

for Virginia, Verizon can only manufacture a [Begin Highly Confidential]

[End Highly Confidential] of competitive lines by improperly counting CLECs relying wholly on Verizon's facilities on the competitive side of the ledger.⁶⁹ And even if these non-facilities-based CLECs were properly part of the analysis – which they are not – by its own numbers Verizon has a greater market share than all cable and CLECs combined. As the Commission made clear in the *Six MSA Order*, this alone shows that Verizon is not entitled to forbearance.⁷⁰ In sum, for multiple reasons even taking Verizon's line counts at face value, the petition should be denied.⁷¹

Worse still, except for purposes of denying the petition, the Commission should *not* take Verizon's numbers at face value, because they are not credible. Verizon's market share data is

⁶⁹ In the *Six MSA Order*, the Commission assumed the relevance of this data only for purposes of denying Verizon's forbearance petition. *Six MSA Order* ¶ 27 n.89. But the Commission's decisions granting forbearance have properly focused on facilities-based competition and have not relied on wholesale or resold services as a sufficient basis for forbearance. See, e.g., *Omaha Forbearance Order* ¶ 60 ("forbearing from section 251(c)(3) and the other market-opening provisions of the Act and our regulations where no competitive carrier has constructed substantial competing 'last-mile' facilities is not consistent with the public interest"); *ACS UNE Forbearance Order* ¶ 23 (holding same); see also *supra* at Part III-A-1.

⁷⁰ See *Six MSA Order* ¶ 30 ("where the Commission has found an incumbent carrier to be nondominant in the provision of access services, it had a retail market share of less than 50 percent and faced significant facilities-based competition").

⁷¹ Verizon's passing reference to alleged competition from over-the-top VoIP makes clear that even Verizon does not seriously consider such service to affect a determination of Verizon's market share. As the Commission previously recognized, there is no data supporting the claim that over-the-top VoIP currently functions as a substitute for wireline products. *Six MSA Order* ¶ 23. Verizon offers no new evidence here. Moreover, the Virginia State Corporation Commission recently concluded that the market share of over-the-top VoIP providers in Virginia was so small that such providers could not be considered serious competitors to Verizon in Virginia at this time. *In re Application of Verizon Virginia Inc. and Verizon South Inc. for a Determination that Retail Services are Competitive and Deregulating and Detariffing of the Same*, Order on Reconsideration, Feb. 1, 2008, Virginia State Corporation Commission, Case No. PUC-2007-00008 at 9 (attached as Exhibit 7). Notably, Verizon's own data in that proceeding showed that less than 4% of people surveyed subscribed to any VoIP Service at all. *Id.*

based on residential white pages listings, rather than actual line data.⁷² Verizon itself acknowledges that its white pages data are off by more than **[Begin Confidential]** **[End Confidential]** lines with respect to Verizon's own lines.⁷³ That is a significant error; it is more than **[Begin Highly Confidential]** **[End Highly Confidential]** the number of total CLEC lines claimed by Verizon. Moreover, the error rate is likely significantly higher for competitors' lines, for which Verizon will necessarily not have as good information as it does for its own. Indeed, Verizon excludes the former MCI lines from its error rate analysis, and the MCI figures likely also show greater inaccuracy.⁷⁴

Additionally, Verizon's directory figures have been explicitly criticized by the Virginia State Corporation Commission. In 2006, the State Commission issued a Staff Report finding the accuracy of Verizon's directory listings to be seriously flawed, citing "several interrelated problems" including "unnecessarily cumbersome processes" and "human error."⁷⁵ Hundreds of comments were filed in that proceeding by a broad spectrum of parties, over 200 of which identified errors in directory listings, and 149 indicating that directory problems persisted for over a year.⁷⁶ Cox harshly criticized the accuracy of Verizon's white page listings in that same State Commission proceeding, stating that "[t]he bulk of the directory listing errors and omissions are caused by broad, systemic problems in Verizon's directory listing process that

⁷² See Petition at 11; Att. B.

⁷³ Lew/Wismatt/Garzillo Declaration ¶ 20.

⁷⁴ See *Six MSA Order* ¶ 39 n.129 (faulting reliability of Verizon's data where it failed to include former MCI lines).

⁷⁵ *In the Matter of Investigation Directory Errors and Omissions of Verizon Virginia Inc. and Verizon South Inc.*, Virginia State Corporation Commission, Report of Division of Communications, Case No. PUC-2005-00007, September 7, 2006, at 2 (attached as Exhibit 8).

⁷⁶ *Id.* at 9.

Verizon has failed to adequately address.”⁷⁷ Moreover, many of these problems are specific to listings for competitive providers, as “[s]ubmission of order for directory listings is unnecessarily time-consuming and error prone because Verizon uses out-of-synch systems, fails to retain listings where the number has been ported to another local exchange carrier, and requires that competitive LECs verify Verizon’s work.”⁷⁸ In short, the white pages data that Verizon relies upon to determine competitors’ market share is highly suspect. The Commission should not rely upon this inaccurate data in this proceeding, and instead should insist on actual line counts as it has done in the past.⁷⁹

B. Verizon’s Evidence Of Competition In The Enterprise Market Is Wholly Unpersuasive

Verizon fares no better with respect to its showing for the enterprise market. In the *Six MSA* Order, the Commission concluded that “evidence in the record demonstrates the comparatively limited role of the cable operators in serving enterprise customers in [the Virginia

⁷⁷ *In the Matter of Investigation Directory Errors and Omissions of Verizon Virginia Inc. and Verizon South Inc.*, Virginia State Corporation Commission, Comments of Cox Virginia Telecom, Inc., Case No. PUC-2005-00007, March 25, 2005, at 2 (attached as Exhibit 9).

⁷⁸ *Id.* at 6. As recently as April 21, 2008, the Virginia State Corporation Commission found that Verizon failed an audit of directory listings in Northern Virginia. See *In the Matter of Investigation Directory Errors and Omissions of Verizon Virginia Inc. and Verizon South Inc.*, Virginia State Corporation Commission, Report of the Division of Communications of Northern Virginia, Case No. PUC-2005-00007, April 21, 2008 (attached as Exhibit 10).

⁷⁹ *Six MSA Order*, ¶ 27 n.89 (noting that the Commission relies on actual line counts) & ¶ 37 n.115 (noting that in the Qwest Omaha or ACS UNE forbearance proceedings, “the Commission relied upon actual line counts submitted by the incumbent LEC and the major cable provider in the market ...” to calculate market shares, and citing *Omaha Forbearance Order* ¶¶ 28-29, 58 n.152; *ACS UNE Forbearance Order* ¶ 28). Verizon notes that the Commission cited white page listings in an Order regarding forbearance of the Commission’s rules to Qwest’s provision of certain telecommunications services on an integrated basis. Petition at 11. But the Commission did not rely on the directory listings there as a way of distinguishing between subscriber lines offered by competing carriers, but rather to estimate generally the number of consumers served by facilities-based providers. *In re Petition of Qwest Communications International Inc. for Forbearance from Enforcement of the Commission’s Dominant Carrier Rules As They Apply After Section 272 Sunsets*, Memorandum Opinion and Order, 22 FCC Rcd 5207, ¶ 17 n.62 (2007). As explained above, more precision is required here, and in any event, there were no questions raised in that proceeding as to whether the Qwest directory listings were accurate.

