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March 14, 2008

Ex Parte

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

Re: Establishing Just and Reasonable Rates for Local Exchange Carriers, CC Docket No. 07-135

Dear Ms. Dortch:

Yesterday, Susanne Guyer, Amy Rosenthal, Alan Buzacott, Karen Zacharia and the undersigned of Verizon met with Dana Shaffer, Don Stockdale, Doug Slotten, Randy Clarke, Lynne Engledow and Jay Atkinson of the Wireline Competition Bureau to discuss Verizon's position on traffic pumping. Verizon explained that much of the rural ILEC traffic pumping activity has merely shifted to certain rural CLECs and urged the FCC to take the steps outlined in Verizon's Comments to prevent CLEC traffic pumping. Verizon explained how it developed the triggers outlined in its proposed solutions and how those solutions are designed to target rural CLECs engaging in traffic pumping activity, without penalizing carriers experiencing legitimate increases in traffic.

Any rural CLEC meeting the volume trigger Verizon proposes would always have the option of filing a waiver with the FCC to explain the nature of its increased traffic volumes and to demonstrate that such increases are unrelated to traffic pumping. We also discussed the fact that a rural CLEC with a large business customer operating a call center would probably not be entitled to such a waiver since the common way that IXC's serve calls centers is through dedicated services such as special access to handle the traffic volumes - not circuit switched trunks subject to switched access charges. Therefore, a rural CLEC that has a call center customer would not typically experience large increases in switched access minutes or a higher than average call-time per line.

The attached slides were discussed in the meeting. Additionally, Verizon has attached a list containing a number of the CLECs engaged in traffic pumping activity. With only a handful of exceptions, these CLECs are either claiming the rural exemption or are mirroring the interstate access rate of a NECA LEC.

Sincerely,

A handwritten signature in black ink that reads "Donna Epps".

