provide service without efficient collocation and interconnection with the incumbents' networks.[13/] Verizon's unique

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11/ Cox Verizon Comments at 11 ("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.").

12/ Cbeyond, *et al*., Verizon Petition to Deny at 24 ("A competitor in downstream markets that holds market power over upstream inputs needed to provide such downstream services has powerful incentives to raise rivals' costs.").

13/ Cox Verizon Comments at 4; Vonage Verizon Comments at 4.

position in the marketplace creates strong incentives for it to impede and delay the introduction and expansion of competitive choices and to inflate interconnection and collocation costs for facilities-based competitors.[14/] Market forces alone will not cause Verizon (and other incumbent carriers) to voluntarily provide efficient and nondiscriminatory interconnection at just and reasonable rates to competitors.[15/]

Accordingly, routine extension of the terms of interconnection agreements (making those revisions necessary to reflect changes in technology and law) would ensure that competitors are able to secure pro-competitive interconnection agreements on a streamlined basis and would prevent the merged entity from strong-arming competitors into unnecessary and costly interconnection negotiations when the competitor merely seeks to maintain the status quo. Verizon's ability to employ such negotiation tactics will only increase as a result of the merger. Lightpath recommends that the Commission establish a targeted condition in connection with the approval of this merger that Verizon must demonstrate to state commissions that revisions are necessary if it seeks to modify an existing interconnection agreement prior to forcing competitors to engage in costly negotiations and ultimately arbitration over unreasonable wholesale rewrites of existing agreements.

In addition, a condition reinforcing existing law that Verizon must allow competitors to establish a single POI, without the imposition of onerous or unlawful conditions, would facilitate competitive entry.[16/] The Commission has determined that the right of competitors to choose the

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[14/] Cox Verizon Comments at 4.

[15/] Cox Verizon Comments at 11 ("It would be naïve and dangerous to expect that market forces alone will cause SBC and other RBOCs to voluntarily provide efficient and nondiscriminatory collocation and interconnection on just and reasonable rates and terms to competitive providers."); *see also* Cbeyond, *et al*., Verizon Petition to Deny at 15-17 (discussing agreements a Verizon predecessor reached with the Commission to settle charges of violation of interconnection requirements imposed in an earlier merger).

[16/] United States Cellular Corporation Verizon Comments at 4.

location and number of points of interconnection on the incumbents' network, including the right to establish a single point of interconnection, promotes competition by allowing competitive carriers to make efficient network choices.[17/] Requiring competitors to expend significant resources to simply secure their rights under the law acts as a barrier to competition. The reduction in competition resulting from the merger[18/] will only give Verizon more incentive and opportunity to impose these types of unlawful requirements on competitors.

B. Mutually Beneficial Compensation Arrangements for the Exchange of Traffic Are Critical to Facilities-Based Competition

Under their existing interconnection agreements, Lightpath and Verizon pay each other access charges or reciprocal compensation depending on the type of traffic exchanged. The Commission currently is investigating whether a unified intercarrier compensation regime, such as bill-and-keep, should apply to all traffic rather than the current access charge/reciprocal compensation regime.[19/] Although Verizon has appeared to offer tentative support for the Commission's efforts in the past, Verizon has argued that the application of bill-and-keep should be conditioned on other network architecture requirements, such as the establishment of multiple POIs and the imposition of additional transport costs on competitors,[20/] and generally has refused to provide competitors with a bill-and-keep arrangement.

17/ *See, e.g., Developing a Unified Intercarrier Compensation Regime*, 16 FCC Rcd 9610, ¶ 112 (2001) ("an [incumbent carrier] must allow a requesting telecommunications carrier to interconnect at any technically feasible point, including the option to interconnect at single POI per LATA."); *Joint Application by SBC Communications, Inc., et al. for Provision of In-Region InterLATA Services in Texas*, 15 FCC Rcd 18354, ¶ 78 (2000) ("Section 251, and [the Commission's] implementing rules, require an incumbent LEC to allow a competitive LEC to interconnect at any technically feasible point. This means that a competitive LEC has the option to interconnect at only one technically feasible point in each LATA.") (citing 47 U.S.C. § 251(c)(2)(3)).

18/ *Cf.* ACN Communications Services, *et al*. Verizon Comments at 21-32 ("[I]t is clear that the proposed merger would significantly increase concentration in the voice and data markets and would diminish competition.").

19/ *Developing a Unified Intercarrier Compensation Regime*, 20 FCC Rcd 4685 (2005) ("*Intercarrier Compensation FNPRM*").

20/ *See, e.g.*, Comments of Verizon, CC Docket No. 01-92 (filed Aug. 21, 2001).

The requirement to exchange intercarrier compensation results in problems tracking and billing for traffic, and usually results in disputes between the parties, which require the expenditure of time and resources to resolve. As Commission staff has recognized, "a bill-and-keep approach, once implemented, would eliminate intercarrier compensation payments between carriers, [and] should dispose of most, if not all, of the existing compensation disputes between carriers."[21/]

The merger will only enhance Verizon's ability to use intercarrier compensation to distort competition and disadvantage competitors. The Commission has recognized that the existing compensation regimes are based on regulatory distinctions that are not tied to economic or technical differences between services, and distort telecommunications markets at the expense of healthy competition.[22/] Thus, rather than perpetuate an antiquated regime that no longer reflects the current marketplace simply because carriers have always operated in this manner, competition would be greatly enhanced if Verizon were required to demonstrate why a bill-and-keep regime is unreasonable if requested by a competitor. Similarly, Verizon should not be permitted to impose additional obligations on competitors seeking a bill-and-keep regime.