Beach MSA] today. Nor does the record reveal other competitors in [this] MSA that have deployed their own extensive last-mile facilities for use in serving the enterprise market.”⁸⁰

Verizon has offered no evidence to alter these conclusions here.

Verizon again relies heavily on Cox’s presence as a competitor, but provides no data to show that Cox competes significantly in the enterprise market. Instead, Verizon’s petition resuscitates anecdotal evidence that the Commission rejected in the *Six MSA Order*, pointing to general advertising statements on Cox’s website.⁸¹ But this provides no information about the extent to which Cox can reach and serve enterprise customers. In fact, cable networks rarely extend to the bulk of enterprise customers, since these networks were originally built primarily to provide television service to residential customers.⁸² In addition, “[e]ven where cable television [copper coaxial] networks reach [] business customers,” the networks “typically lack the capacity to serve large numbers of business customers that require telecommunications and Internet services at DS-1 and higher speeds.”⁸³ Moreover, cable operators such as Cox cannot presently offer sufficient service level guarantees to support competitive enterprise services, and enterprise customers have raised concerns with their reliability and security.⁸⁴

Verizon nevertheless asserts that Cox and two other smaller competitors have fiber facilities to enterprise locations,⁸⁵ however, Verizon fails to show precisely where Cox’s or its smaller competitors’ fiber cable network is in relation to the enterprise customers, if it is operational, or what percentage of customers in what wire centers actually have access to these

⁸⁰ *Six MSA Order* ¶ 37 (footnote omitted).

⁸¹ Petition at 24.

⁸² Comments of XO et al., WC Docket No. 05-25 (filed Aug. 8, 2007) at Declaration of Ajay Govil, XO ¶¶ 22-23.

⁸³ *Id.* ¶ 24.

⁸⁴ *Id.* ¶¶ 22-24; Ad Hoc Comments, WC Docket No. 05-25 (FCC filed August 8, 2007) at 7.

⁸⁵ Petition at 25, 28.

fiber facilities. Finally, Verizon relies on anecdotal information it pulled from the World Wide Web to assert that Cox has the attributes the Commission identified in the *Omaha Forbearance Order* to make it a competitive threat for enterprise customers in Virginia Beach, that Cox's marketing efforts and emerging success in the enterprise market is at least as advanced in Virginia Beach as in Omaha, and that Cox offers wholesale services in the Virginia Beach MSA.⁸⁶ All of this ignores Cox's own statement to the Commission just last year that Verizon's estimates as to Cox's presence in Virginia Beach are overstated and its numbers are widely inflated.⁸⁷ And in any event, the Commission has previously found that reliance on website postings is unpersuasive.⁸⁸ In sum, Verizon does not provide evidence of actual, sustainable, and robust competition in the enterprise market.⁸⁹

C. Verizon's Line Loss Arguments Should Be Rejected

Verizon also argues that with respect to both its residential and business service, reductions in the number of lines it serves provide independent grounds for granting its

⁸⁶ Petition at 24-26.

⁸⁷ Comments of Cox Communications, Inc., WC Docket 06-172 (FCC filed Mar. 5, 2007) at 27.

⁸⁸ Six MSA Order ¶ 40.

⁸⁹ Verizon also lists a number of other potential competitors for enterprise customers in Cox's service area including other telecom carriers and fixed wireless providers. Petition at 27, 29. However, Verizon provides no data for any of these providers, relying instead on general statements about potential competition in the enterprise market from the *Verizon/MCI Merger Order*, or vague marketing claims from the providers' websites. *Id.* This is hardly evidence of actual competition, and is no more persuasive now than when considered by the Commission in the *Six MSA Order*. Similarly, Verizon resubmits evidence that the Commission has previously rejected in its forbearance analysis, such as use of Verizon's special access services to serve business customers. *See Six MSA Order* ¶ 38 ("the Commission already has rejected the argument that use of special access, in itself, is a reason to forbear from UNE obligations, based on a number of different factors"). In Cavalier's business dealings in Virginia Beach, it does not generally encounter anyone competing for enterprise customers other than Verizon and Cox. *See Wainright Decl.* ¶ 9.

petition.⁹⁰ *These arguments are meritless, and the Commission explicitly rejected them in the Six MSA Order:*

We find that the evidence considered in our market analysis above provides the best evidence regarding the state of competition in the relevant markets. In particular, we reject Verizon's attempt to demonstrate that a particular MSA is competitive by calculating percentage reductions in retail lines. There are many possible reasons for such decreases unrelated to the existence of last-mile facilities-based competition.⁹¹

The Commission was correct in this assessment. Verizon line loss data would be relevant only if it were presented in conjunction with data about the corresponding lines won by competitive carriers. But Verizon provides no such data.

Relying on line loss data in isolation is unreliable. As the Commission has explained, "the abandonment of a residential access line does not necessarily indicate capture of that customer by a competitor."⁹² In the *Six MSA Order*, the Commission pointed to a variety of other explanations, including conversion of second residential lines to a DSL line for Internet access.⁹³ While Verizon asserts that only some of its line loss can be attributed to DSL, it does not attempt to refute other plausible explanations that are also unrelated to the extent of competition. For example, with respect to former MCI lines, Verizon appears to have made a business decision not to continue to market the service. Similarly, while population may have grown in Virginia Beach, the population growth may be weighted toward groups, such as children living at home, that would not be expected to generate increased subscriber lines. In the end, it is unnecessary to consider exhaustively all of the possible explanations for line loss. The Commission instead should rely on actual line counts of competitors, as it has in the past.

⁹⁰ Petition at 17-20, 32.

⁹¹ *Six MSA Order* ¶ 32 (footnote omitted); *see also id.* ¶ 39.

⁹² *Id.* ¶ 39.

⁹³ *Id.* ¶ 39.

IV. VERIZON HAS NOT AND CANNOT DEMONSTRATE A LACK OF IMPAIRMENT HERE

Verizon claims that the record shows that competition without UNEs is possible in the Cox service area of the Verizon MSA; thus, according to Verizon, the impairment standard of Section 251(d)(2) is not met and the Commission must lift unbundling obligations in response to Verizon's forbearance petition.⁹⁴

Even assuming it is appropriate for the Commission to engage in an impairment analysis in adjudicating Verizon's forbearance petition – a view the Commission has thus far rejected – Verizon has not even attempted to show that it meets the Commission's test for a lack of impairment here. With respect to DS1 and greater capacity loops, the Commission has defined impairment in terms of specific tests that “require[] both a minimum number of business lines served by a wire center *and* the presence of a minimum number of fiber-based collocators to show that requesting carriers are not impaired.”⁹⁵ For transport, the Commission adopted a test for impairment “to identify three tiers of wire centers based on the number of business lines served and the presence of fiber-based collocations, which we use to assess economic conditions at wire centers.”⁹⁶ Verizon has provided no evidence that any of these tests can be met for any part of the Cox service area of the Virginia Beach MSA, nor could they be, since there exists only the most minimal facilities-based competition in this area.⁹⁷

⁹⁴ Petition at 36-38.

