

Dee May
Vice President
Federal Regulatory



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

Phone 202 515-2529
Fax 202 336-7922
dolores.a.may@verizon.com

February 15, 2007

Ex Parte Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

*Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

I am writing to update the factual record in the above-captioned proceeding.

In the more than three years since the Commission initiated this proceeding, there have been significant developments in the communications industry. As we have previously explained here and elsewhere, changes in technology and consumer demand have restructured the industry around new technologies, new services, and new providers. As a result of these changes, historical market divisions based on technology or geography no longer apply.

As this Commission and state regulators across the country have recognized, the proper analysis of competition in the marketplace should be forward-looking and must take into account the numerous sources of competition that are already present or now emerging. In a dynamic industry such as this one, historic measures of static market share are not especially meaningful in the competitive analysis.

Developments over the past three years underscore the importance of using a forward-looking analysis. Throughout the country, as well as in Verizon's local telephone service areas in particular, a wide variety of providers and technologies are competing with traditional voice telephone services, including the long-distance services at issue in this proceeding. These alternative providers include cable, wireless, over-the-top VoIP, and traditional wireline companies, as well as other alternatives such as e-mail, instant messaging, WiFi, WiMAX, and

Broadband over Powerline (“BPL”). Competition for voice services will only continue to grow going forward with the increasing deployment of advanced broadband networks. Moreover, these new broadband networks, and the advanced VoIP services provided over them, are inherently agnostic with regard to geography and do not lend themselves to the regulatory balkanization used to define geographically distinct voice markets in the past.

For purposes of this proceeding, these developments have several key implications. *First*, any competitive analysis must take into account all types of competing voice providers, as well as reasonable substitutes for voices services, regardless of technology. *Second*, there is no longer a separate long-distance market, but a market for communications services regardless of distance that does not conform to artificial LATA or other geographic boundaries, and that includes distance-insensitive services or packages as well as any stand-alone local or long-distance offerings. *Third*, under current market conditions, there is no plausible argument that traditional wireline carriers could use their local networks to dominate the long-distance component of voice services at issue here. The Commission accordingly should not re-regulate Verizon or other carriers as dominant when they provide in-region, interstate and international interexchange services outside a separate section 272 affiliate now that these separation requirements have sunset as Congress contemplated they would. *Fourth*, the failure to recognize this fact and eliminate dominant carrier regulation of long-distance services for all providers will only harm consumers. Among other things, it will reduce efficiency and increase costs to consumers generally, and would hinder the deployment of advanced broadband networks and services in particular.

I. THERE IS EXTENSIVE COMPETITION FOR VOICE SERVICES

A. Mass-Market

Mass-market consumers now have access to a wide range of communications alternatives for voice services.

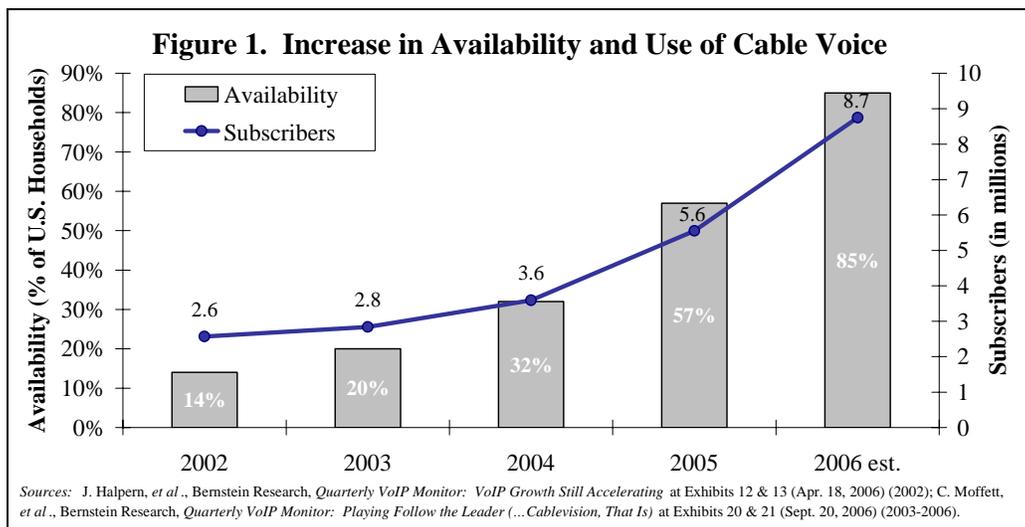
1. Cable

The Commission has repeatedly found that cable voice services “compete as substitutes” for wireline telecommunications service offerings.¹ Forward-looking state regulators around the country have reached the same conclusion.² These determinations are obviously correct.

¹ *Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Omaha Metropolitan Statistical Area*, Memorandum Opinion and Order, 20 FCC Rcd 19415, ¶ 65 (2005) (“*Omaha Forbearance Order*”); *see also Verizon Communications Inc. and MCI, Inc. Applications for Approval of Transfer of Control*, Memorandum Opinion and Order, 20 FCC Rcd 18433, ¶¶ 87-88 (2005) (“*Verizon/MCI Order*”) (holding that “facilities-based VoIP providers” that “own and control the last mile facility” “clearly fall within the relevant service market for local service.” These services “have many similar characteristics to traditional wireline local service” and are viewed by mass-market customers “as sufficiently close substitutes for local service.”).

² *See, e.g., Proceeding on Motion of the Commission To Examine Issues Related to the Transition to Intermodal Competition in the Provision of Telecommunications Services*, Statement of Policy on Further Steps Toward Competition in the Intermodal Telecommunications Market and Order Allowing Rate Filings at 33-34, Case 05-C-0616 (N.Y.P.S.C. Apr. 11, 2006) (“*New York Pricing Flexibility Order*”) (finding that “facilities-based digital phone service (i.e., cable phone)” is “widely available in New York and that from the perspective of customer demand they

As shown in Figure 1, both the availability and use of cable telephony have grown significantly since the Commission initiated this proceeding. The vast majority of mass-market consumers – both nationally and in Verizon’s local telephone service areas – are now able to purchase voice services from an incumbent cable operator. Cable telephone service is already available to nearly three-quarters of the nation’s households,³ and by the end of next year is expected to be available to approximately 94 percent of homes.⁴ Cable operators are offering distance-insensitive voice services, *see* Exhibits 1 (examples of cable voice offerings) & 3 (cable websites advertising voice offerings), and have had great success selling these services. There are currently 8.5 million cable telephony subscribers, with that total increasing by an average of approximately 1.2 million subscribers each quarter.⁵ JPMorgan estimates that, by the end of 2010, cable will capture 23 percent of primary lines.⁶ Other analysts predict that cable will achieve even higher percentages.⁷



are sufficiently close substitutes for traditional wireline local service. . . . In our judgment, consumers view these offerings as close substitutes to wireline local service.”); *Order Instituting Rulemaking on the Commission’s Own Motion to Assess and Revise the Regulation of Telecommunications Utilities*, Opinion, Rulemaking 05-04-005, Decision 06-08-030, at 119-120 (Cal. P.U.C. Aug. 24, 2006) (“*California Regulatory Reform Order*”) (finding that VoIP services, including those provided by cable operators, “are competitors to wireline telecommunications services” and are a “close substitute for wireline services”).

³ See Comments of the National Cable & Telecommunications Association at 45, *Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming*, MB Docket No. 06-189 (FCC filed Nov. 29, 2006) (“*NCTA Comments*”) (“Cable telephone service is now available to more than 73% of the nation’s households, and it is already being purchased by 8.5 million customers.”).

⁴ See C. Moffett, et al., Bernstein Research, *Quarterly VoIP Monitor: Playing Follow the Leader (... Cablevision, That Is)* at Exhibit 20 (Sept. 20, 2006) (“*Bernstein Research Sept. 2006 Quarterly VoIP Monitor*”) (estimating cable telephony availability of 94 percent of homes passed by year-end 2008).

⁵ *NCTA Comments* at 45; *Bernstein Research Sept. 2006 Quarterly VoIP Monitor* at Exhibit 21.

⁶ J. Chaplin, et al., JPMorgan, *Telecom Services/Wireline: State of the Industry: Consumer* at Table 21 (Jan. 13, 2006) (estimating that cable will have a 23 percent share of wireline primary lines by the end of 2010).

⁷ See, e.g., F. Louthan, et al., Raymond James Equity Research, *Reassessment of Access Lines and Wireline Carriers* at 3 (July 5, 2006) (citing IDC estimates that cable will enjoy a share of more than 30 percent of all primary lines by the end of 2010).

Each of the four major incumbent cable operators – Cablevision, Time Warner, Comcast, and Cox – offers competitive voice services in their service territories. Based on the number of homes these companies claim to pass with their networks, these four companies’ networks pass more than 75 percent of the homes in the country.⁸ Analysts also estimate that these cable operators cover approximately 72 percent of homes in Verizon’s local telephone service areas.⁹ As of year-end 2006, these cable companies had already won approximately 7.6 million voice subscribers (not counting the subscribers that Cablevision added in 4Q06, as it has not yet reported those totals).¹⁰ According to these same sources, just three of these four companies were collectively adding more than 55,000 new subscribers each week (the fourth, Cox, does not report these data).

Comcast is the largest provider of cable television service in the U.S. Its network passes more than 47 million homes nationwide.¹¹ According to analysts, approximately one-third of those homes – roughly 16 million – are in Verizon’s local telephone service areas.¹² Comcast recently stated that it was offering voice service to 32 million homes (nearly 70 percent of its footprint) as of year-end 2006, and that it would reach approximately 40 million homes (85 percent of its footprint) by year-end 2007.¹³ In February 2007, Comcast reported that it was providing voice service to more than 2.5 million customers nationwide as of year-end 2006, and that it was adding an average of more than 32,000 customers per week.¹⁴ Comcast states that it is now “significantly ahead of our plan to reach 20% penetration [of Comcast Digital Voice phone service] by the end of 2009.”¹⁵

⁸ Comcast Press Release, *Comcast Reports 2006 Results and Outlook for 2007* (Feb. 1, 2007); Time Warner Inc. Press Release, *Time Warner Inc. Reports Results for 2006 Full Year and Fourth Quarter* (Jan. 31, 2007); Cablevision News Release, *Cablevision Systems Corporation Reports Third Quarter 2006 Results* (Nov. 8, 2006); Cox News Release, *Cox Communications Announces Updated Customer Statistics Following System Sales & Acquisitions* (June 14, 2006).

⁹ J. Halpern, et al., Bernstein Research, *US Telecom: Full Valuations and High Expectations Drive Less Bullish Outlook for 2007 Than 2006* at Exhibit 8 (Nov. 13, 2006).

¹⁰ See Comcast Press Release, *Comcast Reports 2006 Results and Outlook for 2007* (Feb. 1, 2007) (YE06 data); Time Warner Inc. Press Release, *Time Warner Inc. Reports Results for 2006 Full Year and Fourth Quarter* (Jan. 31, 2007) (YE06 data); Time Warner Inc. Press Release, *Time Warner Inc. Reports Third Quarter 2006 Results* (Nov. 1, 2006); Cablevision News Release, *Cablevision Systems Corporation Reports Third Quarter 2006 Results* (Nov. 8, 2006) (3Q06 data); Cox News Release, *A Decade of Bundling Delivers Cox Communications Considerable Competitive Advantages* (Jan. 30, 2007) (YE06 data).

¹¹ Comcast Press Release, *Comcast Reports 2006 Results and Outlook for 2007* at Table 6 (Feb. 1, 2007).

¹² See J. Halpern, et al., Bernstein Research, *US Telecom: Full Valuations and High Expectations Drive Less Bullish Outlook for 2007 Than 2006* at Exhibit 9 (Nov. 13, 2006); Comcast Press Release, *Comcast Reports 2006 Results and Outlook for 2007* at Table 6 (Feb. 1, 2007).

¹³ Comcast Presentation, Citigroup Entertainment, Media & Telecommunications Conference, at 11 (Jan. 9, 2007) (stating that Comcast Digital Voice was available to “32MM+ Marketable Homes” as of YE06 and would be available to “~40MM Marketable Homes” by YE06, as compared to 47 million homes that Comcast passes).

¹⁴ See Comcast Press Release, *Comcast Reports 2006 Results and Outlook for 2007* (Feb. 1, 2007).

¹⁵ Thomson StreetEvents, *CMCSA – Q4 2006 Comcast Corporation Earnings Conference Call*, Conference Call Transcript at 8 (Feb. 1, 2007) (statement of Comcast Corp. COO and President, Comcast Cable Communications, Steve Burke).

Time Warner Cable, the nation's second largest cable operator, passes approximately 26 million homes nationwide.¹⁶ According to analysts, approximately one-quarter of those homes – roughly 6.5 million – are in Verizon's local telephone service areas.¹⁷ Time Warner Cable offers voice service in every market it served prior to its recent transactions with Adelphia and Comcast (markets in which Time Warner passed more than 16 million U.S. homes),¹⁸ and following those transactions provides voice service to approximately 65 percent of its 26 million homes passed.¹⁹ In February 2007, Time Warner reported that it had more than 1.9 million voice subscribers nationwide as of year-end 2006, and that it was adding an average of 15,000 customers each week.²⁰

Cablevision's network passes approximately 4.5 million homes nationwide.²¹ According to analysts, nearly 80 percent, or 3.6 million homes, are in Verizon's local telephone service areas.²² In 2003, Cablevision became the first cable operator in the U.S. to deploy IP-based telephone service *throughout* its cable service territory.²³ As of the end of the third quarter of 2006, Cablevision reported that it already served more than 1.1 million voice subscribers,²⁴ and was adding an average of nearly 9,000 voice subscribers each week.²⁵ Cablevision also reported that it was then the voice provider for more than 24 percent of the homes it passed, and analysts expect this to increase to approximately 33 percent by the end of 2007.²⁶

¹⁶ Time Warner Inc. Press Release, *Time Warner Inc. Reports Results for 2006 Full Year and Fourth Quarter* (Jan. 31, 2007).

¹⁷ See J. Halpern, *et al.*, Bernstein Research, *US Telecom: Full Valuations and High Expectations Drive Less Bullish Outlook for 2007 Than 2006* at Exhibit 9 (Nov. 13, 2006); Time Warner Inc. Press Release, *Time Warner Inc. Reports Results for 2006 Full Year and Fourth Quarter* (Jan. 31, 2007).

¹⁸ Thomson StreetEvents, *TWX – Q4 2004 Time Warner Inc. Earnings Conference Call*, Conference Call Transcript (Feb. 4, 2005) (statement of Time Warner Inc. CFO Wayne Pace).

¹⁹ Time Warner Inc. Press Release, *Time Warner Inc. Reports Results for 2006 Full Year and Fourth Quarter* (Jan. 31, 2007); Time Warner Inc., *2006 Trending Schedules* at Schedule 6, <http://ir.timewarner.com/downloads/4Q06Trending.pdf>.

²⁰ See Time Warner Inc. Press Release, *Time Warner Inc. Reports Results for 2006 Full Year and Fourth Quarter* (Jan. 31, 2007); Time Warner Inc. Press Release, *Time Warner Inc. Reports Third Quarter 2006 Results* (Nov. 1, 2006).

²¹ See Cablevision News Release, *Cablevision Systems Corporation Reports Third Quarter 2006 Results* (Nov. 8, 2006).

²² See J. Halpern, *et al.*, Bernstein Research, *US Telecom: Full Valuations and High Expectations Drive Less Bullish Outlook for 2007 Than 2006* at Exhibit 9 (Nov. 13, 2006); see also *id.* at 7-8 (“Cablevision . . . is almost entirely in Verizon's footprint.”).

²³ Cablevision News Release, *Cablevision Completes Network Rebuild* (Dec. 3, 2003).

²⁴ Cablevision News Release, *Cablevision Systems Corporation Reports Third Quarter 2006 Results* (Nov. 8, 2006).

²⁵ See *id.*

²⁶ *Id.*; R. Bilotti, *et al.*, Morgan Stanley, *Cablevision Systems: Analysis of 3Q06 Results and Revised Model* at Exhibit 18 (Nov. 9, 2006). See also C. Moffett, *et al.*, Bernstein Research, *Cable 3Q Preview: Raising Target Prices for Comcast and Cablevision; Risk/Reward Still Positive* at 15 & Exhibit 23 (Oct. 19, 2006); Cablevision News Release, *Cablevision's Optimum Voice Surpasses One Million Customers* (July 18, 2006) (Tom Rutledge, Cablevision chief operating officer: Optimum Voice “has already been embraced by one-third of [Cablevision's] cable television customers and more than half of [the company's] high-speed Internet customers.”).

Cox Communications' network passes more than 9 million homes nationwide.²⁷ According to analysts, approximately 16 percent, or 1.5 million homes, are in Verizon's local telephone service areas.²⁸ In October 2006, Cox announced that its Digital Telephone service was available in all Cox markets.²⁹ In January 2007, Cox reported that it was providing voice service to more than 2 million homes as of year-end 2006.³⁰ Cox also reported in July 2006 that it already provides voice services to "33 percent of total cable customers and 24 percent of all homes passed by Cox's network."³¹

Bright House Networks is the nation's sixth largest cable operator, with over 2.2 million customers in several large markets, including Tampa, which is one of the country's largest cable clusters.³² The company launched phone service in Verizon's local telephone service areas in Florida in 2004, and as of May 2006 reported that it had already gained more than 225,000 customers.³³ Press reports put that total at more than 300,000 as of December 2006.³⁴ This is consistent with the company's claim that it "is signing up 8,000 to 10,000 new customers for its voice product every month."³⁵

Charter Communications passes approximately 11.8 million homes and has reported that it has nearly 5.5 million cable subscribers.³⁶ According to Charter, approximately 20 percent, or 2.4 million of these homes passed, are in Verizon's local telephone service areas.³⁷ The company has reported that it had deployed telephony services to 6.8 million homes as of year-end 2006.³⁸ In February 2007, the company announced that it now serves more than 500,000 voice customers, and that the company "has more than quadrupled its number of customers since

²⁷ Cox News Release, *Cox Communications Announces Updated Customer Statistics Following System Sales & Acquisitions* (June 14, 2006).

²⁸ See J. Halpern, et al., Bernstein Research, *US Telecom: Full Valuations and High Expectations Drive Less Bullish Outlook for 2007 Than 2006* at Exhibit 9 (Nov. 13, 2006); Cox News Release, *Cox Communications Announces Updated Customer Statistics Following System Sales & Acquisitions* (June 14, 2006).

²⁹ See Cox News Release, *Cox Digital Telephone Now Offered in All Cox Markets* (Oct. 30, 2006).

³⁰ Cox News Release, *A Decade of Bundling Delivers Cox Communications Considerable Competitive Advantages* (Jan. 30, 2007).

³¹ Cox News Release, *Cox Digital Telephone To Be Available in All Cox Markets by End of Year* (July 13, 2006).

³² Bright House Networks Press Release, *Bright House Networks Adds Digital Phone Features* (Nov. 27, 2006); Bright House Networks, *Company Overview*, http://www.mybriighthouse.com/about_us/company_overview.aspx.

³³ Bright House Networks Press Release, *More Than 225,000 Florida Families Switch to Bright House Networks Digital Phone* (May 2, 2006).

³⁴ R. Roger, *Cable Operators Seek Competitive Edge*, Bradenton Herald at 1 (Dec. 17, 2006).

³⁵ L. Mayk, *Battle for Your Bills Heats Up*, Sarasota Herald-Tribune at 16 (Oct. 30, 2006) (quoting company spokesman Joe Durkin).

³⁶ Charter Communications Press Release, *Charter Reports Third-Quarter 2006 Financial and Operating Results* (Oct. 31, 2006).

³⁷ *Charter at Citigroup 17th Annual Entertainment, Media and Telecommunications Conference – Final*, FD (Fair Disclosure) Wire, Transcript 011007au.742 (Jan. 10, 2007) (statement by Charter president and CEO Neil Smit).

³⁸ Charter Communications Press Release, *Charter Reports Preliminary Financial and Operating Results for Fourth-Quarter 2006* (Feb. 9, 2007).

the beginning of 2006.”³⁹ Charter has stated that it plans to continue expanding the availability of its service.⁴⁰

In addition to the larger cable operators discussed above, many of the smaller cable operators in Verizon’s local telephone service areas also are capable of and are providing voice services in their service territories. For example, as shown in Exhibit 2, cable operators such as RCN, Atlantic Broadband, Knology, Mediacom, and others all offer voice services in Verizon’s local telephone service areas.

2. *Wireless*

The Commission has recognized that “growing numbers of particular segments of the mass market are choosing mobile wireless service in lieu of wireline local services,” and that wireless is competing with wireline both for minutes of use and, in many cases, for subscriber lines.⁴¹ The Commission has further noted that it is not necessary that all segments of the mass market be likely to rely upon mobile wireless services in lieu of wireline local services in order for wireless service to constrain prices for wireline service, but rather the analysis “only requires that there be evidence of sufficient substitution for significant segments of the mass market.”⁴² The Commission also found that the evidence shows that “intermodal competition between mobile wireless and wireline service will likely increase in the near term.”⁴³ That conclusion is borne out by ongoing developments, both generally and with respect to the long-distance component of voice services in particular.

As an initial matter, wireless carriers were the pioneers in offering distance-insensitive voice services.⁴⁴ These new offerings caused many customers to use wireless services for their long-distance calling, and later led to increasing displacement of wireline lines. Today, all major wireless providers offer plans with distance-insensitive buckets of minutes. *See* Exhibits 4 (describing wireless offerings) & 5 (maps of major wireless providers in Verizon’s local telephone service areas). Verizon and other wireline companies have responded to these plans with their own comparable offerings. *See* Exhibits 6 & 7 (describing wireline offerings carriers in Verizon’s local telephone service areas).

Mass-market customers are increasingly using wireless services in place of traditional wireline telephone services. As of June 2006, there already were substantially more wireless

³⁹ Charter Communications Press Release, *Charter Telephone Reaches Half-Million Customer Mark* (Feb. 15, 2007).

⁴⁰ *Id.* (In the past year, “Charter undertook an aggressive rollout of telephone,” and “Charter plans to launch phone service in more markets this year.”).

⁴¹ *Verizon/MCI Order* ¶ 91.

⁴² *Id.*

⁴³ *Id.*

⁴⁴ *See Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993; Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services*, Ninth Report, 19 FCC Rcd 20597, ¶ 113 (2004).

subscribers (217 million) than wireline access lines (172 million).⁴⁵ As shown in Figure 2, this represents a significant increase since the Commission initiated this proceeding. As of the middle of 2006, approximately 72 percent of U.S. households had at least one wireless phone.⁴⁶ Analysts have estimated that wireless subscribers make 64 percent of their long-distance calls and 42 percent of their local calls on their wireless phones.⁴⁷ A large and increasing number of customers are giving up their wirelines entirely in favor of wireless. CIBC estimates that 12.8 percent of wireline access lines have been lost to wireless, and that the total will rise to 16.7 percent within two years.⁴⁸ Analysts predict that the number of wireless-only users will grow to 18-25 percent of the market by 2010.⁴⁹

Wireless prices have continued to decline, and have been a significant factor in constraining wireline prices. All major wireless carriers offer voice services that are competitive with comparable wireline offerings with respect to price, *see* Exhibit 4 (describing wireless offerings), despite the fact that regulatory actions have kept wireline prices artificially low in many instances.⁵⁰ The coverage and reliability of wireless networks has continued to improve

⁴⁵ See Ind. Anal. & Tech. Div., WCB, FCC, *Local Telephone Competition: Status as of June 30, 2006* at Tables 1 & 14 (Jan. 2007) (“*FCC July 2006 Local Competition Report*”).

⁴⁶ CTIA, *Wireless Quick Facts: September 2006*, http://www.ctia.org/research_statistics/statistics/index.cfm/AID/10202.

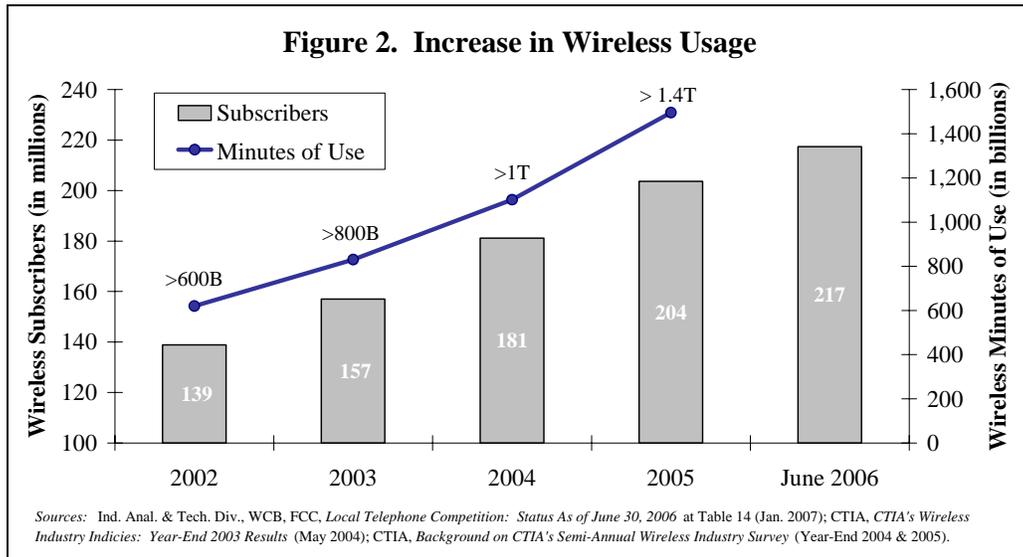
⁴⁷ K. Griffin, Yankee Group, *Pervasive Substitution Precedes Displacement and Fixed-Mobile Convergence in Latest Wireless Trends* at 5 and Exhibit 3 (Dec. 2005); *see also* D. Chamberlain, *et al.*, In-Stat, *Wireless in the Consumer Telecom Bundle: Discounts without Convergence* at 15 (Oct. 2005) (19 percent of survey respondents transferred all long-distance calling to wireless); Pew Internet & American Life Project, *Pew Internet Project Data Memo: Cell Phone Use* at 4 (Apr. 2006) (26 percent of Americans surveyed said they couldn’t live without a wireless phone).

⁴⁸ T. Horan, *et al.*, CIBC World Markets, *4Q06 Communications and Cable Services Preview*, at 16, Exhibit 8 (Jan. 18, 2007); *see also* B. Bath, Lehman Brothers, *Telecom Services – Wireline* at Figure 11 (July 7, 2005) (estimating 24 million wireline access lines have been lost to wireless providers since 1999).

⁴⁹ See F. Louthan, *et al.* Raymond James Equity Research, *Reassessment of Access Lines and Wireline Carriers* at 2 (July 5, 2006) (predicting 25 percent wireless substitution by 2010); R. Bilotti, *et al.*, Morgan Stanley, *Cable/Satellite: Looking into 3Q06 and 2007: Cautious on Top Line, Capital Expenditures, and Lofty Valuations* at Exhibit 53 (Oct. 25, 2006) (predicting 20 percent wireless substitution by the end of 2009); V. Shvets, *et al.*, Deutsche Bank, *4Q04 Review: Wireless OK . . . RBOCs Fare Poorly* at 6 (Feb. 28, 2005) (“wireless cannibalization” now accounts for “more than 1m lines lost per quarter.”); J. Chaplin, *et al.*, JP Morgan, *State of the Industry: Consumer* at Table 57 (Jan. 13, 2006) (estimating that, by the end of 2010, wireless will capture 18 percent of primary lines).

⁵⁰ See, e.g., *Application by Verizon New England Inc., et al., for Authorization to Provide In-Region, InterLATA Services in Vermont*, Memorandum Opinion and Order, 17 FCC Rcd 7625, ¶ 68 (2002) (“In many states . . . higher business rates subsidize some residential rates, and, consequently, certain residential services are priced below cost.”); *Sprint v. FCC*, 274 F.3d 549, 555 (D.C. Cir. 2001) (noting that the FCC’s counsel explained that “state commissions have historically set relatively low residential rates, especially rural ones, allowing the incumbent monopoly to make it up in other aspects of their business.”).

due to investments by wireless providers,⁵¹ and the overwhelming majority of consumers are satisfied with the quality of their wireless service.⁵²



3. Over-the-Top VoIP

The Commission has found that “some proportion of mass market customers may view certain over-the-top VoIP services as substitutes for wireline local service.”⁵³ This turns on whether consumers purchase broadband connections, or have them available to purchase, and on their particular local service requirements.⁵⁴ A number of state regulators have recognized that these conditions are now met and that over-the-top VoIP services are a substitute for traditional wireline services.⁵⁵

⁵¹ See *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993*, Eleventh Report, 21 FCC Rcd 10947, ¶¶ 132-134 (2006).

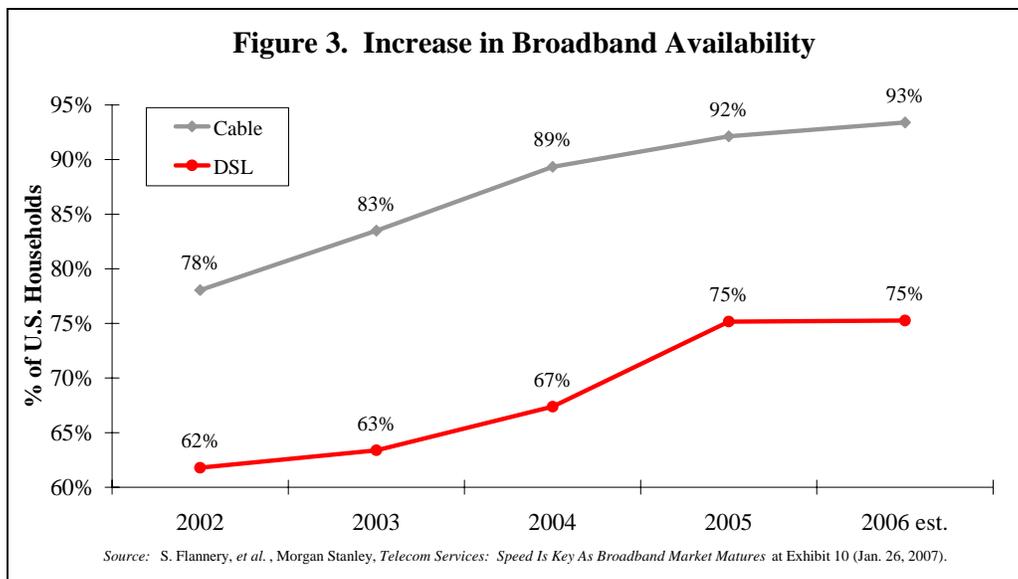
⁵² CTIA Press Release, *Consumers Remain Overwhelmingly Satisfied with their Wireless Service, New Poll Finds* (Sept. 13, 2006) (An August 2006 survey by McLaughlin & Associates found that 86 percent were satisfied with their wireless phone service).

⁵³ *Verizon/MCI Order* ¶ 89.

⁵⁴ See *id.*

⁵⁵ See, e.g., *New York Pricing Flexibility Order* at 33-34 (Concluding that “application based phone service (e.g., Vonage)” is “widely available in New York and that from the perspective of customer demand they are sufficiently close substitutes for traditional wireline local service. . . . In our judgment, consumers view these offerings as close substitutes to wireline local service.”); *California Regulatory Reform Order* at 119-120 (“VoIP communications are competitors to wireline telecommunications services”; “VoIP is a close substitute for wireline service.”); *Joint Application of Verizon Communications, Inc. and MCI, Inc. for Approval of Agreement and Plan of Merger*, Opinion and Order, Docket Nos. A-310580F0009, *et al.*, 2006 Pa. PUC LEXIS 22, at *132 (Pa. P.U.C. Jan. 11, 2006) (“The presence of substitutes or alternatives such as cable telephony, and VoIP, for the mass market customer class, particularly for the provision of local service, are a sufficient constraint on the exercise of market power and potentially anti-competitive behavior.”); Div. of Competitive Markets and Enforcement, Florida PSC, *Report on the Status of Competition in the Telecommunications Industry: As of May 31, 2006* at 66, 2 (Dec. 2006) (VoIP services “are successfully providing competitive alternatives to both residential and business subscribers.” The PSC noted

As an initial matter, any customer with a broadband connection can obtain voice service from one of these VoIP providers. This is particularly significant because broadband is now available to more than 90 percent of U.S. households from a provider other than the incumbent LEC.⁵⁶ See Figure 3.

