

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

In the Matter of the

APPLICATIONS FOR CONSENT TO)
TRANSFER OF CONTROL FILED BY) WC Docket No. 05-
75
VERIZON COMMUNICATIONS INC.)
AND MCI, INC.)
_____)

REPLY COMMENTS OF PACIFIC LIGHTNET, INC.
IN SUPPORT OF THE PARTIES' APPLICATIONS TO TRANSFER
THE CONTROL OF MCI TO VERIZON, SUBJECT TO CONDITIONS

Pacific LightNet, Inc. (Pacific LightNet), by its undersigned counsel, submits these brief reply comments relating to the applications of Verizon Communications Inc. (Verizon) and MCI, Inc. (MCI) for the transfer of control of MCI to Verizon. Pacific LightNet, in essence, generally supports the proposed merger between Verizon and MCI, so long as it's subject to appropriate conditions to ensure that the proposed merger does not impede competitive access to the merged entity's facilities relating to interstate toll and IP-enabled services.

A Hawaii-based competitive local exchange carrier serving customers on Oahu, Maui, Kauai, the Big Island, Molokai and Lanai through its own submarine cable and land-based fiber network, Pacific LightNet offers a full range of integrated telecommunications products and services, including local dial tone, high-speed Internet access, dedicated and switched long distance,

collocation, special access and enhanced data services. Moreover, Pacific LightNet has recently introduced VoIP services to its customers in Hawaii, as well as has a strategic interest in offering such services on the Mainland.

Accordingly, Pacific LightNet believes that appropriate merger conditions will ensure that the merged entity provides its much smaller competitors with fair and non-discriminatory access to tandems, transport facilities, Internet-backbone facilities, and wireless platforms—all of which qualify as critical facilities for the smaller, but no less innovative and nimble, competitors who invigorate the marketplace with their ceaseless array of IP applications.

Pacific LightNet, moreover, endorses Vonage Holdings Corp.'s proposals that the Commission require the merged entity to engage in even-handed porting and honor its commitment to untie DSL from its other services.¹ Further, to ensure the non-discriminatory pricing of critical, or essential, facilities—be they for access to tandems, transport facilities, Internet-backbone facilities, or wireless platforms—Pacific LightNet endorses the Independent Alliance's proposal that the Commission require that the merged entity provide access to these facilities on a "most favored nation" basis, which simply means that smaller carriers will enjoy pricing parity on equal footing with the larger ones.²

¹ *See*, the May 9, 2005 Comments of Vonage Holdings Corp. at p. 10-11.

² *See*, the May 9, 2005 Comments of The Independent Alliance at p. 9.

Based on the foregoing, Pacific LightNet generally supports the proposed merger between Verizon and MCI, so long as it's subject to appropriate conditions as discussed herein.

Respectfully Submitted,

/s/_____

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CERTIFICATE OF SERVICE

I, Jeffrey Mayhook, do hereby certify that on, May 24, 2005, a copy of the foregoing Reply Comments of Pacific LightNet, Inc. In Support of the Parties' Applications to Transfer the Control of MCI to Verizon, Subject to Conditions, as filed with the Federal Communications Commission in WC Docket No. 05-75, was served by electronic mail upon the following Applicants, their counsel, and FCC staff:

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