Attachments

cc: Dana Shaffer
Don Stockdale
Randy Clarke

Jay Atkinson
Doug Slotten
Lynne Engledow

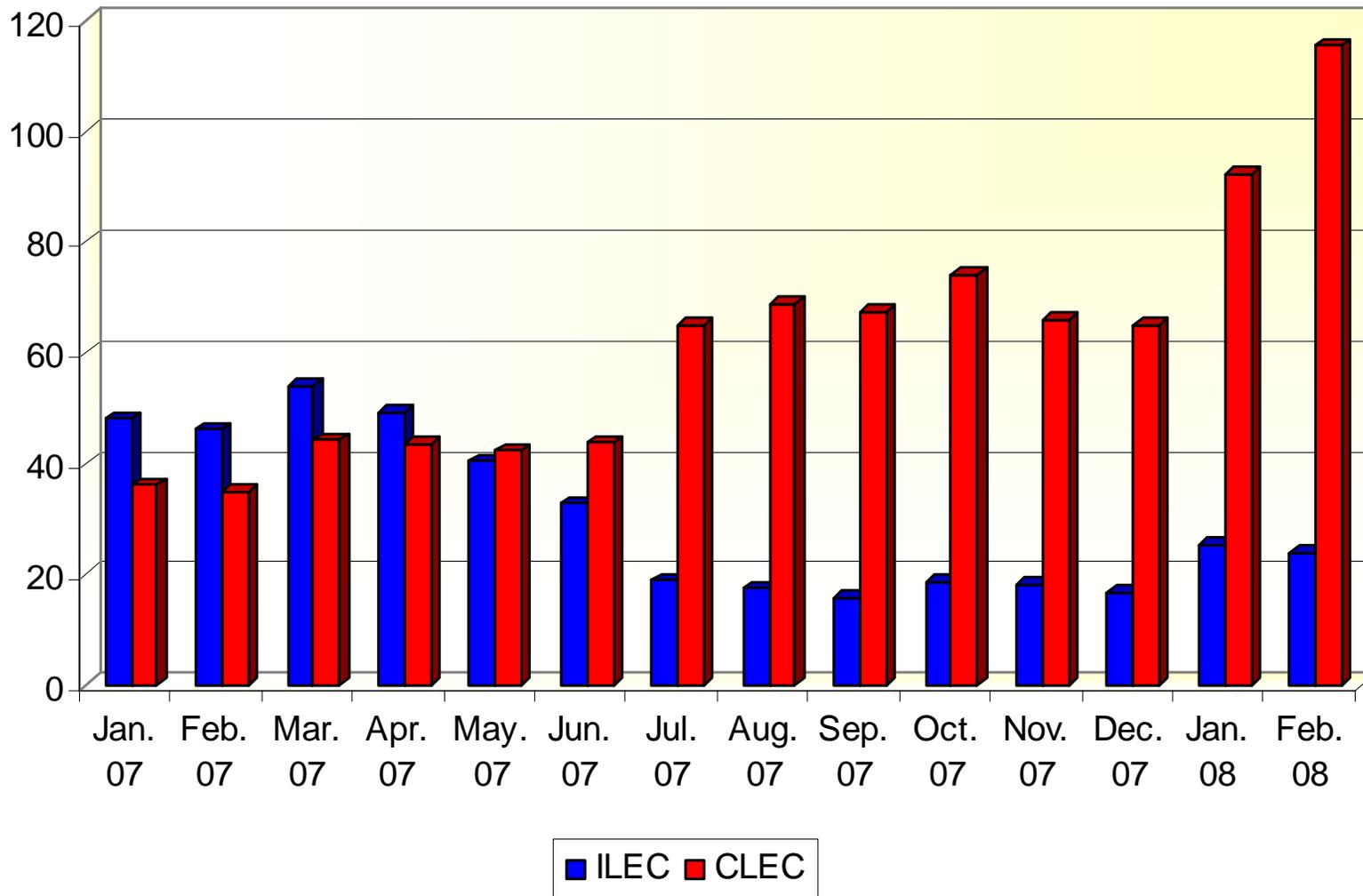


Traffic Pumping Solutions

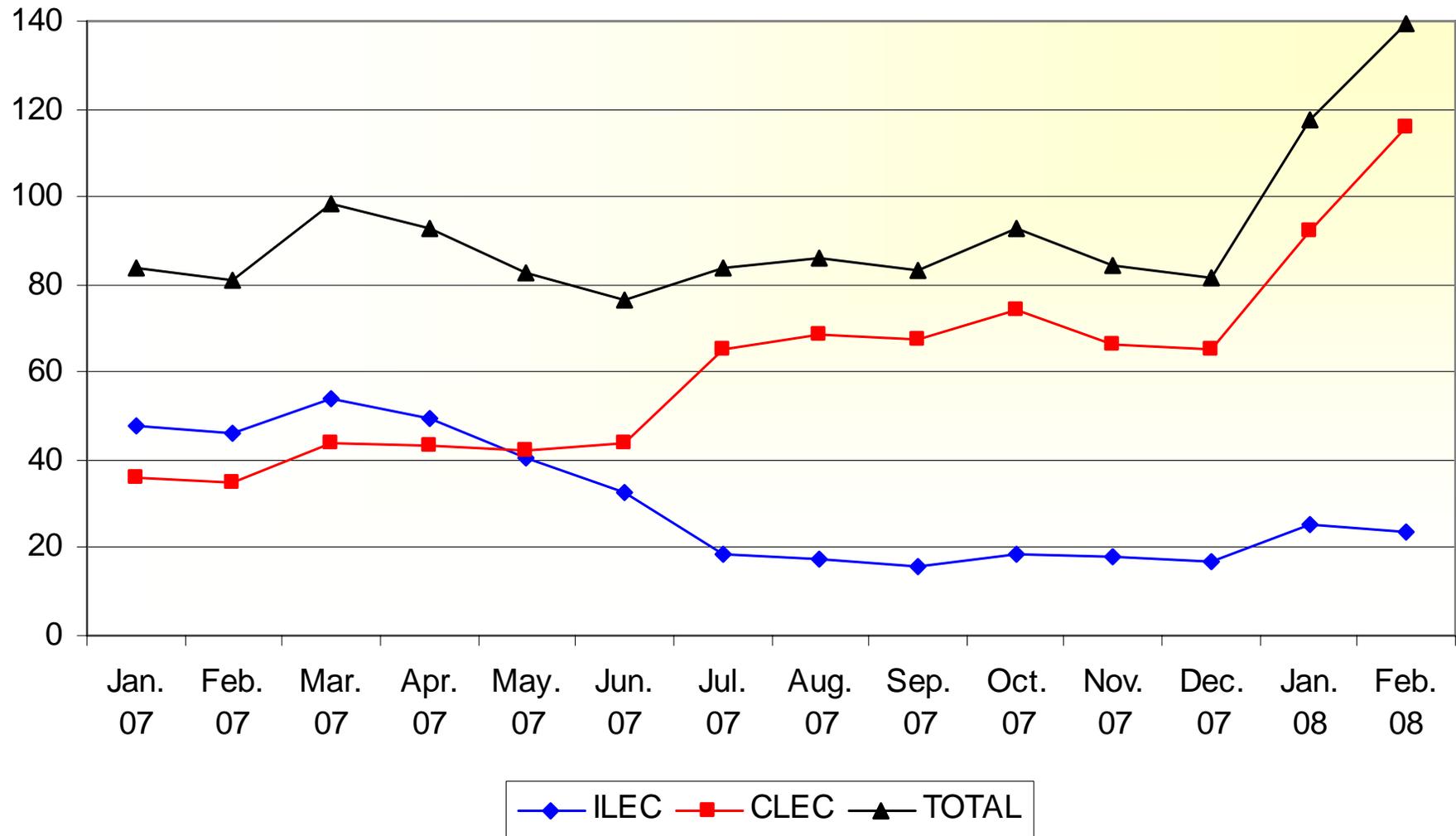


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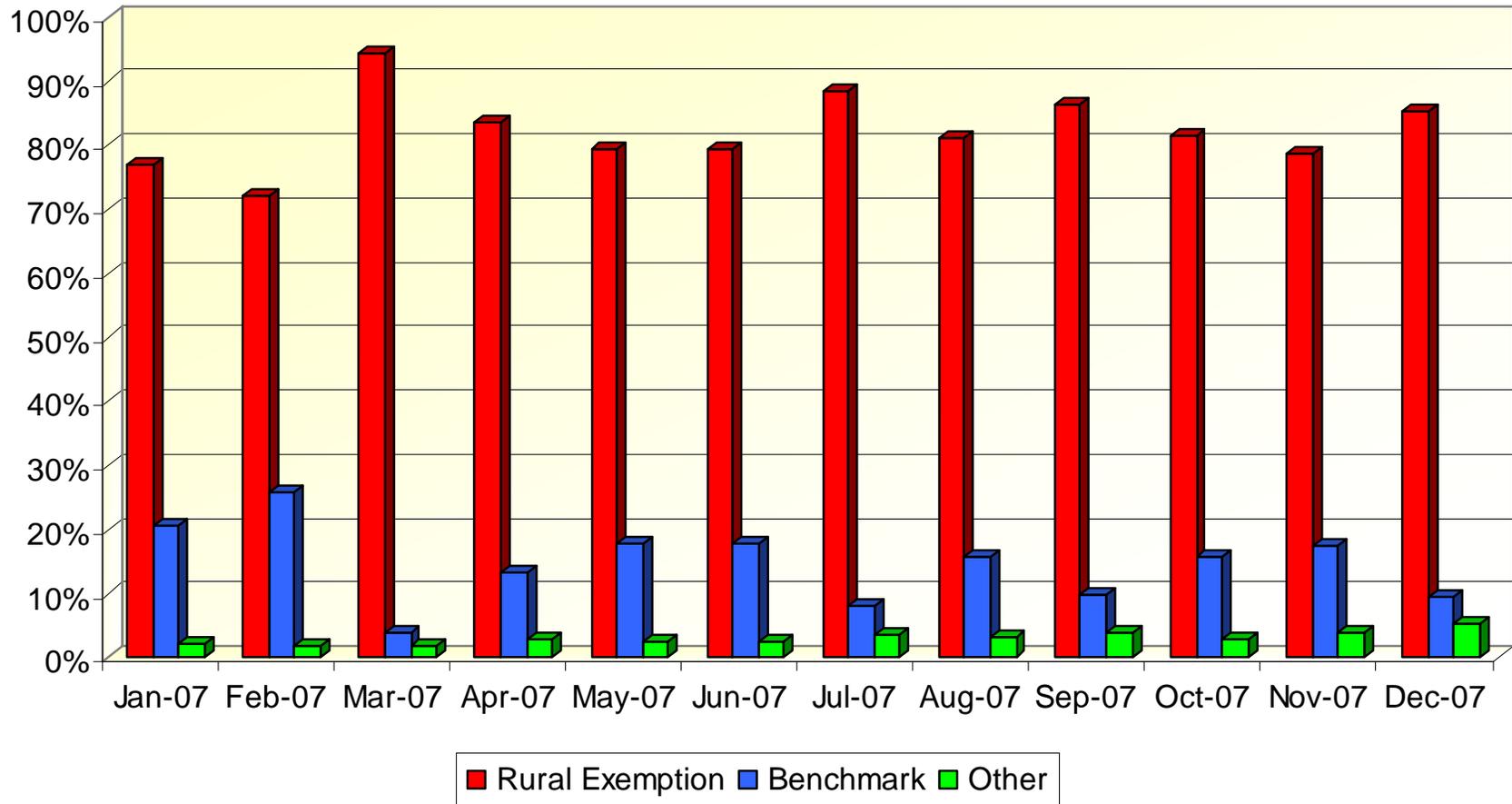
Traffic Volume by ILEC and CLEC Traffic Pumpers 2007 – YTD in Millions of MOU



Traffic Pumping Volume by ILEC , CLEC and Total 2007 – YTD in Millions of MOU



Traffic Pumping By Rural Exemption, Benchmark to NECA, and Other CLECs (% of Billing)



Traffic Pumping CLECs

Aventure Communication Technology, LLC
Accesscom, Inc.
Bluegrass Telephone Company, Inc.
BTC, Inc.
Capital Telephone Company, Inc.
Coon Creek Telecommunications Corp.
Great Lakes Communication Corp.
North County Communications Corp.
Northern Valley Communications, LLC
O1 Communications, Inc.
Omnitel Communications, Inc.
Pinpoint Communications, Inc.
Premier Communications, Inc.
RNK, Inc.
Sancom, Inc.
Spencer Municipal Communications Utility
TC3 Telecom, Inc.
Tekstar Communicaitons, Inc.
Telewise, LLC
Total Telecommunications Services, Inc.