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April 16, 2010

Ex Parte

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

Re: *Cbeyond, Inc. Petition for Expedited Rulemaking to Require Unbundling of Hybrid, FTTH, and FTTC Loops Pursuant to 47 U.S.C. § 251(c)(3) of the Act, WC Docket No. 09-223*

Dear Ms. Dortch:

Yesterday, Ed Shakin, Nneka Ezenwa, and the undersigned of Verizon met with Marcus Maher, Ian Dillner, Al Lewis, Marv Sacks and Heather Hendrickson (via phone) of the Wireline Competition Bureau to discuss why the FCC should reject Cbeyond's Petition for Expedited Rulemaking to Require Unbundling of Hybrid, FTTH and FTTC Loops. We explained that the Commission should not reverse seven years of settled policy by taking the radical step of imposing unbundling mandates on next-generation broadband infrastructure. Our comments were consistent with Verizon's February 19, 2010 ex parte (Attachment 1) and the handouts in Attachment 2. In particular, we explained that any backtracking on the Commission's policy at this time would come late in the game, after companies have invested tens of billions of dollars in fiber infrastructure in express reliance upon the Commission's policy, while also standing as a direct obstacle to the Commission's longstanding broadband goals by discouraging the substantial, future investments needed for widespread availability of next-generation broadband facilities.

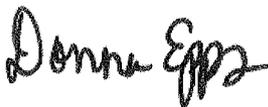
Far from helping small businesses, Cbeyond's proposal would harm these and other customers by undermining the Commission's success in promoting broadband deployment by multiple competing providers and by deterring future investment, thus impeding the Commission's longstanding goal of universal broadband deployment. There are no countervailing benefits to small businesses that today can choose from a variety of broadband suppliers that offer the services and applications small businesses require. For instance, cable, fixed wireless, and CLEC broadband providers have recently expressed their focus on attracting small business customers. *See* Attachment 2. Moreover, a review of the specific small business applications that Cbeyond provides or claims it would provide in the future with unbundled fiber demonstrates that small businesses can obtain them or applications with similar functionality today from Verizon (and likely other broadband providers as well). *Id.*

In addition, although it is not entirely clear, the unbundling Cbeyond appears to seek — i.e., a packetized bit stream transmission path tailored to its business plan and apparently using

mass market fiber facilities rather than dedicated lines already available to wholesale customers — would create difficult technical issues about how to construct fiber networks in a manner that would provide unbundled access to rivals. For example, the design of Verizon's FiOS network takes into account the Commission's 2003 decision not to require unbundling and includes *no* systems and processes to segregate and route multiple providers' packetized traffic. Adding these capabilities would require the development of new hardware, including new routers or switches to add to the Optical Network Terminals that are located at FiOS customers' premises and hardware further upstream to move traffic from multiple streams to the Internet backbone. Substantial software changes and the development and continuous administration of management processes for the traffic of multiple providers would also be required. The costs for these would be substantial and borne by *all* consumers, including small businesses. Importantly, these costs would not be imposed on any other broadband providers, such as cable, wireless, and fixed wireless that compete for the same customers.

Finally, we discussed how, contrary to the claims of Cbeyond, the *Program Access Order* is inapposite to Cbeyond's petition. Aside from the very different statutory regimes in question, Cbeyond seeks network unbundling — an intrusive regulatory requirement far afield from the topics at issue in the *Program Access Order*. In the situation here, competitors have the ability to deploy their own network facilities, and there are in fact multiple facilities-based providers offering broadband connections and other services to small businesses. Indeed, Cbeyond itself serves these customers without the need for the facilities it seeks. In the *Program Access Order*, on the other hand, the Commission addressed the anticompetitive practices of cable incumbents that have acquired the rights to non-replicable, must-have programming — such as regional sports programming — and then, to inhibit competition and consumer choice, refused to provide access to this unique and competitively significant programming to competitive providers on negotiated terms. And the Commission decided to provide relief only on a case-by-case basis upon a showing the statutory standards had been met. Therefore, that order provides no support for the intrusive and extreme relief sought here by Cbeyond.

Sincerely,



Attachments

April 16, 2010
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ATTACHMENT 1

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February 19, 2010

VIA ECFS

Ex Parte

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

Re: National Broadband Plan, GN Docket No. 09-51;Cbeyond, Inc. Petition for Expedited Rulemaking to Require Unbundling of Hybrid, FTTH, and FTTC Loops Pursuant to 47 U.S.C. § 251(c)(3) of the Act, WC Docket No. 09-223

Dear Ms. Dortch:

In connection with the National Broadband Plan, Cbeyond and others are urging the Commission to reverse seven years of settled policy and to take the radical step of imposing unbundling mandates for next-generation broadband infrastructure. Their purported reason for this extraordinary proposal is to permit CLECs like Cbeyond to offer services over those unbundled loops to small business customers.¹

These proposals are bad policy, flawed legally and cannot be a part of a National Broadband Plan that's explicit purpose is to encourage broadband deployment and investment. Cbeyond's proposal would undermine the Commission's success in promoting broadband deployment by multiple competing providers and deter future investment, which would impede – not promote - the Commission's longstanding goal of universal broadband deployment. The Commission's previous decision not to require unbundling of advanced broadband network elements was based on a voluminous evidentiary record showing that this policy would give *all* providers the proper incentives to invest in cutting-edge broadband infrastructure. This settled policy — which has been repeatedly reaffirmed by the Commission and uniformly upheld by the courts — has spurred massive investments in next-generation broadband infrastructure and a robustly competitive broadband marketplace. Since 2003, broadband penetration has nearly tripled, from 23 percent of households to 66 percent of households, and the number of high-speed Internet lines in the United States has increased nearly six-fold. Investment in fiber broadband infrastructure has been even more explosive. Between 2003 and 2007, incumbent LECs deployed enough fiber to circle the earth almost seven times. Verizon *alone* has committed \$23 billion to its all-fiber FiOS network, which currently reaches roughly 15.4

¹ See Letter from Thomas Jones, Counsel for Cbeyond, to Marlene H. Dortch, GN Docket No. 09-51, WC Docket No. 09-223 (filed Feb. 4, 2010).

million premises. This investment and innovation has hardly been limited to incumbent LECs. Today, providers of all stripes — including, but not limited to, ILECs, CLECs, cable operators, and fixed and mobile wireless providers — are investing heavily in their broadband networks and competing aggressively for small and medium-sized business customers as well as mass-market customers. Cbeyond’s proposal would undermine this competitive success and deter further investment in broadband, to the detriment of all of these customers. And, as noted below, it also would be unlawful.

1. In the *Triennial Review Order*, the Commission drew upon “an extensive record developed over more than two years”² in concluding that forced unbundling of advanced broadband network elements such as FTTP and hybrid loops would deter investment by both ILECs and CLECs. The Commission found that the “effect of unbundling on investment incentives is particularly critical in the area of broadband deployment, since incumbent LECs are unlikely to make the enormous investment required if their competitors can share in the benefits of these facilities without participating in the risk inherent in such large scale capital investment.”³ Moreover, the Commission recognized that, “with the certainty that their fiber optic and packet-based networks will remain free of unbundling requirements, incumbent LECs will have the opportunity to expand their deployment of these networks, enter new lines of business, and reap the rewards of delivering broadband services to the mass market.”⁴ Along similar lines, the Commission determined that, “with the knowledge that incumbent LEC next-generation networks will not be available on an unbundled basis, competitive LECs will need to continue to seek innovative network access options to serve end users and to fully compete against incumbent LECs in the mass market.”⁵

These policy judgments were informed by section 706 of the 1996 Act, which provides that the Commission “shall encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans” by, among other means, “remov[ing] barriers to infrastructure investment.”⁶ The Commission concluded that “applying section 251(c) unbundling obligations to these next-generation network elements would blunt the deployment of advanced telecommunications infrastructure by incumbent LECs and the incentive for competitive LECs to invest in their own facilities, in direct opposition to the statutory goals authorized in section 706.”⁷

The Commission’s decisions not to mandate unbundling of FTTP and hybrid loops — and other broadband network elements — were repeatedly affirmed by the courts. The D.C.

² Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, 18 FCC Rcd 16978, ¶ 272 (2003) (“*Triennial Review Order*” or “*TRO*”).

³ *Id.* ¶ 3.

⁴ *Id.* ¶ 272.

⁵ *Id.*

⁶ 47 U.S.C. §157 note (internal quotation marks omitted).

⁷ *TRO* ¶ 288.

Circuit affirmed the *Triennial Review Order*'s treatment of FTTP and hybrid loops, holding that "the decision not to unbundle these elements was reasonable . . . in light of evidence that unbundling would skew investment incentives in undesirable ways and that intermodal competition from cable ensures the persistence of substantial competition in broadband."⁸ Since the *Triennial Review Order*, the Commission and the courts have consistently reaffirmed these conclusions that mandatory unbundling policies create a disincentive to investment in advanced broadband infrastructure.⁹

2. Rigorous empirical research by some of the leading academics in the field makes clear that the Commission's determinations were correct. Economists Jerry Hausman and J. Gregory Sidak conducted a detailed review of unbundling policies in the United States, United Kingdom, New Zealand, Canada, and Germany, and concluded that *none* of the major rationales for unbundling — such as promoting retail competition and enabling future facilities-based competition — were supported by the empirical evidence.¹⁰ Thomas Hazlett and Anil Caliskan compared DSL, which had been subject to unbundling mandates for years, and cable modem service, which had not. They found that investment incentives were highly sensitive to changes in unbundling policy, even in the short run, and that the rapid growth of DSL service following the repeal of an unbundling mandate "presents a strong case for protecting such growth dynamics in public policy."¹¹ Similarly, an article by Scott Wallsten and Stephanie Hausladen — which analyzed the effects of unbundling policies on fiber deployment in 27 European countries — concluded that, "countries with more broadband connections per capita provided through [unbundling] have fewer fiber connections . . . per capita provided by the incumbents and entrants. Conversely, in countries where entrants provide broadband over their own DSL or cable infrastructure, incumbents provide more fiber."¹²

Notably, the leading *manufacturers* of fiber optic cable and telecommunications equipment — who have a direct interest in maximizing investment in broadband networks — oppose Cbeyond's proposal and support the Commission's current rules and policy. For

⁸ *United States Telecom Ass'n v. FCC*, 359 F.3d 554, 585 (D.C. Cir. 2004) ("*USTA II*").

⁹ See, e.g., Memorandum Opinion and Order, *Petition for Forbearance of the Verizon Telephone Companies Pursuant to 47 U.S.C. § 160(c)*, 19 FCC Rcd 21496, ¶¶ 21-25 (2004), *aff'd*, *EarthLink, Inc. v. FCC*, 462 F.3d 1, 12 (D.C. Cir. 2006).

¹⁰ See Jerry Hausman & J. Gregory Sidak, *Did Mandatory Unbundling Achieve Its Purpose? Empirical Evidence from Five Countries*, 1(1) *Journal of Competition Law & Economics* 173, 245 (2005).

¹¹ Thomas W. Hazlett & Anil Caliskan, *Natural Experiments in U.S. Broadband Regulation*, 7(4) *Review of Network Economics* 460, 477 (Dec. 2008).

¹² Scott Wallsten & Stephanie Hausladen, *Net Neutrality, Unbundling, and Their Effects on International Investment in Next-Generation Networks*, 8(1) *Review of Network Economics* 90, 102 (Mar. 2009); see also Jeffrey A. Eisenach, The Progress & Freedom Foundation, *Broadband Policy: Does the U.S. Have It Right After All?* 10-11 & Fig. 3 (Sept. 2008); Harold Ware & Christian M. Dippon, NERA Economic Consulting, *Wholesale Unbundling and Intermodal Competition* 11 (Jan. 7, 2010) ("[T]he statistical evidence does not support claims by proponents of unbundling that this regulatory tool results in higher broadband penetration rates.").

example, Corning — the leading producer of fiber-optic cable in the United States — asserts that Cbeyond’s proposal is “contrary to the Commission’s recognized need for more investment to upgrade the broadband infrastructure with next-generation capacity.”¹³ Similarly, the Telecommunications Industry Association — which represents 600 manufacturers and suppliers of broadband equipment, services, and applications — concludes that the Commission’s current policies “have been exceedingly successful, prompting an explosion in next-generation facilities investment and deployment and a concomitant rise in broadband adoption.”¹⁴ The D.C. Circuit has emphasized that manufacturers of telecommunications equipment such as these commenters “have the incentive to make a completely unbiased judgment” about the likely effects of Commission policy because their goal is to sell as many goods and services as possible.¹⁵

The data on broadband investment and fiber deployment also confirm that the Commission’s predictive judgment that refusing to mandate broadband unbundling would spur broadband investment was correct. Since 2003, broadband penetration has nearly tripled, from 23 percent of households to 66 percent of households.¹⁶ The number of high-speed Internet lines in the United States increased nearly six-fold between 2003 and 2008, from 23 million to 132.8 million.¹⁷ By some estimates, cumulative capital expenditures by broadband providers from 2000 to 2008 were over half a trillion dollars.¹⁸ In 2009, broadband providers were estimated to have invested nearly \$60 billion in their networks.¹⁹

In particular, investment in fiber broadband infrastructure has been nothing short of explosive. Between 2003 and 2007, incumbent LECs deployed more than 280,000 kilometers of fiber, enough to circle the earth almost seven times.²⁰ Verizon *alone* has committed \$23 billion to its all-fiber FiOS network, which currently reaches roughly 15.4 million premises. And AT&T’s U-verse fiber-to-the-neighborhood program will reach 30 million living units by 2010.²¹ This boom in investment has not been limited to incumbent LECs. Cable operators are also investing in cutting-edge broadband infrastructure such as the DOCSIS 3.0 platform, which offers the potential for speeds of 100 Mbps and higher; Comcast expects to offer this service

¹³ Comments of Corning Incorporated at 2, WC Docket No. 09-223 (filed Jan. 22, 2010).

¹⁴ Comments of the Telecom. Indus. Ass’n at 2, WC Docket No. 09-223 (filed Jan. 22, 2010).

¹⁵ *United States v. Western Elec. Co.*, 993 F.2d 1572, 1582 (D.C. Cir. 1993).

¹⁶ See Robert C. Atkinson & Ivy E. Schultz, Columbia Inst. For Tele-Info., *Broadband in America: Where It Is and Where It Is Going* 25-26 (Nov. 11, 2009) (“CITI Report”).

¹⁷ See Industry Analysis and Technology Division, Wireline Competition Bureau, *High-Speed Services for Internet Access: Status as of June 30, 2008*, Table 1 (July 2009).

¹⁸ See Comments of U.S. Telecom, *Preserving the Open Internet: Broadband Industry Practices*, GN Docket No. 09-191, at 6 (filed Jan. 14, 2010) (citing U.S. Dept’t of Commerce, National Telecommunications and Information Administration, *Networked Nation: Broadband in America 2007*, at 32-34 (Jan. 2008)).

¹⁹ *Id.* (citing data from Yankee Group Research).

²⁰ See FCC, ARMIS Infrastructure Report, FCC Report 43-07, Table II.

