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February 3, 2006

Ex Parte

Marlene H. Dortch - Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Applications for Consent to Transfer Control of Filed by Verizon
Communications, Inc. and MCI, Inc., WC Docket No. 05-75**

Dear Ms. Dortch:

The attached document was provided to Tom Navin, Chief, Wireline Competition Bureau and I am respectfully requesting it be placed on the record in the above proceeding. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Ann D. Berkowitz".

Attachment

cc: Tom Navin
Gail Cohen
Bill Dever

Dee May
Vice President
Federal Regulatory



1300 I Street, NW, Suite 400 West
Washington, DC 20005

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February 3, 2006

Mr. Thomas Navin
Chief, Wireline Competition Bureau
Federal Communications Commission
Washington, D.C. 20554

Re: Verizon Communications Inc. and MCI, Inc. Applications for Approval of Transfer of Control, WC Docket No. 05-75, Merger Condition G

Dear Mr. Navin:

As required by Appendix G of the Commission's Order,¹ Attached is a revised list of wire centers that satisfy the Tier 1 and Tier 2 criteria for dedicated transport and the wire centers that satisfy the non-impairment thresholds for DS1 and DS3 loops. This list amends the original list of wire centers provided by Verizon, as most recently updated on April 15, 2005.²

In preparing this revised list, Verizon has excluded collocation arrangements established by MCI or its affiliates, as required by Merger Condition G. Based on these exclusions, thirty-three wire centers have either decreased in status (i.e., from Tier 1 to Tier 2) or have been removed from the list altogether.³ Specifically, 14 wire centers have shifted from Tier 1 to Tier 2 status; 16 wire centers have shifted from Tier 2 to Tier 3 status and, therefore, have been removed from the list. One wire center has been removed from the list providing DS1 loop UNE relief, and 3 have been removed from the list providing DS3 loop UNE relief.

¹ *Verizon Communications Inc. and MCI, Inc. Applications for Transfer of Control, WC Docket No. 05-75, FCC 05-184, 37 Comm. Reg. (P&F) 416 (rel. Nov. 17, 2005).*

² *See Letter from Susanne A. Guyer, Verizon, to Jeffrey J. Carlisle, FCC, WC Docket No. 04-313 and CC Docket No. 01-338 (filed Feb. 18, 2005); Letter from Edwin J. Shimizu, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 04-313 and CC Docket No. 01-338 (filed Mar. 4, 2005); Letter from Edwin J. Shimizu, Verizon, to Michelle Carey, FCC, WC Docket No. 04-313 and CC Docket No. 01-338 (filed Apr. 15, 2005).*

³ One of these thirty-three wire centers has decreased in status both for DS1 loop and DS3 loop UNE relief.

Mr. Tom Navin, Feb. 3, 2005

Page 2 of 2

Verizon notes, however, that two of these thirty-three wire centers – BRYMPABM in Pennsylvania and NWTNMAWA in Massachusetts – have been re-qualified for Tier 2 transport status, because, pursuant to the Commission's implementation rules allowing updates to the exclusion list, they qualify, even excluding MCI, based on more recent access line and collocation data. *See Unbundled Access to Network Elements, Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, Order on Remand, 20 FCC Rcd 2533, ¶ 142, n. 399 (2005) and 47 CFR § 51.319(e)(3)*. Thus, while these two wire centers do not appear on these lists, a supplemental notice indicating that these two wire centers will retain Tier 2 status was provided to our carrier customers in Pennsylvania and Massachusetts on February 2, 2005.

Sincerely,

A handwritten signature in black ink that reads "Dee May". The signature is written in a cursive, flowing style.

Attachment

Verizon's Wire Centers Exempt from UNE Hi-Cap Loop and Dedicated Transport Ordering

Effective March 11, 2005

Last updated 02/03/06 to reflect status as of 3/11/05

Transport (Unbundled Dedicated Transport + Unbundled Dedicated Transport portion of a Loop-Transport combination)

DS1 Unbundled Transport will not be offered between Wire Center CLLIs marked "Yes" in the Tier 1 column.

DS3 Unbundled Transport and Dark Fiber will not be offered between Wire Center CLLIs marked "Yes"

in *either* the Tier 1 or Tier 2 columns.

Loop (Unbundled Loop + Unbundled Loop portion of a Loop-Transport combination)

DS1 Unbundled Loop Services will not be offered from Wire Centers marked "Yes" in the DS1 Loop column.

DS3 Unbundled Loop Services will not be offered from Wire Centers marked "Yes" in the DS3 Loop column.