C. Clearly Defined Provisioning Parameters for Day-to-Day Operations Such as Number Porting and Timely Billing Practices Are Necessary to Ensure Competition

As discussed above, Lightpath depends on Verizon for many of the key components and business arrangements it requires to offer competitive retail services, including day-to-day operational issues such as number porting and billing practices. Lightpath is significantly

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21/ "A Bill-and-Keep Approach to Intercarrier Compensation Reform: An Analysis of Pleadings in CC Docket No. 01-92 by the Staff of the Wireline Competition Bureau," at 109, *attached to Intercarrier Compensation FNRPM*.

22/ *Intercarrier Compensation FNPRM* ¶ 15.

hindered in its ability to offer competitive services when Verizon does not provide timely and efficient service in these key areas.

For instance, Lightpath relies on Verizon to port telephone numbers in order to offer services to its customers. Lightpath, like many other competitors,[23/] has encountered numerous problems with Verizon when a Verizon customer seeks to transfer its number to Lightpath. Although there are established industry standards for number porting (*e.g.*, four days for a simple port), Verizon often uses the number porting process to delay the transfer of the customer to its competitor.[24/] As the Commission repeatedly has noted, the number portability process utilized by incumbents must be non-discriminatory.[25/] Incumbent carriers like Verizon clearly have a vested interest in delaying number ports, especially for those customers that also subscribe to the incumbents' DSL services. Delays in the porting process can have a material impact on competition.

Accordingly, the imposition of a definitive porting interval for DSL-related ports and enforcement of nondiscriminatory porting policies in general would ensure that the merged entity cannot use its ability to control the number porting process to discriminate against competitors.[26/]

23/ *BellSouth Telecommunications, Inc. Request for Declaratory Ruling that State Commissions May Not Regulate Broadband Internet Access Services by Requiring BellSouth To Provide Wholesale or Retail Broadband Services to CLEC UNE Voice Customers*, 20 FCC Rcd 6830 ¶ 36 (2005) ("*BellSouth UNE Order*") (noting that Comcast Phone, Time Warner, and Bright House Networks raised issues with incumbent providers' porting delays).

24/ For instance, Verizon has claimed that it cannot readily port a telephone number when the customer also has Verizon's DSL service, and in the past, has delayed the port for days or weeks, or in some cases, has refused it altogether until the customer disconnects its DSL service. In response to the *BellSouth UNE Order* stating that carriers must port numbers even in cases in which the voice customer also subscribes to DSL, however, Verizon has made a commitment to port telephone numbers connected to DSL services within seven business days. CloseCall America, however, suggests that Verizon continues, despite this pledge, to "block[ ] orders from CloseCall (and likely other CLECs) to transfer a customer's local service when the customer also subscribes to Verizon's DSL service." CloseCall America Verizon Comments at 4.

25/ *BellSouth UNE Order* ¶ 36 (stating "we intend to enforce, non-discriminatory number porting"); *see also Telephone Number Portability*, 18 FCC Rcd 20971, ¶ 11 (2003); *Telephone Number Portability*, 18 FCC Rcd 23697, ¶¶ 21, 34-37 (2003).

26/ CloseCall America Verizon Comments at 4 ("Verizon's unyielding effort to maintain a stranglehold on local voice service customers by leveraging its DSL offering is hardly surprising."); Elliott Spitzer Verizon

Both end users and competition suffer if the number porting process undermines the ability of new entrants to provide high-quality service to end users. Indeed, as some commenters point out, consumers are less likely to exercise their competitive options or change their minds to switch providers if the number porting process becomes too burdensome.[27/]

Another critical item Lightpath relies on is timely and accurate billing for the services Lightpath purchases from Verizon. In addition to the administrative burdens associated with tracking and billing for the exchange of traffic discussed above, Verizon routinely engages in "bad billing" practices, such as billing for services not purchased, billing at non-agreed upon rates, and backbilling for services rendered months and even years in the past. Each of these bad billing practices requires Lightpath to expend significant time and resources to review Verizon's bills, lodge the necessary disputes, and follow-up on the disputes in order to secure resolution. Often, these disputes are the same month after month because Verizon seems unable to implement changes to its billing systems on a going forward basis.

As the Commission has recognized, "[i]naccurate or untimely wholesale bills can impede a competitive LEC's ability to compete" because competitors "must spend additional monetary and personnel resources reconciling bills and pursuing bill corrections."[28/] The Commission also acknowledged that untimely wholesale bills may cause competitors to "lose revenue because they generally cannot, as a practical matter, back-bill end users in response to

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Comments at 23 ("As a condition to approving the proposed merger, Verizon should file proposed performance standards . . . in such categories as number porting . . .").

27/ *See, e.g.*, Vonage Verizon Comments at 10 (noting that "the ILECs often make portability so difficult and time consuming that customers are discouraged from switching service providers").

28/ *Application of Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization to Provide In-Region, InterLATA Services in Pennsylvania*, 16 FCC Rcd 17419, ¶ 23 (2001).

an untimely wholesale bill."[29/] The merger will only enhance Verizon's ability to exercise "control over key inputs that rivals need in order to offer retail services,"[30/] such as timely billing. Accordingly, specific billing parameters should be applied to all services to ensure that the merged entity cannot use billing practices to discriminate against competitors or otherwise erect roadblocks to entry.

29/ *Id.*

30/ *BA-GTE Merger Order* ¶ 176.

CONCLUSION

For the foregoing reasons, Lightpath respectfully requests that the Commission impose the targeted conditions outlined above on the approval of the merger to ensure that the merged entity does not have increased incentive and ability to adversely affect competitors' provision of services.

Respectfully submitted,

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Dated: May 24, 2005

CERTIFICATE OF SERVICE

I, Angela Collins, hereby certify that on this 24th day of May 2005, a copy of the foregoing "Reply Comments of Cablevision Lightpath, Inc." was served on the following:

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