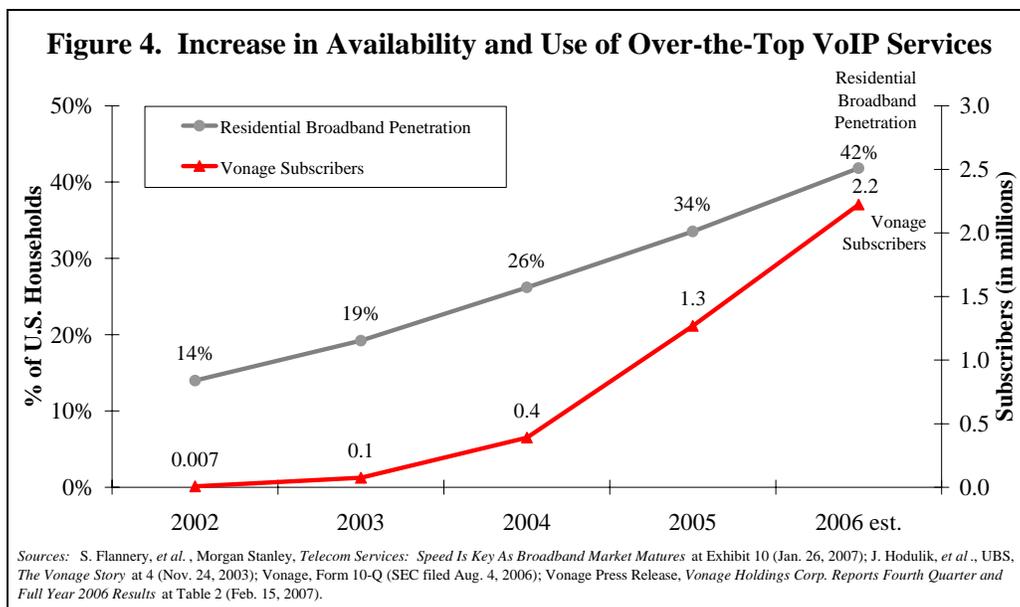


Moreover, a significant and rapidly growing portion of mass-market customers subscribes to broadband service, approximately 42 percent as of year-end 2006,⁵⁷ while many more customers have broadband available to them. As shown in Figures 3 & 4, the availability and use of broadband have grown significantly since the Commission initiated this proceeding, as has the use of broadband to obtain over-the-top VoIP services.

“the increasing acceptance of intermodal competitors, especially wireless and Voice over Internet Protocol (VoIP) service providers, as adequate substitutes for wireline telecommunications service by the consuming public.”)

⁵⁶ See, e.g., NCTA, *Industry Overview: Statistics & Resources*, <http://www.ncta.com/Docs/PageContent.cfm?pageID=86> (estimating 107.8 million homes passed by cable modem service in 2006); Leichtman Research Group, Inc., Research Notes 1Q06 at 7 (Mar. 15, 2006) (estimating 107.5 million homes passed by cable modem service provided by the top 10 MSOs).

⁵⁷ S. Flannery, et al., Morgan Stanley, *Telecom Services: Speed Is Key As Broadband Market Matures*, at Exhibit 10 (Jan. 26, 2007).



Over-the-top VoIP services were first embraced principally by consumers who make large volumes of international and long-distance calls, and now appeal to consumers generally and compete directly with traditional wireline service offerings. Indeed, as shown in Exhibit 8, there are dozens of over-the-top VoIP providers in Verizon’s local telephone service areas that offer voice services at prices that are comparable to or lower than Verizon’s prices.

The fact that over-the-top VoIP services are viewed as an alternative to traditional voice service is evidenced by the numbers of customers switching to these services. As of September 2006, analysts reported that over-the-top VoIP providers served at least 2.3 million subscribers.⁵⁸ Vonage, the largest over-the-top VoIP provider, is adding approximately 13,000 subscribers each week, and served more than 2.2 million subscribers as of the end of 2006, a 75 percent increase over the previous year.⁵⁹ Analysts estimate that over-the-top VoIP providers will displace 5 percent of primary telephone access lines by the end of 2010.⁶⁰

For customers who have not yet subscribed to broadband service, analysts have determined that the combination of broadband service and VoIP is competitive with what customers pay for a narrowband combination of local, long-distance and dial-up Internet access.⁶¹ The quality of over-the-top VoIP services also is sufficient for most users. In fact,

⁵⁸ See Bernstein Research Sept. 2006 *Quarterly VoIP Monitor* at Exhibit 17.

⁵⁹ Vonage Press Release, *Vonage Holdings Corp. Reports Fourth Quarter and Full Year 2006 Results* at Table 2 (Feb. 15, 2007).

⁶⁰ See J. Chaplin, et al., JPMorgan, *Telecom Services/Wireline: State of the Industry: Consumer* at Table 21 (Jan. 13, 2006).

⁶¹ See M. Rollins, et al., Citigroup, *Share Wars – Telco vs. Cable* at 7 (Oct. 5, 2005) (The average narrowband household could capture a net savings of \$6 per month by subscribing to broadband and migrating to VoIP service. Assumes \$50 a month landline service & \$21 a month dial-up, replaced by \$40 a month cable modem service and an independent VoIP provider at \$25 a month); C. Moffett, et al., Bernstein, *Quarterly VoIP Monitor: The “Halo Effect” of VoIP is Driving Faster Subscriber Growth* at 4 (Sept. 2, 2005) (“[T]he bundled price of VoIP and

most customers who subscribe to VoIP view it as a replacement for their primary telephone line. For example, analysts have reported that approximately 60-70 percent of Vonage's subscribers port their telephone numbers.⁶²

4. Traditional CLECs

Although declining in importance relative to intermodal competitors, there are still a number of traditional CLECs that provide distance-insensitive voice services to mass-market customers. See Exhibit 7 (describing offerings of traditional CLECs). According to the Commission's most recent Local Competition Report, CLECs reported serving more than 6 million mass-market lines as of June 2006, not including lines served by cable companies.⁶³

Following the Commission's finding of no impairment for switching, Verizon began offering its Wholesale Advantage service, which provides the same features and functionality of the UNE platform but at negotiated market rates.⁶⁴ As of December 2006, more than 100 competitors were serving approximately 1.5 million residential lines using Wholesale Advantage, and more than 150 competitors were serving more than 150,000 residential lines using Verizon's resale offerings. Still other competitors are offering voice services to mass-market customers by combining their own facilities with wholesale service purchased from Verizon.

5. Additional Competitive Alternatives

Changes in technology have opened the door for a variety of other types of services to compete with traditional wireline voice service.

First, e-mail and instant messaging ("IM") substitute for a large fraction of voice traffic on wireline networks.⁶⁵ A large and growing fraction of this traffic originates and/or terminates on competitive networks, but even when carried over the incumbents' network, such traffic often substitutes for local or long-distance telephone calls and displaces significant usage-sensitive (e.g., per-minute or per-call) revenues that incumbents otherwise would receive. A 2006 Yankee

broadband is compelling to dial-up subscribers, for whom the cost of upgrading to broadband is more than offset by the savings on telephony.").

⁶² See D. Shapiro, *et al.*, Banc of America Securities, *Battle for the Bundle* at 30 (June 14, 2005).

⁶³ *FCC June 2006 Local Competition Report* at Tables 2 & 5. The Commission's data do not provide a breakdown of the technology used to serve these mass-market lines, but for CLEC mass-market and enterprise lines combined, approximately 36 percent are provided via CLECs' own loops, 42 percent are provided via UNEs, and 22 percent are provided via resale. *Id.* at Table 3.

⁶⁴ *Omaha Forbearance Order* ¶ 67 (where there are "very high levels of retail competition that do not rely on [the ILEC's] facilities – and for which [the ILEC] receives little to no revenue" the ILEC has "the incentive to make attractive wholesale offerings available so that it will derive more revenue indirectly from retail customers who choose a retail provider other than [the ILEC]."); *id.* ¶ 71 (retail competition "minimizes the risk of . . . anticompetitive conduct").

⁶⁵ See D. Schoolar, In-Stat/MDR, *State of the US Carrier Market* at 6 (Oct. 2003) ("Consumers are using e-mail and instant messaging in place of a phone call."); C. Golvin, *et al.*, Forrester, *Sizing U.S. Consumer Telecom*, at 19 n.5 (Jan. 2002) ("[a]lternate forms of communications, such as email and instant messaging, [] reduce long-distance minutes of use.").

Group survey found that “a significant portion of Yahoo! IM users stated that IM usage has replaced at least 10% of their telephony calling.”⁶⁶ The three largest instant messaging providers – AOL, MSN, and Yahoo! – serve 46.4 million, 27.6 million, and 24 million active users, respectively.⁶⁷ According to the most recent J.D. Power and Associates survey of online use, approximately 36 percent of U.S. Internet users now use instant messaging on a daily basis.⁶⁸

The use of e-mail and IM in place of telephone calls also is occurring on wireless networks, where it displaces not only wireless but also wireline calls. In the case of Verizon Wireless, for example, customers sent and received 5 billion text messages on their mobile phones in September 2006 alone – up from 2 billion in September 2005.⁶⁹ Among all major wireless carriers, data services are growing rapidly and now account for between 11-14 percent of total voice revenues, up by an average of 50 percent from the previous year.⁷⁰

Second, as the Commission has recognized, there are a number of emerging broadband technologies, such as WiMAX, WiFi, and Broadband over Powerline, that will offer an alternative means through which mass-market customers can obtain VoIP service.⁷¹ Because many of these alternatives are less expensive to deploy than traditional alternatives, they are being deployed in rural and other high-cost areas.⁷²

Fixed Wireless/WiMAX. Fixed wireless service is a broadband alternative for many customers today and is likely to reach many more customers over the next few years. Currently, there are thousands of wireless Internet service providers (“WISPs”) that use fixed wireless technology, often to serve rural areas that cable and DSL do not reach.⁷³ In Virginia, for

⁶⁶ J. Simpson, Yankee Group, *Web Voice Services Challenge the Incumbents in Telecommunications* at 9 (Aug. 2006).

⁶⁷ See B. Nielsen, *AOL Upgrades Instant Messenger with Video*, Chicago Sun-Times (Nov. 16, 2006) (citing October 2006 data provided by Leilani Han of Nielsen/NetRatings).

⁶⁸ J.D. Power and Associates Press Release, *J.D. Power and Associates Reports: Yahoo! Messenger Ranks Highest in Customer Satisfaction among Instant Messaging Services* (Oct. 11, 2006). J.D. Power and Associates estimates that 78 percent of U.S. households subscribe to an ISP. J.D. Power and Associates Press Release, *J.D. Power and Associates Reports: High-Speed Internet Overtakes Dial-Up in Market Share as Bundling Makes Services More Affordable* (Sept. 20, 2006) (citing the J.D. Power and Associates 2006 Internet Service Provider (ISP) Residential Customer Satisfaction Survey).

⁶⁹ VZ – Verizon at UBS 34th Annual Global Media Conference, Thomson StreetEvents, Conference Call Transcript (Dec. 6, 2006) (statement by Verizon Chief Financial Officer Doreen Toben).

⁷⁰ S. Flannery, et al., Morgan Stanley, *Telecom Services: 3Q06 Trend Tracker: Cost Savings Critical as Wireless & Broadband Growth Slows* at Exhibit 56 (Dec. 4, 2006); S. Flannery, et al., Morgan Stanley, *Telecom Services: 3Q05 Trend Tracker: Wireless Winners and Losers Diverge* at Exhibit 61 (Dec. 1, 2005).

⁷¹ See, e.g., *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities*, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853, ¶ 33 (2005) (“*Wireline Broadband Order*”).

⁷² For example, Virginia Broadband provides fixed wireless services in three rural service territories and is expanding its service territory to 16 counties through a partnership with the Rappahannock Electric Cooperative. See Virginia Broadband, LLC, *What Is Our Coverage Area*, <http://www.vabb.com/coverage.htm> (as of 2005); M. Cotter, *REC Plans To Roll Out Broadband Service*, Fredericksburg.com (May 20, 2006), http://fredericksburg.com/News/FLS/2006/052006/05202006/192464/printer_friendly.

⁷³ See Wireless Broadband Access Task Force, FCC, *Connected & On the Go: Broadband Goes Wireless*, GN Docket No. 04-163, at 32 (Feb. 2005) (reporting estimates that there are between 4,000 and 8,000 WISPs). There is

example, a Verizon survey revealed that fixed wireless services were available to 71 percent of households in Verizon's local telephone service area in the state. See Exhibit 9. WISP services also are being deployed in major metropolitan areas by companies such as TowerStream and Clearwire.⁷⁴ Sprint has announced that by 2008 it will have constructed a nationwide WiMAX network to provide 2-4 Mbps service to an estimated 100 million customers, with an investment of \$3 billion.⁷⁵ WiMAX services are capable of and are being used to provide voice services that compete with distance-insensitive wireline offerings.⁷⁶ In-Stat estimates that, by 2009, 8.5 million users will get their broadband services via WiMAX, with more than half of those customers receiving voice service via their WiMAX connection.⁷⁷

WiFi. Initial deployment of commercial WiFi service in the U.S. involved the placement of hotspots in public gathering points such as airports, coffee shops, and parks.⁷⁸ Recently, dozens of cities have begun deploying WiFi networks to provide high-speed Internet access (typically up to 1 Mbps) and other services to businesses and residents.⁷⁹ These WiFi networks are capable of being used to access a wide range of VoIP services. Vonage recently announced

at least one fixed wireless broadband provider in all but three states (Connecticut, Delaware, and Rhode Island) and an average of more than 8 providers in the remaining 47 states. Ind. Anal. & Tech. Div., Wireline Competition Bureau, FCC, *High-Speed Services for Internet Access: Status as of June 30, 2006* at Table 8 (Jan. 2007) ("FCC June 2006 High-Speed Internet Access Report"). WiMAX is being rapidly deployed, and more than 150 deployments were in use as of May 2006. See U.S. Gov't Accountability Office, *Broadband Deployment Is Extensive Throughout the United States, But It Is Difficult To Assess the Extent of Deployment Gaps in Rural Areas*, GAO-06-426 at 60 (May 2006) ("May 2006 GAO Report").

⁷⁴ TowerStream, *Service Areas*, <http://www.towerstream.com/content.asp?serviceareas> (TowerStream offers high-speed Internet access in Boston, New York City, San Francisco, Los Angeles, Chicago, and Providence/Newport/Westerly, Rhode Island); Clearwire, *Interactive Coverage Map*, http://www.clearwire.com/store/service_areas.php; Clearwire, *Clearwire Facts*, <http://www.clearwire.com/company/facts.php> (Clearwire serves 162,000 subscribers in 31 U.S. markets in Alaska, California, Florida, Hawaii, Idaho, Minnesota, Nevada, North Carolina, Oregon, Texas, Washington State, and Wisconsin).

⁷⁵ A. Sharma, *et al.*, *Sprint To Spend Up to \$3 Billion To Build Network Using Wimax – New Wireless-System Plan Shows Belief in Demand for Mobile Internet Services*, Wall St. J. at B2 (Aug. 9, 2006); A. Mohammed, *Sprint Nextel To Build \$2.5 Billion Wireless Network*, Wash. Post at D04 (Aug. 9, 2006); J. Markoff, *et al.*, *Sprint Will Build an Intel-Backed Network*, N.Y. Times at 7 (Aug. 9, 2006).

⁷⁶ See, e.g., Clearwire, *Clearwire Internet Phone Service: Features*, <http://www.clearwire.com/internet-phone-service/features.php>; Clearwire, *Products: Internet Phone Service*, <http://www.clearwire.com/internet-phone-service/compare.php> (Clearwire offers unlimited local and long-distance calling, along with many basic features (including voice mail, caller ID, call forwarding, 3-way calling, call blocking, etc.), for \$29.99); Virginia Broadband, *What is VoIP*, <http://www.vabb.com/voip.htm> (Virginia Broadband advertises "Local and National telephone service for one flat rate. With your high-speed Internet connection you can get phone service, and not have to deal with any large, cumbersome phone company.").

⁷⁷ J. Hu, *Study: Net Phones Key to WiMax Success*, CNet News.com (Feb. 16, 2005), http://news.com.com/Study+Net+phones+key+to+WiMax+success/2100-1039_3-5579377.html.

⁷⁸ See JiWire, *Wi-Fi Hotspot Directory*, <http://www.jiwire.com/search-hotspot-locations.htm> (49,892 hotspots in the U.S. as of February 12, 2007); see also T-Mobile, *T-Mobile HotSpot: US Locations*, <https://selfcare.hotspot.t-mobile.com/locations/viewLocationMap.do> (T-Mobile offers more than 8,000 WiFi hotspots spanning all 50 states).

⁷⁹ According to one industry source, as of the end of 2006 there were approximately 79 municipal WiFi networks in the U.S. that were providing public access, plus 36 additional networks that were being used solely for municipal purposes such as public safety. See MuniWireless.com, *List of US Cities and Regions* at 1, 3 (Dec. 29, 2006), <http://munewireless.com/reports/docs/Dec-29-2006summary.pdf>.

plans to launch VoIP on the municipal WiFi networks that EarthLink is deploying.⁸⁰ A variety of equipment manufacturers (including LinkSys and NetGear) have begun producing handsets to be used on WiFi networks using Skype's VoIP service.⁸¹

Broadband over Powerline. Chairman Martin has stated that BPL services “hold great promise for consumers.”⁸² BPL uses the electric distribution network as a third broadband pipe to the home. Because the wires needed for BPL are largely in place, BPL can be deployed rapidly and at relatively low cost in virtually any market.⁸³ BPL technology is being deployed commercially by Current Communications (a company backed by Google and other investors) in Ohio and Texas,⁸⁴ and by other providers in smaller deployments throughout the U.S.⁸⁵ Where BPL is available, it is capable of and is being used to access VoIP services. For example, Current Communications offers “local telephone service combined with unlimited long distance and your favorite calling features – all for one low monthly price.”⁸⁶ Current voice service “is available without a subscription to broadband Internet service.”⁸⁷

6. Wireline Minutes and Lines Have Declined

While competition from the various alternatives described above has been steadily increasing, the traditional wireline business has declined. Both access lines and access minutes are steadily decreasing. The migration of traffic is particularly significant for purposes of this proceeding because lost long-distance traffic historically would have traversed the local network. Today, increasing amounts of long-distance traffic originate, terminate, or both on alternative networks – such as wireless-to-wireless calls, and calls that originate on cable networks or other

⁸⁰ Vonage Press Release, *Beyond Broadband Voice: Vonage and EarthLink Team To Offer Wi-Fi Access* (Jan. 8, 2007).

⁸¹ *Google and Skype Fund FON as Cisco Joins*, Computer Business Review Online (Feb. 7, 2006), http://www.cbonline.com/article_feature.asp?guid=2A93B2D6-BE8B-4EB8-99CD-EDF7DFB80C65 (“Skype has partnerships in place with hotspot aggregators such as Boingo and The Cloud, and already offers WiFi-enabled Skype handsets made by, among others, Linksys. A visit to any internet cafe in a big city will reveal countless individuals calling home over the P2P VoIP service, so if those connections can be wireless-enabled, it should only stand to gain more users.”).

⁸² Statement of Chairman Kevin J. Martin in WC Docket No. 06-10 (rel. Nov. 7, 2006).

⁸³ See S. Cleland, NetCompetition.org, *Why Competition Obviates Net Neutrality*, presentation for the FTC Internet Access Task Force at 6 (Sept. 26, 2006) (“99% of the cost to provide BPL is already paid for to supply electricity.”).

⁸⁴ See Current Communications, *Overview*, <http://www.currentgroup.com/about/index.html>; Current Communications Press Release, *Current Communications Group Announces Strategic Investments To Catalyze Broadband over Power Line Deployments* (July 7, 2005); Current Communications Press Release, *Current Communications Announces \$130 Million in Investments in Broadband over Power Line Networks* (May 4, 2006).

⁸⁵ See, e.g., United Power Line Council, *BPL Deployment Map*, http://uplc.utc.org/file_depot/0-10000000/0-10000/7966/conman/BPL+Deployment+Map+2007.pdf; BPL Co-op, *Broadband over Powerline*, <http://www.forcvec.com/bplcoop/index.html> (In southwestern Virginia, a joint venture of the Central Virginia Electric Co-operative and International Broadband Electric Communications is deploying BPL service to rural customers.).

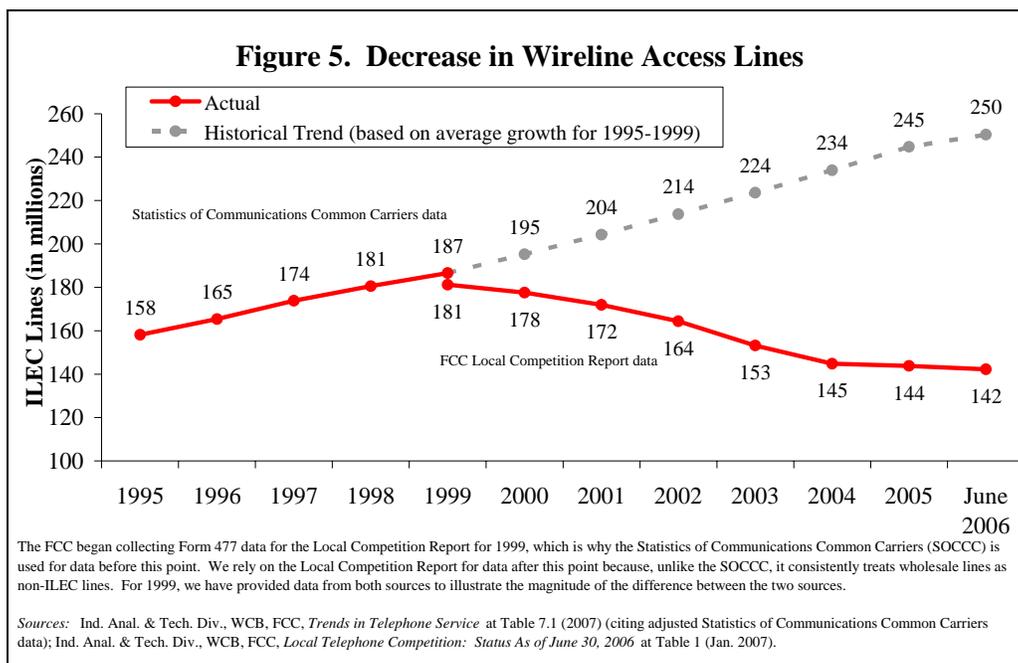
⁸⁶ Current Communications, *Residential Voice*, <http://www.current.net/ServiceAndPricing/Residential/Voice/>.

⁸⁷ Current Communications, *Residential Voice FAQ*, <http://www.current.net/ServiceAndPricing/Residential/Voice/Faq/>.

competitive last-mile facilities. Thus, while these alternatives also compete for voice services generally, it is beyond serious dispute that they can be and are used as alternatives for the long-distance component of voice telephone service.

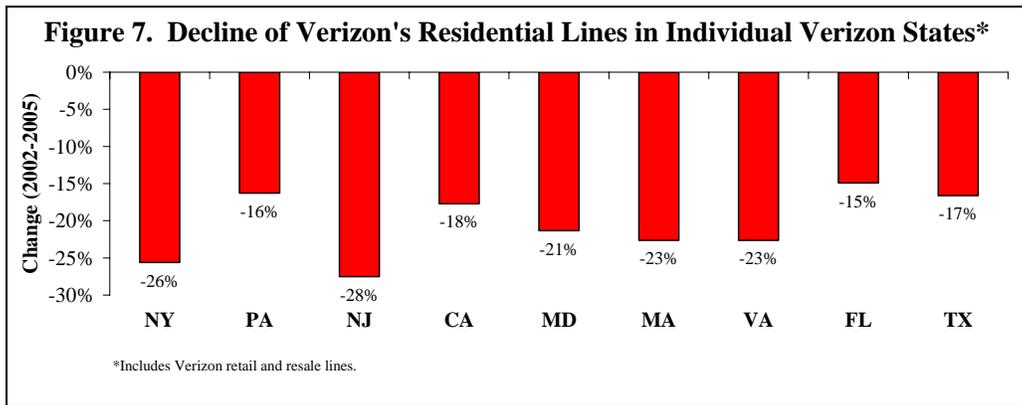
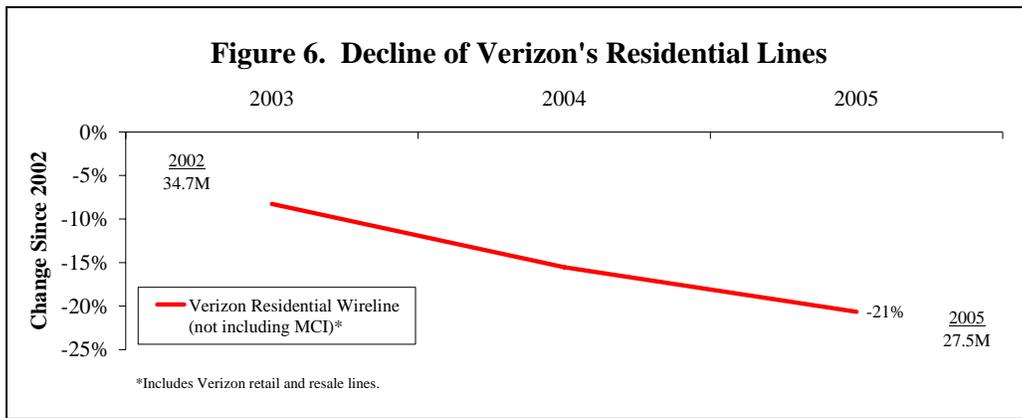
As an initial matter, any analysis of the decline in access lines and minutes must take into account not only the trend in the absolute number of lines and minutes, but also a comparison to historical growth rates. Historically, both the number of access lines and the number of minutes traversing local networks grew at a relatively stable rate, driven in large measure by growth in the population and the overall economy. But while these overall trends have continued, the numbers of local wireline lines and minutes not only are no longer growing but have actually declined in absolute terms as intermodal competition and technology substitution have increased.

With respect to lines, Figure 5 shows the number of nationwide ILEC access lines over the past decade. It also compares the decline in access lines that has occurred over the past six years to the historical trend of year-over-year growth in access lines, driven by the general growth in population and the economy. Given that these larger economic trends have continued, it is apparent that the actual loss of access lines to other alternatives is even greater than what the absolute loss in ILEC lines shows, as ILECs are not capturing all of the new demand. Moreover, these trends show that ILECs are losing lines not just to cable and other wireline competitors, but also to wireless, as the difference between the historical trend and the current number of lines exceeds the number of competitive lines that cable companies and CLECs report serving.⁸⁸



⁸⁸ The loss of second lines to DSL or other competitive alternatives accounts for no more than a small percentage of the total decrease in ILEC lines. According to the Commission's most recent data, there were 26.2 million non-primary residential lines in 2000 compared to 12.1 million in 2005, representing a net loss of 14.1 million lines. See Ind. Anal. & Tech. Div., WCB, FCC, *Trends in Telephone Service* at Table 7.4 (2007). By comparison, Figure 5 shows a difference of 54 million lines from 2000 to 2003, and a difference of 37 million additional lines between 2003 and June 2006.

Data from Verizon provide further evidence of these trends. From 2002 through 2005, Verizon's switched access lines provided to residential customers declined by approximately 21 percent in absolute terms (from 34.7 million to 27.5 million), in contrast to the historical trend of year-over-year growth. See Figure 6.⁸⁹ This decline occurred both region-wide and in individual states. See Figure 7. And the trend has continued since the elimination of the UNE platform ("UNE-P"). Verizon had, as of December 2004, lost approximately 4.4 million residential lines to UNE-P, and since the abolition of the UNE-P Verizon's access lines have continued to decline in both absolute and relative terms. As one analyst has explained, "the telcos failed to win back a substantial portion of wholesale line cancellations, which customers likely took one of three paths: (1) they shifted to wireless only, (2) they defected to standalone, price-competitive VoIP providers, or (3) they opted into cable triple-play bundles. The probable answer is a little of all three occurred, with the emphasis on the latter two and increasingly #3."⁹⁰

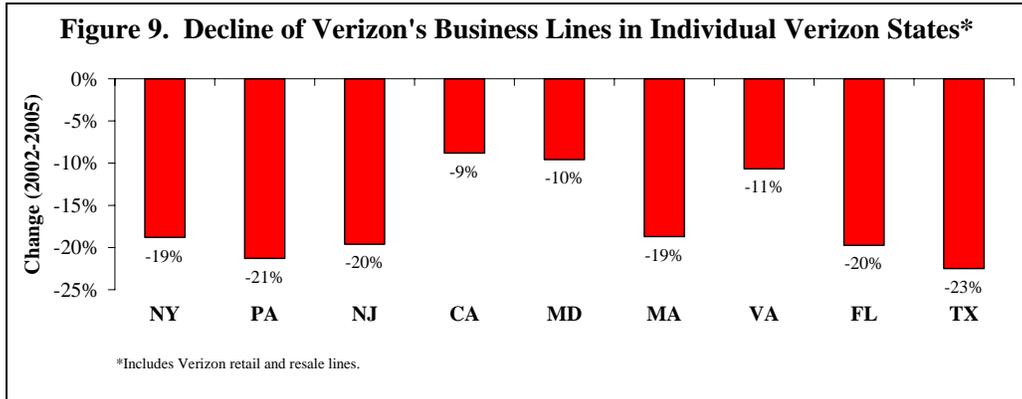
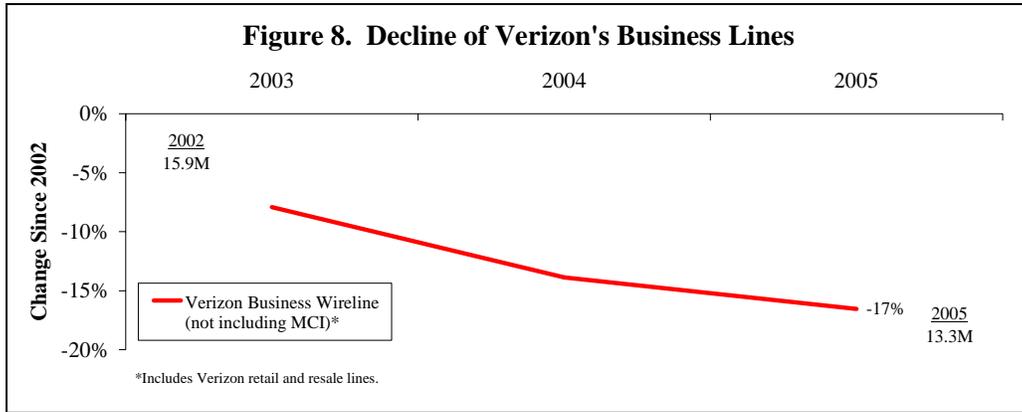


Verizon's data also show a decline in switched access lines provided to business customers, which includes very small businesses that the Commission considers part of the mass-market, as well as medium and large enterprise customers. From 2002 through 2005, Verizon's

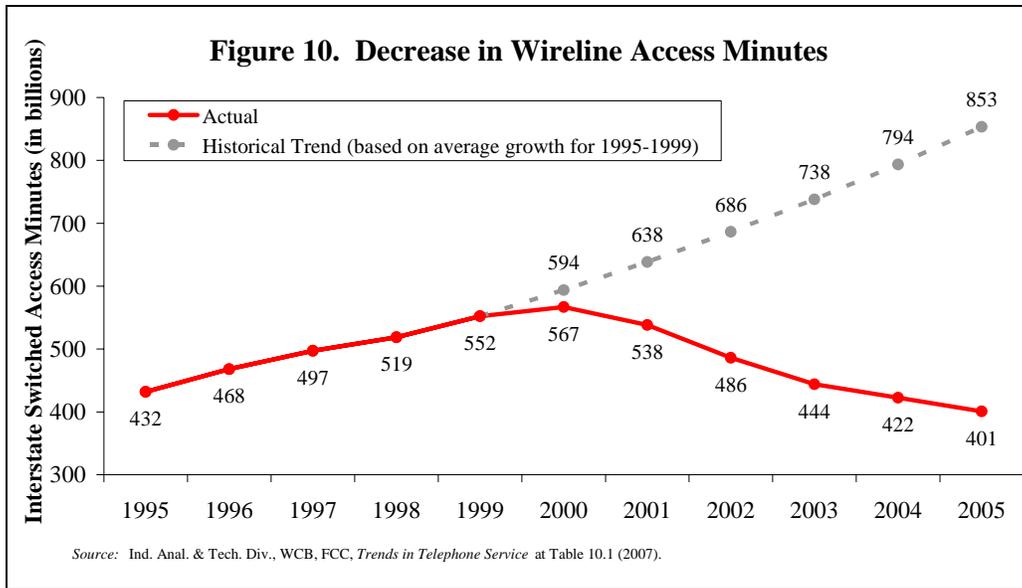
⁸⁹ During this same period (2002-2005), the number of second lines that Verizon provided declined from 5.3 million to 3.1 million, a decrease of 2.2 million. Thus, the loss of second lines to DSL or other competitive alternatives accounts for no more than a small percentage of the decrease in the Verizon's total access lines.