⁹⁵ *Triennial Review Remand Order* ¶ 168. Verizon does not seriously contend that CLECs are not impaired without access to DS0 loops, as Verizon has not offered a shred of evidence that self-provisioning these facilities is economically or technically viable. Both the Commission and the Court of Appeals for the D.C. Circuit have recognized that “the lowest capacity level – a DS0 copper loop to the customer premises – is the most obvious candidate for an unbundling obligation.” *Id.* ¶ 149 & n.417 (citing *U.S. Telecom Ass'n v. FCC*, 359 F.3d 554, 561 (D.C. Cir. 2004)).

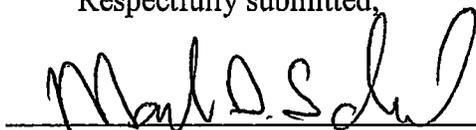
⁹⁶ *Id.* ¶ 66.

⁹⁷ While Verizon's petition plainly seeks forbearance from unbundling loops and transport regardless what an impairment analysis would show, Verizon has offered no argument or

CONCLUSION

For the foregoing reasons, Cavalier requests that the Commission deny Verizon's petition for forbearance.

Respectfully submitted,



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evidence whatsoever for why forbearance from these impairment tests would meet the requirements of section 10. Cavalier accordingly does not understand Verizon to be seeking such relief.

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MAY 13 2008
Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Petition of the Verizon Telephone Companies) WC Docket No. 08-49
for Forbearance Pursuant to)
47 U.S.C. § 160(c) in Cox's Service Territory in)
Virginia Beach Metropolitan Statistical Area)
)

EXHIBITS TO
CAVALIER TELEPHONE, LLC'S OPPOSITION TO VERIZON'S
PETITION FOR FORBEARANCE

REDACTED MATERIAL

REDACTED - FOR PUBLIC INSPECTION

May 13, 2008

EXHIBIT 1

Virginia State Corporation Commission

Division of Communications

Telephone Company Tariff Filing Log for Tariffs Received Between 1/1/2007 and 12/31/2007, listed in chronological order by Carrier Type CLEC (Competitive Local Exchange Carrier), ILEC (Incumbent Local Exchange Carrier), and IXC (Interexchange Carrier).

ILEC Tariffs:

Tariff ID	Company	Date Filed	Requested Effective Date	Subject
5053	VERIZON VIRGINIA INC.	01/05/2007	02/05/2007	This filing is being issued to designate and explain Rate class 8, 8a and 8b as outlined in this tariff. Local Exchange Service, S.C.C. Va.-No. 202 Section 2 - 1st Revised Page 1a, 13th Revised Page 2, 8th Revised Page 3, 14th Revised Page 4, 7th Revised Page 5, 18th Revised Page 6, 12th Revised Page 7, 15th Revised Page 8, 10th Revised Page 9, 8th Revised Page 10, 3rd Revised Page 29, 3rd Revised Page 30, 4th Revised Page 30a, Original Pages 30b, and 30c, 4th Revised Page 31, 3rd Revised Page 32 Section 9, 3rd Revised Page 9, 2nd Revised Page 10-
5063	VERIZON VIRGINIA INC.	01/16/2007	02/15/2007	The purpose of this filing is to introduce a new Duplicate Bill Charge that will be applied when a Verizon Virginia, Inc. customer requests a printed copy of a residential telephone bill that is more than six months old. Revised page: Tariff 203, Section 3A, page 1.
5067	VERIZON SOUTH INC.	01/17/2007	01/18/2007	This filing is being issued to eliminate the ISDN PRI - Remote/Host Transport Charge, add clarifying language regarding Remote/Hose Switching and reduce the ISDN-PRI Term & Volume Package Rates. Revised pages: Appendix A, pages 47, 49, 50, 53, 57 and 58.
5068	CENTEL	01/18/2007	02/18/2007	This filing changes the terms and conditions under which the Solutions Package Progressive Plan must be purchased. This change does not affect current customers. Revised page: Section 22, page 5.0.3.
5069	UNITED	01/18/2007	02/18/2007	This filing changes the terms and conditions under which the Solutions Package Progressive Plan must be purchased. This change does not affect current customers. Revised page: Section U19, page 4.3.
5074	VERIZON VIRGINIA INC.	01/31/2007	03/02/2007	This filing is being issued to change the text to make the reference to the Home Voice Mail offering more generic. Revised pages: SCC Tariff No. 203, Section 21, pages 4, 6 and 10.
5075	VERIZON SOUTH INC.	01/31/2007	03/02/2007	This filing is being issued to change the text to make the reference to the Home Voice Mail offering more generic. Revised pages: Section 16, pages 15, 17 and 21.
5076	VERIZON VIRGINIA INC.	02/01/2007	03/03/2007	The purpose of this filing is to modify the Business Link Rewards Plan to include DSL*, FiOS* and Long Distance* revenue in the qualifying threshold and to make changes to the tariff language relevant to eligibility requirements for participation in the plan. Revised pages: SCC No. 206, Section 2, pages 1 and 2.
5087	BURKES GARDEN	02/12/2007	03/01/2007	This filing adds several custom calling features Caller Id, Call Waiting ID and *69/Return Call. Revised pages: Section 1, pages 1 and 3,
5107	VERIZON SOUTH INC.	03/01/2007	04/01/2007	This filing is being made to increase the rate for one of Verizon's competitive services, National Directory Assistance. Revised page: Appendix A, 2nd Revised Page 1.
5108	VERIZON VIRGINIA INC.	03/01/2007	04/01/2007	This filing is being made to increase the rate for one of Verizon's competitive services, National 411 Service. Revised page: SCC Tariff No. 206, Section 3, 3rd Revised Page 2.
5109	VERIZON SOUTH INC.	03/01/2007	04/01/2007	In this filing, Verizon is increasing its rates for selected OLETS offerings consistent with Verizon's Plan for Alternative Regulation. Revised pages: Section 13, pages 5, 5.1 and 12.

