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October 6, 2009

Ex Parte

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

Re: Application of Open Network Architecture and Non Discrimination Safeguard, CC Docket No. 92-256;
Installation and Maintenance Non Discrimination Reports, CC Docket No. 88-2;
Implementation of Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128;
Reporting Requirements for U.S. Providers of International Telecommunications Services; Amendment of Part 43 of the Commission's Rules, IB Docket No. 04-112;
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, WC Docket No. 07-139;
Petitions of Qwest Corporation, Embarq Local Operating Companies, and Frontier and Citizens ILECs, for Forbearance from Enforcement of the Commission's ARMIS and/or 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c), WC Docket No. 07-204;
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;
Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering, WC Docket No. 08-190

Dear Ms. Dortch:

Pursuant to a request by the Office of Strategic Planning (OSP), please find attached a chart describing various Commission reporting obligations that Verizon believes are outdated and should be eliminated or scaled back and revised. Verizon looks forward to working with OSP during its review of all Commission data gathering and reporting activities in order to determine whether such reports are necessary in the modern communications age.

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Consistent with Commission rules, I am filing one electronic copy of this notice in the record of the above-referenced proceedings.

Should you have any questions, please call.

Sincerely,

A handwritten signature in black ink that reads "Donna Epps". The signature is written in a cursive, flowing style.

Attachment

cc: Paul de Sa, Chief, Office of Strategic Planning and Policy Analysis

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
<p>ONA - Quarterly Nondiscrimination Report</p> <p>CC Docket Nos. 92-256, 88-2 and 96-128</p>	<ul style="list-style-type: none"> • Compares timeliness of installation and maintenance of Open Network Architecture (ONA) services for own information services operations versus the information services operations of their competitors • Must include information on total orders, due dates missed and average intervals for a set of service categories specified by the FCC, following a format specified by the FCC (see list and format prescribed by FCC below table) • If BOC or GTE demonstrates in ONA plan that company lacks the ability to discriminate with respect to installation and maintenance services and files an annual affidavit to that effect, it may modify its quarterly report to compare installation & maintenance services provided to its own information services operations with services provided to a sampling of all customers. 	<p>The Comparably Efficient Interconnection (CEI) and ONA rules no longer reflect the realities of the communications marketplace – many separate and different technologies and platforms now compete for the same customers. These requirements have been eliminated for broadband services and there is no compelling policy reason to continue the reporting of this information for legacy voice and data services.</p>	<p>The FCC set ONA reporting requirements before enactment of the Paperwork Reduction Act (1995); see <i>Filing and Review of Open Network Architecture Plans</i>, Memorandum Opinion and Order, 6 FCC Rcd 7646, 1991 FCC LEXIS 6723 (1991).</p>

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
<p>ONA - Semi-Annual Report</p> <p>CC Docket Nos. 92-256, 88-2 and 96-128</p>	<ul style="list-style-type: none"> • Consolidated matrix of ONA services and state and federal ONA tariffs • File computer diskettes and print outs of data regarding state and federal tariffs • File a printed copy and computer diskette of the ONA Services User Guide • File updated information contained in Appendix A of the January 31, 1991 <u>Cross Reference Guide</u> on Enhanced Service Provider (ESP) requests received and how they were addressed by the BOCs with details and matrices • File updated information contained in Appendix B of the January 31, 1991 <u>Cross Reference Guide</u> on BOC responses to the requests and matrix. • File updated information contained in Appendix C of the January 31, 1991 <u>Cross Reference Guide</u> on services offered by the BOC in response to the requests. 	<p>Matrices of state and federal tariffs provide no practical or useful information to policy makers, ESPs or consumers. Information on Verizon's services, and how to order them, is generally available on Verizon's website and through various sales channels.</p>	<p>See above.</p>

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
<p>ONA - Annual Report</p> <p>CC Docket Nos. 92-256, 88-2 and 96-128</p>	<ul style="list-style-type: none"> • Annual projected deployment schedules for its ONA services by type of ONA service (Basic Service Arrangement “BSA”, Basic Service Element, “BSE”, Complimentary Network Service “CNS”) in terms of percentage of access lines served system-wide and by market-area • New ONA service requests from ESPs and their disposition • Those ONA service requests previously deemed technically infeasible, and their disposition • SS7, ISDN, and IN projected deployment in terms of percentage of access lines served system-wide and on a market-area basis. SS7 data should be reported by TR 317 and TR 394, ISDN data by BRI and PRI, and IN data by release number or other designation by type • New ONA services available through SS7, ISDN and IN, and plans to provide these services • Progress on the efforts in the Information Industry Liason Committee on continuing activities for the implementation of service-specific and long-term uniformity issues • Progress in providing billing information, and call detail services to ESPs. • Progress in developing and implementing OSS services and ESP access to those services • Progress on the uniform provision of OSS services • List of BSEs used in the provision of BOC's own enhanced services. 	<p>These services are widely deployed throughout Verizon’s network and uniform OSS systems have been in place for years - there is no compelling policy reason to continue the reporting of this information for these legacy voice and data services.</p>	<p>See above.</p>