⁹⁰ C. Moffett, et al., Bernstein Research, *Quarterly VoIP Monitor: Six Million and Counting* at 10 (June 12, 2006).

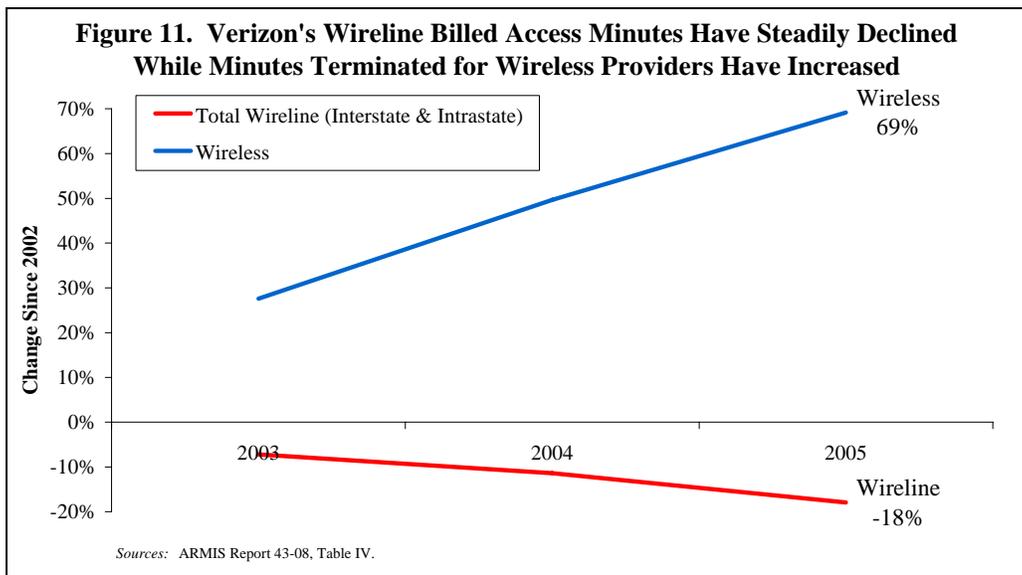
switched access lines provided to business customers have declined by approximately 16 percent (from 16.8 million to 14.1 million). See Figure 8. This decline occurred both region-wide and in individual states. See Figure 9.

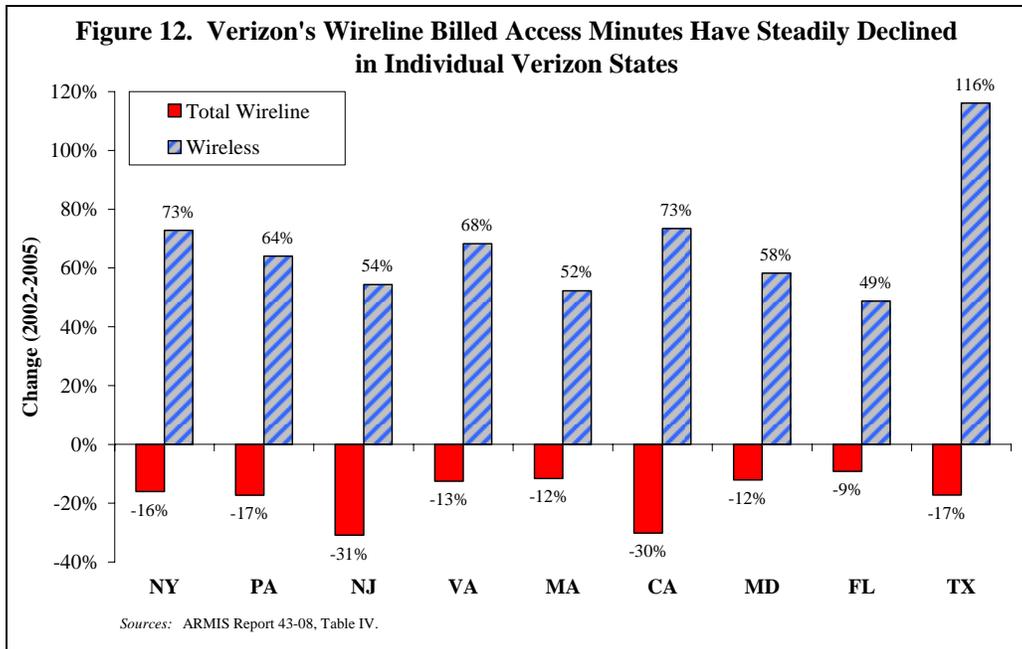


With respect to minutes, Figure 10 shows the number of interstate switched access minutes from 1995 to 2005 (the most recent year the Commission reports). It also compares the decline in minutes that has occurred over the past five years to the historical trend of year-over-year growth in interstate switched access minutes access lines, driven by the general growth in population and the economy. As noted above, given that these larger economic trends have continued, it is apparent that the actual loss of minutes to other alternatives is even greater than what the absolute loss in interstate switched access minutes shows, as ILECs are not capturing all of the new demand.



Here, too, Verizon’s data provide further evidence of these trends. Between 2002 and 2005, the number of billed access minutes originating or terminating on Verizon’s wireline network billed to interexchange carriers decreased by 18 percent. *See* Figure 11. By contrast, minutes that Verizon terminated for wireless carriers during this period increased by 69 percent. *See id.* Actual use of wireless is, of course, much greater as this does not include the significant amount of wireless-to-wireless traffic that takes place, or the calls between wireless and other competitive wireline or cable networks. Figure 12 shows that, just as these trends are taking place across Verizon’s local telephone service areas, they also are occurring within individual states.

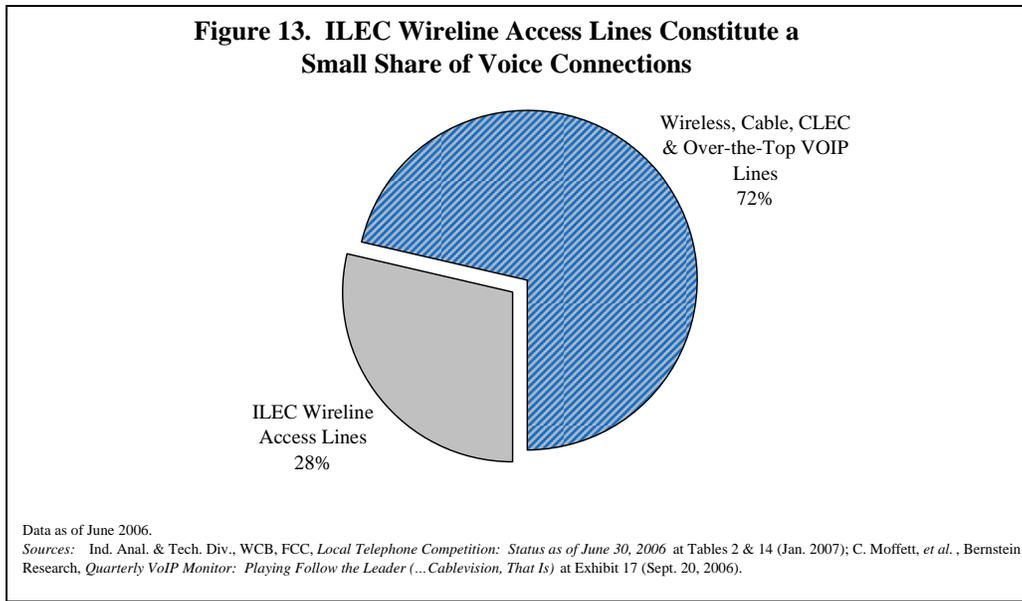




Finally, while static market shares are not meaningful given the rapid emergence of new competitors and the trajectory of competition, an analysis that includes even just the principal alternative providers of voice service makes clear that Verizon and other carriers do not have anything approaching a dominant position, and certainly do not have a position that would allow them to dominate in the long-distance component of voice services. As of June 2006, ILEC wireline access lines accounted for only approximately 28 percent of all voice connections provided to mass-market consumers, with cable, wireless, over-the-top VoIP, and other CLECs accounting for the rest.⁹¹ See Figure 13. As explained above, including all of these alternatives is particularly appropriate in this proceeding, because consumers are extensively using all of these competitive options to make long-distance calls. As also noted above, this figure is conservative, because in the second half of 2006 the use of these various alternatives continued to grow, while ILEC lines continued to decline.

⁹¹ This estimate was calculated as follows. The denominator is the sum of (1) ILEC and CLEC residential wireline access lines, (2) the number of wireless subscribers, and (3) the number of over-the-top VoIP subscribers. The number of ILEC and CLEC lines, and the number of wireless subscribers are based on the FCC's *June 2006 Local Competition Report* (Tables 2 and 14, respectively). Estimates of over-the-top VoIP subscribers are based on the 2Q06 estimate by Bernstein Research. *Bernstein Research Sept. 2006 Quarterly VoIP Monitor* at Exhibit 17. As this analysis compares ILEC wireline access lines to competitive alternatives, it does not attribute the wireless subscribers of any ILEC wireless affiliate to the ILEC. This approach also is appropriate given that wireless is robustly competitive with ILEC wireless affiliates competing against unaffiliated wireless providers nationwide. In order to remain competitive for wireless services, ILEC wireless affiliates must provide service offerings comparable to those of their rivals, even where such offerings compete against the affiliated ILEC's wireline service.

Figure 13. ILEC Wireline Access Lines Constitute a Small Share of Voice Connections



B. Enterprise

The Commission has found that retail competition for enterprise customers is “strong” and will remain so “because medium and large enterprise customers are sophisticated, high-volume purchasers of communications services that demand high-capacity communications services, and because there [are] a significant number of carriers competing in the market.”⁹² The Commission recognized that “interexchange carriers, competitive LECs, cable companies, other incumbent LECs, systems integrators, and equipment vendors” all “are prepared to make competitive offers” to enterprise customers and that they therefore “ensure that there is sufficient competition.”⁹³ A number of states have reached similar conclusions.⁹⁴ These findings apply

⁹² *Verizon/MCI Order* ¶ 56.

⁹³ *Id.* ¶ 74.

⁹⁴ *Joint Petition of Verizon Communications Inc. and MCI, Inc. for a Declaratory Ruling Disclaiming Jurisdiction Over or in the Alternative for Approval of Agreement and Plan of Merger*, Order Asserting Jurisdiction and Approving Merger Subject to Conditions, Case 05-C-0237 at 33-34 (N.Y.P.S.C. Nov. 22, 2005) (“We agree with Staff that a direct, retail-based remedy is not required for the Enterprise market. As a group, Enterprise customers are sophisticated purchasers of telecommunication services. These large customers can obtain services from alternative providers or negotiate a competitive price for service if they are not satisfied with either price or service from their current provider.”); Draft Report on the Status of Competition in the Telecommunications Industry, Division of Competitive Markets and Enforcement at 4 (*72) (Fla. P.S.C. May 31, 2006) (“[E]vidence suggests that these intermodal competitors are successfully providing competitive alternatives to both residential and business subscribers. . . . [T]he Commission concludes that competitors are providing functionally equivalent service to both residential and business customers.”); *California Regulatory Reform Order* at 3-4, 75, and 164 (“In conclusion, there is no evidence concerning the basic business segment of the voice communications market that causes us to reassess the conclusions reached in our general market analysis. Indeed, the evidence that we have supports our two major conclusions – that there is a single market for voice communications and this market is subject to significant competition by different technologies. Consequently, we find that it is reasonable to eliminate all price regulations of basic business service effective immediately.”); *id.* (“wireless competition plays a particularly important role in the basic business segment of the voice communications marketplace” and provides evidence of “significant cross-platform competition among providers of basic business service.”).

with equal force in this proceeding, where the ultimate question likewise concerns competition at the retail level.⁹⁵

As the Commission has recognized, enterprise customers tend to purchase packages of service that include not just distance-insensitive voice services, but also myriad data services as well as network integration and management capabilities and wireless services.⁹⁶ Indeed, large enterprise and other commercial and institutional customers now spend more on data and wireless than they spend on wireline voice, and data and wireless spending is growing considerably, while wireline voice spending is declining.⁹⁷ Any reasonable competitive analysis should therefore analyze the full array of services that large enterprise customers and medium businesses purchase as a whole, rather than partition those packages into artificial categories that are no longer relevant in the marketplace.

Verizon's share of retail business services revenues as a whole is relatively small. In an October 2006 report, Lehman Brothers estimated Verizon's 2006 business services revenues at \$19.7 billion, compared to \$103.7 billion for the market as a whole, representing a share of approximately 19 percent.⁹⁸ These totals appear to include all business customers, and may include some customers that the Commission has traditionally counted as part of the mass market. Lehman Brothers' most recent report does not provide a revenue breakdown for different classes of business customers.

Verizon's share of retail data services revenues provided to business customers also is small. Lehman Brothers estimated Verizon's share of such revenues at 14.5 percent in 2006, and expected it to decline to 13.9 percent in 2007.⁹⁹ This is significant for several reasons. *First*, the retail data services analyzed in the Lehman report are the types most often purchased by medium and larger businesses,¹⁰⁰ which confirms that Verizon faces intense competition for these customers in general. *Second*, enterprise customers are increasingly using data services to carry their voice traffic. As a result, the intense competition that Verizon faces in the provision of retail data services also disciplines the retail voice services that are at issue here.

Verizon faces competition from traditional telecom carriers such as AT&T, Level 3, Sprint, Global Crossing, Broadwing, XO, and One Communications; managed service providers and systems integrators such as IBM, Electronic Data Systems Corp., Accenture, Northrop Grumman, and Lockheed Martin; and equipment vendors such as Lucent and Nortel. Exhibit 10 summarizes the voice services that traditional competitors are offering in Verizon's local

⁹⁵ See Section 272(f)(1) *Sunset of the BOC Separate Affiliate and Related Requirements*, Further Notice of Proposed Rulemaking, 18 FCC Rcd 10914, ¶ 22 (2003) (noting that Commission's focus is ability of carrier "to unilaterally raise and sustain" retail prices in the relevant markets).

⁹⁶ *Verizon/MCI Order* ¶ 57.

⁹⁷ See T. Seitz, Lehman Brothers, *Telecom Services – Wireline*, at 4, Figure 5 (Oct. 18, 2006).

⁹⁸ *Id.* at 14, Figure 19.

⁹⁹ *Id.* at 11, Figure 15.

¹⁰⁰ Lehman includes the following services: "Unmanaged Business Data Transport, Legacy Packet, IP (Direct Internet Access), Fiber/Ethernet, Other High Speed, Managed Data Networks, Data Centers/Hosting/Content Delivery). See *id.*

telephone service areas; Exhibit 12 provides further descriptions of these offerings from the competitive providers' own websites. Moreover, to the extent medium or large business customers use basic switched business lines, they have all the same alternatives as mass-market customers, and, as shown above (*see* Figures 8 & 9, *supra*), are using these alternatives given the declines in retail business lines.

Cable operators are also moving aggressively into the enterprise market, and are competing for medium-sized businesses as well as smaller businesses that the Commission has defined as part of the mass market. Each of the major cable companies in Verizon's local telephone service areas – Time Warner, Cablevision, Cox, and Comcast – has been offering data services to enterprise customers for many years, and most are now expanding to provide voice services. *See* Exhibit 11 (describing cable voice offerings). One analyst estimates that the cable industry will “grow its commercial revenue base from \$1.3B this year to \$2.0B in '07 and \$3.2B by '08.”¹⁰¹ Buckingham estimates that cable operators have already won approximately 4 percent of revenues for small and medium enterprise customers, and that cable companies can use their existing plant to target more than 85 percent of commercial revenues.¹⁰²

By way of examples, Cablevision offers “Optimum Voice for Business,” which provides “local, regional and long distance calling . . . for one low, fixed per-line monthly rate: a rate that could save you as much as 60 percent per month, or more.”¹⁰³ Cablevision has said it could cut prices for small- and medium-sized businesses by as much as half compared with bills from Verizon and AT&T, and that it could get a 25 percent share of the business market in its area in two years.¹⁰⁴ Cox Business Services offers a variety of voice services to enterprise customers, including digital telephone, Centrex, digital trunks, and dedicated long distance.¹⁰⁵ According to Cox, with Cox Business Services, “your business can enjoy the savings and convenience of getting your local and long distance service from one company, with one bill and one point of contact.”¹⁰⁶ Comcast's CEO has recently stated that commercial services represent the “next great business opportunity” for Comcast, and that it will do the “same thing” in the enterprise market as it has done in the mass market.¹⁰⁷ Comcast recently told investors that it would be making a “\$250 million investment in commercial services in 2007.”¹⁰⁸ Time Warner Cable has

¹⁰¹ Q. Hasan, *et al.*, Buckingham Research Group, *Cable Goes Commercial: Examining Cable's Next Growth Phase* at 18 (Jan. 11, 2007).

¹⁰² *Id.* at Exhibit 14.

¹⁰³ Cablevision, *Optimum Voice for Business, Advantages*, <http://www.optimum.com/business/ov/advantages.jsp>.

¹⁰⁴ *See Comcast, Cablevision Target Businesses for Growth*, Reuters (Sept. 20, 2006); M. Farrell, *Cablevision Revs Up for Business Blitz*, Multichannel News (Sept. 25, 2006).

¹⁰⁵ Cox Business Services, *Cox Digital Telephone and Voice Mail*, <http://www.coxbusiness.com/products/voice/digitaltelephone.html>.

¹⁰⁶ *Id.*

¹⁰⁷ *See Comcast Corporation at Citigroup 17th Annual Entertainment, Media and Telecommunications Conference – Final*, FD (Fair Disclosure) Wire, Transcript 010907aw.757 (Jan. 9, 2007) (statement by Comcast chairman and CEO Brian Roberts).

¹⁰⁸ Thomson StreetEvents, *CMCSA – Q4 2006 Comcast Corporation Earnings Conference Call*, Conference Call Transcript at 6 (Feb. 1, 2007) (statement of Comcast Corp. EVP, Co-CFO and Treasurer, John Alchin).

announced that, “[i]n 2007, we will launch Time Warner Cable’s Business Class Phone, an offering directed towards small to medium sized businesses.”¹⁰⁹

Many enterprise customers also are using VoIP technology in place of traditional switched services. Enterprise customers were the first to adopt this new technology. They have migrated their traditional voice services to IP Virtual Private Network (“VPN”) and other converged services that are provided over Multi-Protocol Label Switching (“MPLS”) networks.¹¹⁰ These converged services are being used in place of all local, interexchange, and international voice and data services. A study by In-Stat predicts that business IP phone shipments will increase approximately 450 percent between 2006 and 2010 (from 10 million to more than 45 million).¹¹¹ Another heralded development in the enterprise market is the addition of VoIP capabilities to the new Microsoft Vista Office suite. Microsoft’s Chairman, Steve Ballmer, has stated that “[w]e are going to enter the voice over IP market the beginning of [2007].”¹¹² Analysts have called the new service “a push into the enterprise voice market, bringing the software powerhouse right to the Bells’ back door.”¹¹³

Enterprise customers also are using wireless extensively. According to the Yankee Group, U.S. businesses now spend a quarter of their telecommunications budgets on wireless offerings – about \$33 billion a year.¹¹⁴ For the average company with more than 500 employees, Yankee Group estimates that “a full 40% of them are mobile.”¹¹⁵ Business customers also use

¹⁰⁹ Thomson StreetEvents, *TWX – Q4 2006 Time Warner Inc. Earnings Conference Call*, Conference Call Transcript at 4 (Jan. 31, 2007) (statement of Time Warner Inc. Chairman & CEO, Dick Parsons).

¹¹⁰ See M. McCormack, et al., Bear Stearns, *U.S. Wireline Services: The Catalyst for Consolidation* at 53 (June 2005) (“We expect significant interest in VoIP as businesses pursue the convergence of their voice and data networks onto a single platform in order to improve efficiency, reduce costs, and develop new revenue-generating value-added services. We note that several large companies have made VoIP deployment announcements, including Ford (50K IP phones with SBC), Bank of America (180K IP phones with Cisco and EDS), and Boeing (150K IP phones with Cisco).”).

¹¹¹ P. Tufegdzcic, et al., In-Stat, *IP Phones Invade the Home and Office* at Figure 1 (Nov. 6, 2006).

¹¹² D. Gardner, *Microsoft to Launch Major VoIP Move Early Next Year*, InformationWeek (Nov. 7, 2006), <http://www.informationweek.com/hardware/showArticle.jhtml?articleID=193600273>; C. Mellor, *Microsoft Informer: Microsoft Vista to Get VoIP*, CIO.com (Nov. 8, 2006), http://www.cio.com/blog_view.html?CID=26481 (Microsoft’s new software “will group VoIP, e-mail, video-conferencing and instant messaging into a single communications facility that will be incorporated into desktop and server applications as well as the Vista OS.”).

¹¹³ J. Halpern, Bernstein, *U.S. Telecom: Internal Transformation Holds the Key to Unlocking Long-Term TelCo Values* at 2 (July 14, 2006); see also S. Cleland, et al., Precursor Group, “*Telecom Tunnel Vision*” of SBC-T and VZ-MCIP at 1 (Mar. 10, 2005) (“MSFT’s just-announced Live Communications Server (LCS) offering is a potentially game-changing edge application that threatens to dis-intermediate SBC-T and VZ-MCIP’s coveted enterprise customers. MSFT’s inexpensive LCS application essentially subordinates voice as sub-application of Office. Ultimately, we see MSFT and other tech companies eroding much of T’s and MCIP’s higher-value-added revenue. Over time, what enterprises equipped with MSFT LCS mostly will need from SBC-T and VZ-MCIP is just a fat dumb pipe.”) (emphasis omitted); M. McCormack, et al., Bear Stearns, *Key Takeaways from VON Conference* at 2 (Mar. 20, 2006) (Microsoft’s new service “may be gaining critical mass among customers and represents a strong selling point to deploy VoIP in the enterprise.”).

¹¹⁴ J. Henry, *Analyzing Wireless Use Pays Off*, Arkansas Business (Apr. 24, 2006).

¹¹⁵ *Yankee Group Issues Results of 2005 Wireless User Surveys; Analysis Reveals Burgeoning Trends and Provides Actionable Recommendations*, Business Wire (June 21, 2005).

wireless e-mail extensively, and much of this messaging substitutes for voice calls. As of year-end 2005, there were an estimated 6.0 million data device subscribers (Blackberries, laptop cards, and so forth), which is expected to grow to 16.4 million by the end of 2008.¹¹⁶

II. RE-REGULATING VERIZON AND OTHER CARRIERS AS DOMINANT IN THE PROVISION OF LONG-DISTANCE SERVICE IS UNNECESSARY AND COUNTERPRODUCTIVE

As detailed above, the developments in the marketplace in the time since this proceeding was initiated further confirm that there are multiple providers of communications services that are competing without regard to technology, and that this competition will only continue and grow more intense going forward. These developments have a number of key implications for this proceeding.

First, any competitive analysis must be appropriately forward-looking, and must take into account all types of competing voice providers, as well as reasonable substitutes for voice services, that are already present or are now emerging regardless of technology. The Commission previously has held that, where, as here, new technologies and new providers are emerging, competition “is more appropriately analyzed in view of larger trends in the marketplace, rather than exclusively through the snapshot data that may quickly and predictably be rendered obsolete as th[e] market continues to evolve.”¹¹⁷ The Commission accordingly will “consider technological and market changes, and the nature, complexity, and speed of change of, as well as trends within, the communications industry.”¹¹⁸ The Commission will examine both “actual and potential competition” that “either is present, or readily could be present.”¹¹⁹ And the Commission has repeatedly recognized that the proper analysis should not be limited to “strict measurement of market share,”¹²⁰ and that any analysis of “the level of competition for LEC services based solely on a LEC’s market share at a given point in time would be too static and one-dimensional.”¹²¹ In particular, market share analysis “may misstate the competitive significance of existing firms and new entrants.”¹²² The Commission has recognized that “the presence and capacity of other firms matter more for future competitive conditions than do current subscriber-based market shares.”¹²³

¹¹⁶ J. Armstrong, *et al.*, Goldman Sachs, *2006 Outlook – Stuck In Neutral* at 27 (Jan. 13, 2006).

¹¹⁷ *Wireline Broadband Order* ¶ 50.

¹¹⁸ *Applications of AT&T Wireless Services, Inc. and Cingular Wireless Corporation for Consent To Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, 19 FCC Rcd 21522, ¶ 41 (2004) (“*AT&T Wireless/Cingular Order*”).

¹¹⁹ *Omaha Forbearance Order* ¶ 62.

¹²⁰ *Id.* ¶ 31.

¹²¹ *Price Cap Performance Review for Local Exchange Carriers*, Second Further Notice of Proposed Rulemaking in CC Docket No. 94-1, Further Notice of Proposed Rulemaking in CC Docket No. 93-124, and Second Further Notice of Proposed Rulemaking in CC Docket No. 93-197, 11 FCC Rcd 858, ¶ 143 (1995).

¹²² *Verizon/MCI Order* ¶ 74.

¹²³ *AT&T Wireless/Cingular Order* ¶ 148.

Applying this framework, the forward-looking competitive analysis must take into account the full range of technologies and services that provide voice services, including cable, wireless, over-the-top VoIP, and traditional wireline competitors, as well as other alternatives to traditional voice service such as e-mail, instant messaging, WiFi, WiMAX, and BPL. As the Commission has found with respect to both mass-market and enterprise customers, “intermodal competition from cable telephony, mobile wireless service providers, and providers of certain VoIP services will likely continue to provide these customers with viable alternatives.”¹²⁴ The Commission has also recognized that consumers are increasingly using their broadband connections to obtain competitive voice services, and that broadband competition is robust and growing. The Commission has acknowledged that “[c]hanges in technology are spurring innovation in the use of networks” and that there are a “wide variety of competitive and potentially competitive [broadband] providers and offerings . . . emerging in this marketplace,” such as “satellite and wireless, and even broadband over powerline in certain locations.”¹²⁵

Second, for purposes of this proceeding, the Commission should recognize there is no longer a separate market for stand alone long-distance services, but a single “any distance” market for communications services regardless of geography that includes both distance-insensitive services as well as any stand alone offerings. The fact that these services all compete with one another in the same market is best evidenced by the degree to which distance-insensitive services have supplanted previous stand-alone offerings, both as a general matter and for long distance in particular.

In the time since this proceeding was initiated, consumers have increasingly demanded distance-insensitive communications services, and service providers have responded accordingly. Today, service providers of every variety – wireline, cable, wireless, and VoIP alike – all routinely offer distance-insensitive calling plans. *See* Exhibits 1-8. These distance-insensitive service plans are increasingly displacing stand-alone offerings, including stand-alone long-distance services. According to J.D. Power and Associates, “[s]eventy-five percent of U.S. households now receive their local and long distance telephone service from one provider.”¹²⁶ The number of customers purchasing distance-insensitive services has been steadily increasing each year, a trend that analysts expect will continue.¹²⁷ As shown above, moreover, wireless distance-insensitive plans also substitute in particular for what previously would have been wireline voice long-distance calls.

¹²⁴ *Verizon/MCI Order* ¶ 77 (referring to enterprise customers); *see id.* ¶ 102 (concluding that for mass-market customers, “competition from intermodal competitors is growing quickly, and we expect it to become increasingly significant in the years to come.”); *id.* ¶ 105 (“[W]e find that intermodal competitors, including facilities-based VoIP and mobile wireless providers, are likely to capture an increasing share of mass market local and long distance services.”).

¹²⁵ *Wireline Broadband Order* ¶ 50.

¹²⁶ J.D. Power & Associates Press Release, *J.D. Power & Associates Reports: Three-Quarters of Households Now Bundle Local and Long-Distance Telephone Service with One Provider* (July 13, 2005).

¹²⁷ *See, e.g.,* D. Lemelin, In-Stat, *Wireline Remains in Decline: US Wireline Service 2005* at 19 (Mar. 2006) (noting “[c]ontinued consumer migration to alternative ‘any distance’ voice technology, including VoIP telephony and wireless services that often bundle minutes of use, or provide unlimited minutes of local and domestic long distance.”).

Although various providers still offer stand-alone long-distance services, this does not suggest there is a separate market for these services. As an initial matter, these stand-alone offerings are due in part to regulatory requirements, not market forces. State regulations often require local telephone companies to offer stand-alone local services, and equal access rules require local telephone companies to enable customers to select a separate long-distance carrier. In the absence of such regulation, it is not clear there would be market-driven supply or demand for stand-alone services. As the Commission has found, regulations requiring certain offerings tend to “skew” offerings in the marketplace.¹²⁸

Regardless, it is clear that any stand-alone services are disciplined by distance-insensitive services and bundles that consumers are increasingly purchasing. Different services are considered to be part of the same product market so long as they are considered reasonably interchangeable by “marginal” customers – that is, the subset of customers who will switch between the services in the putative market in response to small changes in relative prices. The Commission has recognized that in order for two competing technologies to constrain each other’s prices, it “only requires that there be evidence of sufficient substitution for significant segments of the mass market,” not that every customer views the two services as substitutes.¹²⁹ And, as noted above, the facts show that large numbers already have switched to distance-insensitive plans and are continuing to do so.

In any event, while the facts show there no longer is a separate long-distance market, it is all the more apparent that there is no separate *wireline* long-distance market. As demonstrated above, consumers use cable, wireless, and VoIP services extensively in place of wireline long-distance services, and these services must therefore be included in any analysis of whether any provider or group of providers could dominate the long-distance component of voice telephone services.

Third, under current market conditions, there is no plausible argument that traditional wireline carriers could use their local networks to dominate the provision of voice long-distance service. Accordingly, there is no reason to re-regulate long-distance services offered by a subset of providers just because the section 272 separation requirements have sunset on the schedule established by Congress. As demonstrated above, there are now many competitive alternatives available, and consumers are using these alternatives to a large and increasing extent, both as a general matter and for their voice long-distance calls in particular.