²¹ See *CITI Report* at 15.

throughout its footprint by the end of the year.²² Wireless broadband providers, too, are investing heavily to “quickly upgrade and enhance their networks, which is resulting in 3G and 4G build activity.”²³ The four largest wireless providers invested \$10.4 billion in their broadband capabilities in 2008 and \$11.8 billion in 2009.²⁴ Indeed, the roll-out of 4G wireless networks will provide a competitive alternative to wireline broadband for many consumers; Clearwire, for example, advertises its 4G WiMAX service — which offers average download speeds of 3-6 Mbps — as “offer[ing] speeds comparable to cable and DSL for home, and up to 4x faster than you can get with mobile broadband from a cellular company.”²⁵ CLECs have also deployed more than 100,000 route miles of fiber to tens of thousands of office buildings, and there is an average of six fiber-based broadband providers in each of the fifty largest MSAs.²⁶ Nationwide, there are currently more than 600 facilities-based providers offering fiber broadband service; collectively, these providers serve 1.1 million customers.²⁷

Especially as the Nation is emerging from a recession, it is crucial that the Commission preserve these incentives for investment and innovation in the broadband marketplace. Broadband deployment and usage is a significant factor driving economic growth and job creation. Drs. Crandall, Lehr, and Litan have estimated that a one-percent increase in broadband penetration translates into a 0.2 to 0.3 percent increase in employment; nationwide, that suggests an additional 300,000 jobs either added or saved.²⁸ The same study found that “employment in both manufacturing and service industries (especially finance, education and health care) is positively related to broadband penetration.”²⁹ In a follow-up study, Drs. Crandall and Singer found that first-generation broadband technologies such as cable modem, DSL, and 3G wireless were *directly responsible* for creating 434,100 jobs.³⁰ They predict that job creation will only continue to increase as providers make massive investments in next-generation broadband

²² See Comments of Comcast, *A National Broadband Plan for Our Future*, GN Docket No. 09-51, at 37-39 (filed June 9, 2009).

²³ Simon Flannery et al., Morgan Stanley, *3Q Trend Tracker: Signs of Life for Telecom*, at 67 (Dec. 4, 2009).

²⁴ See *CITI Report* at 66, Table 15.

²⁵ See <http://www.clear.com/shop/services/mobile?id=226&market=42>.

²⁶ See Patrick Brogan & Evan Leo, USTelecom, *High-Capacity Services: Abundant, Affordable, and Evolving* 24-25 & Table 7 (July 2009) (“*USTelecom Report*”), available at http://ustelecom.org/uploadedFiles/News/News_Items/High.Capacity.Services.pdf.

²⁷ See RVA LLC, *Fiber-To-The-Home: North American Market Update 9-10* (Apr. 2009). This number includes CLECs that are divisions of ILECs.

²⁸ See Robert Crandall, William Lehr & Robert Litan, *The Effects of Broadband Deployment on Output and Employment: A Cross-sectional Analysis of U.S. Data*, The Brookings Institute: Issues in Economic Policy at 2 (July 2007).

²⁹ *Id.*

³⁰ See Robert Crandall & Hal Singer, *The Economic Impact of Broadband Investment* at 2 (forthcoming Feb. 2010).

platforms such as FTTP, DOCSIS 3.0, and 4G wireless.³¹ These new broadband services will also lead to positive “spillover effects” that drive investment and job creation in other sectors of the economy; more than 1.3 million jobs may ultimately be created due to the deployment of second-generation broadband infrastructure.³² Moreover, state-of-the-art broadband networks — which enable telecommuting, telemedicine, distance learning, e-commerce, and social networking — provide countless benefits to consumers, *especially* those who live in rural communities; these applications also enable consumers to save billions of dollars on transportation costs, which, in turn, helps protect the environment.³³ Drs. Crandall and Singer caution, however, that the enormous positive impact of next-generation broadband networks could be jeopardized by “new regulatory changes [that] undermine the incentives of [providers] to continue to invest.”³⁴ Any changes to the Commission’s existing policy — which gives *all* providers the proper incentives to invest in cutting-edge broadband infrastructure — would thus jeopardize job growth not only in the communications industry, but across many other sectors of the economy as well.

3. Cbeyond and others supporting its proposal assert that unbundling is required to bring broadband to small businesses. They are wrong. It will have the opposite effect.

As an initial matter, Verizon has long been aware of the unique issues facing small businesses, and offers a number of products and services that are tailored to the needs of these firms — including plans that offer small businesses up to 35 Mbps symmetrical upload and download speeds over Verizon’s all-fiber, FiOS network.³⁵ Other competitors also offer a wide range of broadband services that are specifically designed for small-business customers.³⁶

But Verizon, AT&T and Qwest are hardly the only broadband providers targeting small and medium businesses. In the past few years, the five largest cable operators have announced plans to invest several billion dollars to expand their business offerings, including high-capacity services.³⁷ For example, Comcast alone plans to invest more than \$3 billion in business services between 2007 and 2012.³⁸ That investment is helping cable operators gain market share; the leading cable companies already serve nearly one million business customers, and their revenue from business services is growing by 15-20 percent per year.³⁹ Cable operators “have made [small and medium-sized businesses] their primary growth initiative,” and are “competing

³¹ *Id.* at 38-39.

³² *Id.* at 47-48.

³³ *Id.* at 31-36.

³⁴ *Id.* at 4.

³⁵ See <http://smallbusiness.verizon.com/>; <http://mediumbusiness.verizon.com/>.

³⁶ See Comments of Qwest at 7-10, WC Docket No. 09-223 (filed Jan. 22, 2010); Comments of AT&T at 24-25, WC Docket No. 09-223 (filed Jan. 22, 2010).

³⁷ *USTelecom Report* at 9.

³⁸ *Id.* at 10, Table 1.

³⁹ See *id.* at 9; see also *id.* at 14-15, Table 3.

particularly aggressively” for these customers.⁴⁰ Comcast has identified five million small and medium-sized businesses within its footprint and has announced plans to actively pursue these firms.⁴¹ Similarly, Cox offers business broadband services at “[s]peeds to fit all your needs,” “[w]hether you’re a small, growing business or a large, established enterprise.”⁴² It is projected that, by next year, cable providers will double their share of the small and medium business market segment.⁴³

Fixed wireless providers are also intensely pursuing business customers. As the Commission has recognized, “fixed wireless offers the potential of being a cost-effective substitute for fiber as a last-mile connection to commercial buildings.”⁴⁴ This service is rapidly being deployed in urban and suburban areas — as well as areas in which demand tends to be less concentrated — and it is seen as “a particularly attractive substitute for the ILECs’ DS-1 and DS-3 special access services.”⁴⁵ More than a dozen fixed wireless providers currently offer a wide range of broadband services to small, medium, and large businesses; many of these providers offer “speeds (such as 8 Mbps) that are in between the standard DS-1 and DS-3 offerings specifically to appeal to businesses whose needs fall in between this range.”⁴⁶ For example, Covad Wireless offers a “flexible, scalable and cost effective business-quality broadband service” at symmetrical speeds between 768 Kbps and 6 Mbps, “up to four times the speed of a conventional land line T1.”⁴⁷ Covad emphasizes that this service “is the perfect choice for mission critical business applications and companies of any size.”⁴⁸

Mobile wireless providers are also investing heavily in deploying 4G broadband networks. In 2010, Verizon intends to extend 4G coverage to roughly 100 million customers in 30 different markets; by 2013, Verizon’s entire footprint will have 4G coverage.⁴⁹ Sprint already provides 4G service to 27 markets and plans to expand coverage to Boston, Houston, New York,

⁴⁰ Craig Moffett et al., Bernstein Research, *U.S. Telecom: Enterprise Services . . . Time for a Star Turn?* 17 (Mar. 25, 2008); *USTelecom Report* at 15-16.

