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April 6, 2007

Ex Parte

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

Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements, WC Docket No. 02-112 and Petition of the Verizon Local and Long Distance Telephone Companies for Interim Waiver with Regard to Certain Dominant Carrier Regulations for In-Region, Interexchange Services, WC Docket No. 06-56

Dear Ms. Dortch:

Today, Maggie McCready, Leslie Owsley, Tom Moynihan and the undersigned of Verizon met with Don Stockdale, Bill Dever, Al Lewis, Deena Shetler, Lynne Engledow and Jay Atkinson of the Wireline Competition Bureau to discuss Verizon's petitions for relief from certain dominant carrier regulations. Verizon reviewed the attached which outlines the affiliate relationships within Verizon and the associated rules that are followed for affiliate transactions.

Please feel free to call me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Dee May".

Attachment

cc: Don Stockdale
William Dever
Al Lewis
Deena Shetler
Lynne Engledow
Jay Atkinson

Regulatory Classification of MCI's Domestic Affiliates

7/10/06 Version

272 Affiliates

MCI Communications Services, Inc.
(d/b/a Verizon Business Services in certain states)

MCI International Services, Inc.

MCI International, Inc.

MCI Network Services of Virginia, Inc.

MCImetro Access Transmission Services LLC
(d/b/a Verizon Access Transmission Services in certain states)

MCImetro Access Transmission Services of Virginia, Inc. (d/b/a Verizon Access Transmission Services of Virginia)

MCImetro Access Transmission Services of Massachusetts, Inc. (d/b/a/ Verizon Access Transmission Services of Massachusetts)

Metroplitan Fiber Systems of New York, Inc.

Teleconnect Long Distance Services & Systems Co.

Skytel Corporation (Paging)

TTI National Inc. (LD Reseller)

Service Companies

Verizon Business Financial Management Corporation
(f/k/a MCI Financial Management Corporation)

Verizon Business Network Services Inc.
(f/k/a MCI Network Services, Inc.)

This company was a Section 272 affiliate through year end 2005. Assets and customers have been transferred to MCI Communications Services, Inc.

Verizon Business Purchasing LLC
(f/k/a MCI Purchasing LLC)

Non Regulated (Non 272) Affiliates

Network Securities Technologies, Inc.

Holding Companies

MCI, LLC

MCI Communications Corporation

MCI International Telecommunications Corporation

MFS Globenet, Inc.

Telecom*USA, Inc. (1)

"Inactive" Domestic Affiliates

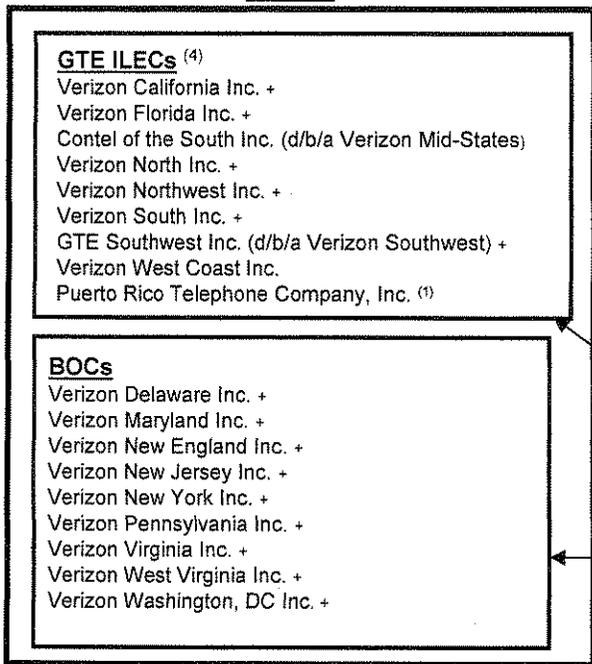
The following affiliates are not expected to have any accounting activity and as such are not expected to have transactions with Verizon telephone companies. If one of these affiliates becomes active in the future it will need to be classified for regulatory purposes.

- MCI Funding Corporation
- Mtel Latin America, Inc.
- MFS CableCo U.S., Inc.
- MCI Intermedia, Inc.
- MCI Intermedia Communications, Corp.
- MCI Intermedia Telecom, Inc.
- MCI Broadband Solutions, Inc.
- MCI International Mobile Services, Inc.