In light of these circumstances, it is implausible that any single provider could use its local market presence to dominate the provision of long-distance services. Indeed, the Commission has repeatedly recognized that the long-distance market is competitive,¹³⁰ that

¹²⁸ *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, 18 FCC Rcd 16978, ¶ 261 (2003) (“[R]ules requiring line sharing may skew competitive LECs’ incentives toward providing a broadband-only service to mass market consumers, rather than a voice-only service or, perhaps more importantly, a bundled voice and xDSL service offering.”).

¹²⁹ *Verizon/MCI Order* ¶ 91.

¹³⁰ See, e.g., *Regulatory Treatment of LEC Provision of Interexchange Services Originating in the LEC’s Local Exchange Area*, Second Report and Order in CC Docket No. 96-149 and Third Report and Order in CC Docket No. 96-61, 12 FCC Rcd 15756, ¶ 86 (1997) (“*LEC Classification Order*”) (“Because we previously have found that

barriers to entry are low,¹³¹ and that demand for long-distance services is very elastic, both in the mass market and especially in the enterprise market.¹³² And those conclusions apply with even greater force today, with the wide proliferation of intermodal alternatives. For example, in 2006, cable, wireless, VoIP, and wireline providers added a *net* total of approximately 21 million subscribers, which indicates that a large fraction of mass-market customers are switching between these various alternatives, or switching between various providers, at any given point in time.¹³³ Moreover, this is a conservative total because *gross* adds, which providers generally do not report, are undoubtedly higher due to customer churn.

Although it is impossible to develop precise market shares that take into account all of the voice and non-voice alternatives available to consumers for long distance, even examining a subset of those alternatives shows that any individual provider serves only a small portion of consumer demand. As demonstrated above, ILEC wireline access lines represent less than 30 percent of total voice connections. *See* Figure 13, *supra*. This is well below the levels at which the Commission previously made findings of non-dominance with respect to long-distance services, even before the advent of intermodal competition.¹³⁴

Moreover, just as it is true that no carrier is dominant in the provision of traditional circuit-switched long-distance voice services, it is if anything even more true with respect to advanced VoIP services. Both the broadband services over which they are provided and the VoIP services themselves are inherently agnostic with respect to geographic boundaries and are being offered by a wide range of providers across the country. These services can be offered over any broadband connection, which are now available to 90 percent or more of the population. Thus, there is no plausible argument that any single provider is or could become

markets for long distance services are substantially competitive in most areas, marketplace forces should effectively deter carriers that face competition from engaging in the practices that Congress sought to address through the section 214 requirements.”); *Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, Order on Remand, 20 FCC Rcd 2533, ¶ 36 n.107 (2005) (collecting orders in which the FCC found the long-distance market to be competitive).

¹³¹ *Verizon/MCI Order* ¶ 81 (noting the “presence of extensive competitive national wholesale interexchange networks with excess capacity”).

¹³² *See Motion of AT&T Corp. To Be Reclassified as a Non-Dominant Carrier*, Order, 11 FCC Rcd 3271, ¶ 63 (1995) (“*AT&T Reclassification Order*”) (“[R]esidential customers are highly demand-elastic and will switch to or from AT&T in order to obtain price reductions and desired features.”); *Verizon/MCI Order* ¶ 56 (“medium and large enterprise customers are sophisticated, high-volume purchasers of communications services that demand high-capacity communications services, and because there will remain a significant number of carriers competing in the market.”).

¹³³ J. Chaplin, *et al.*, JPMorgan, *Telecom Services/Wireline: State of the Industry: Consumer* at Table 21 (Jan. 13, 2006) (net adds for VoIP lines); J. Chaplin, *et al.*, JPMorgan, *Telecom Services/Wireline: Fourth Quarter 2006 Preview* at Tables 12 & 23 (Jan. 23, 2007) (net adds for cable, ILEC, and wireless lines).

¹³⁴ When the Commission declared AT&T to be non-dominant in the provision of domestic interstate interexchange services, AT&T’s market share of such services was estimated to be less than 60 percent. *AT&T Reclassification Order* ¶ 67. Likewise, AT&T’s share of the international message telephone service market was estimated to be sixty percent when AT&T was declared non-dominant in the provision of those services, and AT&T’s average market share in 76 select countries was 74 percent, and AT&T faced no competition at all in four countries. *Motion of AT&T Corp. To Be Declared Non-Dominant for International Service*, Order, 11 FCC Rcd 17963, ¶ 40 (1996).

dominant in the provision of VoIP services. The Commission must accordingly find that, at a minimum, all providers are non-dominant in the provision of VoIP services.¹³⁵

Fourth, and finally, re-regulating long-distance services provided by a subset of providers would only harm consumers by needlessly reducing efficiency, increasing cost and hindering deployment of advanced broadband networks and services.

As the Commission has found, “regulations associated with dominant carrier classification can . . . have undesirable effects on competition.”¹³⁶ For example, “[i]n these environments that are competitive for end users, applying these dominant carrier regulations to [a carrier] limits its ability to respond to competitive forces and, therefore, its ability quickly to offer consumers new pricing plans or service packages.”¹³⁷ The Commission has also recognized that requiring carriers to file tariffs for long-distance service “may harm consumers by impeding the development of vigorous competition, which could lead to higher rates.”¹³⁸ In particular, such requirements “(1) remov[e] incentives for competitive price discounting; (2) reduce[e] or tak[e] away carriers’ ability to make rapid, efficient responses to changes in demand and cost; (3) impos[e] costs on carriers that attempt to make new offerings; and (4) prevent[] consumers from seeking out or obtaining service arrangements specifically tailored to their needs.”¹³⁹ The Supreme Court has likewise acknowledged its “considerable sympathy” with the view that tariff “filing costs raise artificial barriers to entry and that the publication of rates facilitates parallel pricing and stifles price competition.”¹⁴⁰

Re-regulating Verizon and other carriers as dominant also would violate well-settled policies favoring a level regulatory playing field for new investment. As the Commission has held, “it is in the public interest to place intermodal competitors on an equal regulatory footing by ending unequal regulation of services provided over different technological platforms.”¹⁴¹ The Commission will “neither unfairly favor nor disfavor one technology over another.”¹⁴² Given the extensive competition that now exists for voice services, asymmetrical regulation imposes artificial price constraints that impede full competition among providers and harms consumers.¹⁴³

¹³⁵ The Commission also should confirm in its ongoing IP-Enabled Services proceeding that VoIP services are preemptively interstate in nature and deregulated, regardless of provider. *See IP-Enabled Services*, Notice of Proposed Rulemaking, 19 FCC Rcd 4863 (2004).

¹³⁶ *LEC Classification Order* ¶ 90.

¹³⁷ *Omaha Forbearance Order* ¶ 47.

¹³⁸ *Policy and Rules Concerning the Interstate, Interexchange Marketplace; Implementation of Section 254(g) of the Communications Act of 1934, As Amended*, Second Report and Order, 11 FCC Rcd 20730, ¶ 37 (1996).

¹³⁹ *Id.* ¶ 53.

¹⁴⁰ *MCI Telecommunications Corp. v. AT&T*, 512 U.S. 218, 233 (1994).

¹⁴¹ *Omaha Forbearance Order* ¶ 78.

¹⁴² *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776, ¶ 47 (1997).

¹⁴³ *See, e.g., Appropriate Framework for Broadband Access to the Internet over Wireline Facilities*, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853, ¶¶ 45, 71, 79 & n.241 (2005).

The harms of re-imposing dominant carrier regulation would be even greater in the case of advanced broadband networks and services that Verizon and other carriers are deploying, and in the case of advanced VoIP services. These new networks and services do not conform to any geographic boundaries, much less the artificial boundaries traditionally used to define and regulate separate local and long-distance services and markets. These advanced networks are instead designed to provide multiple services – voice, data, and in some cases, video – using packet switches, computer servers, and other types of equipment that may be located more efficiently at some distance from the end user. As the Commission has noted, “[f]ully evolved digital broadband will virtually eliminate geographic distance as an obstacle to acquiring information, and dramatically reduce the time it takes to access information.”¹⁴⁴ Imposing regulation on these networks and services based on the artificial service and geographic categories of the past would impede the ability of providers to deploy these networks and services based on the most efficient engineering and business considerations, and require instead that they conform to outdated regulatory requirements. By reducing the efficiency of these new networks, such regulation would delay or deter their deployment, contrary to Congress’s and the Commission’s stated goals of promoting broadband deployment.¹⁴⁵

In sum, dominant carrier regulation of Verizon’s and other carriers’ long-distance services is not only unnecessary to ensure just, reasonable, and nondiscriminatory rates and to protect consumers, but it would be affirmatively detrimental to competition and harmful to the public interest.

Very truly yours,

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

Attachments

¹⁴⁴ *Service Rules and Procedures to Govern the Use of Aeronautical Mobile Satellite Service Earth Stations in Frequency Bands Allocated to the Fixed Satellite Service*, Notice of Proposed Rulemaking, 20 FCC Rcd 2906, ¶ 2 (2005).

¹⁴⁵ *See, e.g., Wireline Broadband Order* ¶ 77; 47 U.S.C. § 157 nt. (Section 706 of the Act).

EXHIBIT 1

Exhibit 1. Examples of Any-Distance Offerings from Top Cable Operators			
MSO	Plan	Any-Distance Offering (incl. voice mail and calling features)	Monthly Price (range based on subscription to other services)
Comcast	Comcast Unlimited	Unlimited (incl. Canada & U.S. territories)	\$39.95-\$54.95
	Triple Play	Unlimited (incl. Canada & U.S. territories)	promotional offer: \$33 (with cable and broadband service for \$33 each; regular price is \$135.81 for all 3 services)
Time Warner Cable	Digital Phone	Unlimited (incl. Canada)	\$39.95-\$49.95 promotional offer: 2 mos. free
Cox	Digital Telephone with Nationwide Connections (Hampton Roads, VA)	Unlimited	\$39.95 promotional offer: 1st mo. free
	Connection Unlimited (Roanoke, VA)	Unlimited	\$39.95-\$49.95 promotional offer: \$24.95/mo. for the first 3 mos.
	Unlimited Connection (Fairfax, VA)	Unlimited (excl. voice mail)	\$39.95-\$49.95
Cablevision	Optimum Voice	Unlimited	\$34.95 (for broadband customers)
	Optimum Double Play	Unlimited	\$34.95 promotional offer: \$29.95/mo. for the first 12 mos. (with \$29.95 cable service)
	Optimum Triple Play	Unlimited	\$34.95 promotional offer: \$29.95/mo. for the first 12 mos. (with cable and broadband service for \$29.95 each)

Sources

Comcast. Comcast, *Comcast Digital Voice National Residential Pricing List*, <http://www.comcast.com/MediaLibrary/1/1/About/PhoneTermsOfService/PDF/DigitalVoice/NationalPricingLists/CDV%20National%20PriceList.pdf>; Comcast, *Comcast Triple Play*, <http://www.comcast.com/tripleplay/>.

Time Warner Cable. Time Warner Cable, *New York & New Jersey: Packages & Pricing*, <http://www.timewarnercable.com/nynj/products/cable/packagesandpricing.html>; Time Warner Cable, *New York & New Jersey: Web Exclusive Offer*, <http://www.timewarnercable.com/nynj/products/digitalphone/dpfree2months.html>.

Cox. Cox, *Hampton Roads: Digital Telephone: Pricing*, <http://www.cox.com/hr/telephone/pricing-telephone.asp#ld>; Cox, *Hampton Roads: Special Offers*, <http://www.cox.com/hr/offers/special-offers.asp>; Cox, *Roanoke: Digital Telephone: Pricing*, <http://www.cox.com/roanoke/telephone/pricing.asp>; Cox, *Roanoke: Promotions*, <http://www.cox.com/roanoke/promotions/>; Cox, *Fairfax: Digital Telephone: Pricing*, <http://www.cox.com/fairfax/telephone/rates.asp>.

Cablevision. (Cablevision) Optimum, *Optimum Voice*, <http://www.optimum.com/voice/pricing.jsp>.

EXHIBIT 2

Exhibit 2. Examples of Any-Distance Offerings from Other Cable Companies

Company	Areas in Verizon's Region Where Telephony Is Offered	Any-Distance Offering (incl. voicemail & calling features)	Company Statements
Charter	California (Los Angeles MSA); Massachusetts (Boston, Springfield & Worcester MSAs); Michigan (Flint MSA); North Carolina (Asheville MSA); South Carolina (Greenville & Spartanburg MSAs; Abbeville Co.); Texas (Dallas MSA); Washington (Kennewick MSA); Wisconsin (Chicago, Fond du Lac, Janesville, Madison & Wausau MSAs; Dodge, Door, Green, Jefferson, Lincoln, Richland, Sauk, Walworth & Wood Cos.)	\$39.99-\$44.95/mo. promotional offer: \$29.99/mo. for the first 3 months	<ul style="list-style-type: none"> • 11.8M homes passed • 6.8M telephony homes passed • >500,000 voice subscribers • “We deliver our calls along our private network until our switch delivers the call on the public switched telephone network. Our service is just as secure as the traditional phone companies.” • “Save up to 20%”
Mediacom	Illinois (Bloomington, Champaign, Chicago, Peoria & Rockford MSAs; Bureau, Crawford, De Witt, Douglas, Franklin, Jackson, La Salle, Livingston, Logan, Moultrie, Putnam, Randolph & Union Cos.)	\$29.95-\$49.95/mo.	<ul style="list-style-type: none"> • >2.8M homes passed • >1.85M telephony homes passed • >83,000 voice subscribers • “Add Mediacom Phone Service And Save A Bundle.”
Bright House Networks	California (Bakersfield MSA); Florida (Lakeland, Sarasota & Tampa MSAs); Indiana (Anderson & Indianapolis MSAs)	\$39.95-\$49.95/mo.	<ul style="list-style-type: none"> • >2M customers • >300,000 voice subscribers • “Since launching Digital Phone in 2004 the service has enjoyed tremendous popularity.”
Suddenlink	Texas (San Angelo MSA)	\$66.46/mo. \$99/mo. with video and cable services	<ul style="list-style-type: none"> • ~1.4M customers • targeting 2.2M telephony homes passed • 30,000 voice subscribers from Cox • Recent acquisitions from Cox and Charter “more than triple[d] Suddenlink’s size. The new network will provide VoIP-based telephony services to Suddenlink’s national customer base from California to North Carolina.”
RCN	District of Columbia/Maryland (Washington, DC MSA); Massachusetts (Boston MSA); New York (New York MSA); Pennsylvania (Allentown & Philadelphia MSAs)	\$30/mo.	<ul style="list-style-type: none"> • ~1.3M telephony homes passed • 250,000 voice customers • “Make the move to RCN phone service and you’ll enjoy crystal-clear calls on RCN’s always-on, reliable network at better rates than you have today.”

Exhibit 2. Examples of Any-Distance Offerings from Other Cable Companies			
Company	Areas in Verizon's Region Where Telephony Is Offered	Any-Distance Offering (incl. voicemail & calling features)	Company Statements
Knology	Florida (Tampa MSA)	\$28.95/mo. (for broadband customers)	<ul style="list-style-type: none"> • >965,000 homes passed • >160,000 voice subscribers • “Enjoy unlimited local and domestic long distance minutes for one low monthly fee with our Limitless Plan. . .”
Atlantic Broadband	Maryland (Baltimore MSA; Kent & Talbot Cos.); Pennsylvania (Altoona & Johnstown MSAs)	\$29.95-\$44.95/mo.	<ul style="list-style-type: none"> • >440,000 homes passed • >7,750 voice subscribers • Atlantic Broadband Phone Service is available “at an average savings of \$15 to \$30 per month over less full-featured calling plans offered by Verizon.”
Buckeye Cable System	Ohio (Sandusky & Toledo MSAs)	\$39.95/mo.	<ul style="list-style-type: none"> • 166,000 video subscribers • “Our voice network is in place and ready to help your voice carry farther for less.”
Millennium Digital Media	Maryland (Baltimore & Washington, DC MSAs); Michigan (Battle Creek, Grand Rapids, Jackson & Lansing MSAs; Branch & Shiawassee Cos.)	\$29.99/mo.	<ul style="list-style-type: none"> • ~120,000 customers • “Call around the country or around the block for one low, flat monthly rate with our Unlimited Calling Plan.”
Patriot Media	New Jersey (New York & Trenton MSAs)	\$39.95/mo. promotional offer: \$29.95/mo.	<ul style="list-style-type: none"> • >118,000 homes passed • >5,000 voice subscribers • “Using Patriot Media Digital Phone is as easy and convenient to use as your current telephone service, but available at a monthly rate that’s up to 50% less than the average telephone bill.”
Wave Broadband	Washington (Bellingham, Mount Vernon & Seattle MSAs; Island Co.)	\$39.95-\$49.95/mo. promotional offer: \$19.95/mo. for the first 3 mos.	<ul style="list-style-type: none"> • ~140,000 customers • “WavePhone is now available in all our service areas!” • “Sounds, acts, and feels just like old-fashioned phone service – minus the domestic toll charges!”

Sources

Charter. Charter Communications Press Release, *Charter Reports Preliminary Financial and Operating Results for Fourth-Quarter 2006* (Feb. 9, 2007); Charter Communications Press Release, *Charter Telephone Reaches Half-Million Customer Mark* (Feb. 15, 2007); Charter Communications Inc. Press Release, *Charter Reports Third-Quarter 2006 Financial and Operating Results* (Oct. 31, 2006); Charter Communications Inc. Press Release, *Charter Telephone(TM) Recognized by Electronic Security Leader ADT As Service That Can Support Monitoring of Its Security Systems* (Nov. 15, 2006); Charter, *Frequently Asked Questions*, <http://www.charter.com/Visitors/FrequentQuestions.aspx?ProductItem=3>; Charter, *Telephone*, <http://www.charter.com/Visitors/Products.aspx?MenuItem=4>; Charter, *Find What's Available at Your Address*, <https://www.charter.com/order/localize.aspx?targetpage=../order/offers.aspx?productitem=3>.

Mediacom. Mediacom Communications Corp., Form 10-Q (SEC filed Nov. 7, 2006); Mediacom, *Mediacom Phone*, <http://www.mediacomcc.com/phone.html>; Mediacom Communications Corp., Form 10-K (SEC filed Mar. 16, 2006).

Bright House Networks. Bright House Networks Press Release, *Bright House Networks Adds Digital Phone Features* (Nov. 30, 2006); Bright House Networks, *Digital Phone FAQs*, http://tampabay.mybriighthouse.com/customer_care/FAQs/digital_phone/default.aspx.

Suddenlink. Suddenlink, *Unlocking Opportunities*, <http://www.suddenlink.com/About-Suddenlink.html>; Suddenlink Press Release, *Suddenlink To Provide Cable VoIP Services Using Nortel Technology* (June 21, 2006); Suddenlink Press Release, *Suddenlink and Sprint Nextel Establish Wireline Telephony Services Relationship* (Nov. 8, 2006); Telephone call with Suddenlink Sales Department representative (Bryan), 866-269-4386 (Dec. 13, 2006).

RCN. RCN Corp., Form 10-Q (SEC filed Nov. 9, 2006); RCN, *Phone*, <http://www.rcn.com/phone/index.php>; RCN Corporation, *Available Services*, <http://www.rcn.com/specialoffers/display.php>.

Knology. Knology Inc., Form 10-Q (SEC filed Nov. 14, 2006); Knology, *For Home > Phone Service: Long Distance Telephone Service*, <http://www.knology.com/content/forhome.cfm?menulevel2=phoneservices&menulevel3=longdistance>; Telephone call with Knology Sales Department representative (Tracey), 877-566-5649 (Dec. 13, 2006).

Atlantic Broadband. Atlantic Broadband Press Release, *Atlantic Broadband Acquires Aiken, SC, Cable TV System from G Force* (Nov. 2, 2006); Atlantic Broadband Finance, LLC, Form 10-Q (SEC filed Nov. 9, 2006); Atlantic Broadband Press Release, *Atlantic Broadband Launches Phone Service in Maryland; First in Region To Offer Video-Internet-Phone "Triple Play"* (Oct. 30, 2006); Net2Phone, Inc. Press Release, *Net2Phone Cable Telephony to Provide Managed Digital Phone Service for Atlantic Broadband* (Jan. 30, 2006); S. Piatek, *Cable Company Promotes New Phone Service for Johnstown, Pa., Customers*, *Tribute-Democrat* (Jan. 20, 2006); Atlantic Broadband, Inc., *Unlimited Service*, <http://www.atlanticbb.com/wfphoneunlimited.asp?site=digital&page=23>.

Buckeye Cable System. Buckeye CableSystem, *TV Coverage Map: Toledo, OH and Southeast MI*, <http://buckeyeadvertising.com/pdfs/MapSheetToledo.pdf>; Buckeye CableSystem, *TV Coverage Map: Sandusky, OH (Erie County)*, <http://buckeyeadvertising.com/pdfs/MapSheetSandusky.pdf>; Buckeye CableSystem, *TV Coverage Map: Port Clinton, OH (Ottawa and Sandusky Counties)*, <http://buckeyeadvertising.com/pdfs/MapSheetPortCl.pdf>; Buckeye Cable Systems, *Frequently Asked Questions*, http://www.buckeyecablesystem.com/downloads/FAQ_brochures/TEL_faqs.pdf; Buckeye Cable Systems, *Buckeye TEL*, <http://www.buckeyecablesystem.com/buckeyetel/index.html>.

Millennium Digital Media. Millennium Digital Media Press Release, *Kelvin Westbrook Promoted to Chairman and Chief Strategic Officer of Millennium Digital Media Systems* (Sept. 25, 2006); Millennium Digital Media, *Home > Millennium Voice*, <http://www.mdm.net/midatlantic/voice.php>; Millennium Digital Media, *Home > Millennium Voice > FAQs*, <http://www.mdm.net/midatlantic/voicefaq.php>.

Patriot Media. Patriot Media & Communications CNJ, LLC Press Release, *Patriot Media Announces its Coverage Schedule of Local Schools' Fall Sports!* (Sept. 26, 2006); Patriot Media & Communications CNJ, LLC Press Release, *Patriot Media Reaches 5,000 Phone Customers* (May 22, 2006); Patriot Media & Communications CNJ, LLC, *Digital Phone Frequently Asked Questions*, http://www.patmedia.net/patriot/Products_Phone_FAQ.htm; Patriot Media, *Digital Phone Rates and Special Offers!*, http://www.patmedia.net/patriot/Products_Phone_Rates.htm.

Wave Broadband. WaveDivision Holdings, LLC, *About Us*, <http://www.wavebroadband.com/art.php?id=about>; Wave Broadband, *Wave Broadband Service Areas*, <http://www.wavebroadband.com/art.php?id=citylist>; Wave Broadband, *WavePhone: Home Phone Service*, <http://www.wavebroadband.com/art.php?id=phone>.

EXHIBIT 3

Comcast Digital Voice® National Residential Pricing List

Important — Please Read

The purpose of this National Residential Pricing List is to highlight charges for the main features of Comcast Digital Voice. To review a complete listing of charges for Comcast Digital Voice and the terms under which the service is offered, please visit www.comcast.com/cdv/termsofservice.

Monthly Service charges

The Comcast Unlimited™ package provides unlimited nationwide direct-dial calling from your home and includes direct-dial calls to Canada, Puerto Rico, US Virgin Islands, Guam, and Saipan/N. Mariana Islands as well as the following calling features:

3-Way Calling, Anonymous Call Rejection, Call Forwarding Selective, Call Forwarding Variable, Call Return, Call Screening, Call Waiting, Caller ID, Caller ID Blocking Per Call/Caller ID Blocking Per Line, Caller ID With Call Waiting, Repeat Dialing, Speed Dial 8, plus Comcast Enhanced Voice Mail and other enhanced features.

If you have:	Your Comcast Digital Voice price is:
Comcast Cable AND Comcast High-Speed Internet	\$39.95/mo.
Comcast Cable OR Comcast High-Speed Internet	\$44.95/mo.
Comcast Digital Voice ONLY	\$54.95/mo.

The Twice the Talk™ package provides two phone lines with unlimited nationwide direct-dial calling from your home and includes direct-dial calls to Canada, Puerto Rico, US Virgin Islands, Guam, and Saipan/N. Mariana Islands. The primary line also comes with the following calling features:

3-Way Calling, Anonymous Call Rejection, Call Forwarding Selective, Call Forwarding Variable, Call Return, Call Screening, Call Waiting, Caller ID, Caller ID Blocking Per Call/Caller ID Blocking Per Line, Caller ID With Call Waiting, Repeat Dialing, Speed Dial 8, plus Comcast Enhanced Voice Mail and other enhanced features.

If you have:	Your Twice the Talk price is:
Comcast Cable AND Comcast High-Speed Internet	\$49.95/mo.
Comcast Cable OR Comcast High-Speed Internet	\$54.95/mo.
Comcast Digital Voice ONLY	\$64.95/mo.

Calling Features on the Second Line \$10.00/mo.

Modem Lease Fee \$ 3.00/mo.

(If service is combined with Comcast High-Speed Internet, only a single modem lease fee will apply.)

Directory Listings (Not applicable to fax and computer lines.)

Single Listing	Included
Non-Published Phone Number — Primary Line	up to \$4.95/mo.
Non-Published Phone Number — Second Line	up to \$4.95/mo.

(To review actual charges for Non-Published Phone Numbers, please visit www.comcast.com/cdv/termsofservice.)

Per-Call charges

Domestic Directory Assistance (Per call)

Directory Assistance (Limit 3 listings per call)	\$ 0.99
Directory Assistance With Call Completion	\$ 0.99

Domestic Operator Services (Per call)

Operator-Handled Call	\$ 2.49
Usage for Operator-Handled Call — Per minute.	\$ 0.12
Busy Line Verify	\$ 2.99
Busy Line Interrupt (Includes Busy Line Verify)	\$ 5.99

International Services (Please visit www.comcast.com/digitalvoice for country-specific usage rates.)

Directory Assistance — Per call (Limit 1 listing per call)	\$ 4.99
Operator Services — Per call	\$ 4.99

Other charges

Please note that additional fees, charges, and surcharges apply to your service. For a complete listing of all fees, charges, and surcharges, including charges for the installation or modification of service, please visit our website at www.comcast.com/cdv/termsofservice or call 1-888-COMCAST.

Service is for residential customers located in Comcast serviceable areas only and is subject to availability. Multi-product discounts for Unlimited Package require continuous subscription to all specified Comcast products. Prices shown do not include federal, state, or local regulatory fees, taxes, or surcharges; our Regulatory Recovery Fee, which is not a tax or government mandate; or other applicable charges (e.g., operator service calls, installation, maintenance, or repair charges). Service is subject to the Comcast Digital Voice Subscriber Agreement and other applicable terms and conditions. Prices shown are effective August 1, 2006, and are subject to change. Other restrictions apply. Please visit our website for additional information or contact us at 1-888-COMCAST.



Products & Services

[Products >>](#)

[Cable >>](#)

[High Speed Online >>](#)

[Digital Phone >>](#)

[Get 2 Free Months!](#)

[Plan Details >>](#)

[Calling Features](#)

[Packages & Pricing](#)

[Call History & Statement](#)

[International Rates](#)

[Voice Mail](#)

[FAQs](#)

[Self-Installation >>](#)

[Sign Me Up!](#)

[My Account](#)

[Triple Play Offer](#)

[Special Offers](#)

[Business Services](#)

Plan Details

With Time Warner Cable Digital Phone service you can make unlimited calls anywhere in the U.S. and Canada for one low monthly price. As a Digital Phone customer you can call anytime, anywhere and talk for as long as you want without worrying about extra charges, confusing plans or variable bills!

- Make unlimited calls anywhere in the U.S., Canada and Puerto Rico for one low monthly price - call anyone, anytime, anywhere. Across the street, across the state, or across the country, the price doesn't change.
- Competitive rates for all your other calls - International, directory assistance and operator services are billed at competitive rates with other major carriers.
- Get popular and convenient calling features included at no extra charge - Call Waiting, Caller ID, Call Waiting ID, Call Forwarding and more!
- Free no-hassle installation - Digital Phone from Time Warner Cable works with existing phones and jacks, so there's nothing extra to buy.
- It's one price, on one bill, from one company. It doesn't get any easier than that.



Order Digital Phone for as low as \$39.95 per month, and get 2 months for free.
[Learn More >](#)

Find out all the benefits of Time Warner Cable Digital Phone.
[Learn More >](#)

Get your messages even faster with our upgraded Voice Mail service.
[Learn More >](#)





Your Friend in the Digital Age.



Login to view/pay your bill

Login ▶

Need a password?

Forgot your password?

For Home

For Business

Order Services

View / Pay Bill

Customer Support

About Cox

Find service in your area

Zipcode

FAIRFAX

- Home
- Order now
- Customer support
- Bundles
- Telephone**
- Special offers
- Pricing
- Calling features
- U.S. long distance
- Intl. long distance
- Additional services
- Learn more
- High Speed Internet
- Video Service
- HDTV
- DVR
- On Demand - PPV
- CSAP
- Promotions
- Press

Digital Telephone

Dial in for savings & convenience. Bundle discounts, one company, one bill.

- Complete plans of local, long-distance and calling features
- Additional savings when you bundle with Cox Digital Cable and Cox High Speed Internet — you get great pricing without any billing surprises
- The most popular calling features available
- Add an international long-distance plan for great low rates to friends and family around the world
- Join over 1.5 million customers who rely on Cox Digital Telephone
- **Great prices and special offers** are now available. Select your location above to learn more about the services offered in your area

[Order Cox Digital Telephone ▶](#)



Build Your Bundle [Order now ▶](#)

Related links

- ▶ [Technical Support](#)
- ▶ [Telephone User Guide \(English and Spanish\)](#)
- ▶ [Yellow Pages](#)
- ▶ [White Pages](#)
- ▶ [How to Take Charge! of your phone use](#)
- ▶ [Pricing](#)
- ▶ [Benefits and Packages](#)
- ▶ [Long Distance](#)
- ▶ [International Savings Plus](#)
- ▶ [International Calling Cards](#)

Special offers

- ▶ [Free professional installation](#)

Check out our **Special Offers** on Cox Services

EasyPay
Sign up here for an easier way to pay

© 1998-2007 Cox Communications, Inc. Policies
[Visitor Agreement](#) | [Privacy Policy](#) | [Parental Control](#)

[Cox.net](#)

[Careers](#)

[Diversity](#)

[Newsroom](#)

[Search Cox.com](#)

[Contact us](#)



What is it?

Optimum Voice, available exclusively to Optimum Online customers, is a digital home phone service that includes:

- Unlimited local and long-distance calling within the United States, Puerto Rico and Canada
- No per-call charges, no per-minute fees
- **13 popular calling features** such as Voicemail, Caller ID and Call Waiting
- The ability to keep your current phone number, or get a new one
- Simple set-up with no special equipment—same phones, same phone jacks
- **My Optimum Voice** - Your personal website to check voicemail online, search your call details and turn on/off calling features with just the click of a mouse
- All for one low, **flat monthly rate** - with no hidden fees



[▶ Order Optimum Voice](#)

Optimum Voice® World Call



Save even more! Worldwide calling anytime, anywhere for just \$19.95 more a month.

[Learn More](#) [Order Now](#)

© Copyright CSC Holdings Inc.

- [About Cablevision](#)
- [Terms of Use](#)
- [Other Optimum Sites](#)
- [Terms of Service](#)
- [Contact Us](#)
- [Your Privacy](#)
- [Site Index](#)
- [Careers](#)



[Cable TV](#) [High-Speed Internet](#) [Telephone](#) [Business Services](#) [Support](#)

[Telephone](#)

[Prices & Availability](#)

[Features](#)

[International Calling](#)

[Frequently Asked Questions](#)

Contact Us:

Have a question? Get an answer:

Chat with us:

[Chat Live Now!](#)

E-mail us:

[E-mail Charter](#)

Call us:

[1-888-GET CHARTER](#)

Support:

Need help with your Telephone service?

