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July 20, 2006

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: WC Docket No. 06-55, In the Matter of Petition of Time Warner Cable for Declaratory Ruling That Competitive Local Exchange Carriers May Obtain Interconnection Under Section 251 of the Communications Act of 1934, as Amended, To Provide Wholesale Telecommunications Services to VoIP Providers; WC Docket No. 06-54, Petition of Time Warner Cable for Preemption Pursuant to Section 253 of the Communications Act

Dear Ms. Dortch:

On July 19, 2006, Kathleen Grillo and Leslie Owsley of Verizon held separate meetings with Renee Crittendon, Chief of the Competition Policy Division, and Jeremy Miller, Deputy Chief of the Competition Policy Division, and with Tom Navin, Chief of the Wireline Competition Bureau, Julie Veach, Deputy Chief of the Wireline Competition Bureau, and Marcus Maher, Legal Counsel to the Bureau Chief, to discuss the above-referenced proceedings.

Verizon explained that it provides a wholesale service that it offers to facilities-based VoIP providers, including Time Warner Cable.¹ This wholesale service includes the transport necessary for the delivery of local and long-distance calls between the VoIP network and the public switched telephone network ("PSTN"); E911-related connectivity; administration, payment, and collection of intercarrier compensation; local number portability; and the provision of operator services and directory assistance services. It was Verizon's attempt to obtain interconnection agreements with five independent LECs in South Carolina — so that it could sell its wholesale service to Time Warner Cable in those LECs' territories — that led to two of the orders that form the basis of Time Warner Cable's petitions.

Verizon stated that the Commission should declare that the recent orders by the South Carolina Public Service Commission ("PSC") —holding that Verizon has no right to

¹ These services were provided by MCI Network Services, Inc. prior to the merger of MCI into Verizon on January 6, 2006. In this filing, we refer to the provider as Verizon.

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interconnect with the independent LECs in order to provide its wholesale service to Time Warner Cable – conflict with the Communications Act, as amended, and with basic federal policies regarding local competition and broadband deployment.

Verizon also explained that the Commission need not resolve the regulatory classification of *either* Time Warner Cable's VoIP service *or* Verizon's wholesale service in order to reach this decision. The Commission need not determine whether Verizon's wholesale service is telecommunications, a telecommunications service, or an information service in order to hold that decisions such as those of the South Carolina PSC conflict with federal law. Regardless of how Verizon's wholesale service is ultimately classified, independent LECs are required to interconnect and exchange traffic with, and port local telephone numbers to, Verizon in connection with the provision of that wholesale service.

Pursuant to Section 1.1206(b) of the Commission's rules, one electronic copy of this notice is being filed in the above-referenced proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Hill". The signature is written in a cursive, somewhat stylized font.

cc: Tom Navin
Julie Veach
Marcus Maher
Renee Crittendon
Jeremy Miller