

KELLOGG, HUBER, HANSEN, TODD, EVANS & FIGEL, P.L.L.C.

SUMNER SQUARE  
1615 M STREET, N.W.  
SUITE 400  
WASHINGTON, D.C. 20036-3209

(202) 326-7900

FACSIMILE:  
(202) 326-7999

October 31, 2007

**Ex Parte**

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

*Re: Petitions of the Verizon Telephone Companies for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence and Virginia Beach Metropolitan Statistical Areas, WC Docket No. 06-172*

Dear Ms. Dortch:

On October 9, 2007, Time Warner Cable (“TWC”) submitted in the above-captioned proceeding Highly Confidential Information regarding the number of customers and locations it serves in the New York metropolitan statistical area (“MSA”).<sup>1</sup> These data include business customers and locations by zip code, and residential customers by rate center. Verizon’s outside counsel has converted these data to wire centers, which are attached here.

With respect to TWC’s data on business customers and locations by zip code, if there was only one Verizon wire center (“Verizon CLLI”) for a given zip code, all data for that zip code were attributed to that wire center. If there was more than one Verizon CLLI associated with the zip code, TWC data were assigned proportionately to each Verizon CLLI in the zip code based on the relative number of Verizon’s business lines (Retail + Resale + Wholesale Advantage) in each wire center.<sup>2</sup> Attachment 1 provides TWC’s data on business customers and locations by wire center. Attachment 2 contains the key that Verizon used to associate zip codes with wire centers. In some cases, the zip codes associated with Time Warner Cable’s business data fall in areas outside the New York MSA; data for such areas are presented in Attachment 3.

---

<sup>1</sup> See Letter from Brian W. Murray, Latham and Watkins, to Marlene H. Dortch, FCC, WC Docket No. 06-172 (Oct. 9, 2007).

<sup>2</sup> Data are based on legacy Verizon’s operations and do not include data served over former MCI facilities.

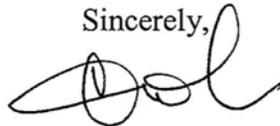
**REDACTED – FOR PUBLIC INSPECTION**

With respect to TWC's data on residential customers by rate center, if there was only one Verizon CLLI associated with the rate center, TWC customers were assigned to that Verizon CLLI. If there was more than one Verizon CLLI associated with the rate center, TWC customers were assigned proportionately to each of these Verizon CLLIs based on the relative number of Verizon's residential lines (Retail + Resale + Wholesale Advantage)<sup>3</sup> in each wire center.<sup>4</sup> Attachment 4 provides TWC's data on residential customers by wire center. Attachment 5 contains the key that Verizon used to associate rate centers with wire centers. In some cases, Verizon's outside counsel was not able to identify the rate centers listed by Time Warner Cable, and in other cases, Time Warner Cable's rate centers fall outside the New York MSA; data for such areas are presented in Attachments 6 and 7, respectively.

The Attachments contain Highly Confidential Information that is proprietary to both Time Warner Cable and Verizon and have been marked "HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 06-172 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION" in accordance with the Second Protective Order in this proceeding.<sup>5</sup> A redacted version of this submission is being filed electronically on ECFS.

Please do not hesitate to contact me at [eleo@khhte.com](mailto:eleo@khhte.com) or 202-326-7930 if you have any questions.

Sincerely,



Evan T. Leo

#### Attachments

cc: Gary Remondino  
Jeremy Miller  
Tim Stelzig

---

<sup>3</sup> Data are based on legacy Verizon's operations and do not include data served over former MCI facilities.

<sup>4</sup> Where a rate center is associated with wire centers both inside and outside of the MSA, the allocation was limited to wire centers within the MSA.

<sup>5</sup> *Petitions of the Verizon Telephone Companies for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence and Virginia Beach Metropolitan Statistical Areas*, Order, WC Docket No. 06-172, DA 07-208 (rel. Jan. 25, 2007) ("Second Protective Order").

**REDACTED – FOR PUBLIC INSPECTION**

**REDACTED – FOR PUBLIC INSPECTION**