



City of Chicago
Richard M. Daley, Mayor

Department of Law

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October 4, 2006

VIA ELECTRONIC FILING

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

Re: WC Docket No. 06-159; *Petition of Neutral Tandem, Inc. for Interconnection with Verizon Wireless, Inc. Pursuant to Sections 201(a) and 332(c)(1)(B) of the Communications Act of 1934, as Amended*

Dear Ms. Dortch:

The City of Chicago ("City") respectfully submits this *ex parte* letter, pursuant to the Federal Communications Commission's ("Commission") rules, in support of the Petition for Interconnection with Verizon Wireless, Inc. ("Verizon Wireless") Pursuant to Sections 201(A) and 332(c)(1)(B) of the Communications Act of 1934, as amended, filed by Neutral Tandem, Inc. ("Neutral Tandem").

The City supports Neutral Tandem's request for a Commission order requiring Verizon Wireless to maintain and establish direct physical connections and through routes with Neutral Tandem, consistent with the narrow and specific request made by Neutral Tandem. In submitting this filing, the City focuses on one critically important aspect of the Petition: the need for network redundancy in the public switched telephone network ("PSTN"). Because granting Neutral Tandem's request will promote such redundancy, which is plainly in the public interest, the City urges the Commission to act favorably on the Petition expeditiously.

I. Introduction

As are thousands of governmental entities throughout the country, the City is concerned about emergency preparedness following recent natural disasters, such as Hurricane Katrina, and the heightened state of alert resulting from terrorist attacks in the United States. The City has been at the forefront of efforts to safeguard its citizens in the event of future emergency situations, and has participated in numerous innovative and pioneering activities to promote this objective. For example, the City's Office of Emergency Management and Communications has developed one of the most advanced 911 centers in the world, and has launched a homeland security grid comprised of over 900 miles of fiber optic cable. The grid is



designed to enable the City to expand its use of surveillance cameras and biological, chemical and radiological sensors. As designed, the grid will facilitate the early detection of potential terrorist attacks. In addition, on September 7, 2006, the City held the first mass evacuation drill to be conducted in a major U.S. city, during which it tested the City's readiness for a potential emergency in partnership with the Chicago business community and thousands of citizen volunteers.

The City's groundbreaking efforts in the area of emergency preparedness have heightened its awareness of the potential vulnerability of various aspects of the City's infrastructure, including the PSTN, in the event of a future natural disaster or terrorist crisis. The alternate means of tandem connectivity represented by Neutral Tandem's services clearly favors the public interest. By supplementing the number of physical connections between various competitive carriers and incumbent local exchange carriers that can be relied upon in a crisis situation, the City will have a more diverse and robust PSTN to utilize in the event of an emergency. The critical redundancy that Neutral Tandem offers could be instrumental in the City's handling of a possible crisis, and would plainly benefit the needs of the public should an emergency arise.

II. Discussion

A. Network Redundancy Is Necessary for Emergency Preparedness

Neutral Tandem offers CLECs, wireless carriers and cable companies an alternative means to interconnect and exchange traffic without the necessity of using incumbent LEC transit and tandem-switched access services, and presently functions as the industry's only independent tandem services provider. As the first market for its roll-out of services, Neutral Tandem's services have been available in the Chicago area for over two years. As represented by the views of numerous comments who agree with the company's focus on the benefits of redundancy, Neutral Tandem's service offerings are designed to promote rapid disaster recovery efforts and increased homeland security, improved network reliability, alleviation of incumbent LEC tandem exhaust and call blocking due to tandem overcapacity, and a more robust PSTN in the event of outages or overloads.

Although the Commission has long recognized the importance of tandem competition, the pressing need for such competitive alternatives was recently emphasized by the findings of the independent panel it established to evaluate the impact of Hurricane Katrina on the telecommunications infrastructure in the wake of the devastating storm. The Katrina Report specifically cited the lack of redundancy in the telecommunications infrastructure as having contributed to the daunting recovery effort

following the hurricane. It concluded that three major problems caused the bulk of communications network interruptions, one of which was the “failure of redundant pathways for communications traffic.” The panel’s findings are instructive, and demonstrate that the ability of alternative tandem service providers such as Neutral Tandem to add necessary redundancy to the telecommunications infrastructure could minimize the detrimental effects resulting from future natural disasters, or from terrorist attacks that might similarly create an emergency situation for the City. The City respectfully requests the Commission to heed the panel’s guidance and not limit availability of the competitive alternatives offered by Neutral Tandem, which positively affect both current emergency preparedness efforts and the City’s ability to respond to a future crisis situation. Because encouraging redundancy in the PSTN in the manner requested by Neutral Tandem before disaster strikes is to the benefit of all citizens, the Petition should be granted.

B. Tandem Competition is Not Duplicative of Existing Facilities and Promotes the Public Interest

Verizon Wireless and others mistakenly discount the significant benefits of redundancy in the nation’s telecommunications networks that flow from the availability of Neutral Tandem’s competitive tandem services. The City is particularly concerned about this issue because it views redundancy as an important feature of its emergency preparedness program. However, Verizon Wireless repeatedly insists that “Neutral Tandem simply duplicates existing indirect connections” in several guises, and urges the Commission to harness the availability of Neutral Tandem’s services by rejecting the Petition. The City does not agree with this approach and suggests that the Commission reject Verizon Wireless’ claims.

Neutral Tandem demonstrated that its services do not simply duplicate or replicate existing facilities, but instead introduce multiple areas of diversity to the PSTN by giving CLECs, wireless carriers and cable companies an alternative means to interconnect and exchange traffic without the necessity of utilizing solely the incumbent LEC transit and tandem-switched access services. The City understands that Neutral Tandem does not rely on collocation in incumbent LEC facilities and nearly exclusively employs the services of competitive fiber carriers versus LEC transport, with the combined effect of bypassing (in lieu of “duplicating”) incumbent LEC facilities.

The City submits that the availability of multiple, competing service providers adding redundancy to the PSTN is a distinct public benefit that justifies granting the Petition. The redundancy offered by Neutral Tandem is both tangible and manifestly in the public interest, as tandem competition

strengthens the telecommunications infrastructure that the City will necessarily rely upon during emergency situations for the benefit of the public at large.

III. Conclusion

For the foregoing reasons, the City of Chicago urges the Commission to grant Neutral Tandem's Petition and order Verizon Wireless to establish direct physical connections and through routes with Neutral Tandem. Please contact the undersigned should you have any questions concerning this letter.

Respectfully submitted,

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cc: Victoria Goldberg (FCC)