⁴¹ *USTelecom Report* at 11.

⁴² *Id.* at 14, Table 3.

⁴³ See Jessica Reif Cohen, Bank of America/Merrill Lynch, *The Enterprise: Cable’s Next Frontier* 4 (Sept. 9, 2009).

⁴⁴ Memorandum Opinion and Order, *AT&T and BellSouth Application for Transfer of Control*, 22 FCC Rcd 5662, ¶ 48 (2007); see also *USTelecom Report* at 16-19.

⁴⁵ *USTelecom Report* at 17.

⁴⁶ *Id.* at 17-22 & Tables 4-6.

⁴⁷ See <http://www.covadwireless.com/services-super-t.html>.

⁴⁸ *Id.*

⁴⁹ See Marguerite Reardon, CNet News, *Verizon Completes Initial 4G Wireless Test*, (Aug. 14, 2009), http://news.cnet.com/8301-1035_3-10310232-94.html.

San Francisco, and Washington, DC in 2010.⁵⁰ By the end of the year, Clearwire's 4G network will cover 120 million people in 80 markets.⁵¹ Many of these providers offer speeds that are well-suited to the needs of small businesses. For example, both Sprint and Clearwire offer 4G broadband service with average download speeds of 3-6 Mbps and average upload speeds of roughly 1 Mbps.⁵² And Clearwire's "CLEAR Professional" plans provide additional features such as dedicated support lines and enhanced security.⁵³

In sum, there is no merit to the contentions that an unbundling mandate tailored to the business plans of a handful of providers is necessary to enable small businesses to obtain the benefits of broadband.

At the same time, small businesses — like *all* customers — would suffer if the Commission were to reverse course on its unbundling decisions and adopt such a radical policy. At the very least, imposing unbundling obligations on one among the various competing providers will serve to *reduce* the competitive options available to small businesses. At a minimum, it would deter investment by the companies directly subject to an unbundling obligation as they are forced to rethink their ability to justify making the large fixed capital investments necessary to serve these customers. Moreover, an unbundling mandate will ultimately result in less investment in next-generation broadband networks by all providers to serve all customers, given the heightened investment risk (and the corresponding increased cost) created by the prospect that the Commission might expand the obligation at any time once it starts down this ill-advised path. In addition, the business case for deploying fiber is often most tenuous in rural, high-cost, and less-densely populated areas. Policies that artificially raise the costs of broadband deployment will have a *disproportionately* negative impact on those areas, and will thus stand as a direct obstacle to the Commission's longstanding goal of providing high-speed broadband access to all Americans.

4. Cbeyond asserts that the unbundling of fiber broadband facilities it seeks could be imposed at little or no cost to the government or incumbent LECs. To the contrary, as the Commission and the courts have repeatedly recognized, the costs of unbundling — both direct and indirect — are significant. The D.C. Circuit has emphasized that "mandatory unbundling comes at a cost, including disincentives to research and development by both ILECs and CLECs and the tangled management inherent in shared use of a common resource."⁵⁴ The unbundling Cbeyond seeks — *i.e.*, a packetized bit stream transmission path tailored to its business plan —

⁵⁰ See News Release, Sprint, *Sprint 4G Rollout Blazes on with Maui Launch* (Dec. 1, 2009), available at http://newsreleases.sprint.com/phoenix.zhtml?c=127149&p=irol-newsArticle_newsroom&ID=1360459.

⁵¹ See Simon Flannery & Sean Ittel, Morgan Stanley, *Clearwire Corporation: 2Q09 Preview: Market Rollout and Wholesale Launches Progressing* 4 (Aug. 10, 2009).

⁵² See <http://www.clear.com/shop/services/mobile?id=226&market=42>;
http://www.nextel.com/en/solutions/mobile_broadband/mobile_broadband_4G.shtml.

⁵³ See <http://clearprofessional.net/>.

⁵⁴ *United States Telecom Ass'n v. FCC*, 290 F.3d 415, 429 (D.C. Cir. 2002).

would create difficult technical issues about how to construct fiber networks in a manner that will provide shared access to rivals. For example, Verizon's network is not currently designed to segregate and route multiple providers' packetized traffic; adding these capabilities would require the development of new hardware, software, and traffic management processes, as well as new measures for keeping such data secure.⁵⁵ Qwest also emphasizes that it would have to "re-engineer the network" in order to provide the service Cbeyond seeks.⁵⁶

In addition to these direct costs, *any* unbundling mandate would impose administrative oversight costs with regard to the terms and conditions of the forced sharing. Indeed, attempting to require unbundling only when used to serve small businesses (or only to provide a particular set of products to that class of customer) — as Cbeyond requests here — would also raise difficult and costly issues of implementation, as ILECs and regulators would need means of ensuring that a CLEC does not use such a newly unbundled loop for a different class of customer or a different product line. All of these costs would divert resources that could, instead, have been devoted to greater broadband deployment.

Cbeyond contends that the costs of unbundling would be minimized if CLECs were required to pay so-called "retail" prices for the service at issue. As an initial matter, if there were an existing "retail" product that provided the service Cbeyond seeks through unbundling, Cbeyond could purchase that product today. But, as explained above, the service that Cbeyond wants ILECs to be required to supply simply does not exist. There is thus no existing "retail price" for that service. As a result, what Cbeyond is seeking to do is to transplant an end-user retail rate — set in the marketplace based on the particular characteristics of that offering and competitive offerings from other providers — to a completely different service, a packetized pathway for serving small businesses.

Indeed, regardless of the exact rate it is proposing, what *is* clear is that Cbeyond wants access to fiber loops at a *lower* price than it could obtain through arms-length negotiations in the marketplace. But in the absence of impairment, the Commission has quite correctly concluded that "the market price should prevail, as opposed to a regulated rate."⁵⁷ Mandating *any* below-market rates — even if those rates are above TELRIC prices — would create a disincentive to investment in fiber loops. As the D.C. Circuit has held, "even if unbundling under [above-TELRIC prices] would produce marginally less disincentive, the FCC reasonably concluded that there would still be a significant deterrent due to costs inherent in complying with any unbundling mandate."⁵⁸ And, of course, any unbundling mandate will quickly be followed by a demand to apply TELRIC pricing. In fact, various parties already are arguing precisely that.⁵⁹

⁵⁵ See Comments of Verizon at 17-20, WC Docket No. 09-223 (filed Jan. 22, 2010).

⁵⁶ Qwest Comments at 30-31.

⁵⁷ Third Report and Order and Fourth Further Notice of Proposed Rulemaking, *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, 15 FCC Rcd 3696, ¶ 473 (1999), *vacated and remanded on other grounds*, *USTA I*, 290 F.3d 415.

⁵⁸ *EarthLink, Inc. v. FCC*, 462 F.3d 1, 13 (D.C. Cir. 2006).

⁵⁹ See Comments of XO, WC Docket No. 09-223 (filed Jan. 22, 2010) at 9-11; Comments of Covad, WC Docket No. 09-223 (filed Jan. 22, 2010) at 17.