[Telephone Support](#)

Features

Charter Telephone gives you all the features you expect from home phone service.

Unlimited nationwide calling in the U.S., plus Canada and Puerto Rico

10 calling features* plus voice mail:

Caller ID

Call Waiting

Call Waiting with Caller ID

Call Forwarding – Variable

Call Forwarding – Selective

Call Screening

Anonymous Call Rejection

Custom Ring

Selective Call Acceptance

Speed Dial 8

Digital sound quality

Works with your existing handsets and phone jacks

Directory listings, 911 emergency services, 411 directory assistance

It's easy to switch!

Free professional installation

Keep your current phone number**

No fees to switch, no disruption in service

No long-term contracts

Satisfaction Guarantee

We guarantee that you will be satisfied with Charter Telephone. If not, we'll refund your money for the first 30 days of service. Try it risk-free today!

Interested in International Calling? [Learn more about international calling rates.](#)

*Available with Unlimited Long Distance Package only.

**Number portability only available within a current rate center.



1-877-304-7466

Contact Us

My Account

Your Local Zip is:

Go

Home Special Offers Cable TV Internet Phone Business Services Customer Support About Us

Features

Our Advantage

Phone FAQ



Mediacom® Phone

As Low As
\$29⁹⁵
Per Month

UNLIMITED LOCAL & NATIONWIDE CALLING

Now That's Something
To Talk About!

Use Your Existing

Across town or across the country, talk as long as you want, whenever you want, for a flat monthly rate as low as \$29.95 plus taxes and fees!

Phone & Home Wiring

Mediacom phone uses all of your existing home phone equipment, jacks, outlets and in-home wiring.

Mediacom provides the phone modem, which connects to any one of your phone outlets or jacks, activating every phone on that line.

- Unlimited local and nationwide calling to anywhere in the 50 United States, Puerto Rico, the U.S. Virgin Islands and to all of Canada for one low monthly rate
- Includes 14 popular calling features like Voice Mail, Caller ID and Call Waiting
- Deal with one company and one bill for all of your cable, Internet and phone services
- Professional standard installation and 24/7 customer support
- Access optional services like International calling at competitive rates
- Keep your current phone number, or get a new one

With No other Mediacom service	\$49⁹⁵ A Month	Monthly Savings	Yearly Savings
With Either Family Cable or Higher, OR Mediacom Online Internet service:	\$39⁹⁵ A Month	\$10	\$120
With Both Family Cable or Higher, AND Mediacom High-Speed Internet service:	\$29⁹⁵ A Month	\$20	\$240

[Details](#) *Above phone rates are separate montly fees.



All you pay is your monthly fee and any mandatory local, state and federal taxes and applicable fees. No more confusing extras like subscriber line fees that can add up to \$6.50 or more each month to your bill. The only other charges that will appear on your bill are for the optional features you select like International and collect calls.

Satisfaction Guaranteed
Mediacom is in your community, so you can depend upon 24/7 customer care. And like our cable and Internet services, Mediacom phone comes with a **30-Day Money-Back Guarantee**

[Pay Your Bill Online](#)

[Parental Controls](#)

[Advertise On Cable TV](#)

[Careers At Mediacom](#)

[High-Speed Business Solutions](#)

[Site Map](#) | [Terms of Use](#) | [Privacy Policy](#) | [Copyright and Trademark Policies](#)

© 2007 Mediacom Communications Corporation. All Rights reserved.



Looking for us?
Find us in your area.

[about us](#)

[areas we serve](#)

[products](#)

[business solutions](#)

Search

Enter Your Zip Code
[contact us](#)

Digital Phone

You are here: [Home](#) | [Products](#) | [Digital Phone](#)

- [Digital Cable](#)
- [Digital Phone](#)
- [High Speed Internet](#)

Digital Phone

Talk All You Want.

When you live in a Bright House every day is easier because you can connect to the people you love without limit.

- **Popular Calling Features** - Call Waiting, Caller ID, Voice Mail, and more.
- **Enhanced 911 Service**
- **Unlimited Nationwide Calling**- Call anytime, anywhere in the U.S., Puerto Rico, and Canada for one low price
- **Competitive Rates for International Calls**
- **One Bill Convenience** - One company, one bill. Make Life Easier!



[Areas We Serve](#) | [Site Map](#) | [Careers](#) | [Contact Us](#) | [News & Information](#)

[Can I Get RCN Service?](#)
[All Special Offers](#)

Special Offers



Unlimited Phone
 Local and Long Distance Calling
 for only **\$30** a month
 with a 12-month contract *

Now you can talk, talk, talk - all day long!

For just \$30 a month, you get unlimited local, regional, and long distance calling. With RCN phone service, you'll enjoy crystal clear calls on our always-on, reliable network. It's also:

- Digital - so you get a clear connection every time
- Secure - to ensure you get a direct link to 911
- Convenient - you can keep your existing phone number

Plus, choose any 4 phone features, such as:

- Basic voicemail
- Caller ID block
- Call waiting
- Three-way calling
- Call waiting

...and many more!

Get connected today.

[Can You Get RCN?](#) **Go**

*Offer valid for new customers only. Offer expires February 28, 2007. 12-month service contract is required. If service is cancelled between months 2-12, a \$75 early termination fee applies. \$30 per month rate is valid for 12 months; regular retail rates apply thereafter. Other restrictions apply. Not all services are available in all areas.

EXHIBIT 4

Exhibit 4. Examples of Any-Distance Offerings from Wireless Providers			
MSO	Plan	Any-Distance Offering (incl. voice mail and calling features)	Monthly Price
Cingular	Cingular Nation 450	450 minutes + 5000 night and weekend minutes; unlimited mobile-to-mobile minutes; unused minutes rollover	\$39.99 (\$0.45/add'l min.)
	Cingular Nation 900	900 minutes + unlimited night, weekend, and mobile-to-mobile minutes; unused minutes rollover	\$59.99 (\$0.40/add'l min.)
Verizon Wireless	America's Choice 450	450 minutes + unlimited night, weekend, and mobile-to-mobile minutes	\$39.99 (\$0.45/add'l min.)
	America's Choice 900	900 minutes + unlimited night, weekend, and mobile-to-mobile minutes	\$59.99 (\$0.40/add'l min.)
Sprint Nextel	Sprint Basic Plan	200 minutes + unlimited night, weekend and mobile-to-mobile minutes	\$29.99
	Sprint Power Pack 450	450 minutes + unlimited night, weekend, and mobile-to-mobile minutes	\$39.99 (\$5 for 50 add'l minutes; \$0.45/add'l min. thereafter)
	Sprint Power Pack 900	900 minutes + unlimited night, weekend, and mobile-to-mobile minutes	\$59.99 (\$5 for 50 add'l minutes; \$0.40/add'l min. thereafter)
T-Mobile USA	Basic Plus	300 minutes + unlimited weekend minutes	\$29.99 (\$0.40/add'l min.)
	Get More	600 minutes + unlimited night and weekend minutes	\$39.99 (\$0.40/add'l min.)
	Get More 1000	1000 minutes	\$39.99 (\$0.40/add'l min.)

Exhibit 4. Examples of Any-Distance Offerings from Wireless Providers			
MSO	Plan	Any-Distance Offering (incl. voice mail and calling features)	Monthly Price
T-Mobile USA (continued)	myFaves 300	300 minutes + unlimited night and weekend minutes; unlimited calling to 5 numbers	\$39.99 (\$0.40/add'l min.)
	Get More 1000 Plus	1000 minutes + unlimited night and weekend minutes	\$49.99 (\$0.40/add'l min.)
	myFaves 600	600 minutes + unlimited night and weekend minutes; unlimited calling to 5 numbers	\$49.99 (\$0.40/add'l min.)
	Get More Ultra	1500 minutes + unlimited night and weekend minutes	\$59.99 (\$0.40/add'l min.)
	myFaves 1000	1000 minutes + unlimited night and weekend minutes; unlimited calling to 5 numbers	\$59.99 (\$0.40/add'l min.)

Sources

Cingular. Cingular, *Individual Plans*, <http://www.cingular.com/cell-phone-service/cell-phone-plans/individual-cell-phone-plans.jsp>.

Verizon Wireless. Verizon Wireless, *Plans*, <http://www.verizonwireless.com/b2c/store/controller?item=planFirst&action=viewPlanDetail&sortOption=priceSort&catId=323>

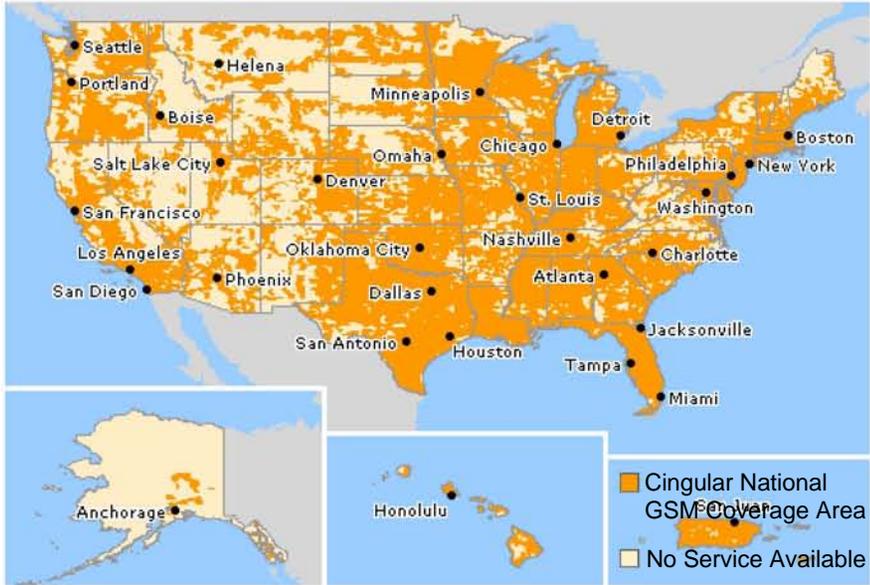
Sprint PCS. Sprint PCS, *Sprint PCS Service Plans*, <http://www1.sprintpcs.com/explore/coverage/CoverageOverview.jsp>.

T-Mobile. T-Mobile USA, *All Plans*, <http://www.t-mobile.com/shop/plans/>.

EXHIBIT 5

Exhibit 5.

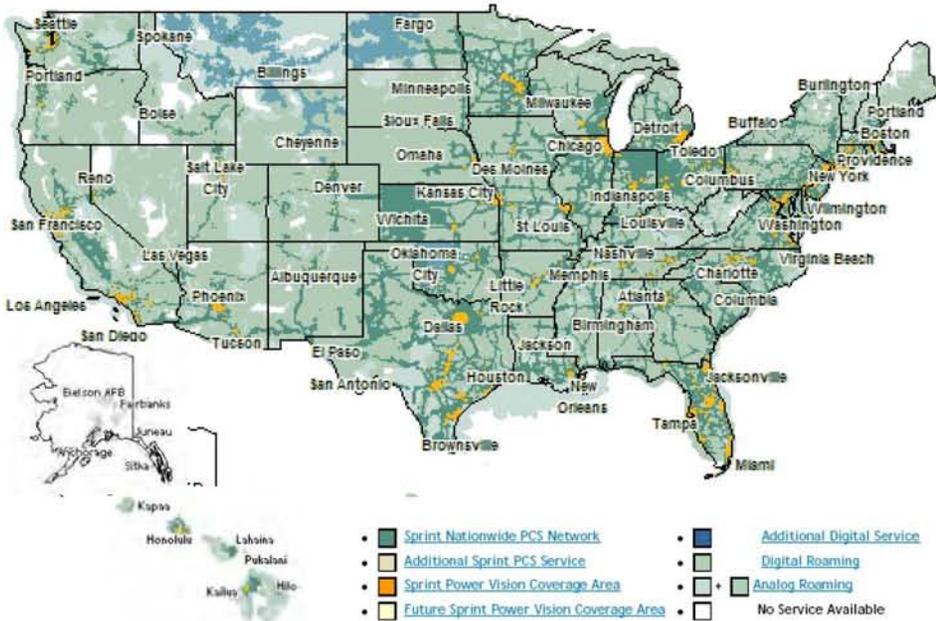
Cingular



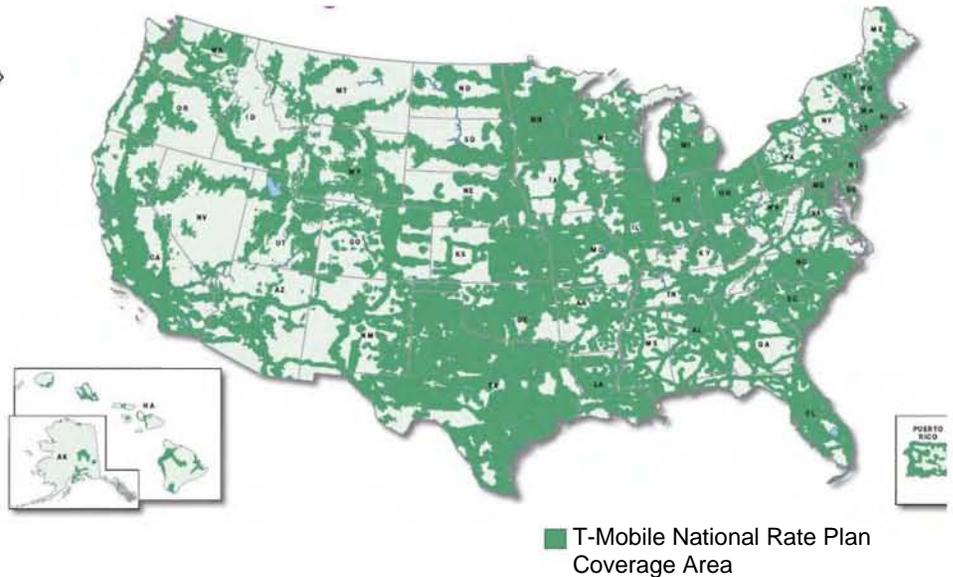
Verizon Wireless



Sprint Nextel



T-Mobile USA



Sources

Cingular, *Cingular Coverage Viewer*, , <http://www.cingular.com/coverageviewer/>.

Verizon Wireless, *America's Choice Map*, available at <http://www.verizonwireless.com/b2c/store/controller?item=planFirst&action=viewPlanDetail&sortOption=priceSort&catId=323>.

Sprint Nextel, *Coverage Information*, http://www1.sprintpcs.com/explore/coverage/CoverageInfo.jsp?ATR_ExtraOne=UHP_CDMA_Coverage_Maps.

T-Mobile USA, <http://www.t-mobile.com/Cms/Files/Published/0000BDF20016F5DD010312E2BDE4AE9B/0000BDF20016F5DF0109A352BDD6976C/file/National%20Rate%20Plan%20Coverage.pdf>.

EXHIBIT 6

Exhibit 6. Verizon's Any-Distance Offerings			
Plan	Any-Distance Offering	State	Monthly Price
<i>Circuit-Switched</i>			
Verizon Freedom Value (not available in AZ, NV, VT, WA)	Unlimited (no calling features)	MD	\$34.95
		CT, NJ, RI	\$34.99
		NY	\$34.99-\$39.99
		DC, DE	\$37.99
		CA	\$39.95
		FL, ID, IL, IN, MA, ME, MI, NC, NH, OH, OR, PA, SC, TX, VA, WI	\$39.99
		WV	\$44.99
Verizon Freedom Essentials (not available in AZ, NV, VT, WA)	Unlimited • 3 calling features incl. voice mail	MD	\$39.95
		CT	\$39.99
		DC	\$42.99
		DE	\$43.99
		NY	\$39.99-\$44.99
		CA	\$44.95
		FL, MA, ME, NC, NH, NJ, OR, PA, RI, SC, TX, VA	\$44.99
ID, IL, IN, MI, OH, WI, WV	\$49.99		
Verizon Freedom Unlimited	Unlimited • 3 calling features incl. voice mail	VT	\$56.99
Verizon Freedom (not available in AZ, NC, NV, SC)	Unlimited (incl. Canada) • 5 calling features incl. voice mail	FL	\$53.68
		DC, MD	\$53.99
		ME, NH, RI, VA	\$54.99
		DE, NJ, PA, TX	\$57.99
		MA, WV	\$59.99
		CA, CT, NY, VT	\$61.99
		ID, IL, IN, MI, OH, OR, WA, WI	\$64.95
Verizon Freedom Extra (not available in AZ, NC, NV, SC)	Unlimited (incl. Canada) • more than 10 calling features incl. voice mail	FL	\$58.68
		DC, MD	\$58.99
		ME, NH, RI, VA	\$59.99
		DE, NJ, TX	\$62.99
		WV	\$64.99
		CA, CT, VT	\$66.99
		MA, PA	\$67.99
		ID, IL, IN, MI, OH, OR, WA, WI	\$69.95
NY	\$71.99		
<i>VoIP</i>			
VoiceWing 500	500 minutes (incl. Canada)	Regionwide	\$19.95 (\$0.04/add'l min.)
VoiceWing Unlimited	Unlimited (incl. Canada)	Regionwide	\$24.95 (\$34.95 in AZ)

EXHIBIT 7

Exhibit 7. Examples of Any-Distance Offerings from Traditional Wireline Competitors			
Competitor	Plan	Any-Distance Offering (incl. voice mail and calling features)	Monthly Price
ACN	Advantage Unlimited	Unlimited	\$38.95
	Digital Phone Service	Unlimited (incl. Canada)	\$23.99
Cavalier Telephone	Unlimited Long Distance	Unlimited (incl. Canada)	\$34.95
	Phonom Total Call Gold (VoIP)	Unlimited	\$24.99 (\$19.99 for the first 3 mos.)
IDT America	Unlimited Local & Long Distance	Unlimited	\$39.95
Keep It Simple and Save (KISS/Covista)	Premium National	Unlimited (incl. Canada)	\$42.99
Trinsic	Trinsic Home Connection Unlimited	Unlimited (incl. Canada)	\$37.99
	Trinsic Unlimited	Unlimited (incl. Canada)	\$51.49

Sources

ACN. ACN, Inc., *Massachusetts Calling Plans*, http://www.acninc.com/images/us/1052_tcm29-5606.pdf; ACN, Inc., *ACN Digital Unlimited Calling Plan*, https://www.myacn.com/acndigital/products_unlimited.htm.

Cavalier. Cavalier Telephone, *Unlimited Long Distance Plans for Residential Customers*, http://www.cavtel.com/homeservice/Unlim_%20residential.shtml; Cavalier Telephone, *Phonom Voice over Broadband Plans*, http://www.cavtel.com/homeservice/voip/complete_packages.shtml.

IDT Corporation. IDT Corporation, *Unlimited Local & Long Distance \$39.95*, <http://www.idt.net/personal/local/unlimited.aspx>.

KISS. KISS, *Services*, <http://www.kissld.com/webcgi/services.html>.

Trinsic. Trinsic, Inc., *Residential Services*, <http://www.trinsic.com/teloa/getTN.do>.

EXHIBIT 8

Exhibit 8. Examples of Any-Distance Offerings from VoIP Providers			
VoIP Provider	Plan	Any-Distance Offering	Monthly Price
1TouchTone	Voice Residential Basic	500 outgoing minutes; unlimited incoming minutes & calls to other 1TouchTone users; \$0.03/add'l minute	\$14.99
	Voice Residential Unlimited	Unlimited (incl. Canada)	\$29.99
AT&T	CallVantage Service	Unlimited (incl. Canada)	\$24.99 (1st mo. free w/ online order)
	CallVantage 2-Line	Line 1: Unlimited Line 2: 500 mins.	\$49.99
bbtelsys	Home Unlimited	Unlimited (incl. Canada)	\$24.95
	The NO Plan	Unlimited (incl. Canada)	\$16.58 (\$199/yr.)
Broadfone	500 Outbound Minutes	500 outgoing minutes; unlimited incoming minutes; \$0.039/add'l minute	\$14.99
	Unlimited U.S./Canada	Unlimited (incl. Canada)	\$24.99
BroadVoice	Unlimited World	Unlimited (incl. int'l to 21 countries)	\$19.95
	Unlimited World Plus	Unlimited (incl. int'l to 35 countries)	\$24.95
Broadvox Direct	Residential Choice Plus	100 outgoing minutes; unlimited incoming minutes; \$0.029/add'l minute	\$9.95
	Residential Unlimited	Unlimited (incl. Canada)	\$29.95
EarthLink	trueVoice Unlimited	Unlimited	\$24.95 (Free activation \$29.95 value)
FuturaVoice	Voice Residential Basic	500 outgoing minutes; unlimited incoming minutes & calls to FuturaVoice users; \$0.03/add'l minute	\$14.99
	Voice Residential Unlimited	Unlimited (incl. Canada)	\$29.99
iConnectHere	World Plan +400 World Minutes Per Month	400 minutes (selected countries); \$0.02/add'l minute to U.S./Canada	\$15.99 (\$30 sign-up bonus)
	World Plan +800 US/ Canada Minutes Per Month	800 minutes (incl. Canada); \$0.02/add'l minute	\$15.99 (\$30 sign-up bonus)
	World Plan +2000 US/ Canada Minutes Per Month	2000 minutes (incl. Canada); \$0.02/add'l minute	\$24.99 (\$30 sign-up bonus)

Exhibit 8. Examples of Any-Distance Offerings from VoIP Providers			
VoIP Provider	Plan	Any-Distance Offering	Monthly Price
InPhonex	USA and Canada Residential Unlimited with Incoming Phone Number	Unlimited (incl. Canada)	\$24.95
iPhone	Voice Residential Basic	500 outgoing minutes; unlimited incoming minutes; \$0.03/add'l minute	\$14.99
	Voice Residential Unlimited	Unlimited (incl. Canada)	\$29.99
ITP	Residential Premium Unlimited	Unlimited (incl. Canada)	\$19.99
	Home Office Basic (2 lines)	1500 minutes (incl. Canada)	\$34.99
	Home Office Premium Unlimited (2 lines)	Unlimited (incl. Canada)	\$44.99
Lingo	Lingo Link	Unlimited to other Lingo users; unlimited incoming calls; \$0.03/add'l minute	\$7.95 (1st mo. free)
	Small Talk	500 outgoing minutes (incl. Canada & Puerto Rico); unlimited calls to Lingo users; \$0.03/add'l minute	\$14.95 (1st mo. free)
	Chatter Box	Unlimited (incl. Canada, Puerto Rico & select countries)	\$21.95 (1st mo. free)
MyPhone Company.com	Unlimited Home U.S. & Canada	Unlimited (incl. Canada)	\$24.99
	Unlimited U.S. & Canada + International	Unlimited (incl. int'l)	\$34.99
Net2Phone	VoiceLine U.S./Canada 500	500 outgoing minutes; unlimited incoming minutes & calls to other VoiceLine users; \$0.039/add'l minute	\$14.99
	VoiceLine U.S./Canada Unlimited	Unlimited (incl. Canada)	\$29.99
OPEX	Internet Voice	Unlimited (incl. Canada)	\$24.99
Packet8	Freedom Unlimited	Unlimited (incl. Canada)	\$19.99
	Freedom Unlimited Global	Unlimited (incl. Canada & selected countries)	\$49.99
	Freedom Annual	Unlimited (incl. Canada)	\$16.58 (\$199/yr.)

Exhibit 8. Examples of Any-Distance Offerings from VoIP Providers			
VoIP Provider	Plan	Any-Distance Offering	Monthly Price
SunRocket	Limited Edition	200 outgoing minutes; unlimited incoming minutes, calls to other SunRocket users & select countries; \$0.03/add'l minute	\$9.95
	Annual Edition	Unlimited (incl. Canada); \$3 allowance for int'l calls	\$16.58 (\$199/yr.)
	Monthly Edition	Unlimited (incl. Canada); \$3 allowance for int'l calls	\$24.95
	SunSpots Edition	Unlimited (incl. Canada & selected countries)	\$24.92 (\$299/yr.)
	Global Edition	Unlimited (incl. Canada); \$20 allowance for int'l calls	\$29.08 (\$349/yr.)
USA Datanet	All Talk	Unlimited (incl. Canada)	\$24.95 (1st mo. free)
VelocityTel	Residential Basic 500	500 outgoing minutes (incl. Canada); unlimited incoming minutes; \$0.03/add'l minute	\$14.95
	Residential Unlimited	Unlimited (incl. Canada)	\$24.95
ViaTalk	vt_500	500 outgoing minutes (incl. Canada); unlimited incoming minutes; \$0.035/add'l minute	\$14.95
	vt_500 (12-month billing cycle)	500 outgoing minutes (incl. Canada); unlimited incoming minutes; \$0.035/add'l minute	\$11.95
	vt_500 (24-month billing cycle)	500 outgoing minutes (incl. Canada); unlimited incoming minutes; \$0.035/add'l minute	\$9.95
	vt_unlimited	Unlimited (incl. Canada)	\$22.95
	vt_unlimited (12-month billing cycle)	Unlimited (incl. Canada)	\$16.58 (\$199/yr) (+1 year free)
VoicePulse	America Unlimited	Unlimited	\$24.99
Voiceral	600	600 outgoing minutes \$0.02/add'l minute	\$12.99
	Unlimited	Unlimited	\$14.99
VOIP2SAVE. com	Monthly Residential Plan	Unlimited (incl. Canada & selected countries)	\$24.95
	Lifetime Residential Plan	Unlimited (incl. Canada & selected countries)	\$999.99 (one-time)

Exhibit 8. Examples of Any-Distance Offerings from VoIP Providers			
VoIP Provider	Plan	Any-Distance Offering	Monthly Price
VoIP Your Life	Premier Basic	unlimited incoming calls and calls to in-network users; \$0.024/add'l minute	\$14.97
	Premier Unlimited	Unlimited (incl. Canada)	\$23.97
	Premier Global Unlimited	Unlimited (incl. Canada & selected countries)	\$29.97
Vonage	Residential Basic 500	500 outgoing minutes; unlimited incoming minutes; \$0.039/add'l minute	\$14.99
	Residential Premium Unlimited	Unlimited (incl. Canada & Europe)	\$24.99 (1 mo. free)
ZingoTel	400 Plus	400 outgoing minutes (incl. Canada); unlimited incoming minutes & calls to ZingoTel users; \$0.039/add'l minute	\$14.95 (1 mo. free)
	Residential Unlimited	Unlimited (incl. Canada)	\$19.95 (1 mo. free)

Sources

ITouchTone. 1TouchTone, *1TouchTone Plans*, http://www.1touchtone.com/index.php?remurl=/html/index.php-page=voice_plans.

AT&T. AT&T, *AT&T CallVantage: Plans & Pricing*, <http://www.usa.att.com/callvantage/plans/index.jsp>.

Bbtelsys. bbtelsys, *The Home Unlimited Plan*, <http://bbtelsys.com/services/?subcat=3&pager=16>; bbtelsys, *The NO Plan*, <http://bbtelsys.com/services/?subcat=3&pager=20>.

Broadfone. Broadfone, *Choose Your Broadfone Calling Plan*, <http://www.broadfone.com/plan.php>.

BroadVoice. BroadVoice, *Rate Plans*, <http://www.broadvoice.com/rateplans.html>.

BroadVox. BroadVox, *BroadVox Direct*, <http://www.broadvoxdirect.net>.

EarthLink. EarthLink, *trueVoice*, <http://www.earthlink.net/voice/truevoice/>.

FuturaVoice. FuturaVoice, *FuturaVoice Plans*, https://www.futuravoice.com/html/index.php?page=voice_plans.

iConnectHere. iConnectHere, *ICH Signup*, https://www.icconnecthere.com/nonmembers/eng/signup/broadband_phone/signup.asp; iConnectHere, *View Rates*, <https://www.icconnecthere.com/NonMembers/eng/rates/rates.asp?t=0&service=9>.

InPhonex. InPhonex, *USA and Canada Residential Unlimited Calling Plans*, http://www.inphonex.com/products/unlimitedplans_res_uscan.php.

iPhone. iPhone, *iPhone Plans*, https://iphone.nuvio.com/html/index.php?page=voice_plans.

ITP. ITP, *Products & Services*, http://www.itp4you.com/products_menu.aspx.

Lingo. Lingo, *Home Plans*, http://www.lingo.com/voip/residential/home_plans.jsp; Lingo, *Lingo Link Residential VoIP*, http://www.lingo.com/voip/residential/link_internet_phone_service.jsp; Lingo, *Lingo Small Talk Home VoIP*, http://www.lingo.com/voip/residential/basic_internet_phone_service.jsp.

MyPhoneCompany.com. MyPhoneCompany.com, *Home*, <http://www.myphonecompany.com/>.

Net2Phone. Net2Phone, *Net2Phone VoiceLine: Calling Plans & Rates*, <http://web.net2phone.com/consumer/voiceline/plans.asp>.

OPEX. OPEX, *OPEX Internet Voice*, <https://www.opexinternetvoice.com/secure/planoverview.asp?name=opexld&id=&membername=&cid=&planid=5>.

Packet8. Packet8, *Residential Plans*, <http://www.packet8.net/about/residential.asp>.

SunRocket. SunRocket, *SunRocket Service Plans*, <http://www.sunrocket.com/services/plans/>; Sun Rocket, *Limited Edition*, <http://www.sunrocket.com/services/plans/limited/>; SunRocket, *Annual Edition*, <http://www.sunrocket.com/services/plans/annual/>; SunRocket, *Monthly Edition*, <http://www.sunrocket.com/services/plans/limited/>; SunRocket, *International Service Plans*, <http://www.sunrocket.com/services/international/>.

USA Datanet. USA Datanet, *Product Information*, <http://www.usadatanet.com/broadband/productInfo.html>.

VelocityTel. VelocityTel, *Products*, <http://www.velocitytel.com/products.html>; VelocityTel, *Residential Basic 500*, <http://www.velocitytel.com/basic.html>

ViaTalk. ViaTalk, *Products: Broadband Phone Service*, http://viatalk.com/broadband_phone_service.htm; ViaTalk, *Broadband Phone Service – VT_500*, http://viatalk.com/broadband_phone_service_vt500.htm; ViaTalk, *Broadband Phone Service – VT_Unlimited*, http://viatalk.com/broadband_phone_service_vtunlimited.htm.

VoicePulse. VoicePulse, *Plans & Pricing*, <http://www.voicepulse.com/plans/default.aspx>.

Voiceral. Voiceral, *Home*, <http://www.voiceral.com/index.php>.

VOIP2SAVE.com. VOIP2SAVE.com, *Home*, <http://voip2save.com/>.