(1) When Telecom USA acts on behalf of Teleconnect arrangements, 272 applies

Summary Rules for Affiliate Relationships – 8/17/06

ILECs



GTE ILECs (4)

- Verizon California Inc. +
- Verizon Florida Inc. +
- Contel of the South Inc. (d/b/a Verizon Mid-States)
- Verizon North Inc. +
- Verizon Northwest Inc. +
- Verizon South Inc. +
- GTE Southwest Inc. (d/b/a Verizon Southwest) +
- Verizon West Coast Inc.
- Puerto Rico Telephone Company, Inc. (1)

BOCs

- Verizon Delaware Inc. +
- Verizon Maryland Inc. +
- Verizon New England Inc. +
- Verizon New Jersey Inc. +
- Verizon New York Inc. +
- Verizon Pennsylvania Inc. +
- Verizon Virginia Inc. +
- Verizon West Virginia Inc. +
- Verizon Washington, DC Inc. +

Service Co Affiliates

- Telesector Resources Group, Inc. (d/b/a Verizon Services Group) +
- Verizon Advanced Data Inc. (5)
- Verizon Asset Management Corp. +
- Verizon Communications Inc. (formerly Bell Atlantic Corp.) +
- Verizon Corporate Services Corp. (formerly Verizon Government Relations Company) +
- Verizon Corporate Services Group Inc. (formerly GTE Service Corporation) +
- Verizon Data Services Inc. (formerly GTE DS)** +
- Verizon Global Funding Corp. (formerly BA FSI) +
- Verizon Investment Management Corp. +
- Verizon Investments Inc. +
- Verizon Network Funding Corp. +
- Verizon Services Corp. (formerly BA NSI) +
- Verizon Services Organization Inc. (formerly GTE CSI) +

Verizon Business (fMCI) Service Companies

- Verizon Business Financial Management Corporation (formerly MCI Financial Management Corporation) ***
- Verizon Business Network Services Inc. (formerly MCI Network Services, Inc.) ***
- Verizon Business Purchasing LLC (formerly MCI Purchasing LLC)***

Service Co. Affiliates – not having transactions with the ILECs

- Bell Atlantic Administrative Services, Inc.
- Bell Atlantic Aviation Services, L.P.
- Verizon Accounting and Information Services Inc.
- Verizon Advanced Data Services Inc.
- Verizon NSI Holdings Inc.

272 Affiliates (3)

- Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance) +
- Verizon International Communications, Inc. (formerly CODETEL International Communications, Incorporated (CIC!)) +
- MCI 272s *** (6)
- NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) +
- Verizon Global Networks Inc. +
- Verizon Select Services Inc. (formerly GTECC) +

Independent Long Distance Carrier Affiliates (4)

- PRT Larga Distancia, Inc.
- Verizon Hawaii International Inc. (formerly GTE Hawaiian Tel International Incorporated)

Other Non-Regulated Affiliates

- Bell Atlantic Network Systems Company +
- Bell Atlantic World Wide Services Group, Inc.
- Compañía Anónima Nacional Telefónica de Venezuela (CANTV)
- Empire City Subway Company (Limited) +
- Exchange Indemnity Company +
- Federal Network Systems LLC +
- GTE Communication Systems Corporation (a/k/a Verizon Logistics) +
- GTE International Incorporated
- GTE.NET LLC (a/k/a Verizon Internet Solutions) +
- Network Securities Technologies, Inc. ***
- Verizon Airfone Inc. +
- Verizon Avenue Corp. (formerly OnePoint Communications Corp.) +
- Verizon Capital Corp. (formerly BA Credit Corp.) +
- Verizon Connected Solutions Inc. (formerly BACCSI) +
- Verizon Credit Inc. (formerly GTE Leasing Corporation) +
- Verizon Directories Corp. (a subsidiary of Verizon Information Services Inc.)*** +
- Verizon Dominicana, C. por A. (formerly CODETEL, C. por A.)
- Verizon Federal Inc. (formerly BAFIS) +
- Verizon Information Technologies LLC +
- Verizon International Telecom Services Inc.
- Verizon International Teleservices, C por A (formerly Infotel) +
- Verizon International Teleservices Jamaica Limited
- Verizon Internet Services Inc. [a/k/a Verizon Online] (formerly BAIS) +
- Verizon Laboratories Inc. (formerly GTE Laboratories Incorporated) +
- Verizon Network Integration Corp. (formerly BANI) +
- Verizon Online - Maryland LLC +
- Verizon Online - New Jersey LLC +
- Verizon Online Pennsylvania Partnership +
- Verizon Properties Inc. +
- Verizon Realty Corp. +
- Verizon Select Services of Virginia Inc. (formerly GTECC of VA)
- Verizon Technology Corp. +
- Verizon TeleProducts Corp. +
- Verizon Wireless Inc.* + (7)