5. Those who seek a reversal of settled policy have also failed to demonstrate that the statutory “impairment” standard is satisfied; without a showing of impairment, the Commission may not require unbundling.⁶⁰ The critical question under the impairment standard is whether competitors are *capable* of competing without UNEs — impairment does not exist when “competition is possible” without UNEs.⁶¹ Indeed, “[t]he fact that CLECs *can* viably compete without UNEs . . . *precludes* a finding that the CLECs are impaired.”⁶² As explained above, providers are demonstrably capable of deploying their own fiber loops — or high-speed broadband wireless “loops” — and using those facilities to compete successfully. CLECs, cable operators, and fixed and mobile wireless providers are all deploying broadband networks and aggressively marketing broadband services using those networks to business customers. These providers are doing so, moreover, *without* unbundled access to FTTP and hybrid fiber loops. This evidence that facilities-based competition is not only possible — but is flourishing — precludes the Commission from finding that impairment exists for FTTP and hybrid fiber loops. Indeed, Cbeyond’s proposal is little more than a desire to obtain unbundling under terms and conditions that would suit its particular business model; the Commission has emphasized, however, that it “will not . . . evaluate whether individual requesting carriers or carriers that pursue a particular business strategy are impaired without access to UNEs.”⁶³

In fact, the D.C. Circuit previously invalidated an unbundling requirement that is directly analogous to what Cbeyond advocates here. Specifically, the Commission previously imposed a requirement to unbundle and make available to other carriers a packetized transmission path over their local facilities which it referred to as line sharing. The Court vacated that requirement, however, precisely because the existence of competing broadband services from cable showed that it was possible to compete without unbundling. The court emphasized that when intermodal competition exists, there is “no reason to think [an unbundling mandate] would bring on a significant enhancement of competition.”⁶⁴ Since the D.C. Circuit decided *USTA I* in 2002, incumbent LECs have faced even *stronger* competition from a much wider array of broadband providers. Any finding of impairment in the face of such competition would clearly be unlawful.

6. Moreover, Verizon and other providers relied on the Commission’s explicit rulings to take massive investment risks without the threat of forced sharing of this investment. The current proposals to reverse course would change the rules late in the game and penalize providers for their reasonable reliance on settled policy. An about face on the Commission’s decisions not to require unbundling of broadband facilities would thus raise serious constitutional questions. As the Supreme Court has emphasized, a “decision to arbitrarily switch back and

⁶⁰ See 47 U.S.C. § 251(d)(2).

⁶¹ *USTA II*, 359 F.3d at 575; see also 47 U.S.C. § 251(d)(2)(B) (unbundling required only when competitors lack the “ability” to provide service without access to UNEs).

⁶² *Covad Communications Co. v. FCC*, 450 F.3d 528, 534 (D.C. Cir. 2006) (internal quotation marks omitted, emphases added).

⁶³ *TRO* ¶ 115.

⁶⁴ *USTA I*, 290 F.3d at 429.

forth between” regulatory regimes “in a way which required investors to bear the risk of bad investments at some times while denying them the benefits of good investments at others would raise serious constitutional questions.”⁶⁵ That is precisely what would occur if the Commission, after inducing broadband providers to invest tens of billions of dollars in fiber networks, denied them the benefits of those investments by re-imposing forced sharing. Therefore, unlike the takings challenge to the Commission’s TELRIC rules — which the Supreme Court rejected while noting that “there was no ‘switch’ of methodologies,” no “opportunistic switch ‘back and forth,’” and no “promise” by the government to use a particular methodology⁶⁶ — the reversal of course that Cbeyond and others urge on the Commission would raise substantial questions under the Takings and Due Process Clauses.

Finally, but importantly, the rule change Cbeyond and others seek would artificially skew competition in the broadband marketplace by imposing a unique — and significant — burden on only one class of providers, among the many broadband platform providers that exist today. In a marketplace where all providers are making large and risky investments in deploying new networks and facilities, it makes no sense to saddle only *one* set of providers with a costly unbundling mandate.

* * *

The Commission’s well-reasoned decision not to require unbundling of next-generation broadband network elements was based on a voluminous evidentiary record showing that there is no impairment and that this policy gives *all* providers the proper incentives to invest in advanced broadband infrastructure. Those determinations were correct. Since the *Triennial Review Order*, multiple competing broadband providers using a variety of technologies have made massive investments in next-generation networks, and intermodal competition has flourished. Contrary to the arguments being raised by some, a number of different broadband providers are competing aggressively to market a wide array of broadband services to small-business customers. Not only is unbundling unnecessary to bring broadband service to these customers, but small businesses — like all consumers — would suffer from the reduced broadband investment that would inevitably follow from a costly and intrusive unbundling mandate.

Sincerely,



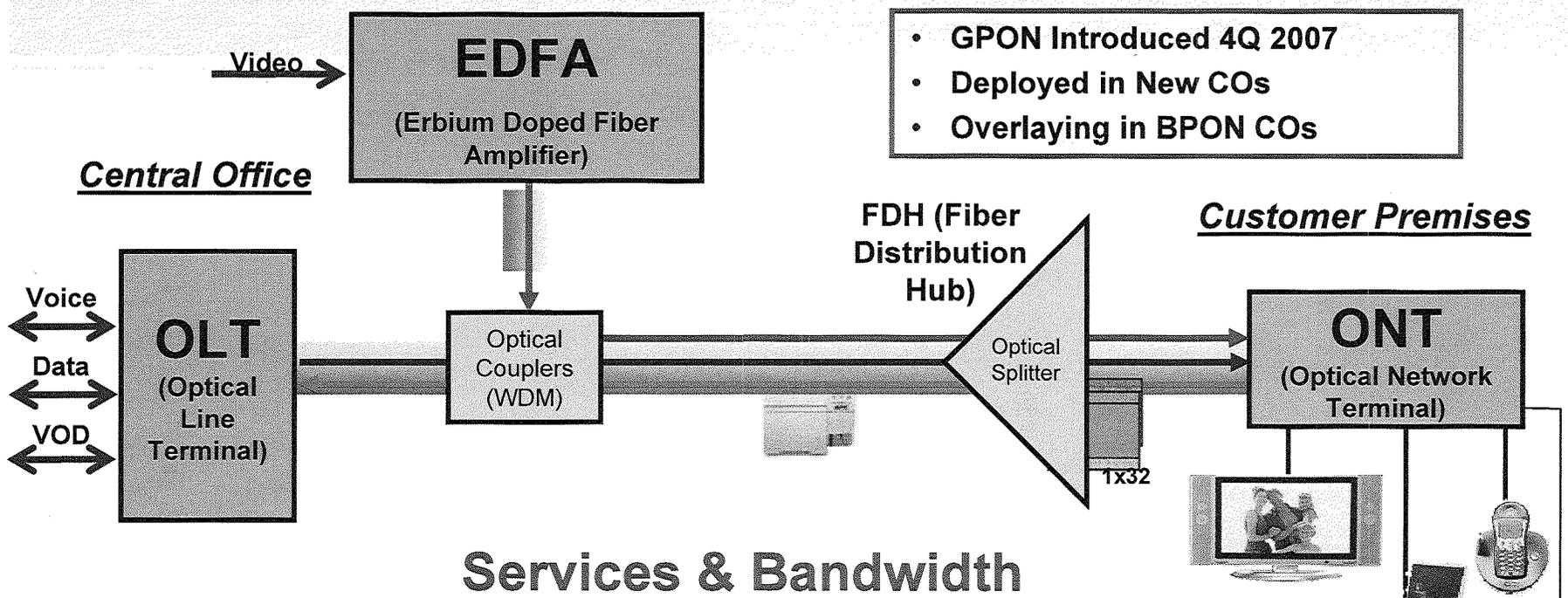
⁶⁵ *Duquesne Light Co. v. Barasch*, 488 U.S. 299, 315 (1989); cf. *United States v. Winstar Corp.*, 518 U.S. 839 (1996) (allowing breach of contract claims when the government eliminated an accounting rule that had induced healthy banks to take over failing banks during the savings and loan crisis).

