

Nneka Ezenwa
Director
Federal Regulatory Affairs



1300 I Street, NW
Suite 400 West
Washington, DC 20005
(202) 515-2466
(202) 336-7922 (fax)
nneka.n.ezenwa@verizon.com

April 27, 2009

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Petition of Verizon New England Inc. for Forbearance Pursuant to 47 U.S.C. § 160(c) in Rhode Island (WC Docket No. 08-24); Petition of the Verizon Telephone Companies for Forbearance Pursuant to 47 U.S.C. § 160(c) in Cox's Service Territory in the Virginia Beach Metropolitan Statistical Area (WC Docket No. 08-49)

Dear Ms. Dortch:

On April 24, 2009, Edward Shakin, Scott Angstreich and Rashann Duvall of Verizon met with Ajit Pai, Joe Palmore, Richard Welch, Chris Killion, and Diane Griffin Holland from the General Counsel's office. During the meeting, Verizon explained that the impairment standard applies where an incumbent LEC seeks forbearance from unbundling requirements, and that unbundling cannot be required where there is no impairment. Verizon further explained that under the impairment standard the focus is whether competition is possible without unbundling, precluding a requirement of multiple wireline competitors and the use of a market power or market share test. Verizon also emphasized that several prior Commission orders considered wireless cut-the-cord competition, and that nothing has changed that would support the exclusion of wireless competition from the Commission's analysis in the above-captioned proceedings.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Nneka Ezenwa".

Nneka Ezenwa