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ILEC Tariffs:

Tariff ID	Company	Date Filed	Requested Effective Date	Subject
5110	VERIZON VIRGINIA INC.	03/01/2007	04/01/2007	In this filing, Verizon is increasing its rates for selected OLETS offerings consistent with Verizon's Plan for Alternative Regulation. Revised pages: SCC Tariff No. 203, Section 6, page 12a; Section 21, pages 11, 12 and 12a.
5112	VERIZON VIRGINIA INC.	03/02/2007	04/01/2007	With this filing Verizon is increasing the rates for its Verizon Local Package, Verizon Local Package Extra, Verizon Regional Package and Verizon Regional Package Extra optional residential service packages. The market classification for each package is a Bundled Service. Revised pages: SCC Tariff No. 203, Section 31 pages 3, 5 and 7.
5113	VERIZON SOUTH INC.	03/02/2007	04/01/2007	With this filing Verizon is increasing the rates for its Verizon Local Package, Verizon Local Package Extra, Verizon Regional Package and Verizon Regional Package Extra optional residential service packages. The market classification for each package is a Bundled Service. Revised pages: Section 16 pages 14, 16 and 18.
5115	UNITED	03/02/2007	04/04/2007	This filing removes language for V&H Coordinates and determination of Airline Miles from this tariff. This information is maintained in the NECA Tariff 4. Revised pages: Section U23, pages 17, 19, 20, 21, 22, 23 and 24.
5121	VERIZON VIRGINIA INC.	03/09/2007	03/14/2007	This filing is being made to change the limits of Verizon's liability for Directory errors and omissions and to provide additional explanatory information regarding Directory errors. The issued and effective dates of these tariffs pages is in accord with Commission agreement. Revised page: Tariff No. 201, Section 1, page 30 and 30a.
5122	VERIZON SOUTH INC.	03/09/2007	03/14/2007	This filing is being made to change the limits of Verizon's liability for Directory errors and omissions and to provide additional explanatory information regarding Directory errors. The issued and effective dates of these tariffs pages is in accord with Commission agreement. Revised page: Section 2, page 16 and 16.1.
5123	CENTEL	03/12/2007	04/12/2007	This filing grandfathers various Solutions - Residence packages. Ongoing subscription to these packages has significantly declined, with new customers most often subscribing to a package not being grandfathered under this filing. This filing also includes revisions previously approved on August 5, 2005 and August 1, 2006 that were subsequently deleted from the tariff in error. Revised pages: Section 22, pages 2, 3, 4, 5, 5.0.1, 5.0.2 and 5.0.3, 6.1; Section 122, pages 1 and 1.1.
5124	UNITED	03/12/2007	04/12/2007	This filing grandfathers various Solutions - Residence packages. Ongoing subscription to these packages has significantly declined, with new customers most often subscribing to a package not being grandfathered under this filing. This filing also includes revisions previously approved on August 5, 2005 and August 1, 2006 that were subsequently deleted from the tariff in error. Revised pages: Section U19, pages 3, 4, 4.1, 4.2, 4.3 and 4.4; Section U100, pages 8 and 8.1.

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ILEC Tariffs:

Tariff ID	Company	Date Filed	Requested Effective Date	Subject
5142	UNITED	03/22/2007	04/22/2007	This filing adds transmission speeds of 3.0 Mbps, 6.0 Mbps, 10.5 Mbps and 12.0 Mbps for Frame Relay Access Lines. Also, this filing reduces the nonrecurring charge associated with the 1.544 Mbps Frame Relay Access Line for the two and three year terms, reduces the monthly rate for Permanent Virtual Circuit (PVC) - IntraLATA for Speeds over 1.536 through 4 Mbps Frame for LAN, and reduces all monthly rates for PVC - IntraLATA for speeds over 4 Mbps through 16 Mbps. In addition, the wavier for non-recurring charges ordered in conjunction with the Company's non-regulated Dedicated IP Service is expanded to include all speeds. Revised pages: Section U13, pages 74.1, 78, 78.1, 80, 81 and 82.
5143	VERIZON VIRGINIA INC.	03/23/2007	03/26/2007	The purpose of this filing is to make changes to the Termination Liability Language relevant to Verizon's Enhanced FlexGrow service. The changes will result in a reduction in the Termination Liability charges billed to customers who terminate their Enhanced FlexGrow service prior to the completion of their current term commitment period. Additional language is also being introduced to provide further clarification of the Termination Liability guidelines. Revised pages: Tariff No. 204, Section 17, pages 1, 2.1 and 2.2.
5150	VERIZON SOUTH INC.	03/30/2007	04/01/2007	This filing is being issued to grandfather (Limited Availability designation LA-3) Verizon's ISDN PRI Service three-year standard contracts. Prior approval of this shortened interval was received from SCC Staff. Revised pages: Appendix A, pages 37, 53 and 57.
5151	VERIZON VIRGINIA INC.	03/30/2007	04/01/2007	This filing is being issued to grandfather (Limited Availability designation LA-3) Verizon's ISDN PRI Service three-year standard contracts. Prior approval of this shortened interval was received from SCC Staff. Revised pages: Tariff No. 206, Section 11, pages 12, 15, 16, 18, 19 and 20.
5161	CENDEL	04/12/2007	05/14/2007	This filing introduces MultiLine Bundle for business customers. This service is classified as Bundled. Revised pages: Concurrence page 1, Index page 5, Section 19, TOC page 2 and page 21.
5162	UNITED	04/12/2007	05/14/2007	This filing introduces MultiLine Bundle for business customers. This service is classified as Bundled. Revised pages: Index page 6, Section 22, TOC page 2, pages 23 and 24.
5171	VERIZON SOUTH INC.	04/27/2007	04/30/2007	This administrative filing is being issued per request of, and in agreement with Commission Staff. Verizon issued tariff changes on 3/30/07 to grandfather the ISDN-PRI-3-Year Standard Term Rates. The purpose of this filing is to make requested typographical changes to the text to further clarify the language associated with grandfathering of this service option. Revised pages: Appendix A, pages 47, 53 and 57.
5172	VERIZON VIRGINIA INC.	04/07/2007	04/30/2007	This administrative filing is being issued per request of, and in agreement with Commission Staff. Verizon issued tariff changes on 3/30/07 to grandfather the ISDN-PRI-3-Year Standard Term Rates. The purpose of this filing is to make requested typographical changes to the text to further clarify the language associated with grandfathering of this service option. Revised pages: SCC Tariff 206, Section 11, pages 12, 15, 16, 18, 19 and 20.