Operated State	Wire Center	Wire Center Qualified w/o MCI - Yes or No - 02/03/06			
		Tier 1	Tier 2	DS1 Loop	DS3 Loop
CA	BLPKCAXF	No	Yes	No	No
	CCMNCAXF	No	Yes	No	No
	LNBHCAXF	Yes	No	No	No
	LNBHCAXS	No	Yes	No	No
	SNBBCAXF	No	Yes	No	No
	SNMNCAXG	No	Yes	No	No
	SNMNCAXP	No	Yes	No	No
	THOKCAXF	No	Yes	No	No
	WLANCAXF	No	Yes	No	No
	WLANCAXH	No	Yes	No	No
	WMNSCAXF	Yes	No	No	No
CT	GNWCCTGN	Yes	No	No	No
DC	WASHDCDN	Yes	No	Yes	Yes
	WASHDCDP	Yes	No	No	No
	WASHDCMO	Yes	No	Yes	Yes
	WASHDCMT	Yes	No	Yes	Yes
	WASHDCSW	Yes	No	Yes	Yes
	WASHDCWL	No	Yes	No	No
DE	DOVRDEDV	No	Yes	No	No
	NWRKDENB	Yes	No	No	No
	WLMGDEWL	Yes	No	No	No
FL	BHPKFLXA	Yes	No	No	No
	CLWRFLXA	Yes	No	No	No
	CNSDFLXA	No	Yes	No	No
	PNLSFLXA	No	Yes	No	No
	SPBGFLXA	Yes	No	No	No
	SRSTFLXA	No	Yes	No	No
	SWTHFLXA	Yes	No	No	No
	TAMPFLXA	Yes	No	No	No
	TAMPFLXE	Yes	No	No	No
	TAMPFLXX	Yes	No	No	No
	WSSDFLXA	Yes	No	No	No
	YBCTFLXA	No	Yes	No	No
	HI	HNLLHIMN	Yes	No	No

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		Wire Center Qualified w/o MCI - Yes or No - 02/03/06			
Operated State	Wire Center	Tier 1	Tier 2	DS1 Loop	DS3 Loop
IN	FTWYINXA	No	Yes	No	No
MA	BKLIMAMA	No	Yes	No	No
	BRNTMAWA	No	Yes	No	No
	BRTNMACR	Yes	No	No	No
	BSTNMABE	Yes	No	Yes	Yes
	BSTNMABO	Yes	No	No	Yes
	BSTNMAFR	Yes	No	No	No
	BSTNMAHA	Yes	No	No	Yes
	BURLMABE	No	Yes	No	No
	CMBRMABE	Yes	No	No	No
	CMBRMAWA	Yes	No	Yes	Yes
	DNVSMahi	Yes	No	No	No
	FRMNMAUN	Yes	No	No	No
	HLYKMAMA	No	Yes	No	No
	LWLLMAAP	Yes	No	No	No
	LWRNMACA	Yes	No	No	No
	LXTNMAWA	No	Yes	No	No
	MLDNMAEL	No	Yes	No	No
	MRBOMAMA	Yes	No	No	No
	NATNMAMA	No	Yes	No	No
	QNCYMAHA	Yes	No	No	No
	SALMMANO	Yes	No	No	No
	SOVLMACE	Yes	No	No	No
	SPFDMAWO	Yes	No	No	Yes
	WLHMMASP	Yes	No	No	No
WLHMMawe	Yes	No	No	No	
WRCSMACE	Yes	No	No	Yes	
MD	BLTMMDCH	Yes	No	Yes	Yes
	BLTMMDWL	Yes	No	No	No
	BTHSMDRP	Yes	No	No	No
	CHCHMDBE	Yes	No	No	Yes
	CLMAMDCB	No	Yes	No	No
	FPATMDFR	No	Yes	No	No
	FRDRMDFR	Yes	No	No	No

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Operated State	Wire Center	Wire Center Qualified w/o MCI - Yes or No - 02/03/06			
		Tier 1	Tier 2	DS1 Loop	DS3 Loop
	GMTWMDGN	No	Yes	No	No
	GTBGMDBG	Yes	No	No	No
	HGTWMDHG	No	Yes	No	No
	LARLMDLR	No	Yes	No	No
	RKVLMDMR	Yes	No	No	No
	RKVLMDRV	Yes	No	No	No
	SLBRMDSB	Yes	No	No	No
	SLSPMDSS	Yes	No	No	Yes
	TWSNMDTW	No	Yes	No	No
	WHTNMDWT	No	Yes	No	No
ME	BNGRMEPA	No	Yes	No	No
	LSTNMEAS	No	Yes	No	No
	PTLDMEFO	Yes	No	No	Yes
NC	DRHMNCXE	Yes	No	No	No
	DRHMNCXM	Yes	No	No	No
NH	DOVRNHTH	No	Yes	No	No
	KEENNHWA	Yes	No	No	No
	MNCHNHCO	Yes	No	No	Yes
	NASHNHWP	Yes	No	No	No
	PTMONHIS	Yes	No	No	No
NJ	ATCYNJAC	No	Yes	No	No
	CMDNNJCE	Yes	No	No	No
	ELZBNJEL	Yes	No	No	No
	ENWDNJEN	No	Yes	No	No
	EORNNJEO	No	Yes	No	No
	FRFDNJFA	No	Yes	No	No
	HCKNNJHK	Yes	No	No	Yes
	HOLMNJHO	No	Yes	No	No
	JRCYNJBR	Yes	No	No	No
	JRCYNJJO	Yes	No	No	Yes
	MRTWNJMR	Yes	No	No	Yes
	MSTWNJMO	No	Yes	No	No
	NBRGNJNB	No	Yes	No	No
	NBWKNJNB	Yes	No	No	Yes