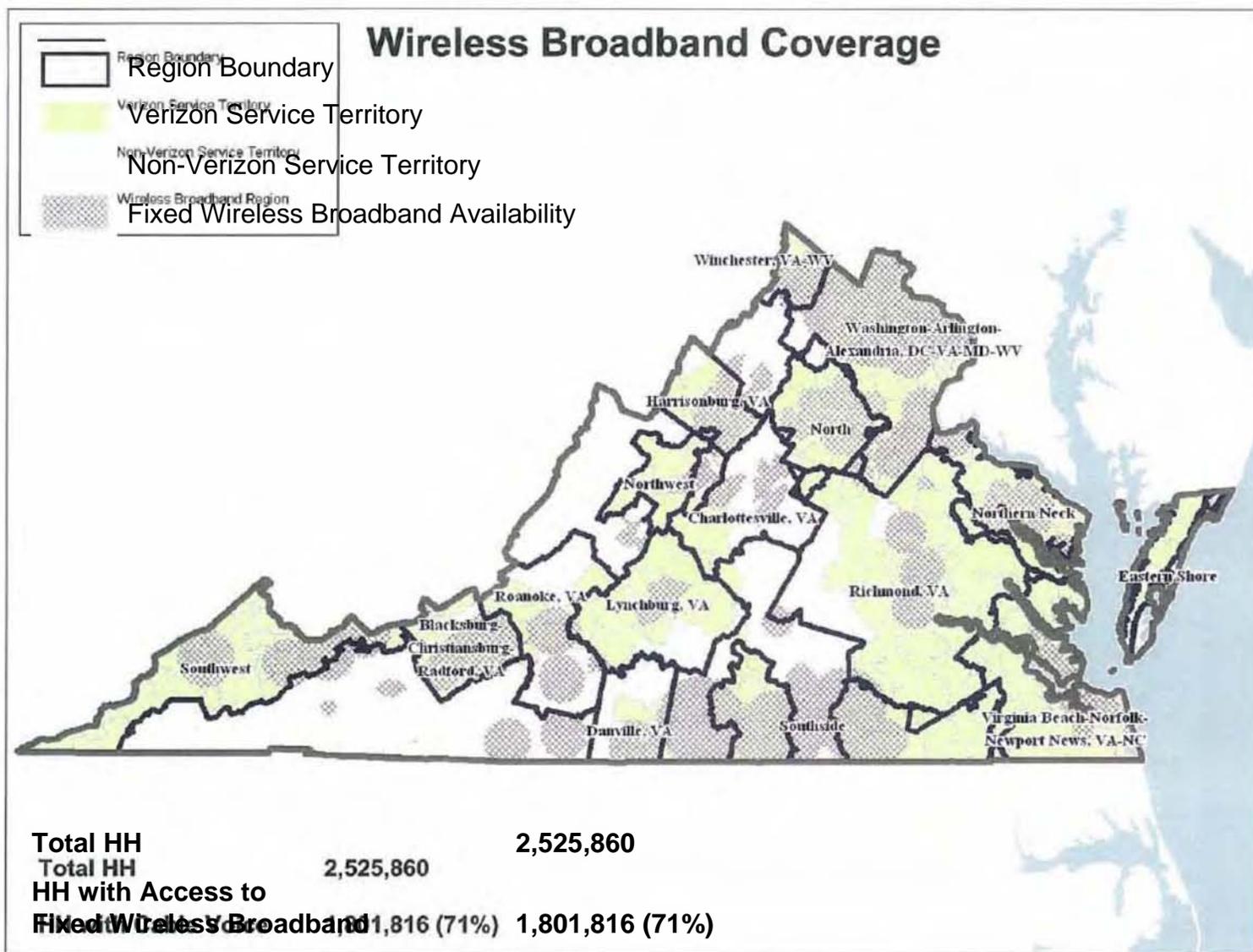
VoIP Your Life. VoIP Your Life, *Home*, <http://www.voipyourlife.com/>.

Vonage. Vonage, *Services*, http://www.vonage.com/services.php?lid=nav_services.

ZingoTel. ZingoTel, *Calling Plans: US & Canada*, <http://www.zingotel.com/online/en/voip-plans.php>.

EXHIBIT 9

Exhibit 9. Fixed Wireless Broadband Coverage



Source: Verizon study submitted in connection with *Application of Verizon Virginia Inc. and Verizon South Inc. for a Determination That Retail Services Are Competitive and Deregulating and Detariffing of the Same*, PUC-2007-00008 (VA SCC filed Jan. 17, 2007), available at http://scc.virginia.gov/division/puc/industry/vv_comp/rsc_app.htm.

EXHIBIT 10

Exhibit 10. Competitive Providers of Any-Distance Services to Enterprise Customers		
Provider	Areas Served in Verizon's Region	Any-Distance Services
AT&T	Albany, Baltimore, Boston, Buffalo, Camden, Dallas, Hartford, Los Angeles, Newark, New Haven, New York, Philadelphia, Pittsburgh, Providence, Richmond, Rochester, Seattle, Stamford, Tampa, Washington, DC, Worcester	"AT&T DS-1 Local Service includes: a full T1 that supports inbound and outbound local calling, as well as access to toll-free, long distance, and international service[.]"
Broadview	Albany, Boston, Buffalo, Newark, New York, Philadelphia, Syracuse, Westchester	"Using either a single Integrated T1 or Voice over DSL connection, Broadview Networks meets all your needs for local, regional, long distance and higher-speed Internet access in one cost-efficient package."
Cavalier	Baltimore, Delaware, Fredericksburg, Hampton Roads, Philadelphia, Richmond, Washington, DC	Cavalier offers "[u]nlimited local and long distance calling for a set price per month."
CTSI	Allentown, Harrisburg, Philadelphia, Reading, Scranton, York	"CTSI Business Line(s) – combined with unlimited local service for one flat rate – makes CTSI's Business Bundles the perfect choice for your business. Bundles save you time and money by packaging the services you need, making it simple for you and an optimal decision for your business."
Deltacom	Dallas, Newark, New York City, Philadelphia, Richmond, Tampa, Washington, DC	"Take the guesswork out of your voice services with Deltacom's Simpli-Voice product. Simpli-Voice combines all of your local and long distance needs into one low cost, easy to understand communication solution designed specifically for the small-to-medium sized business."
Global Crossing	Albany, Altoona, Baltimore, Boston, Buffalo, Dallas, Harrisburg, Hartford, Los Angeles, New York, Philadelphia, Pittsburgh, Poughkeepsie, Providence, Richmond, Rochester, Santa Barbara, Seattle, Syracuse, Washington, DC	"Talk to offices, customers, and business partners around the world with Global Crossing Outbound Service. Voice Service with a single rate and a single bill for international calls. (Local and national calling available too.)" "Business Line Service from Global Crossing provides advanced local calling service with features like call forwarding, call waiting, caller ID, and speed dial. This value-add service is only available bundled with other Global Crossing services."
InfoHighway	Available in Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia, Washington, DC	InfoHighway "offer[s] a variety of usage packages with all of our voice lines, including measured usage (usage is billed a la carte) and usage bundles with unlimited local, regional and long distance minutes."
One Communications	Connecticut, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, West Virginia	One Communications "offers a complete array of value-packed voice solutions from business lines, to Conversent long distance, to integrated services, and more. With Conversent voice solutions you receive all of your services on one bill[.]"

Exhibit 10. Competitive Providers of Any-Distance Services to Enterprise Customers		
Provider	Areas Served in Verizon's Region	Any-Distance Services
PAETEC	Albany, Baltimore, Boston, Buffalo, Connecticut, Long Island, Los Angeles, New Hampshire, New Jersey, New York City, Philadelphia, Pittsburgh, Poughkeepsie, Rhode Island, Rochester, Syracuse, Tampa, Washington, DC, Western Massachusetts	“PAETEC offers a full spectrum of traditional voice services, each predicated on our enormous industry experience and the world-class technology of our partners. We offer comprehensive Local, Long Distance, and Operator services[.]”
Qwest	Local service available in Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Virginia, Vermont, Washington, DC, West Virginia	<p>“Qwest Choice Business Prime offers your business a customized local calling package at one low, monthly rate. Your package includes your phone line, unlimited local calls and your choice of three features from a list of our most popular calling options.”</p> <p>“Qwest Choice Long Distance Plus” allows you to “[m]ake all the domestic long-distance calls you want for just 5 cents a minute.”</p> <p>“DS-1 will reduce overall expenses and control costs by combining data and voice applications over one circuit. DS-1 does all of this with flexible intrastate and interstate pricing plans.”</p> <p>“Qwest® OneFlex® Integrated Access provides a simple solution with a single circuit that combines both voice and data. . . . Local, long distance, international voice, fax and data services from one provider with all product components included on a single invoice.”</p>
Time Warner Telecom	Albany, Binghamton, Dallas, Los Angeles, New York, Northern New Jersey, Rochester, Santa Barbara, Seattle, Tampa	<p>TWT's “Switched & Transport Services [] include local and long distance calling solutions that use a carrier class switch to connect one calling party to the other[.]”</p> <p>“For medium-size business customers, VersiPak provides a single-vendor solution that combines your local voice, Internet, and long distance services onto one dedicated clear channel T-1.”</p>
US LEC	Baltimore, New York, Norfolk, Philadelphia, Pittsburgh, Richmond, Tampa, Washington, DC	US LEC provides “bundle[d] local and long distance services to maximize use of customers’ existing access facilities, and to provide a single, consolidated invoice for all calling. Long Distance network access is done over the same high-quality facilities used to connect to the local network or by ‘LD Only Access T-1.’”
XO	Allentown, Baltimore, Boston, Dallas, Harrisburg, Los Angeles, Newark, New York, Philadelphia, Pittsburgh, Reading, Richmond, Scranton, Seattle, Washington, DC	“XO provides a wide range of cost-efficient, dependable voice products for businesses of all sizes. From reliable local services to conferencing and advanced applications like Interactive Voice Response (IVR), XO has the products and services you need with the support you want[.]” including “[c]ost-effective in-state, out-of-state, international and toll-free calling.”

Sources

AT&T. New Paradigm Resources Group, Inc., *Competitive Carrier Report 2006*, Ch. 6 – AT&T at 5-9 (20th ed. 2006) (“*Competitive Carrier Report 2006*”) (markets with local voice networks); AT&T, *US Local T1*, http://www.business.att.com/service_fam_overview.jsp?repoint=ProductSub-Category&repointem=eb_us_local_t1_service&serv_port=eb_access_and_local_services&serv_fam=eb_us_local_t1_service&segment=ent_biz.

Broadview. Broadview Networks, *Business Service Coverage Area*, http://www.broadviewnet.com/Products_Services/Common/ServiceArea.asp?scenario=0; Broadview Networks, *Business Voice Services*, http://www.broadviewnet.com/Products_Services/Business/VoiceServices.asp?scenario=0.

Cavalier. Cavalier Telephone, *Cavalier Business Communications*, <http://www.cavtel.com/business/index.shtml#>; Cavalier Telephone, *Voice Solutions from Cavalier Business Communications*, http://www.cavtel.com/business/voice_solutions.shtml.

CTSI. CTSI, *Network*, http://www.ctsi.com/carrier/carrier_network.html; CTSI, *Bundles*, http://www.ctsi.com/business/bus_bundles.html.

Deltacom. Deltacom, *Fiber Optic Network*, http://www.deltacom.com/fiberoptic_network.asp; Deltacom, *Integrated Packages: Simpli-Voice*, http://www.deltacom.com/simpli_voice.asp.

Global Crossing. Global Crossing, *Global Crossing Interactive Map*, http://www.globalcrossing.com/html/map05_11_05.html; Global Crossing, *Global Crossing Outbound Service*, http://www.globalcrossing.com/enterprise/outbound/outbound_landing.aspx; Global Crossing, *Business Line Services*, http://www.globalcrossing.com/enterprise/business_line_svc/business_line_service_landing.aspx.

InfoHighway. InfoHighway, *Local Phone Service*, http://www.infohighway.com/Local_Phone.html; InfoHighway, *Long Distance*, http://www.infohighway.com/Long_Distance.html; InfoHighway, *Business Lines & Trunks*, http://www.infohighway.com/Business_Lines.html.

One Communications. One Communications, *Where We Are*, http://onecommunications.com/where-we-are/one-your-local-clec.aspx?TierSlicer1_mtid=14&TierSlicer1_mtt=4&TierSlicer1_mid=8; One Communications (Conversent Subsidiary), *Conversent Voice Solutions*, <http://www.conversent.com/website/products/index.asp?prodId=1&pId=1&type=voice&page=prod>.

PAETEC. PAETEC, *Markets Served*, http://www.paetec.com/2_1/2_1_5__2.html; PAETEC, *Voice Services: Overview*, http://www.paetec.com/1_1/1_1_1__1.html.

Qwest. Qwest, *Choose Your State*, <http://pcat.qwest.com/pcat/profile.do?salesChannel=SmallBusiness>; Qwest, *Qwest Choice Business Prime*, <http://pcat.qwest.com/pcat/productDetail.do?salesChannel=SmallBusiness&offerId=6743>; Qwest, *Qwest Choice Long Distance Plus*, <http://pcat.qwest.com/pcat/productDetail.do?salesChannel=SmallBusiness&offerId=6685>; Qwest, *DS1*, <http://pcat.qwest.com/pcat/productDetail.do?salesChannel=SmallBusiness&offerId=6433>; Qwest, *VoIP OneFlex Integrated Access*, http://www.qwest.com/largebusiness/enterprisesolutions/downloads/voip/oneflexintegratedaccess_po_051106.pdf.

Time Warner Telecom. Time Warner Telecom, *Long Distance Services Brochure*, <http://www.twtelecom.com/Documents/Resources/PDF/MarketingCollateral/1301LD.pdf>; Time Warner Telecom, *Business Switched Services Brochure*, <http://www.twtelecom.com/Documents/Resources/PDF/MarketingCollateral/1601BusSw.pdf>; Time Warner Telecom, *Customer Solutions: By Application*, http://www.twtelecom.com/cust_solutions/application.html; Time Warner Telecom, *Capabilities Brochure*, <http://www.twtelecom.com/Documents/Resources/PDF/MarketingCollateral/1001General.pdf>.

US LEC. US LEC, *Eastern United States Network Map*, <http://www.uslec.com/core-networks-map.aspx>; US LEC, *Long Distance*, <http://www.uslec.com/long-distance-voice.aspx>.

XO. XO, *Voice Assets: XO Communications*, http://www.xo.com/about/network/maps/voice_large.html; XO, *XO Voice Services*, <http://www.xo.com/products/smallgrowing/voice/>.

EXHIBIT 11

Exhibit 11. Cable Voice Offerings to Business Customers	
Cablevision	<p>Provides “local, regional and long distance calling . . . for one low, fixed per-line monthly rate; a rate that could save you as much as 60 percent per month, or more.”</p> <p>“Optimum Lightpath’s Internet/Voice Bundle gives your business Internet access, as well as the ability to make and receive voice calls, over a dedicated Ethernet connection . . . [and includes] flat-rate voice service for a specified number of minutes per month (local, regional and U.S. domestic long distance), with no additional charges for voice facilities.”</p> <p>“Optimum Lightpath is able to reliably provide scalable, high-capacity IP-based Metro Ethernet services that support high bandwidth data, Internet and voice applications and optimize the enterprise customer’s quality of experience – at lower prices than traditional offerings.”</p>
Charter	Offers “[b]usiness lines for small businesses with a choice of affordable long distances and popular calling features such as Caller ID, Call Waiting, 3 Way Calling, Speed Dial 30, Call Forwarding, Voice mail and many more.”
Comcast	<p>“Started offering commercial voice to SMBs (small and medium businesses; with 20 or less employees) in late 2006.”</p> <p>Business services are a “natural extension of [Comcast’s] network and services” including “[d]ata, [v]oice and [v]ideo.”</p>
Cox	<p>“Cox Digital Telephone is a business-grade local phone service designed to help you manage the full range of voice needs for your business, with flexible packaging options, a complete array of calling features, and optional Cox Voice Mail services.”</p> <p>“In Cox’s circuit switch markets, 55% of new commercial data customers also take the company’s voice product.”</p> <p>With Cox Business Services, “your business can enjoy the savings and convenience of getting your local and long distance service from one company, with one bill and one point of contact.”</p> <p>Cox “serves businesses of every size.”</p>
Time Warner	“In 2007, we will launch Time Warner Cable’s Business Class Phone, an offering directed towards small to medium sized businesses.”
RCN	<p>“We offer the following services to our [business] customers: Local Origination, Local Termination, Facilities Based Local Services, Long Distance, 800# Service, [and] Audio Conferencing.”</p> <p>RCN offers small businesses “unlimited calling anywhere in the continental United States and Canada for one monthly low price.”</p> <p>RCN will “help you find the right telephone solution to meet your business needs.”</p> <p>RCN’s services are “delivered over a fast and powerful platform designed to support Wholesale Telecommunications, Enterprise and Government requirements.”</p>

Sources

Cablevision. Cablevision, *Optimum Voice for Business: Advantages*, <http://www.optimum.com/business/ov/advantages.jsp>; Optimum Lightpath, *Internet/Voice Bundle*, <http://www.optimumlightpath.com/Interior210.html>; Optimum Lightpath Press Release, *Optimum Lightpath Connects 2,000th Fiber-Lit Building* (Jan. 9, 2007).

Charter. Charter Business, *Charter Business Telephone*, <http://www.charter-business.com/Charter+Business+Telephone+service+voice+services+voip+telephony.aspx>.

Comcast. J. Bazinet, *et al.*, Citigroup, *CMCSK: Key Takeaways from Comcast's Presentation at EMT 2007* at 3 (Jan. 9, 2007); Comcast Presentation to Citigroup Entertainment Media & Telecommunications Conference (Jan 9, 2007), available at: <http://library.corporate-ir.net/library/11/118/118591/items/226374/CitigroupJan2007FinalNoNotes-Thomson.pdf>.

Cox. Cox Business Services, *Voice Products & Services*, http://www.coxbusiness.com/systems/ri_rhodeisland/; J. Reif-Cohen, *et al.*, Merrill Lynch, *2007 – The Year Ahead: Momentum Driving Valuations* at 6 (Jan. 19, 2007); Cox Business Services, *Cox Digital Telephone and Voice Mail*, <http://www.coxbusiness.com/products/voice/digitaltelephone.html>.

Time Warner. Thomson StreetEvents, *TWX – Q4 2006 Time Warner Inc. Earnings Conference Call*, Conference Call Transcript at 4 (Jan. 31, 2007) (statement of Time Warner Inc. Chairman & CEO, Dick Parsons).

RCN. RCN Business Solutions, *Network Services*, http://www.rcnbusinesssolutions.com/services/network_services/index.php; RCN, *Small Business: Phone Services*, <http://www.rcn.com/smallbusiness/phone.php>; RCN Business Solutions, *About Us*, <http://www.rcnbusinesssolutions.com/about/index.php>.



Advantages

Available only to Optimum Online business customers, **Optimum Voice** gives you unlimited local, regional and long distance calling within the United States, Canada and Puerto Rico plus premium calling features for one low, fixed per-line monthly rate; a rate that could save you as much as 60 percent per month, or more.

- **Rated #1 by the readers of PC Magazine for sound quality and connection reliability**
- Keep your current business phone number
- Unlimited calls within the U.S., Canada and Puerto Rico
- One low monthly rate
- Online call and feature management
- Enhanced 911 (E911) service
- 13 business calling features at no extra cost, including Three-Way Conferencing, Find Me and more
- Up to 8 separate business lines available
- Up to four separate business lines
- 24/7 customer service line exclusively for business
- **Backed by our 30-day money-back guarantee**

If you need more information, [contact a sales representative](#) or call **1-800-613-9857** .



[Click here](#) to speak with an Optimum Expert now! Or, call us at **1-800-613-9857** .

If you need more information, [contact a sales representative](#) or call **1-800-613-9857** .

Add-ons

Low-Cost International Calling Plans



Calling plans to international locations are also available at highly competitive rates that can save your business up to 25% over the phone company.

[Learn More](#) ▶

Professional Business Installation

- Installation is fast and easy with little or no downtime for your business
- Use your own current phone and computers - we provide the rest
- Modems are free to use for as long as you use Optimum®
- A battery backup is provided in case of local power outage

Call **1-800-613-9857** for details or [contact a sales representative](#).

© Copyright CSC Holdings Inc.

[About Cablevision](#)
[Terms of Service](#)
[Site Index](#)

[Terms of Use](#)
[Contact Us](#)
[Careers](#)

[Other Optimum Sites](#)
[Your Privacy](#)



Intelligent Transport Solutions

[Managed Service Solutions](#)

[Business Continuity Solutions](#)

[Customized Solutions](#)

News & Events

> **Jan 09, 2007** Optimum Lightpath Connects 2,000th Fiber-Lit Building

[>Read More](#)

> **Nov 09, 2006** Town Of Greenwich Speeds Up Municipal Network With Metro Ethernet From Optimum Lightpath

[>Read More](#)

[MORE NEWS](#)

Internet/Voice Bundle

[Products & Services > Intelligent Transport Solutions](#)

Description

Optimum Lightpath's Internet/Voice Bundle gives your business Internet access, as well as the ability to make and receive voice calls, over a dedicated Ethernet connection. It delivers cost-effective, high-bandwidth Internet connectivity at a variety of speeds, plus flat-rate voice service for a specified number of minutes per month (local, regional and U.S. domestic long distance), with no additional charges for voice facilities.

Optimum Lightpath's Internet/Voice Bundle brings new simplicity and cost stability to voice communications. It lets you benefit from a secure voice network that utilizes a time-tested switching architecture without worrying about separate per-line charges or charges for local, regional and U.S. domestic long distance. Instead, you simply purchase the level of voice usage per month that makes sense for your business. And Optimum Lightpath's Internet/Voice Bundle works with your existing customer premise equipment. You'll also save up to 50% as compared with traditional Internet and voice services. Depending upon your selected port speed, up to three usage packages are available (50,000, 100,000 or 250,000 minutes).

- [E-Line](#)
- [V-Line](#)
- [E-LAN](#)
- [Dedicated Internet](#)
- [Internet/Voice Bundle](#)
 - [Bundle Pricing](#)
- [Remote Connectivity](#)



[>Back to top](#)

Features

Optimum Lightpath's Internet/Voice Bundle offers businesses the following features:

- Six bandwidth options—10, 20, 50, 100, 150 and 300 Mbps—at a price point well below traditional DS-3 and OCn connections
- 25 email accounts
- 25 MB of Web space
- IP allocation
- DNS
- Managed security solutions are also available (VPN, firewall)

Benefits and Applications

Optimum Lightpath's Internet/Voice Bundle offers businesses the following advantages:

- A single, standards-compliant platform that can support all your business communications
- Easy installation and rapid provisioning
- Flexibility to tailor bandwidth requirements

- A variety of transport speeds
- Scalability

Optimum Lightpath's Internet/Voice Bundle also includes the added security, reliability and network availability of Optimum Lightpath Ethernet Service. The following array of attributes distinguishes Optimum Lightpath's Ethernet from all other Ethernet-based services:

- The Optimum Lightpath optical network, designed with redundant optics and fiber throughout its core, distribution and access layers
- 24x7x365 network monitoring
- 99.99% network availability
- SONET-like, carrier class recovery rate of <50 ms
- Battery backup
- Four-hour mean-time-to-repair
- Service level commitments

[>Back to top](#)

Find out more

To learn more about how Optimum Lightpath's Internet/Voice Bundle can help you save significantly on both Internet and voice service, call 1-877-LIGHTPATH.

[About Us](#) [Products & Services](#) [Industry Solutions](#) [Customer Service](#) [Network](#) [Contact Us](#) [Other Optimum Sites](#) [Home](#)

Copyright © 2007 Cablevision Systems Corp

[Site Map](#) | [Privacy Policy](#) | [Terms and Conditions](#)



News & Events

Optimum Lightpath Connects 2,000th Fiber-Lit Building

Mack-Cali Building in Suburban New Jersey is Latest to Benefit from Reliable, Facilities-Based Fiber Connectivity

JERICHO, NY, January 9, 2007 – Optimum Lightpath, the next-generation business broadband service provider of Cablevision Systems Corporation (NYSE: CVC), today announced that its network is now connected to 2,000 fiber-lit buildings in the New York metropolitan area. Optimum Lightpath achieved this milestone with the "lighting" of a Mack-Cali Realty Corporation (NYSE:CLI) building in Woodcliff Lake, New Jersey.

"One of Mack-Cali's objectives is to provide our tenants with the capacity, bandwidth and speed of fiber connectivity," commented Christopher DeLorenzo, vice president of leasing, Mack-Cali Realty Corporation. "Adding Optimum Lightpath's all-fiber network to this building allows us to accomplish this objective."

The Optimum Lightpath network now comprises more than 2,500 route miles of fiber optic cable (nearly 128,000 miles of actual fiber) within the New York metropolitan area, encompassing New York City, and the suburban areas of Long Island, Westchester County, Northern New Jersey and Southern Connecticut.

"Optimum Lightpath's success in surpassing this milestone is a direct result of the strong demand by medium-sized and larger businesses for full fiber optic connectivity, and the Mack-Cali building is the latest example of the advantages of the technology we can provide," said Dave Pistacchio, executive vice president and general manager, Optimum Lightpath. "Our business strategy is to bring Metro Ethernet services to businesses wherever they're located, and this full-market approach has fueled Optimum Lightpath's strong growth in each of the last two years."

For Optimum Lightpath, the significance of lighting 2,000 buildings is underscored by the fact that fully fiber optic connections are not generally available to the large number of businesses and branch offices in suburban areas. According to Vertical Systems Group, a networking industry market research firm, direct "local loop" fiber connectivity to commercial buildings with more than twenty employees nationwide has been measured at 11.7 percent. However, Optimum Lightpath is changing that imbalance by utilizing its state-of-the-art, all-digital optical network to bring the benefits of fiber optic connectivity to businesses located outside Manhattan.

Metro Ethernet simply and effectively provides organizations with the ability to link multiple locations, run bandwidth-intensive applications and converge multiple types of content over a single network. As a result, this emerging communications technology has the potential to transform how businesses operate and compete in today's economy.

Businesses interested in learning more about Optimum Lightpath's Metro Ethernet services can visit <http://www.metroethernetnow.com> or call 1-877-LIGHTPATH.

About Optimum Lightpath

Optimum Lightpath, a business telecommunications services division of Cablevision Systems Corporation, uses the power of its reliable and resilient fully fiber optic network to deliver converged data, Internet and voice solutions to businesses throughout the New York metropolitan area. Since its formation 18 years ago, Optimum Lightpath built an advanced fiber-to-the-business-premises network extending more than 2,500 route miles throughout the tri-state area. As a result of owning and maintaining this state-of-the-art network, Optimum Lightpath is able to reliably provide scalable, high-capacity IP-based Metro Ethernet services that support high bandwidth data, Internet and voice applications and optimize the enterprise customer's quality of experience – at lower prices than traditional offerings.

Optimum Lightpath has been recognized for eight straight years by the New York State Public Service Commission for delivering highly personalized customer service superior to the competition. Winner of the Metro Ethernet Forum's 2006 Service Provider of the Year Award for Outstanding Innovation, Optimum Lightpath became one of the first service providers in the world and the only North American MSO to earn Carrier Ethernet certification from the Metro Ethernet Forum in April 2006. For more information, visit www.optimumlightpath.com.

About Cablevision

Cablevision Systems Corporation is one of the nation's leading entertainment and telecommunications companies. Its cable television operations serve more than 3 million households in the New York metropolitan area. The company's advanced telecommunications offerings include its iO: Interactive Optimum digital television, Optimum Online high-speed Internet, Optimum Voice digital voice-over-cable, and its Optimum Lightpath integrated business communications services. Cablevision's Rainbow Media Holdings LLC operates several successful programming businesses, including AMC, IFC, WE tv and other national and regional networks. In addition to its telecommunications and programming businesses, Cablevision owns Madison Square Garden and its sports teams, the New York Knicks, Rangers and Liberty. The company also operates New York's famed Radio City Music Hall, and owns and operates Clearview Cinemas.

CLOSE WINDOW



**Citigroup
Entertainment, Media & Telecommunications
Conference**

January 9, 2007

Business Services

A New Growth Opportunity

- **Significant Opportunity in Our Footprint**
 - Total Business Market⁽¹⁾ :\$25 Bn
 - Our Target: SMB⁽¹⁾: \$12-\$15 Bn⁽²⁾; 5MM Businesses
- **Natural Extension of our Network and Services**
 - Data, Voice and Video
- **Credible Alternative to ILECs**
 - Targeting Underserved Market Segment
 - Cable Industry: Preferred Provider
 - Comcast Ranks #1 in SMB Internet Access⁽³⁾
- **Proven Business Model with Strong Returns**

(1) Estimate of 2006 revenue and businesses

(2) Excludes Cellular Backhaul

(3) Yankee Group 2005 SMB Communications, Broadband and VoIP Survey





Products & Services

Solutions By Industry

Product Inquiry

Customer Support

Contact Us | Sitemap | Home |

GO +

Charter Business Bundle™

Charter Business™ Telephone

- Local Packages
- Long Distance Packages
- Features

CB High-Speed Internet

CB Data Networking

Charter Business™ Video

Charter Business™ Music



Home > Products & Services > Charter Business™ Telephone

Charter Business™ Telephone

Now there's a new choice for local telephone service with the right features at the right price

Products & Services:

Choose an Option

Enter zip code for service area:

GO +

Solutions by Industry:

Choose an Option

Customer Support:

Choose an Option

The Features and Functionality you need: Business lines for small businesses with a choice of affordable long distances and popular calling features such as Caller ID, Call Waiting, 3 Way Calling, Speed Dial 30, Call Forwarding, Voice mail and many more!

Easy to switch, easy to save: Keep your same phone number. Plus ask how you can save with the Charter Business Bundle™ when you combine telephone with internet and/or video service.

[Click here](#) to contact a Charter Business Account Executive and get pricing.

Charter Business™ Telephone

LOCAL PACKAGES

[For details click here.](#)

LONG DISTANCE PACKAGES

[For details click here.](#)

FEATURES

[For details click here.](#)



Privacy Policy | AUP and Terms of Service | Contact Us | About Us | News Releases | TMS

Copyright© 2005 Charter Business™ All rights reserved



[» My Account](#) [» Customer Support](#)

- SMALL BUSINESS
- MEDIUM BUSINESS
- LARGE BUSINESS
- SPECIFIC INDUSTRIES
- PRODUCTS & SERVICES

Home > Market Locator > RI - Rhode Island

RHODE ISLAND

Contact Sales:
1-866-456-9944

[» E-mail](#)

Products Available in Your Area:

[» View Map](#)



ZIP Code [» Go](#)

One local provider delivering more efficiency, value and support than you thought possible.

As your full-service, facilities-based provider of advanced communications solutions, Cox Business Services provides you with more of what you need to succeed.

Choosing any of the services we provide can help your business **operate more efficiently**. Choosing a bundled package of Cox services gives you even greater **value and convenience**. With one point of contact, one consolidated bill, and one dedicated service team handling all your communications, you'll experience the kind of **service and support** that sets Cox Business Services apart from other communications providers. And because we own, maintain and monitor one of the nation's largest fiber-optic networks, and are backed by one of the nation's leading communications companies, you can count on Cox.

Cox serves businesses of every size in many locations throughout the Rhode Island area. To contact our local office call us at 401-383-6100.



