

ORIGINAL



J.G. Harrington

D 202.776.2818 E jharrington@dowlohnes.com

May 8, 2009

FILED/ACCEPTED

MAY - 8 2009

Federal Communications Commission  
Office of the Secretary

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

Re: Petition of Verizon New England and the Verizon Telephone Companies for  
Forbearance Pursuant to 47 U.S.C. § 160(c) in Rhode Island, WC Docket No. 08-  
24, and Virginia Beach WC Docket No. 08-49  
**Response to Staff Inquiries**

Dear Ms. Dortch:

Cox Communications, Inc. ("Cox"), in response to inquiries from the Commission's staff, hereby provides the following clarifications regarding data submitted pursuant to staff request in the above-referenced proceedings.<sup>1</sup>

First, Cox's data submission for Rhode Island included the number of DS-1 Lines provided in each of Verizon's Rhode Island wire centers. This data represents the voice-grade equivalent lines served using DS-1 circuits in those wire centers. In other words, the numbers in the DS-1 Lines column consists of the number of DS-1 circuits provided to customers by Cox, multiplied by 24, which represents the service-line capacity of the circuits Cox provides. Cox's data submission for Virginia Beach, however, reports DS-1 Lines as DS-1 circuits, not as voice-grade equivalents.

Second, Cox's DS-1 Lines data for Virginia Beach include approximately [REDACTED] DS-1 lines Cox purchases from Verizon and other carriers and uses for internal use, as well as approximately [REDACTED] lines that Cox purchases as access facilities from Verizon and other carriers and uses to provide last-mile facilities to customers, primarily in areas where Cox is not a franchised cable operator. Cox's internal record-keeping classifies these lines as served by DS-1 facilities and does not track the location of the purchased DS-1 circuits by wire center.

<sup>1</sup> See Letter from Jason E. Rademacher, counsel for Cox, to Marlene Dortch, WC Docket No. 08-49 (Apr. 20, 2009); Letter from J.G. Harrington, counsel for Cox, to Marlene Dortch, WC Docket No. 08-24 (Apr. 21, 2009).

**REDACTED FOR PUBLIC INSPECTION**

Number of Copies rec'd 044  
List ABCDE

Marlene H. Dortch, Esq.

May 8, 2009

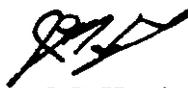
Page 2

Third, Cox's Virginia Beach data submission includes a column reporting the number of resale or UNE lines provided by Cox. As described above, DS-1 facilities purchased by Cox from Verizon and other carriers to provide last-mile facilities are not included in the Resale or UNE Line column because they are not purchased as UNEs.

In accordance with the requirements of Section 1.1206 of the Commission's rules, an original and one copy of this written *ex parte* communication are being filed with the Secretary's Office on this date.

Please let us know if we can be of further assistance in this matter.

Respectfully submitted,



J.G. Harrington  
Counsel to Cox Communications, Inc.

cc: Timothy Stelzig

**REDACTED FOR PUBLIC INSPECTION**