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

Re: Clarification of the Commission's Rules and Policies Regarding Unbundled Access to Incumbent Local Exchange Carriers' Inside Wire Subloops, WC Docket No. 01-338

Telecommunications Services Inside Wiring, Customer Premises Equipment, CS Docket No. 95-184

Implementation of the Cable Television Consumer Protection and Competition Act of 1992; Cable Home Wiring, MM Docket No. 92-260

Dear Ms. Dortch:

Yesterday afternoon, Will Johnson and I met with Scott Deutchman and Rick Chessen, legal advisors to Commissioner Copps, to discuss the above-captioned proceedings. We reiterated the positions set out in Verizon's comments in these proceedings as well as the *ex parte* filed by Verizon on May 17. During the meeting, Mr. Deutchman asked us to provide additional information concerning the various approaches followed in Verizon's territory to permit competitive voice providers to access Verizon-owned inside wire subloops.

As we explained in the meeting, consistent with the Commission's rules assigning to state commissions the role of adjudicating disputes between parties concerning "technically feasible" points and methods for accessing unbundled inside wire subloops in MDUs, state commissions have taken a variety of approaches in addressing where and how access may be accomplished. For the most part, these issues have long been settled and the terms and conditions pertaining to subloop access have been reflected in tariffs and negotiated interconnection agreements filed in the various states. Moreover, at this point, the permitted methods for subloop access now have been successfully implemented and have not been a matter of recent dispute.

For example, Cox's arbitrated interconnection agreement with Verizon in Rhode Island specifies that Verizon will perform the cutover of a customer by installing a jumper from Verizon's inside wiring to Cox's facilities, subject to a negotiated interval. Given network security concerns, these provisions do not permit Cox to perform work directly on Verizon's facilities. Similarly, the Florida Commission found that house and riser cable cutovers should be conducted by Verizon technicians in order to protect Verizon's "network from inadvertent mistakes, acts of sabotage and misuse." Interconnection

agreements with AT&T in Florida also specify that Verizon will connect the inside wiring within a MDU by the installation of a jumper cable connected to AT&T's facilities.

In New York and Massachusetts, on the other hand, CLECs are offered several options to gain access to Verizon inside wire subloops. CLECs may choose to have Verizon install jumper wiring directly to the CLEC's equipment or install an intermediate terminal block and perform the cutover by connecting the wiring to the terminal block for access to the CLEC's facilities. Alternatively, CLECs may perform the cutover themselves, subject to various conditions and safeguards designed to protect network integrity and security. These include joint advance planning meetings to review cable routing, equipment placement, cross-box penetration and security requirements; the requirement to place an order prior to performing the cutover; a requirement that CLEC technicians must be trained in the practices and procedures; proper tagging of wiring and equipment; and the implementation of various security measures designed to protect Verizon equipment, among others.

As we reiterated in the meeting, although various states have reached different conclusions concerning the permissible locations and methods for CLEC access to unbundled inside wire subloops, these issues have largely been settled and are working reasonably well. Therefore, the Commission should not take any action that would upset these approaches, and should limit its consideration to the Oklahoma situation raised by Cox.

Please do not hesitate to contact me if you have any additional questions concerning this proceeding.

Sincerely,



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