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EX PARTE

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

Re: In the Matter of: Petition of AT&T Inc. For Forbearance Under 47 U.S.C. § 160 From Enforcement of Certain of the Commission's Cost Assignment Rules, WC Docket No. 07-21; Petition of AT&T Inc. For Forbearance Under 47 U.S.C. § 160 From Enforcement of Certain of the Commission's ARMIS Reporting Requirements, WC Docket No. 07-139; Petition of Verizon For Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of the Commission's Recordkeeping and Reporting Requirements, WC Docket No. 07-273; and Petition of Qwest Corporation for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160, WC Docket No. 07-204

Dear Ms. Dortch:

Yesterday, Dee May, Maggie McCready, Chris Miller, and the undersigned of Verizon, met with Greg Orlando, Legal Advisor to Commissioner Tate. The purpose of the meeting was to discuss the above pending forbearance petitions. Verizon discussed the Commission's order granting AT&T forbearance from the federal cost assignment rules. Verizon indicated that the Commission's logic in granting AT&T forbearance was not limited to relief granted to AT&T.

Verizon also explained that the ARMIS reports, required of only a small number of market participants, no longer serve a legitimate federal purpose and should be eliminated. Verizon also urged the Commission to grant the relief in all carriers' petitions and grant all carriers the same relief. The attached handouts were provided during the meeting.

Please contact me if you have any questions.

Sincerely,

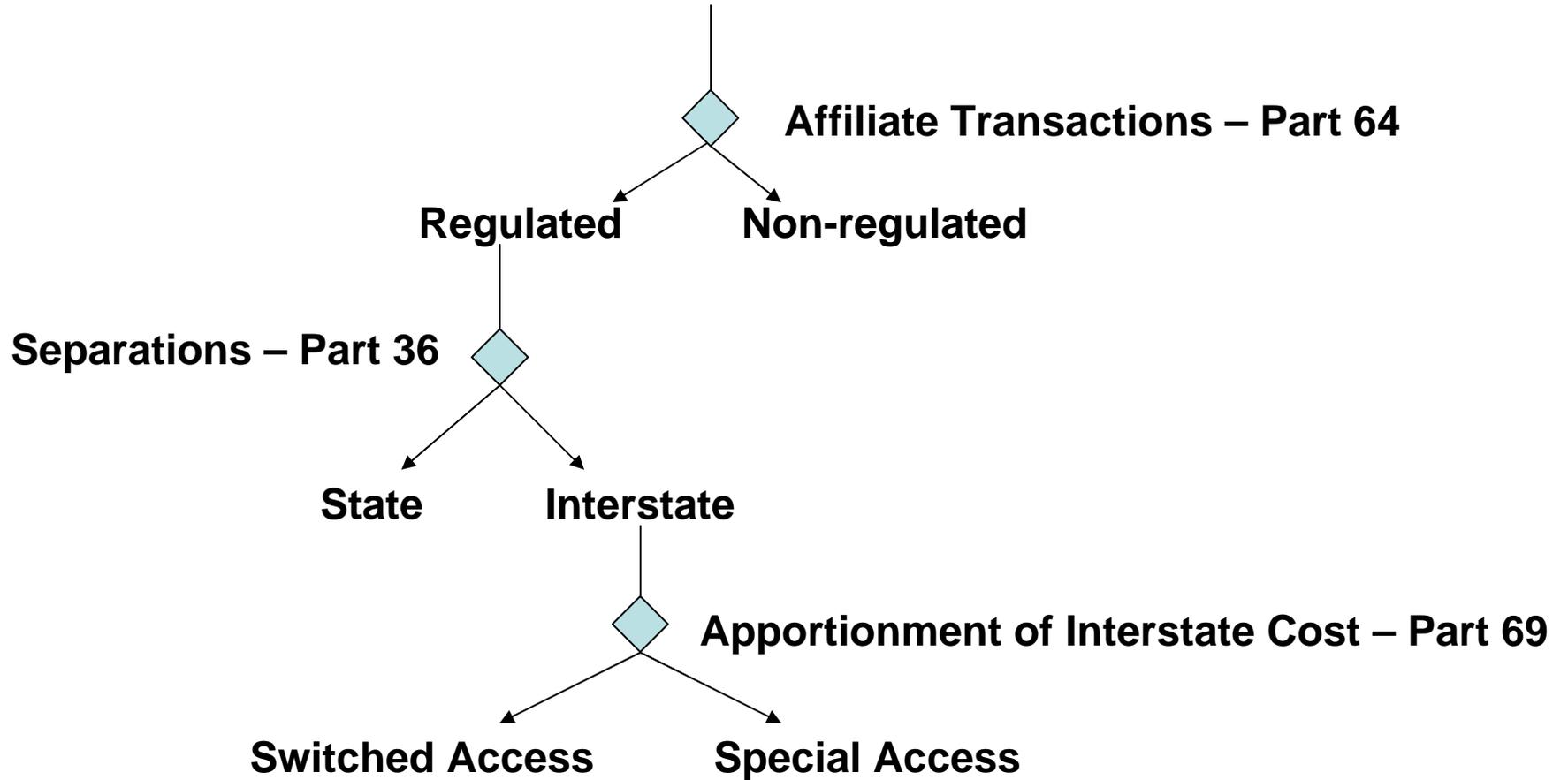
A handwritten signature in black ink, appearing to read "Ann Berkowitz".

Attachments

cc: Greg Orlando

COST ALLOCATION PROCESS

Uniform System of Accounts - Part 32



Automated Reporting Management Information System (ARMIS)*

Financial Reports	Name	Description
43-01	Annual Summary Report	<ul style="list-style-type: none"> ➤ Summary cost and revenue data for total company ➤ Includes regulated / nonregulated, intrastate / interstate, and interstate switched access / special access data ➤ Also includes pole and conduit rental calculations
43-02	USOA Report	➤ Financial statement including balance sheet and income statements as well as assets and services provided to affiliates
43-03	Joint Cost Report	➤ Additional cost and revenue data for total company and regulated / nonregulated activities
43-04	Access Report	<ul style="list-style-type: none"> ➤ Additional regulated cost and revenue data allocated to intrastate and interstate ➤ Includes interstate portions then allocated to switched and special access
495A	Forecast Report	➤ Investment forecasts for Part 64 regulated / nonregulated allocations
495B	Forecast Report	➤ Actual usage of investment for Part 64 allocations
492A	Rate of Return Monitoring Report	➤ Rate of return calculations for interstate services subject to price cap regulation
Quality Reports		
43-05	Service Quality Report	➤ Measurements of service quality including installation and repair intervals, blockage, downtime, and complaints
43-06	Customer Satisfaction Report	➤ Summary of customer satisfaction surveys
Infrastructure Reports		
43-07	Infrastructure Report	<ul style="list-style-type: none"> ➤ Number of local switches ➤ Length of loop and transport facilities by cable type (<i>e.g.</i>, sheath kilometers of copper cable)
43-08	Operating Data Report	➤ Outside plant statistics including kilometers of aerial cable, access lines in service by state, and call volumes by state

* Only AT&T, Verizon, and Qwest are required to file all ARMIS reports. Other incumbent LECs file a limited number of reports based on annual revenues and company-specific regulatory regimes. Competitive LECs, cable companies, independent VoIP providers, and wireless carriers file *no* ARMIS reports.