Summary of Key Affiliate Rules

(see Verizon Affiliate Transaction Policy for full details)

- A. FCC Pricing Hierarchy: 1) Tariff, 2) Prevailing Market, 3) Higher of FDC and FMV when ILEC provides the services, 4) Lower of FDC and FMV when ILEC purchases the services and 5) Publicly filed agreements (Virginia only). (Note: 1) To qualify for prevailing market, > 25% must be provided to third parties, 2) Services under \$500,000 can be recorded at FDC and 3) ILEC can use higher or lower of cost or market valuation as a floor or ceiling [can receive more than the "higher" and pay less than the "lower", except for transactions with 272 affiliates]. **272 EXCEPTION:** In certain cases, transactions with 272 affiliates do not need to meet the 25% threshold. Contact the Affiliate Interest Compliance Office before using the exception. Svc. Co. EXCEPTION: Services provided by a Service Company are priced at FDC.
- B. Structural Separation Section 272. (2)
- C. BOC Non-Discrimination requirements Section 272 (All transactions except joint marketing - sales, orders and customer inquiry). (2)
- D. The ILEC must not fulfill requests for local exchange and exchange access services from a Section 272 Affiliate in a timeframe shorter than the timeframe such services are provided to unaffiliated entities.
- E. Transactions Publicly Disclosed (2)
- F. Transactions Certified by Officer of ILEC (2)
- G. State (Commission) Regulatory approval or notification requirements for affiliate transactions
- H. Independent Carrier Rules per 47 CFR §64 Subpart T Sections 1902 & 1903.

(1) Verizon Wireless in Puerto Rico is a division of Puerto Rico Telephone Company, Inc.

(2) Section 272 requirements sunset March 31, 2006. However, due to other requirements, Verizon has elected to comply past this date. Before taking any action related to sunset consult with Legal.

(3) Verizon Global Solutions Inc. was merged with and into Verizon Select Services Inc. on February 18, 2005.

(4) Verizon Hawaii and GTE Hawaiian Tel Insurance Company were sold May 2, 2005; The Micronesia Telecommunications Corp. and GTE Pacifica Inc. were sold to Pacific Telecom Inc. effective September 20, 2005.

(5) Verizon Advanced Data Inc. does not have transactions with the Verizon ILECs and was removed from Verizon's CAM in January 2006.

(6) Includes: MCI Communications Services, Inc. (d/b/a Verizon Business Services), MCI International Services, Inc., MCI International, Inc., MCI Network Services of Virginia, Inc., MCI Metro Access Transmission Services LLC (d/b/a Verizon Access Transmission Services), MCI Metro Access Transmission Services of Virginia, Inc. (d/b/a Verizon Access Transmission Services of Virginia), MCI Metro Access Transmission Services of Massachusetts, Inc. (d/b/a Verizon Access Transmission Services of Massachusetts), Metropolitan Fiber Systems of New York, Inc., Teleconnect Long Distance Services & Systems Co., Skytel Corporation and TTI National Inc.

(7) Verizon Wireless is listed in Verizon's CAM as Cellico Partnership.

272 Manufacturing Affiliates

Nothing to report

* = Multiple affiliates do business under this name

** = Multiple affiliates are included in this name

*** = Former MCI company

+ = Appears in the Verizon Cost Allocation Manual (CAM)