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September 3, 2008

EX PARTE

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

Re: 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; 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; et al.

Dear Ms. Dortch:

Yesterday, Susanne Guyer, Maggie McCready, and Ed Shakin of Verizon met with Commissioner McDowell and Nick Alexander, Legal Advisor to Commissioner McDowell. The purpose of the meeting was to discuss the above-captioned petitions. Verizon requested that the Commission extend the earlier cost assignment forbearance relief granted to AT&T to Verizon and others in the industry and eliminate the ARMIS reports for all carriers in a single order issued by the statutory deadline for AT&T's ARMIS petition.

Verizon also discussed business line data reported by certain ILECs in ARMIS Report 43-08. This information is reported by study area and generally appears at a state level. Carriers filing the 43-08 report do not break business line data down further by wire center in this report. In the *Triennial Review Remand Order* the Commission adopted UNE impairment tests for dedicated interoffice transport and high capacity loops based in part on the number of business lines in a wire center. *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, Order on Remand, 20 FCC Rcd 2533, ¶ 5 (2005). The Commission did not seek to determine wire center level business line counts from the 43-08 report. Rather, the Commission used the ARMIS *definition* of a "business line" for its UNE impairment tests. *Id.*, ¶ 105. This definition would remain unchanged, and the UNE impairment tests would be unaffected by

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forbearance from the ARMIS reports. There is no need for the Commission to continue business line ARMIS reporting for this purpose. If carriers seek to establish that additional wire centers are not impaired they will file required business line counts at the wire center level, but that data does not come from the 43-08 report.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Burk". The signature is written in a cursive, flowing style.

cc: Nick Alexander
Amy Bender
Dana Shaffer
Darryl Cooper
James Eisner
Alan Feldman
Michael Goldstein
Marcus Maher
Jeremy Miller
Alex Minard
Christi Shewman