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
<p>Annual Affidavit of Compliance</p> <p>CC Docket Nos. 92-256, 88-2 and 96-128</p>	<ul style="list-style-type: none"> • Signed by Officer of the Company principally responsible for installation procedures. • State Company complied with procedures for installation, maintenance and repair procedures described in FCC orders in CC Docket No. 88-2 for Bell Atlantic and CC Docket No. 92-256 for GTE. • State Company policy related to non-discrimination in either installation or maintenance of regulated network services • State Company has not discriminated in favor of the Company's enhanced service providers with respect to installation, maintenance, repair or quality of basic network services. 	<p>The CEI and ONA rules no longer reflect the realities of the communications marketplace – many separate and different technologies and platforms now compete for the same customers. These requirements have been eliminated for broadband services and there is no compelling policy reason to continue the reporting of this information for legacy voice and data services.</p>	<p>See above.</p>

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
ARMIS 43-05 Table I	<ul style="list-style-type: none"> • Installation and Repair Intervals for Interexchange Access (segregated between switched access and special access data) - includes average installation intervals, number of installations met and missed, and number of trouble reports. 	<p>Traditional interexchange access, or standalone long distance service, is a rapidly evaporating market. Switched access services provide connections to local telephone company switches to originate and terminate traditional circuit switched long distance traffic. However, increasingly consumers use a variety of means other than standalone long distance services to place long distance calls. Next-generation services include wireless services, broadband connections using VoIP, and cable IP telephony services. Even for those consumers who do rely on traditional long distance services, those services are very often bundled with local voice, Internet access and other data services, and video offerings. Interexchange access services are also purchased by wholesale carrier customers, and thus installation and repair statistics regarding these services are of no meaningful use to retail service consumers.</p>	3060-0395

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
ARMIS 43-05 Table II	<ul style="list-style-type: none"> • Installation and Repair Intervals for Local Service - includes average installation intervals, number of installations met and missed, and number of trouble reports. 	<p>Consumers who truly want to compare services offered by all competing providers rely on customer satisfaction information available in the popular media and from third-party services that is much more accessible than data metric reporting to the Commission.</p> <p>Isolated data measuring traditional “local” services is not relevant because providers (including intermodal providers) are competing in today’s communications markets by offering bundles of “all distance” services that make no distinction between local and long distance calling. In addition, these services may be further bundled with Internet access and other data services and video offerings.</p>	3060-0395
ARMIS 43-05 Table III	<ul style="list-style-type: none"> • Common Trunk Blockage - the number of common trunk groups exceeding interstate call blocking thresholds. 	<i>See</i> 43-05 Table I and II entries.	3060-0395

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
ARMIS 43-05 Table IV	<ul style="list-style-type: none"> • Total Switch Downtime. 	<p>Providers, in many cases including ILECs, CLECs, wireless, and cable VoIP, already report major service outage information to the Commission through the Commission’s Disaster Information Reporting System and the Network Outage Reporting System, both administered by the Public Safety and Homeland Security Bureau. More important, this data by definition is not helpful to consumers comparing competing services because next generation services such as VoIP and wireless do not rely on traditional switching technology. <i>See also</i> 43-05 Table I and II entries.</p>	3060-0395
ARMIS 43-05 Table IV-A	<ul style="list-style-type: none"> • Occurrences of Two Minutes or More Duration Downtime. 	<p><i>See</i> 43-05 Table I, II, and IV entries.</p>	3060-0395
ARMIS 43-05 Table V	<ul style="list-style-type: none"> • Service Quality Complaints. 	<p>The Commission has a separate, extensive consumer complaint process to collect and summarize information regarding service quality complaint issues that is administered by the Consumer and Government Affairs Bureau. The Bureau already collects and prepares quarterly summaries that reflect compliant information applicable to all classes of providers. <i>See also</i> 43-05 Table I entries.</p>	3060-0395

