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April 29, 2009

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

Re: Petition of Verizon New England for Forbearance Pursuant to 47 U.S.C. § 160 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 28, 2009, Danny Bottoms and Francie McComb of Cavalier Telephone, Keith Wilson and Bill Haas of PAETEC, Dale Schmick of Yourtel, Steve Crawford of Alpheus Communications, Debbie Ward of TSI, Dan Boynton of Zone Telecom, Dennis McCarthy of PacWest, Pat Bennett and Doug Carlen of Covad, Paul Schieber of Sprint, Jim Butman of TDS MetroCom, David Eckmann of FPL Fibernet, Gary Fry of Americatel and Jerry James and the undersigned of COMPTEL met with Commissioner Adelstein and Mark Stone regarding the above-captioned Petitions of Verizon for forbearance from unbundling and dominant carrier regulation in the State of Rhode Island and in the Cox service territory in the Virginia Beach MSA.

Each of the parties briefly described his or her company's business operations and stated their strong objections to the grant of the Verizon Petitions. Mr. Bottoms of Cavalier, which provides telephone service to both business and residential customers in Virginia Beach, noted that Cavalier uses UNE loops to reach 80% of its customers and that granting Verizon forbearance from the unbundling requirements would likely increase its costs of providing service by two or three times. Mr. Wilson of PAETEC, which provides service in Rhode Island and which is the parent company of McLeod USA, stated that after the Commission granted Qwest forbearance from the unbundling requirements in the Omaha MSA, Qwest raised its rates so much that it became uneconomical for McLeod to remain in the market except on an extremely limited basis. McLeod served 17,000 access lines in Omaha before forbearance was granted; today it serves 2,500 and most are for customers that McLeod serves in other markets.

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The parties also urged the Commission not to include “cut-the-cord” wireless lines in the same product market as wireline lines for purposes of the forbearance analysis and referenced the many *ex parte* letters that have been submitted by competitive carriers on the wireline/wireless substitution issue in the last two weeks.

Should you have any questions relating to this submission, kindly contact the undersigned.

Respectfully submitted,

/s/

Mary C. Albert

cc: Chairman Jonathan Adelstein
Mark Stone