[» View Case Studies](#)

MORE

RECOGNITION

[» Click Here for Details](#)

VOICE PRODUCTS

Cox Digital Telephone® and Voice Mail

Cox Centrex Telephone

Cox Digital Trunk

Cox Long Distance and Toll Free

Cox Dedicated Long Distance and Toll Free

Cox Private Line

DATA PRODUCTS

Cox Business InternetSM

Cox Optical InternetSM

Cox Web Hosting and Packages

Private Line

Cox Transparent LAN

Cox Virtual Private

THE BEST OF BOTH WORLDS

COX CUSTOMERS CLICK TO SAVE

PHONE CUSTOMERS

INTERNET CUSTOMERS

BUNDLE AND SAVE

[» Click here for details](#)

VOICE PRODUCTS & SERVICES:

[» Contact Sales](#)

<p>Cox Digital Telephone® and Voice Mail</p>	<p>Cox Digital Telephone® is a business-grade local phone service designed to help you manage the full range of voice needs for your business, with flexible packaging options, a complete array of calling features, and optional Cox Voice Mail services.</p> <p style="text-align: right;">» View Details Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●●●●●</p> <p>Medium ●●●●●</p> <p>Large ●●●●●</p>
<p>Cox Centrex Telephone</p>	<p>Cox Centrex is a feature-rich, expandable telephone service that is ideal for businesses whose needs are changing and whose budgets require minimal upfront investment.</p>	<p>Relevance by business size</p> <p>Small ●●●●●</p> <p>Medium ●●●●○</p> <p>Large ●●●●○</p>

<p>Network</p> <p>VIDEO PRODUCTS</p> <p>Cox Business Video</p> <p>OTHER PRODUCTS</p> <p>Cox Carrier Access Service</p> <p>Cox Enterprise Connectivity</p> <p>Cox SmartBill®</p> <p>CoxSmart Commercial Building Program</p> <p>Additional Resources</p> <p>>> Refer a Business for \$100!</p> <p>>> Referral Agent Program</p> <p>>> Voice Mail Security Tip</p> <p>>> Cox Business Internet User Guide</p> <p>>> Cox Digital Telephone User Guide</p> <p>>> Cox Voice Mail User Guide</p> <p>>> Centrex User Guide</p> <p>>> Critical Security</p>		<p>Basic Centrex Package Designed for nearly all office telephony needs.</p> <p>Attendant Centrex Package Designed for receptionists, executive assistants or small call centers.</p> <p>Call Center Centrex Package Designed for call center employees.</p> <p>A La Carte Features Designed for any Centrex package.</p> <p>>> View Details Product Data Sheet</p>	
	<p>Cox Digital Trunk</p>	<p>Cox Digital Trunk service provides reliable digital-quality voice transmission while securely connecting your business's PBX directly to the public switched telephone network.</p> <p>>> View Details Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●○○○○</p> <p>Medium ●●○○○</p> <p>Large ●●●●●</p>
	<p>Cox Long Distance and Toll Free</p>	<p>Cox Long Distance and Toll Free services provide your business clear connections with convenient options and cost-effective plans to meet your long distance needs and budget.</p> <p>>> View Details Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●●●●●</p> <p>Medium ●●●○○</p> <p>Large ●●●○○</p>
	<p>Cox Dedicated Long Distance and Toll Free</p>	<p>Cox Dedicated Long Distance and Dedicated Toll Free services provide your business with clear, high-quality phone communications with all the benefits of dedicated access, including lower rates, less call blocking and plenty of call capacity.</p> <p>>> View Details Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●○○○○</p> <p>Medium ●●●○○</p> <p>Large ●●●●●</p>
	<p>Cox Private LineSM</p>	<p>Cox Private LineSM service is a SONET-based, point-to-point private line network service that provides a clear, reliable high-speed connection for stand-alone or integrated voice, data, and video communications between locations.</p> <p>>> View Details Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●○○○○</p> <p>Medium ●●●○○</p> <p>Large ●●●●●</p>

DATA PRODUCTS & SERVICES:

>> [Contact Sales](#)

<p>Cox Business InternetSM</p>	<p>Cox Business InternetSM is a cost-effective and reliable broadband data solution that provides scalable, flexible options designed to meet the specific demands of your business.</p> <p>3.0Mbps ↓ 1.0Mbps ↑ 6.0Mbps ↓ 2.0Mbps ↑ 15.0Mbps ↓ 2.0Mbps ↑</p> <p>Home Office</p>	<p>Relevance by business size</p> <p>Small ●●●●●</p> <p>Medium ●●●○○</p> <p>Large ●○○○○</p>
--	--	---

	<p>5.0Mbps ↓ 2.0Mbps ↑</p> <p>Home Office Premier 15.0Mbps ↓ 2.0Mbps ↑</p> <p>>> View Details  Product Data Sheet</p> <p>>> Frequently Asked Questions</p>	
Cox Optical InternetSM	<p>Cox Optical InternetSM is the reliable and scalable high-speed Internet service that gives your business dedicated access to our network with flexible tiered bandwidth options scalable to OC-12 or higher.*</p> <p>>> View Details  Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●○○○○</p> <p>Medium ●●○○○</p> <p>Large ●●●●●</p>
Cox Web Hosting and Packages	<p>Cox Web Hosting and Cox Web Hosting Packages allow your business to establish and maintain a professional and functional Web presence that is cost-effective and easily upgradable.</p> <p>>> View Details  Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●●●●●</p> <p>Medium ●●●●●</p> <p>Large ●○○○○</p>
Cox Private LineSM	<p>Cox Private LineSM service is a SONET-based, point-to-point private line network service that provides a clear, reliable high-speed connection for stand-alone or integrated voice, data, and video communications between locations.</p> <p>>> View Details  Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●○○○○</p> <p>Medium ●●○○○</p> <p>Large ●●●●●</p>
Cox Transparent LAN	<p>Cox Transparent LAN Service (TLS) will interconnect your LANs over our all-optical metro networks, giving your enterprise point-to-point connections between remote sites in a framework that's scalable, cost-effective and reliable.</p> <p>>> View Details  Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●○○○○</p> <p>Medium ●●○○○</p> <p>Large ●●●●●</p>
Cox Virtual Private Network	<p>Cox Virtual Private Network service is a fully managed, turnkey solution that gives employees in any location fast, secure access to your network and connects remote offices to a central network.</p> <p>>> View Details  Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●○○○○</p> <p>Medium ●●○○○</p> <p>Large ●●●●●</p>

 VIDEO PRODUCTS & SERVICES:

>> [Contact Sales](#)

Cox Business Video	<p>Cox Business Video service provides more than 100 channels of consistent, crystal clear digital cable television and Music Choice options for businesses of all types and sizes.</p> <p>>> View Details  Product Data Sheet Channel Lineups</p>	<p>Relevance by business size</p> <p>Small ●●●○○</p> <p>Medium ●●●○○</p> <p>Large ●●●○○</p>
---------------------------	---	---

 OTHER PRODUCTS & SERVICES:

>> [Contact Sales](#)

Cox Carrier Access	<p>Cox Carrier Access service is the ideal solution for</p>	<p>Relevance by business size</p>
---------------------------	---	-----------------------------------

<p>Service</p>	<p>secure and reliable connections to your stand-alone or integrated voice and data customers.</p> <p>>> View Details  Product Data Sheet</p>	<p>Small ●○○○○○</p> <p>Medium ●●○○○○</p> <p>Large ●●●○○○</p>
<p>Cox Enterprise Connectivity</p>	<p>Cox Enterprise Connectivity is a robust, efficient and cost-effective communications solution for enterprises seeking to connect remote workers, customers and suppliers across the country.</p> <p>>> View Details  Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●○○○○○</p> <p>Medium ●●○○○○</p> <p>Large ●●●○○○</p>
<p>Cox SmartBill®</p>	<p>Cox SmartBill® is an invoice analysis tool that conveniently tracks the details of your company's telecommunications usage.</p> <p>>> View Details  Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●●○○○○</p> <p>Medium ●●●○○○</p> <p>Large ●●●○○○</p>
<p>CoxSmart Commercial Building Program</p>	<p>If you're a commercial builder, developer or property manager, you can't get more advanced technology than in a CoxSmart Commercial Building. To find out how our robust communications network gives you a clear advantage in the marketplace, click here:</p> <p>>> View Details  Product Data Sheet</p>	<p>Relevance by business size</p> <p>Small ●●○○○○</p> <p>Medium ●●●○○○</p> <p>Large ●●●○○○</p>

*Services and features not available in all areas. Other restrictions may apply. ©2005 Cox Communications, Inc. All rights reserved.

[About Us](#)
 [Site Map](#)
 [Contact Us](#)
 [Privacy Policy](#)
 [Acceptable Use Policy](#)
 [Residential Services](#)
 ©2006 Cox Communications, Inc. All rights reserved. Service not available in all areas.



[» My Account](#) [» Customer Support](#)

SMALL BUSINESS MEDIUM BUSINESS LARGE BUSINESS SPECIFIC INDUSTRIES PRODUCTS & SERVICES

Voice Products Data Products Video Products Other Products

Home > Products & Services > Voice Products > Cox Digital Telephone and Voice Mail

COX DIGITAL TELEPHONE AND VOICE MAIL

Contact Sales:
1-866-456-9944

[» E-mail](#)

Cox Digital Telephone® is a business-grade local phone service designed to manage the full range of voice needs for your business.

Products Available in Your Area:

[» View Map](#)



ZIP Code [» Go](#)

With Cox Digital Telephone, you get flexible packaging options, a complete array of calling features, and optional Cox Voice Mail services. And your business can enjoy the savings and convenience of getting your local and long distance service from one company, with one bill and one point of contact.

[» Click here](#) to check basic pricing information for Cox Digital Telephone and Cox Long Distance services.

[» View Data Sheet](#)

[» Check here for the availability of this and other Cox products in your area.](#)

Cox Digital Telephone Feature Packages

Choose the package that works best for your business:

Business Value Package	Business ID Package	Business Solutions Package
Call Forwarding Three-Way Calling Call Waiting Speed Calling 30 Busy Line Redial Call Transfer*	Call Forwarding Three-Way Calling Call Waiting Speed Calling 30 Busy Line Redial Caller ID Call Transfer*	Call Forwarding Three-Way Calling Call Waiting Speed Calling 30 Busy Line Redial Caller ID Call Return Selective Call Acceptance Selective Call Forwarding Selective Call Rejection Call Forwarding Busy Call Forwarding No Answer Call Forwarding on Call Waiting

*Feature not available in all areas.

Cox Digital Telephone A La Carte Features

Choose from this list of features for even greater flexibility and customization:

Business Value Package	Business ID Package	Business Solutions Package
900/976 Blocking ¹ Anonymous Caller Restriction ¹ Blocking Directory Assistance Calls Blocking Operator Assisted Calls Busy Line Redial Per Use Busy Line Redial Unlimited Call Forwarding Call Forwarding Busy	Call Forwarding of Call Waiting Call Return Call Trace Call Waiting Call Waiting ID Distinctive Ring Distinctive Ring Fax International LD Blocking Line Number Block Per Call ¹ Line Number Block Per Line ¹	Remote Call Forwarding (RCF) Remote Access to Call Forwarding Remote Call Forwarding Additional Path Priority Ring Selective Call Acceptance Selective Call Forwarding Selective Call Rejection Three-Way Calling Toll Free Blocking

Call Forwarding No Answer Call Forwarding Remote Access		
---	--	--

¹These features included at no charge

Standard Cox Voice Mail Features

Cox Voice Mail keeps your business running at maximum efficiency with a complete package of features that are simple to set up and easy to use:

Feature	Function
Automatic Call Back	Allows you to reply to your voice mail message with one call to your voice mailbox.
Extended Absence Greeting Unskippable	Creates a message that your callers can't bypass before they leave you a voice mail.
Future Delivery	Enables you to create up to 3 voice mails for delivery up to 15 days in the future.
Greeting Options	Two options are included. The Multiple Greeting option enables you to record up to five different greetings depending on the dialed number. And the Time Dependent Greeting option allows you to have different greetings for weekdays and weekends.
Group Lists	Create up to 15 group lists with 25 numbers each and send messages simultaneously to every member within your voice mail system.
Message Forwarding/Sending	Allows you to forward or send a voice mail to another mailbox within the system.
Message Recovery	Lets you recover deleted messages before you exit the voice mailbox.
Message Redirect	Allows you to forward a message to another mailbox or group list.
Message Replay	This feature has quick keys that save time by replaying messages with the press of a button.
Message Time/Date Stamp	Keeps you informed of the day and time of each call.
Personal Operator	Provides the call with the option to leave a message, or to touch "0" and be redirected to a predetermined number.
Prompts for Unplayed Messages	This prompt reminds you of any unplayed messages each time you enter your voice mailbox.

Optional Cox Voice Mail Features

Choose from several optional Voice Mail features to further enhance your Cox Telephone service:

Optional Feature	Function
Automatic Message Forwarding	Lets you forward messages received in your

	mailbox to another mailbox or phone number.
Customized Bulletin Board Applications	Allows you to provide information about your business, such as hours of operation, directions, fax numbers, website address, etc.
Fax Administration	Enables you to receive voice mail and faxes in the same mailbox. You choose to automatically or manually direct faxes to print at a primary or secondary line location.
Message Notification to Pager, Telephone or Cellular Device	Alerts you to new voicemail messages.
Urgent Notification Only	Allows you to limit notification messages to only those marked "Urgent."

How your business benefits from Cox Digital Telephone:

- **More flexibility.** With a choice of packages and calling features, you can customize your service to ensure you have exactly the tools you need, including DID/DOD and POTs, Centrex service with integrated voice and fax mail capabilities, and much more.
- **Seamless integration.** Cox Digital Telephone integrates easily with your current telephone equipment, from standard desktop phones to large PBXs. Or add Centrex for self-managed telephone service.
- **Easy switchover.** You can keep your current numbers as well as your equipment to make switching easy and hassle-free.
- **Cost-effectiveness.** Choose only the services you need and the features you want with our competitive and simply priced plans and options — plus, save up to 20% compared to the local incumbent.*
- **Easy upgrading.** Add capacity with such options as Cox DS-1 Digital Trunk for a T-1 connection or Cox PRI Digital Trunk service for ISDN clear channel connectivity. Or you can choose from our higher-capacity options to ensure your business will always have the capacity it needs.
- **Dependable transmission.** Our network protects against communications failure through fully redundant architecture and battery and generator backup. Plus we monitor our networks around the clock to prevent problems before they occur.
- **Crystal-clear connections.** Quality digital transmission means quality digital sound for all your critical voice communications.
- **Added services.** Get just what you need, from voice mail, long distance, toll free, directory assistance, and more.
- **More convenience.** Add Cox Business InternetSM to your communications, and enjoy the added convenience and efficiency of one bill from one provider and one local team meeting all your business communications needs.

How your business benefits from Cox Voice Mail:

- **Quick and simple.** Access your voice mail quickly in the office or on the road.
- **Easy to use.** User-friendly functionality saves you valuable time.
- **Dependable.** Cox's service is reliable so you won't have to worry about a saved message getting lost or not receiving that important message.

*Services and features not available in all areas. Up to 20% savings based on Cox's basic business lines with a Cox term agreement as compared to the incumbent provider's basic month-to-month rate. Other restrictions may apply. Telephone services provided by Cox Telcom, LLC. ©2005 Cox Communications, Inc. All rights reserved. Other restrictions may apply.

[About Us](#)

[Site Map](#)

[Contact Us](#)

[Privacy Policy](#)

[Acceptable Use Policy](#)

[Residential Services](#)

©2006 Cox Communications, Inc. All rights reserved. Service not available in all areas.



TRANSPORT | VIDEO | INTERNET | VISION

Our Customers

Services

Our Network

Alliances

About Us

Contact Us

Network Services

Managed Data Services

Broadband Services

Voice



Network Services

[Sonet](#) | [Ethernet Transport](#) | [IP Transit](#) | [Construction](#)



RCN Business Solutions is a leading provider of communications services to carrier, enterprise and government marketplaces. RCN Business Solutions offers a comprehensive array of network services over our state-of-the-art fiber optic network. We will work to create a customized solution that fits your needs. With over a decade of experience, RCN Business Solutions has the experience needed to be your network service provider.

The RCN Network

- Presence in five of the top US markets
- Over 3,500 route miles of metro fiber
- Over 800 commercial buildings on-net
- National IP backbone
- Class five switches in every market
- Video Headend in every market

Local Loop Transport

RCN is quickly becoming the preferred choice to connect you from your POP to your partner's POP or directly to the customer premise. Our strength is in providing a true alternative to the "usual suspects" for local loop. Because of our extensive local networks and excellent access to **carrier hotels**, we offer complete independence from the ILEC and we specialize in Business continuity solutions and applications that require construction.

Our metro area services include

- SONET from DS-3 through all OC-n rates.
- Ethernet from 10 Mbps through 10 Gbps

Voice Services

As a facilities-based carrier of competitive residential services, RCN built a robust local network that we own and operate. Our voice network features a Class 5 Switch in each of our six markets. We offer the following services to our customers:

- Local Origination
- Local Termination
- Facilities Based Local Services
- Long Distance
- 800# Service
- Audio Conferencing

IP Transit

RCN Broadband, RCN Commercial, and RCN.com provide over 1 million customers direct Internet access. Our strong local network is complemented with a national IP backbone as well as an extensive list of peering partners.

National and International Private Line

Our customers continually request that RCN apply our strong implementation and operational capabilities towards a long haul product. To answer this need, RCN has partnerships with several top tier long haul providers to extend our capabilities for long haul capabilities. This allows RCN to provide total solutions across markets that include both the local loop and the long haul portions of the circuit. We reach most major markets and all of the top international destinations.



[Bundled Services](#) | [Available Services](#) | [Internet](#) | [Cable TV](#) | [Phone](#) | [Webmail](#) | [My RCN](#) | [Company](#) | [Contact](#) | [Help](#)

- For Small Business Services Call:
1-877-RCN-7000
- [Bundled Services](#)
- [Cable TV](#)
- [Phone](#)
- [Internet](#)
- [Cable Advertising](#)

Small Business

Phone Services

RCN Small Business representatives are trained to help you find the right telephone solution to meet your business needs. They'll work to help you lower your cost, and put together the package that will help you run your business more efficiently.

- **Unlimited Calling**

This phone package gives you unlimited calling anywhere in the continental United States and Canada for one monthly low price. Plus the ability to add calling features to meet your needs such as voice mail, caller ID and others. ** Unlimited Calling includes:

- ▶ Unlimited in-state, state-to-state, U.S. to Canada long distance calling.
- ▶ Unlimited Regional Calling
- ▶ Unlimited Local Calling

- **Unlimited Local Calling**

This phone package offers unlimited local calling for one low monthly price. Plus the ability to add calling features to meet your needs such as voice mail, caller ID and others. ** Add Unlimited Regional Calling for just \$10 more a month.

- **Variable Long Distance Plans**

No need for unlimited long distance? No problem. RCN offers several long distance plans for you to choose from. Talk a lot or a little, it doesn't matter. You only pay for what you use. We'll even add PIN code access so only your authorized staff can make long distance calls. For more details, see the [variable long distance rate plans](#) for your area.

- **Calling Features**

RCN's choice of 30 calling features help make your business calls easier and more efficient. From voice mail, to call forwarding to Caller ID Deluxe, we'll help you get the calls you need and avoid the ones you don't. Review our list of calling features below.

Privacy

Anonymous Call Rejection
Call Block

Don't Miss a Call

Basic Voice Mail
Call Waiting

Identify Your Callers

Call ID Deluxe
Call Return Unlimited
Call Waiting ID Deluxe

Distinctive Ringing

Priority Call *
Distinctive Ringing

Forward Your Calls

Call Forwarding
Call Forwarding Variable
Select Call Forward
Ultra Call Forward Hunting*

Per Use Features

Call Trace
*69 Call Return
*66 Repeat Call
Call Block

Make Dialing Easier

Repeat Call
Speed Calling
Three-Way Calling

* Not available in Chicago

** Phone calling features sold separately.

Can I Get RCN Service? [GO](#)

Small Business Handbook

Download RCN's Small Business Customer Handbook (PDF, 956 Kb) for all the features and instructions for cable tv, phone, and Internet services.

Download [Adobe Acrobat Reader](#) to view this file.

Note: All RCN Small Business Services are subject to the [RCN Small Business Terms and Conditions](#). Please contact an RCN representative for more details.

The banner features the RCN Business Solutions logo on the left, with 'TRANSPORT | VIDEO | INTERNET | VISION' on the right. Below the logo is a navigation menu with links: 'Our Customers', 'Services', 'Our Network', 'Alliances', 'About Us', and 'Contact Us'. The 'About Us' section is highlighted with a grey background and contains the text 'Getting down to business.' next to a photograph of three business professionals. On the far left, there is a vertical sidebar with links: 'Leadership Team', 'Press Releases', and 'Fact Sheet'. Below these links is a 'METRO Ethernet Forum MEMBER' logo.

RCN Business Solutions is the wholly owned, but separately managed, division of RCN Corporation dedicated to serving the communications needs of the business community.

RCN Business Solutions is a licensed Competitive Local Exchange Carrier (CLEC), a Competitive Access Provider (CAP), Internet Service Provider (ISP), Multi-Service Operator (MSO) and Fiber Optic Network Constructor. This unique combination of capabilities provides significant value and choice to the business community.

RCN Business provides network-based communication services to:

- Telecommunication service providers: CLECs, wireless carriers, Internet service providers, facility-based carriers, non facility-based carriers, resellers, regional area network companies, national Tier I and Tier II carriers.
- Enterprise accounts: Hospitality/lodging, broadcast media; education; finance; construction; and real estate vertical markets.
- Government accounts: Federal, State and municipal agencies and entities.

RCN Business Solutions is focused on the provision and management of the "First Mile" connectivity from the customer site to the RCN Network using fiber optic cables.

RCN Business Solution strengths and recent accomplishments include:

- Providing seamless quality over a state-of-the-art fiber-optic network.
- Acceleration of customer operational efficiency through the use of advanced network assets and solutions.
- Flexibility to add new client services without compromising quality.
- Addition of +200 client buildings to our network for a total of more than 500 on-net sites.

Products and Services include:

- **Transport:** SONET DS-3, OC-3, OC-12, OC-48 for data, voice and video integrity.
- **True Fast and Gigabit Ethernet** for LAN extension with no protocol conversion.
- **Broadband Access** for fiber optic connectivity to directly connect client offices to the fiber network.
- **Managed Dedicated Server solutions** to manage client computer servers located on RCN Business Solutions sites.
- **Website Hosting** on Dedicated and Shared RCN Business Solutions servers.
- **IP Transit** designed to move data over fiber-based IP protocol transmission paths.
- **Internet Services** (including email).
- **Business Video** economically delivered in bulk over fiber and with clustered modem management.
- **Voice Services** including Switched, 800 number service, audio conferencing, private lines.
- **Colocation** of client equipment in RNC Points of Presence, city hub sites, carrier hotels.
- **Real Estate Development infrastructure solutions** to deliver the best technology to future tenants.
- **Acquisition of Consolidated Edison Communications** in New York City to raise the total number of on-net buildings to over 800.

RCN Business Solutions provides an unparalleled set of business services as a CLEC, CAP, ISP and MSO. All of our solutions are delivered over the RCN state-of-the-art fiber optic network. We have construction resources available to build the "First Mile" connectivity from the customer's location onto the RCN network. Once connectivity is established RCN Business Solutions provides a range of services: switched voice, broadband transport, IP data service, Internet services, business video, managed servers, and hosting.

Our team of professional sales executives, system engineers, project managers and customer care personnel provide network-based solutions to thousands of businesses that are on or adjacent to our fiber network. We provide managed solutions with multi-year contracts to facilitate customer return on investment. Additionally, RCN Business Solutions specializes in creative contract terms and conditions.

RCN Business Solutions offers a unique array of fiber-based services that can be mixed and matched to meet the complex needs of business customers. We can construct fiber-based solutions that exactly comply with client requirements quickly and economically. We have dedicated client teams that form the proper solution, design it, install it, maintain it and expand it to meet growing client demands. The flexibility of our product offerings delivers valuable services such as business TV and Internet over uniquely designed fiber optic network facilities. When customers put challenges to us, we delight in meeting them.

Our strategy builds on the fact that RCN Business Solutions has unparalleled fiber optic network density, business access in five key metropolitan markets, advanced network technology and an enhanced product line. All of our solutions are delivered over a fast and powerful platform designed to support Wholesale Telecommunications, Enterprise and Government requirements.

The main elements of our strategy are:

- Maximize market penetration into the +20,000 "near net" buildings (those within 500-feet of the network).
- Expand the domestic and international carrier customer base.
- Optimize returns on our core assets through operational improvements, further penetration of "lit" buildings.
- Continue to engage solution partners to add value to our core propositions.
- Selectively evaluate assets that match our core competency and find ways to ally, venture and/or acquire them.
- Continue to build the professional sales team and to exploit opportunities in key markets.



©2006 RCN Corporation. All rights reserved.

EXHIBIT 12



[Home](#) > Enterprise

US Local T1

AT&T DS-1 Local Voice Service is a digital trunking service for voice connectivity that provides full T1 access to AT&T's local, intraLATA and long distance networks, providing Toll Free and International capabilities. The range of configurations for the AT&T's DS-1 Local Service provides your business with efficient solutions for any volume requirements and supports the trunking needs of a wide variety of locations and applications typically with savings of 10% or more over incumbent local carriers.

AT&T DS-1 Local Service includes:

- a full T1 that supports inbound and outbound local calling, as well as access to toll-free, long distance, and international service, PrimeXpress is part of your overall business continuity plan. You can also take advantage of nationwide call redirection services to reroute your incoming calls to alternate locations in the event of a problem or to gain business efficiencies.
- a fractional T1, Prime Digital Trunk is for locations and situations that require less than full T1 capacity. Use it to provide high-performance local trunks for smaller or low-volume locations, or to add flexible capacity at larger locations.
- a specialized trunking solution, PrimeConnect is for applications and locations that receive very high volumes (200,000 to 400,000 minutes per month) of inbound traffic.
- a complete, price-competitive, digital-quality service priced below ILEC rates
- crisp, fast connections to the AT&T network, the most advanced, self-healing fiber-optic network
- full local functionality, Local Number Portability, experienced support and customer care.
- 24-hour end-to-end network monitoring and disaster avoidance, providing an exceptional 99.99% uptime.
- any distance calling backed by centrally managed customer service operations

The merger between SBC and AT&T means a greater selection of products and services. Additional offer information for selected states can be found at: [Dedicated Communications Services](#)

[Terms & Conditions](#) [Privacy Policy](#) [Contact Us](#)

© 2007 AT&T Knowledge Ventures. All rights reserved.

AT&T is a registered trademark of AT&T Knowledge Ventures.



BUSINESS : PRODUCTS & SERVICES

VOICE SERVICES

▶ [Frequently Asked Questions](#)

▶ [Service Coverage Area](#)

▶ [Managed Security Services](#)

▶ **[Voice Services](#)**

- Local & Regional
- Long Distance
- International Long Distance
- Voice T1+PRI
- Integrated Access Solutions
- "212" Numbers
- Calling Services & Features
- VoIP

▶ [Data & High-Speed Internet](#)

▶ [Phone Systems](#)

▶ [Wholesale Voice](#)

▶ [Wholesale Data](#)

▶ [Wholesale Hot Cuts](#)

[Contact Us](#)

For more information
call 1-800-BROADVIEW
(1-800-276-2384)
or [Contact Us](#) online

Get the Edge with the Single-Source Solution

Finally, a solution that meets your need for service, simplicity and savings. With one source for everything from local calling to advanced data networking, you have easy access to a full spectrum of advanced communications. As your business prospers, we can provide the expanded services that support your growing needs. We can also help you control costs with low rates and billing information that makes tracking expenses simple. Switch to the company that really means business.

Voice Services

- **LOCAL PHONE SERVICE** - Start saving on local calls, and simplify by consolidating all your calling through one carrier.
- **REGIONAL PHONE SERVICE** - Low rates on calls within your state, but beyond your local calling area.
- **LONG DISTANCE SERVICE** - Control the cost of both domestic and international long-distance calling with a choice of calling plans.
- **INTERNATIONAL CENTS LONG DISTANCE** – Your business can save money when calling the most popular international destinations across the globe. For a small monthly fee, you'll benefit from some of the best rates you can receive anywhere!
- **VOICE T1 + PRI SERVICES**

Order Broadspeed Voice T1+PRI today to:

- Save money over your ILEC's digital service.
- Protect your voice lines with Broadview Networks state-of-the-art remote monitoring.
- Take advantage of service supporting multiple trunk and call types.
- Pay a single per minute rate for all your long distance in the continental U.S.
- Get the personal service you want with a dedicated account manager.

- **INTEGRATED ACCESS SOLUTIONS** - Tap into the full power of communications with Broadspeed Integrated Access Solutions. Using either a single Integrated T1 or Voice over DSL connection, Broadview Networks meets all your needs for local, regional, long distance and higher-speed Internet access in one cost-efficient package.
- **ONE PROVIDER, ONE POINT OF CONTACT, ONE BILL.**

** Savings will vary.*

Copyright © 2007 Broadview Networks, Inc. [Terms & Conditions](#)



[Subscribe Here for Cavalier Information](#)

[Home](#) [Residential](#) [Business](#) [Customer Care](#) [Careers](#) [Company](#)



Voice Solutions from Cavalier Business Communications

Businesses of every size and in every industry benefit from Cavalier Business Communications' comprehensive suite of voice product solutions. The competitive nature of business demands that companies stay ahead of the pack and keep a sharp eye focused on the bottom line. Cavalier Business Communications customers get rock-solid reliability with state-of-the-art features at savings only offered by a complete telecommunications provider. For more information about Cavalier Business Communication Solutions call toll free **(877) 810-4392**.

[Business Services](#)

[Voice Solutions](#)

[Data Solutions](#)

[Conference Solutions](#)

[Wholesale Solutions](#)

[Government Solutions](#)

[VoIP for Business](#)

[CBC FAQ's](#)

[Testimonials](#)

[Business Care](#)

[Agent Programs](#)

[Markets We Serve](#)

[Delaware](#)

[Hampton Roads](#)

[Maryland](#)

[New Jersey](#)

[Northern Virginia](#)

[Richmond](#)

[Pennsylvania](#)

[Washington DC](#)

[cavCONNECT! Login](#)

[Web Meeting Login](#)

PRODUCT	DESCRIPTION	APPLICATION/PURPOSE
Essentials – Basic	Local telephone service line with three-way conference, toll block and Speed Dial features included.	Businesses that require the most economical package. Usage-based billing for local calling with long-distance packages available.
Essentials_ Unlimited	Flat rate telephone service with unlimited local calling. Three-Way Conference, Speed Dial and Toll Block features included.	Businesses that require an affordable local calling solution. Unlimited local calls with long-distance packages available.
Essentials– Complete	Unlimited local and long distance calling for a set price per month. Certain restrictions apply.	Businesses that need less than 10 lines requiring both local and long-distance for an affordable price.
Complete T	Integrates voice and data services on a single T-1 line.	Businesses that require multiple voice lines and dedicated data services provisioned over a single access circuit.
ISDN PRI	Integrated Services Digital Network Primary Rate Interface – digital connection between the Cavalier network and the enterprise premise.	Digital trunking for PBX that can provide Caller ID, Internet access, or host computer access.
Digital T-1	1.54mbps digital connection providing 24 channels for voice or data applications.	Mid to large-sized businesses with premises based switching equipment used for high volume inbound/outbound local and long-distance calling.
Long Distance	1+ outbound and toll free inbound services for in-state, inter-state and international calling. Calling Card service available.	Businesses that require global voice communications, toll-free inbound calling, and calling cards for a high level of calling control and reporting.
Audio & Web Conferencing	Toll-free reservationless conferencing service enables multiple users from different locations to dial into one telephone number and participate in the same telephone call, creating a virtual meeting. Web Conference option allows presentations or desktop applications to be shared with audio participants. Operator Assisted Event Calls available.	Businesses with a distributed workforce needing to regularly communicate and share information verbally or through the use of presentation materials.
Voice Mail	Network-based centralized voicemail service that captures messages 24 hours a day, seven days a week when phone lines are busy or not answered.	Businesses that require an affordable, provider managed voice messaging solution.



FIBERTREX

Hosted telephone service that provides reliable, hasslefree features to manage your communications without expensive equipment and capital.

Businesses that require the advanced features of a PBX without managing premises based equipment.

[webmaster - services agreement](#) - copyright © 2007 Cavalier Telephone - All Rights Reserved

Welcome to CTSI... A Commonwealth Telephone Enterprises Company Welcome to CTSI... A Commonwealth T



A COMMONWEALTH TELEPHONE ENTERPRISES COMPANY

total telecom flexibility

[about CTSI](#) / [business solutions](#) / [residential solutions](#)

[e-mail this page](#)

[print](#)

[home](#) >> [business solutions](#) >> [business bundles](#)

business solutions

▶ bundles

- unlimited connections
- business essential
- business builder
- business advantage
- business netvantage
- business assistant

integrated voice & data

- voice solutions
- dsl & data
- long distance
- equipment
- web solutions

bundles

CTSI Business Line(s) — combined with unlimited local service for one flat rate — make Business Bundles the perfect choice for your business. Bundles save you time and money by packaging the services you need, making it simple for you and an optimal decision for your business. Additionally, all bundles include the personal service of your Customer Account Manager.