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
ARMIS 43-06 Table I	<ul style="list-style-type: none"> • Customer Satisfaction Survey. 	<p>This report requires certain ILECs to design and conduct their own customer satisfaction surveys related to voice telephone service and report the results. However, increasingly consumers consider many factors when purchasing communications services, only one facet of which is voice capability. Many providers (including intermodal providers) are competing in today's communications markets by offering bundles of "all distance" services that make no distinction between local and long distance calling. In addition, these services may be further bundled with Internet access and other data services and video offerings. Consumers who truly want to compare services offered by all competing providers also rely on customer satisfaction information available in the popular media and from third-party services that is much more accessible than data metric reporting to the Commission. Further, data in this report is in many ways duplicative of the complaint information the Consumer and Government Affairs Bureau collects and summarizes quarterly.</p>	3060-0763

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
ARMIS 43-07 Table I	<ul style="list-style-type: none"> Switching Equipment - the number of non-digital and digital stored program switches, number of access lines by switch type, and switches equipped with SS7 and ISDN technologies. 	<p>The switching categories for which data is collected in this table are outdated and do not reflect modern technologies being deployed in networks today. Newer switching technologies, such as IP-based packet switches, are being widely deployed across the country by a number of different carriers, including incumbent cable VoIP providers that typically rely on IP technology to provide telephone services to their video customers. In addition, information regarding switching equipment deployment is available through other industry sources, including switching facility information maintained by all carriers in the industry's Local Exchange Routing Guide (LERG).</p>	3060-0395
ARMIS 43-07 Table II	<ul style="list-style-type: none"> Transmission Facilities - total kilometers and links of interoffice facilities and central office loop plant terminations based on technology (i.e., analog, digital, copper, fiber) and the number of other terminations such as DSL, DS1 and DS3, hybrid loops and ISDN capable lines. 	<p>Today, interoffice transmission facilities are almost always fiber-based, meaning reporting any data regarding transmission facilities by type of technology is pointless. And the bottom line number of kilometers and links of interoffice fiber facilities provides little or no meaningful information regarding the types of broadband and other services provided to consumers. The existing FCC Form 477 provides much more useful information regarding broadband capabilities being offered by providers in specific areas, such as the number of broadband connections using copper, fiber or coaxial cable in addition to the number of DS1 and DS3 connections.</p>	3060-0395

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
ARMIS 43-08 Table I.A	<ul style="list-style-type: none"> • Outside Plant Statistics - Cable & Wire Facilities - the number of kilometers of various cable and wire facilities (i.e., aerial, underground, buried, intra-building), conduit, and the number of utility poles. 	<p>Bottom line reporting of numbers regarding wire and conduit lengths, utility poles, and the manner of deployment of these facilities does not serve any policy objective. For example, Verizon’s advanced fiber network may be deployed in some areas using aerial facilities, and in other areas those facilities may be buried for any number of reasons – such as geographic impediments and local zoning restrictions – that have no connection to the types of services deployed over the facilities. It is the latter that is of interest to the Commission and to consumers, and that type of information is already being reported on the existing FCC Form 477. In addition, to the extent this data may be used as an input for other matters those limited formulas or processes could be altered.</p>	3060-0496
ARMIS 43-08 Table I.B	<ul style="list-style-type: none"> • Outside Plant Statistics - Other. 	<p>The reporting of data in this table reflects older traditional circuit-switched technologies, such as terrestrial relay radio systems, analog and digital equipped loop circuits, and interoffice cable and microwave systems. This information was not designed for, and, on its face is irrelevant to the Commission’s broadband and public safety goals.</p>	3060-0496
ARMIS 43-08 Table II	<ul style="list-style-type: none"> • Switched Access Lines In Service - number of access lines including Centrex, PBX and ISDN lines. 	<p>See 43-08 Table I.B entry.</p>	3060-0496

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
ARMIS 43-08 Table III	<ul style="list-style-type: none"> • Access Lines In Service By Customer. 	The dynamic raw counts of access lines tells consumers nothing useful about the carrier's products and services, especially since only a few among many competing providers submit this data. In addition, to the extent this data may be used as an input for other matters those formulas should be revisited to reflect the modern communications market.	3060-0496
ARMIS 43-08 Table IV	<ul style="list-style-type: none"> • Telephone Calls - telephone call statistics by state. 	<i>See</i> 43-08 Table I.B. entry.	3060-0496