Virginia State Corporation Commission

Division of Communications

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ILEC Tariffs:

Tariff ID	Company	Date Filed	Requested Effective Date	Subject
5180	VERIZON VIRGINIA INC.	07/12/2007	08/10/2007	<p>The purpose of this filing is to add language to the tariff allowing the continuation of the 6% Monthly CTB Discount with any extensions of the term of the Revised Volume Incentive Plan. This filing also reduces the number of months the customer will continue to receive the Monthly CTB Discount following the termination of the revised plan. Revised pages: Tariff No. 201, Section 7A, pages 17 and 19.</p> <p>NOTE: Verizon Virginia filed a replacement filing dated 7/11/07, to provide additional language to further clarify the determination of the monthly CTB discount applicable to new vs. existing customers to the Revised Volume Incentive Plan. EFFECTIVE DATE CHANGED TO 8/10/07.</p> <p>NOTE: Verizon Virginia by letter dated 7/12/07 filed a replacement tariff and filed a customer notice under proprietary basis. The filing also reflect new date changes as follows: Issued July 11th and Effective August 10.</p>
5188	CENDEL	05/18/2007	06/20/2007	<p>This filing introduces Voice Business Continuity as a new offering, and provides business customers with the ability to establish predetermined alternate routing plans for incoming voice traffic, which can be used as a disaster recovery service. Revised pages: Index Sixth Revised 8, Section 13 - Third Revised Contents Page 6, Original Page 99-104.</p>
5189	UNITED	05/18/2007	06/20/2007	<p>This filing introduces Voice Business Continuity as a new offering, and provides business customers with the ability to establish predetermined alternate routing plans for incoming voice traffic, which can be used as a disaster recovery service. Revised pages: Concurrence - Ninth Revised Page 1, Index Fourth Revised Index 9, Section U13 Fifth Revised Contents Page 4, Original Page 113.</p>
5192	VERIZON SOUTH INC.	05/25/2007	06/26/2007	<p>This filing is issued to add a new Bundle Discount for customers that subscribe to the Verizon Regional Essentials Bundled Service ("Regional Essentials"): This new discount will apply when Regional Essentials is bundled with an unlimited domestic long distance calling plan plus select Verizon FiOS products with a 12 or 24 month commitment. Revised pages: General Customers Services Tariff: Section 16, Original page 21.2.</p>
5193	VERIZON VIRGINIA INC.	05/25/2007	06/26/2007	<p>This filing is issued to add a new Bundle Discount for customers that subscribe to the Verizon Regional Essentials Bundled Service ("Regional Essentials"): This new discount will apply when Regional Essentials is bundled with an unlimited domestic long distance calling plan plus select Verizon FiOS products with a 12 or 24 month commitment. Revised pages: SCC Tariff No. 203, Section 31, Original page 10b.</p>
5202	VERIZON VIRGINIA INC.	06/01/2007	06/15/2007	<p>With this filing Verizon is adding a footnote to provide a description and full price of additional bundled offerings that are subject to disconnection for nonpayment in accordance with DNP Rule 20VAC5-413-10.B. The language in the footnote incorporates the verbiage suggested by your Commission Staff. Prior approval was obtained from Staff was agreed for the shortened interval. Revised pages: SCC Tariff No. 203, Section 31, pages 5, 7, 10 and 11.</p>

Virginia State Corporation Commission
Division of Communications

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ILEC Tariffs:				
Tariff ID	Company	Date Filed	Requested Effective Date	Subject
5242	VERIZON VIRGINIA INC.	07/20/2007	08/20/2007	<p>AMENDMENT FILING DATED 8/17/07: This filing is being submitted to correct the location of the tariff pages; with the concurrence of the Commission staff the effective date remain August 20, 2007. Revised pages: SCC No. 203, TOC page 2 and 3; Section 31, pages 1, 12, 13, 14, 15, 16, 17 and 18.</p> <p>NOTE: 7/20 Filing amended -- This filing introduces two new optional business service packages. They are Unlimited Dial Tone Line (DTL) and Unlimited Custopak Packages. SCC No. 203, TOC page 2 and 3; Section 34, pages 1 - 7.</p>
5243	VERIZON SOUTH INC.	07/20/2007	08/20/2007	<p>This filing introduces two new optional business service packages. They are Unlimited Dial Tone Line (DTL) and Unlimited Custopak Packages. Revised pages: Section 16, TOC page 1.1, pages 23 - 28.</p>
5246	VERIZON VIRGINIA INC.	07/25/2007	07/26/2007	<p>This administrative correction has no impact on Verizon Virginia's customers or bills as the correct rate was communicated to customers via bill insert and the correct rate was billed to customers effective 9/1/06. This filing is in agreement with the SCC Staff. Revised page: SCC No. 203, Section 6, page 12a.</p>
5247	VERIZON VIRGINIA INC.	07/30/2007	09/01/2007	<p>The market classification for services under Verizon's Plan includes BLETS, OLETS, Bundled and Competitive Services. In this filing, Verizon is increasing its rates for selected BLETS and OLETS service offerings consistent with Plan Section F.4., which provides the price increases for BLETS and OLETS may not exceed a percentage amount that equates to 10% per twelve-month period since the most recent increase. In no instance does the resulting price for a BLETS exceed its current price ceiling. The 2007 price ceiling have already been provided to Staff under separate cover. Select business rates are also being reduced consistent with Plan provisions. With this filing Verizon is also changing the Rate Schedule for its Business Two Point Service. The market classification for this service under the Plan is considered as Competitive Service. There have been no increases in the price of any of these services within the past twelve months. Revised pages: SCC No. 202, Section 2, pages 15-29, 30, 30a, 30b, 30c, 31 and 33; Section 7, page 2; SCC No. 203, Section 3, pages 6a and 8; Section 3a, page 1; Section 4, page 6; Section 6, page 12a; Section 9, page 2; Section 21, pages 11 and 12; and SCC No. 206, Section 6b, page 5.</p>
5248	VERIZON SOUTH INC.	07/30/2007	09/01/2007	<p>The market classification for services under Verizon's Plan includes BLETS, OLETS, Bundled and Competitive Services. In this filing, Verizon is increasing its rates for selected BLETS and OLETS service offerings consistent with Plan Section F.4., which provides the price increases for BLETS and OLETS may not exceed a percentage amount that equates to 10% per twelve-month period since the most recent increase. In no instance does the resulting price for a BLETS exceed its current price ceiling. The 2007 price ceiling have already been provided to Staff under separate cover. There have been no increases in the price of any of these services within the past twelve months. Revised pages: General Customer Services Tariff; Section 3, pages 4, 5, 6, 7, 7.1, 8, 8.1, 9, 9.1, 10, 32, 33, 34, 35, 36, 37, 38, 55, 68, 69, 70, 71, 72 and 73; Section 4, page 3; Section 6, pages 4.1, 5 and 8; Section 13, pages 5, 12, 12.1, 12.2 and 33.</p>

Virginia State Corporation Commission

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Telephone Company Tariff Filing Log for Tariffs Received Between 1/1/2007 and 12/31/2007, listed in chronological order by Carrier Type CLEC (Competitive Local Exchange Carrier), ILEC (Incumbent Local Exchange Carrier), and IXC (Interexchange Carrier).