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Operated State	Wire Center	Wire Center Qualified w/o MCI - Yes or No - 02/03/06			
		Tier 1	Tier 2	DS1 Loop	DS3 Loop
	NWVPVJMH	No	Yes	No	No
	NWRKNJ02	Yes	No	Yes	Yes
	NWRKNJIR	No	Yes	No	No
	PLFDNJPF	No	Yes	No	No
	PNNKNJPN	No	Yes	No	No
	PSSCNJPS	Yes	No	No	No
	PSVLNJPL	No	Yes	No	No
	PSWYNJPI	No	Yes	No	No
	PTSNNJAR	No	Yes	No	No
	RCPKNJ02	Yes	No	No	No
	RDBKNJRB	No	Yes	No	No
	RTFRNJRU	Yes	No	No	No
	SOVLNJSM	No	Yes	No	No
	TMRVNJTR	No	Yes	No	No
	TRENNJTE	Yes	No	No	No
	UNCYNJ02	Yes	No	No	Yes
	WHIPNJWH	No	Yes	No	No
NY	ALBYNYSS	Yes	No	No	No
	AMHRNYMP	Yes	No	No	No
	BFLONYEL	No	Yes	No	No
	BFLONYFR	Yes	No	No	Yes
	BFLONYHE	Yes	No	No	No
	BFLONYMA	No	Yes	No	No
	BRWDNYBW	Yes	No	No	Yes
	FLPKNYFP	No	Yes	No	No
	FRDLNYFM	No	Yes	No	No
	GRCYNYGC	Yes	No	Yes	Yes
	HCVLNYHV	No	Yes	No	No
	LYBRNYLB	Yes	No	No	No
	MINLNYMI	Yes	No	No	Yes
	NYCKNY77	No	Yes	No	No
	NYCKNYBR	Yes	No	Yes	Yes
	NYCKNYWM	Yes	No	No	No
	NYCMNY13	Yes	No	Yes	Yes

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		Wire Center Qualified w/o MCI - Yes or No - 02/03/06			
Operated State	Wire Center	Tier 1	Tier 2	DS1 Loop	DS3 Loop
	NYCMNY18	Yes	No	Yes	Yes
	NYCMNY30	Yes	No	Yes	Yes
	NYCMNY36	Yes	No	Yes	Yes
	NYCMNY37	Yes	No	Yes	Yes
	NYCMNY42	Yes	No	Yes	Yes
	NYCMNY50	Yes	No	Yes	Yes
	NYCMNY56	Yes	No	Yes	Yes
	NYCMNY73	Yes	No	No	No
	NYCMNY79	Yes	No	No	Yes
	NYCMNY97	Yes	No	No	No
	NYCMNYBS	Yes	No	Yes	Yes
	NYCMNYVS	Yes	No	No	Yes
	NYCMNYWS	Yes	No	Yes	Yes
	NYCQNYFL	No	Yes	No	No
	NYCQNYJA	Yes	No	No	No
	NYCQNYLI	Yes	No	No	No
	NYCQNYNW	No	Yes	No	No
	NYCRNYNS	No	Yes	No	No
	NYCXNYTR	No	Yes	No	No
	SCHNNYSC	No	Yes	No	No
	SYRCNYSU	Yes	No	No	Yes
	WHPLNYWP	Yes	No	No	Yes
	WSNCNYUN	No	Yes	No	No
	WSVLNYNC	Yes	No	No	No
OR	BVTNORXB	Yes	No	No	No
	SMRWORXA	No	Yes	No	No
	TGRDORXA	Yes	No	No	No
PA	ALTWPAAL	Yes	No	No	No
	AMBLPAAM	No	Yes	No	No
	ARMRPAAR	Yes	No	No	No
	BCYNPABC	Yes	No	No	No
	BHLHPABE	Yes	No	No	No
	BLLVPABE	No	Yes	No	No
	CARNPACA	Yes	No	No	No