⁶⁶ *Verizon Communications, Inc. v. FCC*, 535 U.S. 467, 527-28 (2002).

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ATTACHMENT 2

FTTP Overview – BPON and GPON



- GPON Introduced 4Q 2007
- Deployed in New COs
- Overlaying in BPON COs

Services & Bandwidth

← Upstream ————— Downstream →

	1310 nm	1490 nm	1550 nm
BPON	Voice and Data @ 155 Mbps	Voice, Data & VOD @ 622 Mbps	Broadcast Video 870 MHz
GPON	Voice and Data @ 1.2 Gbps	Voice, Data & VOD @ 2.5 Gbps	Broadcast Video 870 MHz



**Selected Quotes from Cable Companies, Fixed Wireless Providers
and CLECs
Regarding the Small and Medium Business Markets**

Cable Providers

Comcast

Michael Angelakis, EVP, CFO – transcript of 4Q 2009 earnings call on 2-3-10

- “Business services [have] experienced real momentum over the past year, with revenue increasing 48% to \$828 million for 2009. In 2010, we are again enthusiastic about business services’ prospects and expect this momentum to continue as we begin to expand our services to medium-sized businesses and call backhaul.”

Steve Burke, COO - transcript of 4Q 2009 earnings call on 2-3-10

- “[W]e are continuing to invest in future growth. In business services, we continue to have real success in the small end of the business market, with a lot of room for growth.”

Michael Angelakis, EVP, CFO – transcript of Credit Suisse Group Global Media and Communications Conference on 3-9-10

- In response to a question about how small businesses are often neglected by the incoming telcos: “We think we have a better product. And we think we can do it more economical for our customer bases. So, we can walk into a relatively small office and offer multi-line phones, which are more economical than our competitors’. We can offer a high-speed data product that replaces a DSL or ISDN line for again, more economical, so better product, lower cost.”

Cox

Cox Targets \$2B in Biz Revenues 12-3-09 *Light Reading’s Digital Cable News*

Today, about 80 percent of its commercial customers have fewer than 20 workers, with 65 percent of revenues coming from that group. [Phil Meeks, VP] said “Cox is also expanding its capabilities to go after businesses with 20-99 workers aggressively with symmetric DOCSIS Internet services and other offerings targeted to larger commercial customers.”

Time Warner Cable

Landel Hobbs – *COO* transcript of 4Q 2009 earnings call on 1-28-10

- “Sure. First of all I'm really happy with the growth roughly north of 14% in the fourth quarter and 15.5% for the year, particularly in the face of what you mentioned, in a tough economic environment out there. Remember, our sweet spot is the small businesses, actually very small businesses who have been particularly hard hit by the economy. Having seen some increase in churn on that front. Having said that, as we indicated in our prepared remarks, we're going to increase the growth rate of north of 20% next year, and I'm happy to say as I look at the tail end of the fourth quarter moving into the first, I'm seeing my revenue growth improve.

TWC's new Ethernet service rolls into New York City – 10-23-08

CedMagazine.com <http://www.cedmagazine.com/TWC-Ethernet-New-York-City.aspx>

Earlier this week, Time Warner Cable introduced its new “Business Class Ethernet” service to small- and medium-size businesses (SMBs) in its New York City footprint.

“Business Class Ethernet changes the game. Its widespread availability on cable HFC networks means that SMBs now have a cost-effective, multi-megabit alternative to telco T1 and Frame Relay data services. This service will be a real competitive differentiator for Time Warner Cable as it continues to grow its commercial business.”

Cablevision

Tom Rutledge – *COO*, transcript of 4Q 2009 earnings call on 2-25-10

- “Yes, well, with small business, [as} we move up market, the number of lines per customer continue to increase and the -- we continue to penetrate the market place. [W]e did add more than a quarter of a million lines last year, so you can see that in addition to our customer count, we are growing our lines per customer, which is essentially the impact that small business is having on our operating business. So that business continues to look good.”
- “In some ways the fact that we have a superior product at a lower price than our competitors in a tumultuous time gives us an advantage. It is a marketplace that -- people don't likely change their telecommunication provider when you are a business and we are actually doing quite well at getting people to do that. So I am optimistic that that business will continue to grow and that as the economy improves, we will continue to improve with it.”

Fixed Wireless

Covad

Covad Wireless provides service to over 3,500 corporate accounts in the largest metropolitan markets in California, including the San Francisco Bay area, the greater Los Angeles area, and Orange County, as well as Las Vegas, Nevada and the Chicago area. The company's service area encompasses over 220 cities across more than 3,000 square miles and covers more than 50,000 small and medium-sized enterprises (SMEs) in population centers that include more than 25 million households.

<http://www.covadwireless.com/about.html> visited 3-17-10

Covad Wireless Super-T Business Internet Access is the perfect choice for mission critical business applications and offices of any size. Our Covad Wireless Super-T service provides upload and download speeds between 768 Kbps up to 6 Mbps -- that's up to four times the bandwidth of a conventional land line T1!

<http://www.covadwireless.com/services.html> visited 3-17-10

Airband

<http://www.airband.com/press-releases/airband-communication-launches-full-portfolio-of-bundled-voice/> March 17, 2010 press release.

- Airband Communications, Inc., the industry's leading fixed-wireless company for businesses in the U.S., today launched a new suite of bundled services that gives small-to-midsize businesses (SMBs) enterprise-class voice and data services at costs well below what traditional providers can offer. The full set of products can address the voice and data needs of virtually every business in Airband markets.
- "Business customers can now fully benefit from Airband's fixed-wireless advantage. The quality of service (QoS) of our IP-based, last-mile network is on par with, and in many cases is better than the aging wired infrastructure of traditional telecom providers," said Jim DaBramo, executive vice president of field operations at Airband. "Airband is committed to providing businesses, especially SMBs, with enterprise-class voice and data services that help boost their operational and financial performance. We have tilted the playing field toward SMBs by giving them options in voice and data services that they may not have today while meeting their need to reduce monthly telecom costs."

CLECs

Covad

Since 1997, Covad has been delivering broadband Internet access designed especially for small and mid-sized businesses. As a leading service provider of DSL, Business Ethernet, T1 and DS3, Covad lets you choose an Internet solution that balances competitive pricing with the performance, features, and room to grow that your business needs.

<http://www.covad.com/web/services/index.html>

Visited 3-17-10

MegaPath

MegaPath has focused on the SMB and brought to market products and services in a format that can be easily managed by a company with limited IT resources. We have found that SMBs only deploy technology to solve real business problems; faster transactions, cashless transactions or real-time information access for pricing, inventory management, gift/loyalty programs or e-learning. MegaPath augments the SMB's IT staff in building an IP broadband wide area network that can provide the required connectivity and security to handle these applications.

<http://www.megapath.com/solutions/smb/#ixzz0iSatZEgA> visited 3-17-10

Business Service Offerings - Comparison Sheet

 Business Services	
Audio / Web Conferencing	✓
Backup	✓
Calling Card	✓
Domain Services	✓
Fax to Email	+
High Speed Internet	✓
Hosted Microsoft Exchange	✓
International VoIP	✓
IP Addresses	✓
IP Voice	✓
Local Phone Service	✓
Long Distance Service	✓
Managed Firewall	✓
Mobile	✓
Network Configuration	✓
Remote Access	✓
Secure Desktop	✓
Toll-Free Service	✓
Virtual Receptionist	+
Voice Packages	✓
Voicemail	✓
VPN	✓
Web Hosting	✓
Broadcast / Live Video Streaming*	✓
Cloud Computing*	✓
High-Res. Video Conferencing*	✓
Hosted Digital Image & File Management*	✓
Remote Desktop Management*	✓
Robust Data Protection*	✓
Sophisticated Video Security Systems*	✓
Virtualized Desktop*	✓

+ = Verizon does not market these exact services but offers similar services. (Hosted Interactive Voice Response "IVR", E-Fax)

* = These product offerings are services that Cbeyond has indicated that it will offer in the future if the FCC grants its petition. Verizon currently offers these services.