ILEC Tariffs:

Tariff ID	Company	Date Filed	Requested Effective Date	Subject
5256	CENTEL	08/10/2007	09/10/2007	The purpose of this filing is to add nonrecurring charges for Multiplexing under Optional Features and Functions for Special Access service. As a result, monthly recurring rates for this service has been reduced. Also, discounted monthly rates are being introduced for Multiplexing ordered under a Special Access Term Discount Plan. Minor text change were also made. Customer notice is not required as existing customers are not impacted by the increase in NRC charges. Revised pages: Section 5, pages 48, 58 and 67; Section 14, page 1.
5257	UNITED	08/10/2007	09/10/2007	The purpose of this filing is to increase nonrecurring charges for Multiplexing under Optional Features and Functions for Special Access service. As a result, monthly recurring rates for this service has been reduced. Also, discounted monthly rates are being introduced for Multiplexing ordered under a Special Access Term Discount Plan. Customer notice is not required as existing customers are not impacted by the increase in NRC charges. Revised pages: Section 7, pages 56 and 59.
5259	NTELOS TELEPHONE INC.	08/10/2007	09/13/2007	Section 17 has been updated to change the number format of this section and to add two new bundle service offerings, Integrated Access and Integrated Centrex. Section 17.3, Integrated Access, is the same offering that is filed in the NTELOS Network, Inc. SCC No. 1 Tariff. Revised pages: Section 17, TOC page 1, pages 1 - 11.
5267	VERIZON VIRGINIA INC.	08/17/2007	08/20/2007	This administrative change is being submitted to make changes to the text to maintain consistency with text that appears in the Plan O Service - Unlimited ("The Plan") as found in the Bell Atlantic Communications, Inc. D/B/A Verizon Long Distance Posted Rates, Terms and Conditions. The Plan will include unlimited calling to Canada at no additional charge. With this filing Verizon is removing the appearance of the word "domestic" from all references to The Plan. With concurrence of the Commission Staff, this filing is being submitted with a shortened interval. Revised pages: SCC No. 203, Section 31, pages 10a and 10b.
5268	VERIZON SOUTH INC.	08/17/2007	08/20/2007	This administrative change is being submitted to make changes to the text to maintain consistency with text that appears in the Plan O Service - Unlimited ("The Plan") as found in the Bell Atlantic Communications, Inc. D/B/A Verizon Long Distance Posted Rates, Terms and Conditions. The Plan will include unlimited calling to Canada at no additional charge. With this filing Verizon is removing the appearance of the word "domestic" from all references to The Plan. With concurrence of the Commission Staff, this filing is being submitted with a shortened interval. Revised pages: Section 16, pages 21.1 and 21.2.
5270	VERIZON VIRGINIA INC.	08/21/2007	09/20/2007	This filing is being made to introduce a new optional service arrangement for customers who subscribe to Verizon's Basic IntelliLinq PRI Service. This new term service option, called IntelliLinq - PRI Plus is available only in conjunction with Verizon's ISDN-PRI service and, as such, is classified as a competitive service offering. Revised pages: SCC No. 206, TOC page 2, Section 11A, pages 1, 2, and 3.
5276	VERIZON VIRGINIA INC.	08/28/2007	10/01/2007	This filing serves to increase the rates for select rate elements associated with ISDN-BRI service by ten percent. The current market classification for ISDN-BRI is OLETS. Revised pages: Tariff No. 203, Section 14A, pages 10, 11 and 12.

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ILEC Tariffs:

Tariff ID	Company	Date Filed	Requested Effective Date	Subject
5277	VERIZON VIRGINIA INC.	08/31/2007	10/01/2007	This filing is issued to add a new Bundle Discount for customers that subscribe to the Verizon Regional Value Bundled Service (Regional Value). This new discount will apply when Regional Value is bundled with an unlimited long distance calling plan plus other services as specified by Verizon with a 12 month commitment. Revised pages: Tariff No. 203; Section 31, Page 11a.
5278	VERIZON VIRGINIA INC.	08/31/2007	10/01/2007	This filing is issued to discontinue the Verizon Affiliate Bundle Discount to customers that subscribe to Verizon Regional Package or Verizon Regional Package Extra with affiliate products such as Verizon DSL, Verizon Wireless One-Bill or DirecTV when ordered by Verizon. Customers were notified via bill message during in the month of August. Revised pages: Tariff No. 203, Section 31, pages 1, 5 and 7.
5279	VERIZON SOUTH INC.	08/31/2007	10/01/2007	This filing is issued to discontinue the Verizon Affiliate Bundle Discount to customers that subscribe to Verizon Regional Package or Verizon Regional Package Extra with affiliate products such as Verizon DSL, Verizon Wireless One-Bill or DirecTV when ordered by Verizon. Customers were notified via bill message during in the month of August. Revised pages: Section 16, TOC page 1; pages 16 and 18.
5280	VERIZON SOUTH INC.	08/31/2007	10/01/2007	This filing is issued to add a new Bundle Discount for customers that subscribe to the Verizon Regional Value Bundled Service (Regional Value). This new discount will apply when Regional Value is bundled with an unlimited long distance calling plan plus other services as specified by Verizon with a 12 month commitment. Revised pages: Section 16, page 22.1.
5298	VERIZON VIRGINIA INC.	09/20/2007	10/22/2007	The purpose of this filing is to increase the volume discounted per minute rates for Verizon's Corporate Rewards Plan. This optional calling plan is classified as OLETS under Verizon's Plan for Alternative Regulation. Revised page: SCC No. 201, Section 10, page 4.
5302	VERIZON SOUTH INC.	09/21/2007	10/20/2007	This filing is being issued to introduce a Non-Recurring Charge for intercom customers who request to integrate their Centranet/PRI with VoIP applications. Revised pages: Appendix A, pages 49, 52 and 56.
5304	AMELIA	09/21/2007	11/08/2007	This revision make changes to the Local Service Guarantee language to change the Service Outages credit hours from 8 to 24. Revised page: Section 2, page 12.1.
5305	NEW CASTLE	09/21/2007	11/08/2007	This revision make changes to the Local Service Guarantee language to change the Service Outages credit hours from 8 to 24. Revised page: Section 2, page 8.
5306	VIRGINIA TELEPHONE	09/21/2007	11/08/2007	This revision make changes to the Local Service Guarantee language to change the Service Outages credit hours from 8 to 24. Revised page: Section 2, page 8.
5308	UNITED	09/26/2007	09/28/2007	As requested by SCC Staff and agreed to by United, this filing removes language from Section U2., First Revised Page 18, General Regulations, that is associated with the recovery of collection costs incurred by the Company when attempting to recover any amounts due or owed by a business customer.
5312	VERIZON SOUTH INC.	09/28/2007	10/01/2007	This filing is being issued to reduce select ISDN-PRI Term & Volume Package Rates. Revised pages: Appendix A, 4th Revised Page 57.