Choose from

- [Unlimited Connections](#)
- [Business Essential](#)
- [Business Builder](#)
- [Business Advantage](#)
- [Business NetVantage](#)
- [Business Assistant](#)

search CTSI.com

[search >>](#)

call toll free: 1-888-278-8783

[Home](#) | [About CTSI](#) | [Business Solutions](#) | [Residential Solutions](#) | [Carrier Services](#) | [Customer Support](#) | [Contact Us](#)
[Tariffs](#) | [Jobs](#) | [Sitemap](#) | [Legal Notices](#) | [Privacy Policy](#)

Copyright 2004 CTSI, LLC All Rights Reserved | [DMCA Agent](#)

INTEGRATED PACKAGES

[SIMPLICI-T](#)

[SIMPLICI-T PLUS](#)

[SIMPLI-VOICE](#)

LONG DISTANCE

DATA SERVICES

INTERNET SERVICES

CONFERENCING SOLUTIONS

VOICEMAIL

EQUIPMENT & SYSTEMS

Products > Integrated Packages / Simpli-Voice

Take the guesswork out of your voice services with Deltacom's Simpli-Voice product. Simpli-Voice combines all of your local and long distance needs into one low cost, easy to understand communication solution designed specifically for the small-to-medium sized business.

Simpli-Voice Features

- Ability to Support as Few as 2 Lines
- Flexible Calling Plans with Unlimited Local & Long Distance
- Select from Over 25 Calling Features
- No Hunting Fees or Installation Charges
- Term Plans & Discounts Available

Optional Features

- Voicemail
- Toll Free Services
- Internet Bandwidth Options including DSL

Get Simpli-Voice today, only from Deltacom, and get the communication solution developed exclusively to help businesses like yours grow.

Contact Us

Contact us for more information about our products through your local **Branch Office, or call 1.877.239.1200.**

SIMPLIFIED
COMMUNICATION
SOLUTIONS



[Customer Care](#)

[Dealer Services](#)

[Partner Programs](#)

[Careers](#)

[Deltacom News](#)

[Carrier Services](#)

Resources:



My Bill

Pay your bill online, from any computer



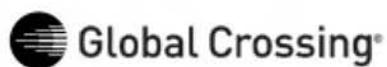
My Email

Access your email anytime from any computer



Dealer Extranet

Access for dealers to manage information



Friday 2-2-2007

Enterprise

Global Crossing Outbound Service

OVERVIEW

Speak freely, communicate globally

Talk to offices, customers, and business partners around the world with Global Crossing Outbound Service. Voice Service with a single rate and a single bill for international calls. (Local and national calling available too.) Eliminate the frustrations of patchwork international calling services and inscrutable bills with Global Crossing's seamless network and integrated services.

[Overview](#)[Specifications](#)[Availability](#)[Overview PDFs](#)[English](#)

FEATURES AND BENEFITS

- Worldwide, seamless service - call to 240 countries worldwide.
- National service in the United Kingdom and the United States - local, interstate, and intrastate calling (connect to in-country, in-state, or out-of-state locations).
- Quality and reliability - calls route over ultra-high bandwidth Global Crossing network with speed, clarity and network reliability backed by competitive customer support.
- Flexible, future-proof solutions - ready to move you to next-generation IP-based communications and data transmission.
- "Any-distance pricing" - prices are the same regardless of originating country for international calling. Allows you to manage costs across multiple countries with stability and predictability.

Communicate clearly and cost-effectively with Global Crossing Outbound Services. Contact your Global Account Manager or [click here](#).

[Top of Page](#) ↑

Customer Support
1-800-562-4206

InfoHighway!TM
HOME communications

[About](#) [Products & Services](#) [Customer Care](#) [Contact Us](#) [Partner Programs](#)

[GET A QUOTE](#) ▶

[Products & Services](#)

BUSINESS LINES AND TRUNKS

[Hosted PBX](#)

[Local Phone Service](#) ▶

[Integrated Voice & Data T1](#)

[Business Lines & Trunks](#)

[Voice T1](#)

[ISDN PRI](#)

[ISDN BRI](#)

[Long Distance Service](#)

[Internet / Data Services](#)

[Other Products & Services](#)

[Cabling & Network Design](#)

InfoHighway's Business Lines and Trunks are ideal for small- to medium-sized business customers looking for a reliable voice telecommunications service to connect their company to the world. Whether it's a single analog POTS line for your fax machine or multiple trunks to carry incoming and outgoing voice calls to and from your PBX or Key system, InfoHighway has a solution to meet your needs.

BUSINESS LINES provide analog voice communications and a local telephone number to business customers. It also enables the transmission of data at speeds up to 56 Kbps. You can purchase a basic dial-tone line or select from an array of features, all designed to help you save time, control costs, and work more efficiently.

Features available on InfoHighway Business Lines include:

- Call Forwarding
- Call Waiting
- Three-Way Calling
- Call Waiting
- Caller ID & Caller ID with name
- Distinctive Ring
- Hunting

We offer a variety of usage packages with all of our voice lines, including measured usage (usage is billed a la carte) and usage bundles with unlimited local, regional and long distance minutes.

BUSINESS TRUNKS provide voice communications to business customers equipped with Private Branch Exchange (PBX) systems that require a local telephone number and multiple line accessibility to their systems. It also enables the transmission of data at speeds up to 56 Kbps.

There are various types of InfoHighway Business Trunks to choose from:

- Combination (2-way) Trunks
- Direct Inward Dialing Trunks
- Ground and Loop start services

InfoHighway Networks Services Include:

[Voice Communications Services](#)

[High-Speed Internet Access](#)

[Managed Network Security Services](#)

[Value Added Services, Hosted Intranet](#)

[Audio and Web Conferencing](#)

[All wrapped together in one bill.](#)





+ Voice Solutions

Products & Services > Voice Solutions

- Products & Services
- + Voice Solutions
- Internet & Data
- + Solutions
- News
- Contact Us
- About Us

Conversent Voice Solutions

Conversent offers a complete array of value-packed voice solutions from business lines, to Conversent long distance, to integrated services, and more.

With Conversent voice solutions you receive all of your services on one bill, and of course you have Conversent Customer Support behind you 24 hours per day, 7 days per week.

Contact us for a **FREE** Business Consultation >>

- + **Business Lines (Local Service)**
- + **Centrex Service**
- + **Digital T1 Voice Services**
- + **ISDN PRI Service**
- + **Integrated T1 Service**
- + **Long Distance Service**
- + **Toll Free Services**
- + **Calling Features**
 - Business Line Features
 - Centrex Line Features
- + **Voice Conferencing**
- + **Calling Cards**
- + **Voicemail Services**
- + **Web Conferencing**
- + **Integrated DSL**

Contact Us ::

Sales
 (877) 2-PROVEN
 (877) 277-6836
 + Contact Sales Online

Support
 (800) 275-2088
 + Contact Support Online

Customer Support ::

- Shortcuts**
- + User guides
 - + Access numbers
 - + Online help & FAQs
 - + OnGuard Login
 - + Report a problem

- Solve a Problem**
- + Configure voice mail
 - + Remote call forward
 - + Email FAQs
 - + How to read your bill
 - + Contact support online

Related Services ::

Internet Solutions
 Data Solutions



Overview

Complete Solutions from *ONE* Provider



[home](#) | [company info](#) | [our offerings](#) | [target customers](#) | [customer care](#) | [careers](#) | [contact us](#)

[voice overview](#)

[ipath voip](#)

[local](#)

[long distance](#)

[toll-free](#)

[truconnect diversity](#)

[conference calling](#)

[operator services](#)

[value bundles](#)

[campuslink](#)

[contact center](#)

[network map](#) |



Voice Services

Overview

PAETEC's Voice Services

PAETEC offers a full spectrum of traditional voice services, each predicated on our enormous industry experience and the world-class technology of our partners. We offer comprehensive Local, Long Distance, and Operator services, as well as sophisticated conferencing and calling card capabilities nationwide. Our prices are competitive, our service is unmatched, and our customers are nothing short of delighted. We think you will be too.

The Foundation of Communications

Voice communications has always been the cornerstone of the communications industry, and PAETEC recognizes that superb quality and reliability are critical aspects of the voice communications of our customers. But as network traffic migrates from traditional TDM (Time Division Multiplexing) networks to modern packet-switched data networks, traditional voice networks become increasingly expensive to install, maintain, and operate - it's a fact of the telecommunications industry.

Smart-Build Strategy

So PAETEC has adopted what we call a "smart-build" strategy for the expansion of our world-class networks. We lease certain facilities, such as transport networks, where it makes financial sense to do so. We purchase switches and other network-deployment components that make sense to own and operate. With intelligent tactical financing, we can reduce our capital investments while maintaining control over the quality and market velocity of our service offerings. The result is world-class voice services at lower cost to our customers.

PAETEC Communications, Inc.

877.472.3832 [legal notices](#)



[Overview](#) | [Long-Distance](#)

SMALL BUSINESS

To order by phone call
800-603-6000

Pricing & Availability Shown For **VA**.

[Select a different state](#)

Qwest Choice™ Business Prime

Qwest Choice Business Prime offers your business a customized local calling package at one low, monthly rate. Your package includes your phone line, unlimited local calls and your choice of three features from a list of our most popular calling options. Save 10%, 15% or 20% when you choose a 1-, 2- or 3-yr. service commitment. Prices and plan details subject to change.

Features

- Includes phone line, unlimited local calls, and choice of three features for one low, monthly rate.

Benefits

- Save 10%, 15% or 20% when you choose a 1-, 2- or 3-yr. service commitment.

Qwest Choice™ Business Prime and Qwest Choice™ Business Prime with 12/24/36 Month Term Commitments: with a 12/24/36 month agreement (\$100/\$200/\$300 early termination fee applies with a 12/24/36 month agreement). Prices based on 10/15/20% discount on Qwest Choice™ Business Prime; prices subject to change. Feature availability varies by customer.

[ABOUT QWEST](#) | [CAREERS AT QWEST](#)

Copyright © 2007 Qwest | All Rights Reserved | [Legal Notices](#) | [Privacy Policy](#)

[Overview](#) | [Long-Distance](#)

SMALL BUSINESS

Voice Solutions : Long Distance

Qwest Choice™ Long Distance Plus

Make all the domestic long-distance calls you want for just 5 cents a minute. Enjoy the convenience of no calling-time restrictions and no monthly fee.

To order call
1 800-603-6000
7AM-6PM (MST), M-F

Pricing & Availability Shown For **VA**.

[Select a different state](#)

Features

- No calling-time restrictions or monthly fee
- Flat per minute rate for all domestic long-distance calls
- Requires \$15 minimum in long-distance calls

Benefits

- Best for businesses that average \$15-\$25 in monthly long-distance charges
- Add on an International calling plan and save even more.

Qwest Choice™ Long-Distance Plus Plan for Business: Available only to Qwest local-service business customers within Qwest's 14-state region or all other domestic business customers outside of Qwest's 14-state region, excluding AK. Limitations exist for 1+ service, data applications, dial-up data (modems) and fax traffic. Depending on the location, long-distance service is provided by either Qwest Communications Corporation or Qwest Long Distance Corporation. Listed rate covers calls only within the U.S. and to Puerto Rico, Guam, USVI and CNMI and does not include taxes, incremental charges and surcharges. Other restrictions may apply. Subject to applicable tariffs and regulations. Rates subject to change.

[ABOUT QWEST](#) | [CAREERS AT QWEST](#)

Copyright © 2007 Qwest | All Rights Reserved | [Legal Notices](#) | [Privacy Policy](#)



Overview | Long-Distance

SMALL BUSINESS

Data Solutions

DS1

High volume, no waiting

To order call
800-860-1020
7AM-9PM (ET), M-F

Pricing & Availability Shown For **VA**.

[Select a different state](#)

Qwest's DS1 service puts you in control with a high-capacity, high-performance dedicated digital information channel designed for full duplex point-to-point transmission at 1.544 Mbps. Voice, data, video - you call the shots. And because the signal is digital, say goodbye to crosstalk, noise, and distortion. So you can focus on your business.

- Connection to interexchange carriers
- LAN-to-LAN connectivity
- Integrated voice and data networking
- PBX networking
- Bulk data transfer
- Interactive computer-aided design
- Distance learning
- Video teleconferencing
- Replacement of multiple analog lines
- Upgrades from digital systems operating at lower speeds
- Remote mainframe access
- Transaction-based tasks: billing, reservations, customer service, database access
- PBX connection to Centrex
- High degree of system security
- Budget predictability with discounts available on long-term contracts

DS1 service is available in the contiguous United States and, on an intraLATA basis only, in the states of AZ, CO, IA, ID, MN, MT, ND, NE, NM, OR, SD, UT, WA and WY.

DS-1 will reduce overall expenses and control costs by combining data and voice applications over one circuit. DS-1 does all of this with flexible intrastate and interstate pricing plans. In many areas DS-1 service is available as part of Qwest's Sonet Ring Services with industry-leading levels of reliability, redundancy, and value.

Features

Optional Features and Functions may be added to DS-1 Service to improve its quality or its utility to meet specific communication requirements. Available DS-1 Optional Features and Functions include:

- Central Office Multiplexing: This equipment is

OneFlex Integrated Access

The power of high-speed digital transport and dynamically allocated bandwidth on a single circuit

Qwest's OneFlex® Integrated Access provides a simple solution with a single circuit that combines both voice and data. Additional features are integrated into the product to assist in running your business more efficiently. Competitively priced, OneFlex Integrated Access allows you to transition from standard telephone service to Voice over Internet Protocol (VoIP) without the need to replace your current telephony equipment. With dynamically allocated voice bandwidth on demand, you have the opportunity to build a solid, stable communications foundation that will grow with your expanding business needs and provide the competitive edge to succeed in the marketplace.

Description

OneFlex Integrated Access is a single T-1 circuit that can be used to transfer data, access the Internet and have real-time, two-way voice calls via IP. It is designed to meet the voice and data needs of single and multi-location businesses. You can make off-net domestic local toll, domestic long-distance and international calls to end users on the public switched telephone network (PSTN) as a low-cost option. Also available are popular calling features like Caller ID, Voice Mail and e-mail. Additionally, calls between users on the Qwest® OneFlex VoIP network are at no additional charge, which is a powerful feature that delivers savings on calls between your locations and your business partners. Qwest delivers all of this as a robust nationwide offering, providing your business with the tools and support for all of your communications needs.

Benefits

- Simple solution—Local, long distance, international voice, fax and data services from one provider with all product components included on a single invoice.
- Cost savings—Single and multiple business locations benefit from this technology and reduce overall communication costs. By leveraging your current investments in existing private branch exchange (PBX) and key system equipment, you have the flexibility to spend in other essential areas of your business.
- Pivotal product for advanced technologies—Qwest can provide an integrated solution that meets your specific needs using a flexible IP network. The service also provides a foundation to move your business to higher-end products.
- Increased efficiency—Management of all telecommunications needs is bundled in to one technology.

Features

- Consolidation of multiple traffic types over a single circuit.
- Support of additional data speeds up to 1.544 Mbps.
- Up to 13 OneFlex Integrated Access voice lines available.
- Real-time dynamically allocated bandwidth between voice and data channels.
- Unlimited local and on-net calling.
- Customizable feature configurations to meet your daily needs.
- Termination to existing PBX or key system equipment.
- Selectable voice mail capabilities.
- Customer portal to manage hunt-group feature changes.

How it works

OneFlex Integrated Access uses VoIP technology to provide dynamically allocated bandwidth between voice and data in real time. The offering is an IP-based solution that integrates local and long-distance voice with Internet access on a single connection. VoIP technology gives customers the advantage of using the entire circuit for Internet access when phones are not in

use. The Qwest technology management team has built thresholds within the product to ensure high IP quality, regardless of the number of voice lines in use.

Why buy from Qwest?

- Network technology—Tier 1 carrier-class network.
- Breadth of the product—Qwest has a nationwide footprint to meet all your business needs, wherever you are.
- Reliable account team service—Qwest has an extensive infrastructure and abundant support/resources to provide a stable solution.
- Extensive product integration—Qwest's full portfolio of services can be your single-source solution.
- Qwest legacy/heritage—Service is carried over the local exchange network, an arena Qwest knows very well. As a frontrunner in VoIP provisioning, Qwest will prepare you to move into the future.

Other products available from Qwest

In addition to OneFlex Integrated Access, Qwest has an array of products to meet your needs, including the following:

- Managed Firewall-VPN—Uses best-in-breed encryption and security solutions for your IP traffic.
- OneFlex[®] Hosted VoIP—The next step within the VoIP product family—this service increases bandwidth and adds features to your current configuration through handsets and a customer portal.
- Internet Port—Provides a full port for public IP traffic. Bandwidth is available from fractional 1.544 Mbps T-1 service up to NxT1 solutions that bond T-1 service together to accommodate your bandwidth requirements.
- Private Port—Provides an Internet port that is fully secured on Qwest's multi-protocol label switching (MPLS) network. Advance queuing of your voice, IP, video and any other traffic is managed via multiple quality of service (QoS) templates.

OneFlex[®] Integrated Access is available to business customers in select areas across the continental U.S. Minimum one-year term commitment required. Early termination charges may apply. Monthly charge based on configuration selected. Long-distance charges are additional. Additional equipment may be required. Not compatible with Qwest Web Contact Center[™], EZ Route and QRouting[™]. Other restrictions may apply. Call for availability and complete details.

Customer Solutions

By Application
 By Business Type
 By Industry

By Application

Internet and Data
 Switched & Transport

Bundled Solutions
 TW Telecom ONE SOLUTION
 (VoIP)

National Operations
 News & Views

Integrated

Our metropolitan **fiber networks** enable us to deploy new service platforms efficiently and cost effectively, which allows us to rapidly meet our customers' needs. Our innovative [National Operations Center \(NOC\)](#) monitors all our networks for reliability and performance, 24-hours-a-day, seven-days-a-week. The flexible infrastructure provided by these networks allows us to offer almost any technology, product, service, or solution to benefit our customers. [Read our capabilities brochure.](#)



Our Solutions Include:

- **Internet & Data Products** that allow customers to create their own internal computer networks and to access the Internet and other external networks.
- **Switched & Transport Services** which include local and long distance calling solutions that use a carrier class switch to connect one calling party to the other, and private line connections for broadband services at transmission speeds from 1.5 megabits to 10 gigabits per second.
- **Bundled Solutions** that bundle products and services to meet unique customer needs and dedicated Internet access
- **TW Telecom ONE SOLUTION - VoIP** is a technology allowing voice telephone services to be delivered over high speed Internet connections. While VoIP provides many new ways to use your voice services, the revolutionary aspect of VoIP allows both voice and data to be delivered from one connection. This is called "Convergence." With fewer connections and vendors to manage, costs and time associated with maintaining corporate communications are diminished.

Internet & Data

Co-location Service
 Dedicated Internet Access
 Ethernet Internet Service
 Storage Transport Services
 Native LAN
 Shared Web Hosting

Switched Native LAN
 IP VPN
 Managed Security Services
 Extended Native LAN
 Metro Ethernet

Switched & Transport

Business Voice Services
 Dedicated High Capacity Services
 Digital Trunks
 ISDN PRI
 Line Features

Long Distance Services
 Regional Networks
 Voice Messaging
 Voice Services: Multi-Location Solutions

Bundled Solutions

VersiPak

TW Telecom ONE SOLUTION VoIP

TW Telecom ONE SOLUTION *Connect*

TW Telecom ONE SOLUTION *Forum*

TW Telecom ONE SOLUTION *Reach*

By Industry

Health Care

Government

Hospitality

Finance

Higher Education

Retail

[Legal Notices](#) | [Privacy Policy](#) | [Tariffs](#) | [Help](#)
©2006 Time Warner Telecom. All rights reserved.

[About Us](#) | [Solutions](#) | [News & Information](#) | [Investors](#) | [Customer Center](#) | [Contact Us](#)

THE POWER DRIVING YOUR NETWORK



Time Warner Telecom is at the forefront of the telecommunications revolution. We are a leading fiber, facilities-based integrated communications carrier offering local businesses "last mile" broadband connections for data, high-speed Internet access and voice. Our SONET-based networks include 100% fiber optic, fully redundant, self-healing digital rings. Diverse routing is standard on most of our metro services. You experience the highest quality voice, data and video communications transmission possible. Our innovative National Operations Center (NOC) monitors all our networks for reliability and performance, 24-hours-a-day, seven-days-a-week.

DATA & TRANSPORT SERVICES:

DEDICATED INTERNET ACCESS – Connect your business to Time Warner Telecom's national IP backbone and experience the high-quality Internet service that your company deserves. Our dedicated Internet Access product delivers high-speed, dedicated connections that ensure access to the Internet bandwidth you need for your critical data. Choose from traditional (T1, DS-3, or OC-3) and Ethernet (10Mbps, 100Mbps, or Gigabit Ethernet) connectivity.

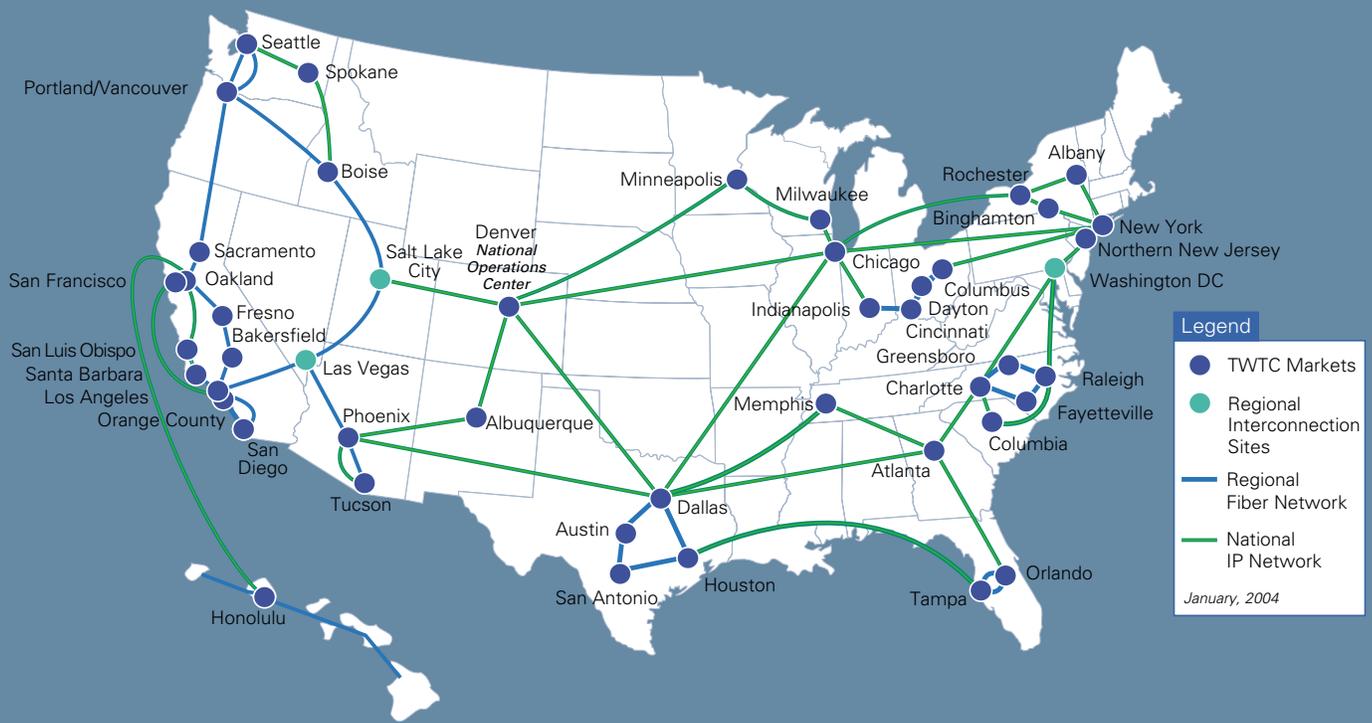
DEDICATED HIGH CAPACITY SERVICES –

A full array of dedicated, fiber-optic transport products and services are available for your business, including SONET-based and DWDM-based private lines and IXC access; in point-to-point, ring, and hubbed configurations. Dedicated services include: DS1, DS3, OC3, OC3c, OC12, OC12c, OC48, OC48c, 2.5 Gbps wavelengths, and 10 Gbps wavelengths. Private Network Transport (private rings) are also available.

NATIVE LAN – Native LAN bridges the gap between legacy networks and a pure Ethernet metro solution by combining their benefits using next-generation optical platforms. This provides you a migration path for the evolving metropolitan area Ethernet technology. We deploy equipment in your business location and allow you to plug into a familiar interface: IEEE Standard 10M, 100M, and 1000M Ethernet interfaces. You can connect between multiple locations and assure delivery of your valuable traffic with our protected service. Native LAN lowers your costs, reducing the need for a customer router and enabling installation with minimal disruption to your existing network.

STORAGE TRANSPORT SERVICES –

How secure is your data? Are you thinking about disaster recovery methods? Time Warner Telecom knows that accessing and preserving your data is critical for the success of your business. Now, we can help you transfer your important data information securely



to your off-site storage facility or to the storage solution provider of your choice.

**VOICE TELEPHONY SERVICES:
LOCAL SERVICE FOR BUSINESS –**

Time Warner Telecom offers business customers a “real” choice for local telephone service, including: local business telephone lines and digital trunks, Primary Rate ISDN, 9-1-1 emergency services, operator services, directory information and listings. Features like caller ID, call waiting, call forwarding, three-way conference calling, call redirect, last call return, voice messaging and many others are also offered.

BUSINESS LONG DISTANCE –

Everyone has a long distance product these days. But only Time Warner Telecom offers customers innovative business solutions. Our Long Distance services include Outbound (1+ Dialing) Domestic; Operator Services and Directory Assistance, and Toll Free (8XX) Service. Our Calling Card Service offers instant access to anywhere in North America, and over 200 countries world-wide.

INTEGRATED BUSINESS SERVICES (CUSTOM COMMUNICATION SOLUTIONS) – For medium-size business customers, VersiPak provides a single-vendor solution that combines your local voice, Internet, and long distance services onto one dedicated clear channel T-1. When the voice channels are not being used, that bandwidth is dynamically allocated for maximizing your bandwidth.

ABOUT TIME WARNER TELECOM

Time Warner Telecom is the leading provider of metro-area broadband optical networks and services to businesses. We deliver “last-mile” broadband data, voice, and Dedicated Internet Access in 44 major U.S. markets. Our strong financial position allows us to deliver powerful networks, robust products, and superior customer care to meet your needs. We’re the power driving your network.

WWW.TWTELECOM.COM

For complete information about Time Warner Telecom products and services, call your local account executive or visit our website: www.twtelecom.com. Time Warner Telecom, 10475 Park Meadows Drive, Suite 400, Littleton, CO 80124



[Solutions](#)

[Customer Care](#)

[Testimonials](#)

[Investors](#)

[About](#)

Home > Products > Voice > Long Distance

Products >>>

Applications

Industry Specific Applications

Products

Integrated Services

- Dynamic T - VoIP
 - ✘ Dynamic T-SIP
 - ✘ BIGVoice
 - ✘ BIGData
 - ✘ Dynamic T Mobility & Voice Messaging Services

- ADVANTAGE Power T
- ETV from US LEC

Data

- MPLS VPN
- Ethernet Local Loop
- ATM
- Frame Relay
- Digital Private Line (DPL)
- Data Backup & Recovery
- Router
- Firewall
- Data Network Reporting

Internet

- Internet Access
 - ✘ Dedicated
 - ✘ Dial up
 - ✘ FAST Pipe
- E-mail Boxes
- E-mail Spooling
- E-mail Defense
- Firewall
- Web Hosting
- Dedicated Server
- Web-enhanced Conferencing
- Router
- MegaPOP
- DSL

Voice

- Local
- Long Distance
 - ✘ Directory Assistance and Operator Services
- Toll Free

Long Distance

US LEC customers benefit from the highest sound quality over US LEC's network. As an added benefit, we also bundle local and long distance services to maximize use of customers' existing access facilities, and to provide a single, consolidated invoice for all calling. Long Distance network access is done over the same high-quality facilities used to connect to the local network or by "LD Only Access T-1."

Long Distance Calling

- ✘ IntraLATA (local toll)
- ✘ Intrastate (instate)
- ✘ Interstate (out-of-state)
- ✘ International calling to more than 150 countries

Directory Assistance

For more information on Directory Assistance, [click here](#).

PIC'd LD

Customers and their employees can now choose US LEC to carry their long distance calls from many locations. Customers save money by combining long distance call volumes from sites without a T-1, with volumes from their T-1-served locations.

Dedicated 1 + Long Distance

US LEC offers excellent rates on intrastate, interstate and international calling.

Cus
in t

>>
>>
>>

Pov

Neer

US L

for F

pow

cust

US L

acce

man

serv

repc

First

mus

acce

acc

- ✘ Local Toll Free
- ☑ VoiceEclipse
- ☑ Account Codes
- ☑ Calling Cards
- ☑ Conferencing

Colocation ▾

- ☑ Central Office Local Colocation
- ☑ Data Center Colocation

Account Management ▾

- ☑ PowerVIEW
- ☑ Data Network Reporting
- ☑ Service Level Agreements
- ☑ Service Level Agreements (SLA) Reporting
- ☑ Electronic Call Detail
- ☑ Calling Reports
- ☑ Busy Hour Reports



Customers and Agents click here to access your account



[Request More Info](#)



[>>Legal Notices](#)



Type in your question here: _____ search in:

- [BUSINESS SERVICES](#)
- [CARRIER SERVICES](#)
- [PARTNERS](#)
- [CUSTOMER CARE](#)
- [ABOUT XO](#)
- [NEWS](#)
- [CONTACT XO](#)

XO® Voice Services



Contact XO

Sales

Call toll-free **866.349.0134**

[Contact us online](#)

Support

Call toll-free **1.888.575.6398**

[Contact us online](#)

[Manage your account online](#)

What's Hot

- [XO One Managed Services](#) provides bundled voice and data services to mid-tier and larger companies
- [XOptions® Flex](#) is the next-generation integrated services solution for businesses

[Home](#)

[Products and Programs](#)

Voice Services

[Local Services](#)

[Long Distance Services](#)

[Conferencing Services](#)

[IVR](#)

[Calling Card](#)

Overview

XO provides a wide range of cost-efficient, dependable voice products for businesses of all sizes. From reliable local services to conferencing and advanced applications like Interactive Voice Response (IVR), XO has the products and services you need with the support you want.

With all XO voice products, you get convenient one-invoice billing, one point of contact, and 24 x 7 customer service. No matter what your voice calling needs, XO has you covered.

Your business needs...	XO Product Solution	Product Description
Reliable connections to the Public Switched Telephone Network (PSTN) with a full range of productivity-enhancing features.	Local Services	Everything from basic phone service (lines, trunks and Centrex) to voice mail, and directory assistance.
Cost-effective in-state, out-of-state, international and toll-free calling.	Long Distance Services	High quality, high value long distance calling over the XO® high-capacity fiber-optic network.
An economical way to bring multiple people together on the same call to hold productive and cost-effective voice and document conferences	Conferencing Services	Audio and document conferences that can be conducted from any location with few to hundreds of participants.
Automated system to handle a large volume of incoming telephone calls.	IVR	Group of Interactive Voice Response products that automate switchboard or call center operations that previously required live telephone agents.
Ability for business travelers to keep in touch with the home office, suppliers or customers.	Calling Card	Local and long distance calling via toll-free access for business travelers.

* [SERVICE AVAILABILITY](#), PRICES AND CHARGES VARY BY MARKET. MINIMUM TERM COMMITMENT APPLIES.

XO® VOICE SERVICES [TERMS & CONDITIONS](#)

 **Looking for a product?**
[Try the A-Z Product Index](#)

© 2000-07 XO. All rights reserved.
XO, the XO design logo, Concentric, Allegiance,
and all related marks are trademarks of XO Communications.

[Product Terms & Conditions](#) | [Tariffs](#) | [Privacy](#) | [Legal Info](#)