Small and Medium-Sized Business Options Are Focus of Verizon Global Wholesale Offers

Voice-Over-IP and Powerful Internet Access Packages Bolster Business Success In Rough Economic Times

News Release [ShareThis](#)

NEW YORK – March 15, 2010 –

At a time when small and medium-sized businesses look for every technological advantage to help them continue as the fundamental economic growth engine in the U.S., Verizon is providing support with three new voice-over-IP and Internet packages available through the Verizon Global Wholesale division.

The offers are designed to respond to the rapid growth of voice-over-IP (VoIP) in the small and medium business realm and the resulting demand for powerful high-speed Internet connections. In addition, the offers support Verizon Global Wholesale customers' marketing efforts to small and medium sized businesses.

"By creating new VoIP and Internet packages that include both services and hardware, we're giving our wholesale customers new ways to support their small- and medium-sized business customers in a time when every nickel and every efficiency counts toward success," said Quintin Lew, senior vice president of marketing for Verizon Global Wholesale. "Our goal continues to be to arm our wholesale customers with the tools that help them to help small and medium-sized businesses succeed."

(For more information about the benefits Verizon Global Wholesale offers its wholesale customers who support the small and medium business market, [click here](#).)

NEC IP PBX and SIP Gateway Solution

The first new package combines Verizon's SIP (session initiation protocol) Gateway Service with associated router hardware. SIP Gateway Service transports VoIP traffic between packet-based IP networks and the traditional telephone network, allowing Verizon Global Wholesale's customers to give small and medium-sized businesses a quick and easy way to get into the VoIP world.

In addition to providing access to Verizon's expansive IP local network and its telephone number inventory, wholesale customers can offer small and medium-sized businesses a new NEC UNIVERGE SV8100 IP PBX and its associated installation and maintenance bundle at a discount, simplifying the setup and lowering the cost of entry into the IP market. This enables small and medium-sized businesses to work with a single vendor, receive one bill, and gain access to a feature-rich VoIP solution that delivers cost reductions and the promise of increased productivity.

Both the SIP connection and the NEC UNIVERGE SV8100 PBX are priced at a discount with this new simple, feature-rich package. The service and hardware discounts expire on June 30.

Internet Dedicated T1 Package

The second new package, Internet Dedicated T1, also combines discounted service and hardware. It provides a high-capacity connection for 30 or more users and is designed for transmitting high-volume e-mail traffic, transferring large files, or hosting Web sites from virtually anywhere.

The package, based on T1 technology, combines 24 channels of broadband signal into a 1.544 megabit per second (Mbps) service, with customer equipment available to enable the service. Quality of service (QoS) assurance is offered as an option, at an additional cost. QoS is important for businesses that consolidate voice, video and key business applications onto a converged IP network.

The equipment offered in this package is either a Samsung Ubigate iBG 1000 for data-only applications or a model 1003 for data and voice services combined. The discounts on service and equipment expire on March 31, 2011.

For small and medium-sized businesses with a larger appetite for Internet access, a third new promotional offer features Internet access with an Ethernet connection at either 5 Mbps or 10 Mbps. This Internet Dedicated Ethernet service is discounted and bundled with a Samsung iBG1000 router, the cost of which is credited back over the initial year of service.

Targeted at businesses that intend to consolidate voice, video and key business applications onto a converged IP network, this offer delivers a single-vendor solution that end-user customers can leverage to fit their business model. The Ethernet service discount and the monthly credit offer for the cost of the router are scheduled to expire on March 31, 2011.

"Small businesses need their carriers to go beyond a one-size-fits-all solution," Lew said. "These Internet offers cover the key speeds and features that growing small and medium-sized enterprises require to solve modern connection issues and engage the world in new and aggressive ways."

Verizon Communications Inc. (NYSE, NASDAQ:VZ), headquartered in New York, is a global leader in delivering broadband and other wireless and wireline communications services to mass market, business, government and wholesale customers. Verizon Wireless operates America's most reliable wireless network, serving more than 91 million customers nationwide. Verizon also provides converged communications, information and entertainment services over America's most advanced fiber-optic network, and delivers innovative, seamless business solutions to customers around the world. A Dow 30 company, Verizon employs a diverse workforce of approximately 222,900 and last year generated consolidated revenues of more than \$107 billion. For more information, visit www.verizon.com.

Verizon FiOS Internet for Business Receives SMB Excellence Award From Global Technology Research Firm

News Release [Share This](#)

NEW YORK – November 12, 2009 –

Verizon FiOS Internet for Business - the ultra-high-speed, fiber-optic-powered broadband solution for small and medium-sized businesses (SMBs) - has been honored by the global technology research firm IDC with an SMB Excellence Award for product excellence and program creativity. The flexibility of FiOS Internet for Business, which is offered as a stand-alone service or in a complete multiservice (Internet, TV and voice) bundle, was considered especially important as a way to meet businesses' diverse needs.

Matt Davis, director of small business and consumer services research for IDC, said that Verizon FiOS Internet for Business is transforming the SMB communications and information technology marketplace by uniquely offering the kind of high-bandwidth connections that were previously beyond the financial reach of most small businesses.

"Without question, FiOS Internet for Business allows more SMBs to take advantage of advanced new business applications that can help them run more efficiently and more productively," Davis said. "Our research indicates that bandwidth-hungry applications, such as videoconferencing, real-time document sharing and data network-based backup, will be increasingly vital to small businesses in the future. FiOS Internet for Business is equipped and priced to enable immediate adoption of these capabilities today."

Monte Beck, vice president for small business strategy and planning for Verizon said, "Receiving the IDC SMB Excellence Award confirms what our customers tell us - that FiOS is a game-changing solution for small businesses that need reliable, super-fast downstream and upstream broadband connections to run the online applications that are essential to their daily business operations."

FiOS Internet for Business offers download speeds of up to 50 Mbps (megabits per second) and upload speeds of up to 20 Mbps.* The service is provided via the company's all-fiber-optic network, which transports broadband, video and voice services at the speed of light directly to small and medium-sized businesses, office buildings, retail outlets and business parks.

"Beyond the attractive pricing and performance of the core FiOS data and voice services, what also sets small business offerings from Verizon apart from cable providers is its television service to business," said Davis. "This is rare among business communications service providers with a telecom-pedigree and effectively counters one of the bundled service benefits that emerging cable company competitors have begun to offer."

Small and medium-sized businesses can also take advantage of a bundled package of Verizon FiOS Internet for Business (20 Mbps downstream/5 Mbps upstream); FiOS TV Enhanced for Business (139 local, regional and national TV channels); Verizon Internet Security Suite and Verizon Online Backup and Sharing services (valued at \$11.99 per month)**; and one standard business phone line with unlimited

nationwide calling and up to five calling features for \$129.99 per month for one year with a three-year agreement, in select areas. This bundled offer ends January 16, 2010.

Verizon also offers similar triple-play bundled promotions to small businesses needing multiple telephone lines and faster broadband connections.

Verizon small-business broadband customers also have free access to more than 14,000 Wi-Fi hot spots in airports, cafes, retail stores, convention centers and other public places across the country.

Verizon offers a broad selection of solutions to businesses of all sizes. For medium- to large-sized businesses, additional dedicated Internet options such as Internet Dedicated Access (for higher bandwidth applications), Ethernet-based Internet access and Managed Internet services and hardware are available. For more information, visit <http://mediumbusiness.verizon.com/> or call **1-800-201-1452**.