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ILEC Tariffs:

Tariff ID	Company	Date Filed	Requested Effective Date	Subject
5313	R&B	10/02/2007	11/02/2007	Section 17A has been updated to change the number format of this section and to add two new bundle service offerings, Integrated Access and Integrated Centrex.
5318	PEOPLES MUTUAL TELEPHONE COMPANY	10/04/2007	11/28/2007	This filing adds local calling from the Gretna and Renan exchanges to the Lynchburg exchange pursuant to Case No. PUC-2006-00123. Revised page: General Exchange Tariff, Section 2, Sheet 2.
5325	VERIZON SOUTH INC.	10/17/2007	11/17/2007	This filing serves to increase the rates for select Fractional T-1, Private Line and Special Access services. The current market classification for these services under Verizon's Plan for Alternative Regulation is OLETS. Revised pages: General Subscriber Services Tariff, Section 20, pages 6 and 7; Facilities for Intrastate Access Tariff, Section 5, pages 44, 46, 47 and 49.
5327	VERIZON VIRGINIA INC.	10/17/2007	11/17/2007	This filing serves to increase the rates for Switched 56-Kilobit service and select Analog Channel, Digital Data and High Capacity Digital services. The current market classification for these services under Verizon's Plan for Alternative Regulation is OLETS. Revised pages: SCC No. 203, Section 11, page 2; SCC No. 204, Section 2, page 1, Section 3, pages 5-7, Section 4, pages 4-5, Section 11, page 7 and Section Page 2; SCC No. 217, Section 7, pages 63-64, 68-69, 74-75 and 84-85.
5333	VERIZON VIRGINIA INC.	10/25/2007	10/31/2007	This filing is being issued to introduce a Month-to-Month DID Trunk Package rate for ISDN-PRI customers. Revised pages: SCC No. 206, Section 11, pages 15 and 18.
5335	UNITED	10/25/2007	11/26/2007	This filing removes call Forward No Answer-Customer Controlled and call Forward Busy - Customer Controlled from the tariff. There are no current or anticipated demand for these custom calling features. Revised pages: Section U13, pages 15, 15.1, 16 and 19.1.
5336	CENTEL	10/25/2007	11/26/2007	This filing removes call Forward No Answer-Customer Controlled and call Forward Busy - Customer Controlled from the tariff. There are no current or anticipated demand for these custom calling features. Revised pages: Section 13, pages 7.1, 7.2 and 11.
5346	VERIZON SOUTH INC.	11/08/2007	11/15/2007	The purpose of this filing is to add language to exempt the application of Service Charges for work required to separate or combine billing accounts. Also included is a text change to correct a typographical error. Revised page: Section 4, page 2.
5347	VERIZON VIRGINIA INC.	11/08/2007	11/15/2007	The purpose of this filing is to add language to exempt the application of Service Charges for work required to separate or combine billing accounts. Revised page: SCC No. 203, Section 3, page 4.
5356	VERIZON SOUTH INC.	11/16/2007	12/01/2007	With this filing, Verizon is increasing its monthly rates for selected Frame Relay Service Offerings. Revised pages: Access Tariff, Section 16, pages 41 - 47 and General Customer Service Tariff, Appendix A, pages 89 - 95.
5360	VERIZON VIRGINIA INC.	11/20/2007	12/01/2007	With this filing, Verizon is increasing its monthly rates for selected Frame Relay Service offerings. Revised pages: SCC No. 206, Section 12, pages 11-14.

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ILEC Tariffs:				
Tariff ID	Company	Date Filed	Requested Effective Date	Subject
5380	VERIZON VIRGINIA INC.	11/27/2007	11/28/2007	This filing provides for the establishment of Extended Local Service between Verizon's Lynchburg exchange and Peoples Mutual Telephone Company's Gretna and Renan exchanges. Revised pages: SCC No. 202, Section 2, page 6 and Section 2C page 2.
5390	VERIZON VIRGINIA INC.	11/30/2000	12/31/2007	The purpose of this filing is to withdraw Switched Multi-Megabit Data Service ("SMDS"). Verizon has no customers currently subscribing to this service. Revised pages: SCC No. 203, Section 15, page 1 and SCC No. 217, Section 17, page 1. NOTE: On November 30, 2007 Verizon submitted a filing to withdraw Switched Multi-Megabit Data Service (SMDS) effective 12/31/07. The tariff pages reflecting the removal of the appearance of SMDS from the Index and Table of Contents were inadvertently omitted from that filing package. Revised pages: General Index, page 13; SCC No. 204, Contents page 2 and SCC No. 217, Contents page 12.
5391	VERIZON VIRGINIA INC.	11/30/2000	12/01/2007	With this filing Verizon is increasing its monthly rates for Asynchronous Transfer Mode (ATM) Cell Relay Service (CRS). Revised pages: SCC No. 206, Section 13A, pages 12-21.
5395	VERIZON SOUTH INC.	12/04/2007	01/04/2008	The purpose of this filing is to withdraw MegaConnect Service. Verizon has no customers currently subscribing to this service. Revised pages: Index page 4; Section 13, page 98.
5396	VERIZON SOUTH INC.	12/05/2007	12/10/2007	The purpose of this filing is to add clarifying text and standardize the tariff language throughout the Verizon footprint as it pertains to the Automatic Call Return service offering. Revised pages: Section 13, pages 6, 8, 10 and 11.
5400	VERIZON VIRGINIA INC.	12/05/2007	12/10/2007	The purpose of this filing is to add clarifying text and standardize the tariff language throughout the Verizon footprint as it pertains to the Automatic Call Return service offering. Revised pages: SCC No. 203, Section 13E, page 3; Section 21, pages 6, 7a and 10.
5406	UNITED	12/13/2007	01/14/2008	This filing introduces Follow Me Plan for residence customers. This service is classified as Bundled. Revised page: Section U19, page 4.4.
5407	CENDEL	12/13/2007	01/14/2008	This filing introduces Follow Me Plan for residence customers. This service is classified as Bundled. Revised page: Section 22, page 5.0.4.
5417	VERIZON VIRGINIA INC.	12/21/2007	12/28/2007	With this filing Verizon is making several non-price changes the tariff language relevant to its Custom Redirect Service Offering. Revised pages: SCC No. 203, Section 32, 1, 2, 4, 4.1, 5, 6, 7, 10 and 11.
5418	VERIZON SOUTH INC.	12/21/2007	12/28/2007	With this filing Verizon is making several non-price changes the tariff language relevant to its Custom Redirect Service Offering. Revised pages: Section 13, pages 61, 62, 63, 64, 65, 66, 67, 68, 69 and 70.
5421	UNITED	12/27/2007	02/01/2008	This filing expands the internet speeds available with Complete Business Bundle and MultiLine Bundle. Revised pages: Section 19, pages 7.3 and 21.
5422	CENDEL	12/27/2007	02/01/2008	This filing expands the internet speeds available with Complete Business Bundle and MultiLine Bundle. Revised pages: Section 22, pages 8.2, 20 and 24.