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Operated State	Wire Center	Wire Center Qualified w/o MCI - Yes or No - 02/03/06			
		Tier 1	Tier 2	DS1 Loop	DS3 Loop
	CNSHPACN	Yes	No	No	No
	CPHLPACH	Yes	No	No	No
	CRAFPACR	Yes	No	No	No
	CRPLPACO	Yes	No	No	No
	DRMTPADO	Yes	No	No	No
	GLNSPAGL	No	Yes	No	No
	GNBGPAGR	No	Yes	No	No
	HRBGPAHA	Yes	No	No	No
	HTBOPAHB	Yes	No	No	No
	KGPRPAKP	Yes	No	No	No
	LNCSPALA	Yes	No	No	No
	MBRGPAME	No	Yes	No	No
	MOVLPAMO	Yes	No	No	No
	NRTWPANR	Yes	No	No	No
	OKMTPAOA	No	Yes	No	No
	PAOLPAPA	Yes	No	No	No
	PEHLPAPH	No	Yes	No	No
	PHLAPAEV	Yes	No	No	Yes
	PHLAPALO	Yes	No	Yes	Yes
	PHLAPAMK	Yes	No	Yes	Yes
	PHLAPAPE	Yes	No	No	No
	PHLAPAPI	No	Yes	No	No
	PHLAPATR	Yes	No	No	No
	PITBPAAL	Yes	No	No	No
	PITBPACA	No	Yes	No	No
	PITBPADT	Yes	No	Yes	Yes
	PITBPAEL	No	Yes	No	No
	PITBPANS	Yes	No	No	No
	PITBPAOK	Yes	No	No	No
	PYVLPAPE	Yes	No	No	No
	RBTPPART	Yes	No	No	No
	RDNGPARE	No	Yes	No	No
	SCTNPASC	Yes	No	No	No
	SHSAPASH	Yes	No	No	No

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Operated State	Wire Center	Wire Center Qualified w/o MCI - Yes or No - 02/03/06			
		Tier 1	Tier 2	DS1 Loop	DS3 Loop
	STCGPAES	Yes	No	No	No
	SWKYPASE	No	Yes	No	No
	TRCKPATC	Yes	No	No	No
	WAYNPAWY	Yes	No	No	No
	WCHSPAWC	No	Yes	No	No
	WKBGPAWK	Yes	No	No	No
	WLBPAWB	No	Yes	No	No
	WLPTPAWI	No	Yes	No	No
RI	CNTNRIPH	No	Yes	No	No
	PRVDRIBR	Yes	No	No	No
	PRVDRIWA	Yes	No	No	Yes
	WNSCRICL	Yes	No	No	No
	WRWKRIWS	Yes	No	No	No
TX	CLSTTXXA	No	Yes	No	No
	DNTNTXXA	No	Yes	No	No
	IRNGTXXA	Yes	No	No	No
	IRNGTXXC	No	Yes	No	No
	IRNGTXXD	No	Yes	No	No
	IRNGTXXG	Yes	No	No	No
	PLANTXXA	Yes	No	No	No
	PLANTXXB	No	Yes	No	No
PLANTXXD	No	Yes	No	No	
VA	ALXNVAAX	No	Yes	No	No
	ALXNVABA	Yes	No	No	No
	ARTNVAAR	Yes	No	No	Yes
	ARTNVACY	No	Yes	No	No
	CNVIVACT	Yes	No	No	No
	FLCHVAMF	No	Yes	No	No
	FRFXVAFF	Yes	No	No	Yes
	HRNDVAHE	Yes	No	Yes	Yes
	MCLNVALV	Yes	No	Yes	Yes
	MNSSVAXA	No	Yes	No	No
	NRFLVABS	Yes	No	No	No
	PNTGVADF	No	Yes	No	No

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		Wire Center Qualified w/o MCI - Yes or No - 02/03/06			
Operated State	Wire Center	Tier 1	Tier 2	DS1 Loop	DS3 Loop
	RCMDVAGR	Yes	No	No	No
	RCMDVAPE	No	Yes	No	No
	RCMDVASR	No	Yes	No	No
	RONKVALK	No	Yes	No	No
	VINNVAVN	Yes	No	No	No
	VRBHVACC	Yes	No	No	No
VT	BURLVTMA	No	Yes	No	No
WA	BOTHWAXB	No	Yes	No	No
	RDMDWAXA	Yes	No	No	No
WV	CHTNWVLE	Yes	No	No	No
Total Qualified WCs		152	96	25	49