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
<p>FCC Continuing Property Records Rules</p> <p>47 C.F.R. § 32.11 (to the extent the rule requires a carrier to keep basic property records or continuing property records)</p> <p>47 C.F.R. § 32.2000(e)-(f) (instructions for telecommunications plant accounts pertaining to basic property records and maintaining continuing property records)</p>	<ul style="list-style-type: none"> These rules specify detailed information that an incumbent LEC must maintain for all plant accounts, including detailed descriptions of the property, location information, date of placement into service, and original cost data and supporting records. <i>See, e.g.,</i> 47 C.F.R. § 32.2000(f). 	<p>Like the ARMIS reports, the property rules were developed under rate-of-return regulation and serve no valid purpose under price cap regulation. Under price cap regulation, a carrier’s interstate rates are unaffected by such minutia, and, in any event, other accounting safeguards and controls such as GAAP adequately ensure that assets are valued properly.</p> <p>The Commission concluded as far back as 2001 that the property records rules should be eliminated. <i>See 2000 Biennial Regulatory Review – Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local Exchange Carriers: Phase 2, etc., Report and Order and Further Notice of Proposed Rulemaking</i>, 16 FCC Rcd 19911, ¶ 212 (2001) (“Incumbent LECs are subject to a number of other regulatory constraints and appear to have ample incentives to maintain a detailed inventory of their property. Moreover, the record shows that our detailed requirements, which include rigid rules for recording property, impose substantial burdens on incumbent LECs. In light of all these factors, we tentatively conclude that we should eliminate our detailed CPR rules in three years.”)</p>	<p>3060-0370 (encompasses proceedings addressing reviews of and revisions to § 32 accounting rules)</p>

Reporting Requirements

Report	Requirements	Reasons for Elimination	PRA/OMB Control Number
47 C.F.R. § 43.61 47 C.F.R. § 43.82 FCC 04-70 IB Docket No. 04-112	<ul style="list-style-type: none"> These international telecommunications traffic rules pertain to international traffic reports required by communication common carriers and certain affiliates. Various reports include annual and quarterly traffic filings and annual international circuit reports. 	These rules are no longer necessary nor in the public interest given the enormous growth in competition on international routes, the lack of useful information in the reports given the explosion in competitive alternatives for international voice calls offered by providers that do not file these reports, and the burden on carriers to produce them and the FCC staff to review them. The FCC should at a minimum significantly scale back the current reporting requirements and should not expand the requirements. Recent reform of regulatory fees for international bearer circuits also reduces the rationale for these reports.	3060-0106

Service Categories Required in the ONA Quarterly Report (referenced above)

- (1) Circuit Switched Line: Business Line, PBX, Centrex, WATS, Mobile, Feature Group A, Foreign Exchange;
- (2) Circuit Switched Trunk: Feature Group B, Feature Group D, DID (Line and Trunk);
- (3) Packet Switched Services (X.25 and X.75): Packet DDD Access Line, Packet Synchronous Access Line, Packet Asynchronous Access Line;
- (4) Dedicated Metallic: Protection Alarm, Protection Relaying, Control Circuit;
- (5) Dedicated Telegraph Grade: Telegraph Grade 75 Baud, Telegraph 150 Baud;
- (6) Dedicated Voice Grade: Voice Non-Switched Line, Voice Switched Line, Voice Switched Trunk, Voice and Tone-Radio Land Line, Data Low Speed, Basic Data and Voice, Voice and Data-PSN Access Tie Trunk, Voice and Data-SSN Access, Voice and Data-SSN-Intermachine Trunk, Data Extension-Voice Grade Data, Protection Relay Voice Grade, Telephoto and Facsimile;
- (7) Dedicated Program Audio: Program Audio 200-3500 HZ, Program Audio 100-5000 HZ, Program Audio 50-8000 HZ, Program Audio 50-15000 HZ;
- (8) Dedicated Video: TV Channel-One Way 15kHz Audio, TV Channel-One Way 5 kHz Audio;
- (9) Dedicated Digital: Digital Voice Circuit, Digital Data-2.4kb/s, Digital Data-4.8kb/s, Digital Data-9.6kb/s, Digital Data-56kb/s;
- (10) Dedicated High Capacity Digital: 1.544 MBPS BSA;
- (11) Dedicated High Capacity Digital (Greater than 1.544 MBPS): Dedicated Digital-3.152 MBPS, Dedicated Digital-6.312 MBPS, Dedicated Digital-44.736 MBPS, Dedicated Digital-45 MBPS or Higher;
- (12) Dedicated Alert Transport;
- (13) Dedicated Derived Channel;
- (14) Dedicated Network Access Link (DNAL)