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ILEC Tariffs:

Tariff ID	Company	Date Filed	Requested Effective Date	Subject
5437	VERIZON SOUTH INC.	01/23/2008	02/01/2008	In this filing, Verizon is increasing its rates for the Unlimited Local Usage for Business and the Unlimited Local Usage and Toll for Business optional calling plans. The market classifications for these services are OLET and Bundled Services, respectively. Revised pages: Customer Services Tariff, Section 13, page 60.1 and Section 16, page 20.2.
5438	VERIZON VIRGINIA INC.	01/23/2008	02/01/2008	In this filing, Verizon is increasing its rates for the Unlimited Local Usage for Business and the Unlimited Local Usage and Toll for Business optional calling plans. The market classifications for these services are OLET and Bundled Services, respectively. Revised pages: SCC No. 203, Section 31, page 9b and Section 33, page 3.
5452	VERIZON SOUTH INC.	02/08/2008	02/17/2008	In this filing, Verizon is making changes to the terms and conditions associated with its FIOS Bundle discounts, introducing a new Voice Discoun Plan for subscribers of Verizon's Regional Value and Regional Essentials packages, and making some corrective text changes. Revised pages: Section 16, pages 21.1 and original pages 21.3 and 22.2.
5453	VERIZON VIRGINIA INC.	02/08/2008	02/17/2008	In this filing, Verizon is making changes to the terms and conditions associated with its FIOS Bundle discounts, introducing a new Voice Discoun Plan for subscribers of Verizon's Regional Value and Regional Essentials packages, and making some corrective text changes. Revised pages: Tariff 22, Section 31, pages 10b and original pages 10c and 11b.
5456	AMELIA	02/11/2008	02/15/2008	WITHDRAWN: Add ISDN-PRI promotion. Revised page: Section 1, page 14. NOTE: By letter dated 02/15/08 Amelia Telephone Company is withdrawing this filing.
5457	VIRGINIA TELEPHONE	02/11/2008	02/15/2008	WITHDRAWN: Add ISDN-PRI promotion. Revised page: Section 1, page 29. NOTE: By letter dated 02/15/08 Virginia Telephone Company is withdrawing this filing.
5462	CENDEL	02/26/2008	03/29/2008	This filing eliminates the Optional Local Calling Plan's (OLCP) flat-rated option. The OLCP has been grandfathered since 1995. The flat-rated OLCF option no longer as any customers. The OLCP's message-rated option continues to have customers and is unchanged by this filing. Revised pages: Section 103, pages 3, 4, 5, 6, 7 and 8.
5472	VERIZON VIRGINIA INC.	03/04/2008	03/07/2008	The purpose of this filing is to revise existing tariff pages to clearly identify those exchanges that were determined as having met the competitive test for residential Basic Local Exchange Telephone Services (BLETS), select Other Local Exchange Telephone Services (OLETS), and/or Individual Line Business BLETS pursuant to PUC-2007-00008. With the concurrence of the Commission Staff, this filing also serves to create a new Competitive Priced Local Exchange Services Tariff, SCC VA No. 220 in which the rates for these designated services will be maintained. Revised pages: General Index, pages 3 and 7; SCC No. 202, Section 2, pages 1a, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11; and SCC No. 220, Original Title Page and Contents page 1, Section 1A, page 1, Section 1B, page 1, Section 1C, page 1 and Section 1D, page 1
5476	VERIZON SOUTH INC.	03/05/2008	03/10/2008	This this filing Verizon is standardizing the promotional language in the Verizon South Inc. tariff with the promotional language in the Verizon Virginia Inc. tariff. Revised page: General Customer Services Tariff, Section 2, page 18.

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ILEC Tariffs:

Tariff ID	Company	Date Filed	Requested Effective Date	Subject
5477	VERIZON VIRGINIA INC.	03/05/2008	03/10/2008	This this filing Verizon is standardizing the promotional language in the Verizon South Inc. tariff with the promotional language in the Verizon South Inc. tariff. Revised page: SCC Tariff No. 201, Section 1, page 38
5478	VERIZON VIRGINIA INC.	03/07/2008	04/21/2008	Proposed tariff filing deregulating the price of business BLETs individual line service in the Chester, Midlothian, Richmond and Sandston exchanges. The competitiveness test for the aforementioned business BLETs services established in PUC-2007-00008 is met as follows: Revised pages: SCC Tariff No. 202, pages 3, 7 and 9; SCC Tariff No. 220, Section 1C, page 1.
5484	UNITED TELEPHONE SOUTHEAST LLC	03/12/2008	04/13/2008	This filing acknowledges the conversion of the company name "United Telephone-Southeast, Inc." to "United Telephone Southeast LLC" and reflects the adoption of the United Telephone Southeast LLC of all currently effective tariffs that were previously filed by United Telephone-Southeast, Inc. Revised Pages: SCC No. 1, Third Revised Title Page and SCC No. 4, Second Revised Title Page.
5491	VERIZON VIRGINIA INC.	03/19/2008	03/28/2008	In this filing, Verizon is adding language to establish renewal terms applicable to its Voice plan for the subscribers of the Regional Value and Regional Essentials packages. Revised pages: SCC No. 203, Section 31, pages 10c and 11b.
5492	VERIZON SOUTH INC.	03/19/2008	03/28/2008	In this filing, Verizon is adding language to establish renewal terms applicable to its Voice plan for the subscribers of the Regional Value and Regional Essentials packages. Revised pages: General Tariff, 203, Section 16, page 21.3 and 22.2
5511	VERIZON VIRGINIA INC.	04/09/2008	04/19/2008	In this filing, Verizon is increasing its One Year Term rates for the Unlimited Local Usage for Business and the Unlimited Local and Toll Usage for Business optional calling plans. This market classifications for these services are OLET and Bundled Services, respectively. Revised pages: SCC Tariff No. 3, Section 31, page 9b; and Section 33, page 3. NOTE: By letter dated April 18, Verizon filed an amending letter to clarify the time between customer notification period and the effective date.
5512	VERIZON SOUTH INC.	04/09/2008	04/19/2008	In this filing, Verizon is increasing its One Year Term rates for the Unlimited Local Usage for Business and the Unlimited Local and Toll Usage for Business optional calling plans. The market classifications for these service are OLET and Bundled Services, respectively. Revised pages: General Customer Services Tariff, Section 13, page 60.1; and Section 16, page 20.2 NOTE: By letter dated April 18, Verizon filed an amending letter to clarify the time between customer notification period and the effective date.
5523	VERIZON VIRGINIA INC.	04/17/2008	06/01/2008	These proposed tariff pages are deregulating the price of residential BLETs Service in the Fredericksburg and Staunton exchanges, and business BLET individual line service in the Blacksburg, Christiansburg, Fredericksburg, Lynchburg, Radford, Salem, Staunton and Winchester exchanges. Revised pages: SCC Tariff No. 202, pages 2, 3a, 5, 6, 8, 9 and 11; SCC No. 220, Section 1B page 1 and Section 1C page 1.

EXHIBIT 2



Jennifer L. McClellan
Assistant General Counsel

2007 DEC 28 A 10:23

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December 28, 2007

Joel H. Peck, Clerk
State Corporation Commission
Post Office Box 1197
Richmond, Virginia 23218

Dear Mr. Peck:

Re: Case No. PUC-2007-00008

Enclosed for filing please find an original and fifteen (15) copies of Verizon Virginia Inc.'s and Verizon South Inc.'s Petition for Reconsideration in the above-referenced case.

A confidential version is being filed under seal.

I have mailed or hand-delivered copies to the parties shown below. Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Enclosure

Copy to:
John F. Dudley, Esquire
Kathleen A. Cummings
Service List