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Via ECFS

EX PARTE

January 16, 2009

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

Re: *In the Matter of 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*

Dear Ms. Dortch:

The purpose of this letter is to request that the Federal Communications Commission ("Commission") extend any additional regulatory relief that it grants Verizon in Verizon's above-captioned petition for forbearance to Qwest Corporation ("Qwest") and other similarly situated incumbent local exchange carriers ("ILECs"), as the Commission did when it granted AT&T's ARMIS forbearance petition and Qwest's ARMIS forbearance petition.¹

The Commission has already granted a portion of the relief that Verizon requested in its forbearance petition when it ruled on AT&T's ARMIS forbearance petition and Qwest's ARMIS

¹ *Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of the Commission's ARMIS Reporting Requirements; Petition of Qwest Corporation for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c), et al.*, Memorandum Opinion and Order, WC Docket Nos. 07-139, 07-204, *et al.*, 23 FCC Rcd 13647 (2008) ("AT&T ARMIS Order"), *appeal pending sub nom., National Association of State Utility Consumer Advocates v. FCC*, No. 08-1353 (D.C. Cir. *pet. for rev.* filed Nov. 4, 2008); *In the Matter of Petition of Qwest Corporation for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c); 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. 07-204, WC Docket No. 07-273, Memorandum Opinion and Order, FCC 08-271 (Dec. 12, 2008) ("Qwest ARMIS Order").

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forbearance petition.² The Commission also indicated, in each instance, that Verizon had filed a forbearance petition that sought additional regulatory relief beyond that contained in those petitions and that this request remained pending.³ Qwest is similarly situated to Verizon with respect to the relief sought in Verizon's petition referenced above. And the interests of equity and efficiency would be served by extending any relief granted to Verizon as a result of that petition to Qwest as well.

Sincerely,

/s/ Melissa E. Newman

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² In the *AT&T ARMIS Order*, the Commission extended conditional forbearance from ARMIS service quality and infrastructure reports (*i.e.*, ARMIS Reports 43-05, 43-06, 43-07 and 43-08) to all carriers required to file them. *AT&T ARMIS Order*, 23 FCC Rcd at 13652 ¶ 7. In the *Qwest ARMIS Order*, the Commission granted conditional forbearance from ARMIS Financial Reports (*i.e.*, ARMIS Reports 43-01, 43-02, and 43-03). *Qwest ARMIS Order* ¶ 1.

³ *AT&T ARMIS Order*, 23 FCC Rcd at 13652 ¶ 5, n.17; *Qwest ARMIS Order* ¶ 5, n.17.