In addition to Internet, TV and phone service, Verizon also offers small businesses encryption solutions, online collaboration, the ability to host online meetings, and much more. For more information, visit <http://smallbusiness.verizon.com/> or call **1-888-649-9500**. For news, resources and more tools for Verizon's business customers, visit the Verizon Small Business Center at <http://business.verizon.net>, a one-stop online portal with easy access to free webinars, tools such as collaboration and a platform for small businesses to network.

** NOTE: actual (throughput) speeds will vary based on factors including computer configuration and network/Internet congestion.*

*** NOTE: Verizon small-business broadband customers will get an applicable credit of \$11.99 per month for 12 consecutive months.*

About IDC SMB Excellence Awards

The IDC SMB Excellence Awards are granted to technology providers who in IDC's view are serving the SMB market in innovative ways, providing advanced technology capabilities to firms with fewer than 1000 employees. Nominees for the IDC SMB Excellence Award are evaluated on the basis of three key criteria: the creation of products and/or programs that specifically address the unique needs of SMBs; the business implications of these products or programs for the nominated firm; and the competitive impact of these products or programs. The award recipients are selected by IDC's SMB Research team in consultation with the IDC analysts that follow the relevant technology market associated with these products or programs.

About Verizon

Verizon Communications Inc. (NYSE:VZ), headquartered in New York, is a global leader in delivering broadband and other wireless and wireline communications services to mass market, business, government and wholesale customers. Verizon Wireless operates America's most reliable wireless network, serving more than 87 million customers nationwide. Verizon's Wireline operations provide converged communications, information and entertainment services over the nation's most advanced fiber-optic network. Wireline also includes Verizon Business, which delivers innovative and seamless business solutions to customers around the world. A Dow 30 company, Verizon employs a diverse workforce of

more than 235,000 and last year generated consolidated operating revenues of more than \$97 billion. For more information, visit www.verizon.com.

Verizon Enterprise Center Steps Up Self-Service for SMB and Large-Business Customers

Automated Customer Care Becomes Even More User-Friendly for Business Customers

News Release ShareThis

BASKING RIDGE, N.J. – September 2, 2009 –

Verizon Business small- to medium-sized business (SMB) customers will now be able to take advantage of the big-business capabilities inherent in the Verizon Enterprise Center (VEC) customer portal. In addition, Verizon Business is helping its customers interact more efficiently with the company through an expanded set of automated customer-care capabilities.

Verizon Business has extended the range of online tools available to SMB customers. Now, the VEC's full suite of services - including reviewing and paying all Verizon invoices, to checking on the status of a repair or order, to the use of network management tools and dashboards - is available to these businesses.

Three new VEC and eBonding features will make the online experience even more user-friendly and productive for businesses of all sizes. The features are:

- A new "click-to-chat" help desk that allows customers to speak with a service representative and get answers to general or application-specific questions.
- A new billing-management tool - prominently placed on the VEC Dashboard - that provides an integrated view of a customer's network on a single screen, and can deliver up to seven billing summary reports and enable customers to view and sort expenses based on geography, currency, product and service.
- Proactive delivery of alarms directly to a customer's event monitor systems, made possible by integration of the VEC Dashboard with Verizon eBonding services.

"Our VEC and eBonding services continue to set the gold standard in business-to-business customer care," said Blair Crump, group president of worldwide sales at Verizon Business. "We've developed these tools so customers can more simply and efficiently retrieve vital network and billing information."

(Note: Listen to audio podcasts on Verizon Enterprise Center and eBonding.)

Available round-the-clock, the VEC allows business customers to securely check online the status of their orders, review and pay bills (and select an environmentally-friendly paperless billing option), request new services, and monitor their network service performance. Verizon also recently introduced the Verizon Enterprise Center Mobile service, which enables customers to receive and access information in near-real time on a mobile device. To access Verizon Enterprise Center Mobile, users need only a wireless Internet connection and a mobile Web browser.

eBonding Automates Business-to-Business Processes

Verizon Business has also enhanced its eBonding service, which shares a common infrastructure with the VEC, allowing customers to directly access the company's operational support systems to manage network issues, orders and inventory right from their desktop. For example, a new feature sends network alarms directly to customers, who can also retrieve the pertinent data. Previously, customers had to go to the VEC Dashboard to view the alarms.

A related new feature for trouble tickets gives customers greater detail about the nature of the problem and the service being performed to fix it.

The eBonding service is primarily targeted at customers that would gain the most operational efficiencies from fully automating their services with the company.

John Williamson, vice president of e-commerce and digital CRM for Verizon, said: "Our customers have told us they want flexibility in how they interact with us, whether by phone with their account team or through our sophisticated self-service applications. We will continue to innovate and deliver advanced automated services that both simplify and add value to our customer relationships."

For a virtual tour of the VEC and more information, go to <https://enterprisecenter.verizon.com>. Customers can now access the demo in the following languages: English, French, German, Dutch, Spanish, Portuguese, Japanese and Chinese.

About Verizon Business

Verizon Business, a unit of Verizon Communications (NYSE: VZ), is a global leader in communications and IT solutions. We combine professional expertise with one of the world's most connected IP networks to deliver award-winning communications, IT, information security and network solutions. We securely connect today's extended enterprises of widespread and mobile customers, partners, suppliers and employees - enabling them to increase productivity and efficiency and help preserve the environment. Many of the world's largest businesses and governments - including 96 percent of the Fortune 1000 and thousands of government agencies and educational institutions - rely on our professional and managed services and network technologies to accelerate their business. Find out more at www.verizonbusiness.com.

Verizon Delivers Great Service Choices That Enable Small Businesses to Thrive Despite Strained Economy

Small-Business Owners Across the Country Attribute Success to Verizon

News Release ShareThis

May 18, 2009 –

NEW YORK - The observation of National Small Business Week this week highlights ways small businesses can grow in today's tough economic climate by using technology as a competitive advantage. And Verizon is playing a major role in helping small-business owners identify the services they need to run their business more productively and cost effectively.

In fact, small businesses around the country are increasingly looking to Verizon as their virtual chief information officer (CIO).

"For the most part, small businesses don't have the resources to hire an IT person, much less have a CIO on staff," said Monte Beck, Verizon's vice president for small-business products and services. "That's where Verizon can help. Verizon is a small-business owner's backbone, providing the necessary communications technology, products and services to enable owners to focus on running their businesses.

"We provide not only the essential services such as phone and Internet to get a business started, but many other value-added services and solutions, like security and online collaboration, to businesses of all sizes," Beck said.

Verizon recently upgraded the Verizon Small Business Center, a one-stop portal that gives small businesses across the country the resources they need at their finger tips to run their businesses effectively and efficiently. The Verizon Small Business Center - <http://business.verizon.net> - combines applications, hosted services and professional networking in one easy-to-use platform.

Verizon Recognizes Several Firms During National Small Business Week

As part of National Small Business Week, Verizon is recognizing some of its small-business customers for leveraging technology to thrive despite the current economy.

Lisa Stein runs an entertainment complex in Middle Village, N.Y., focused on bringing families together for fun and games in a wholesome environment. "Verizon has been excellent for us," said Stein. "I rely on my Verizon Internet and landline phone services, as well as my Verizon Wireless mobile device. Verizon was able to combine all of our services onto one bill, which has been ideal for my specific needs. The service has been excellent and brings great value to the company."

Jana Mobarak owns a property-management company based in the Dallas area and spends 90 percent of her time traveling between properties, focusing on development, construction and financial modeling. "I am heavily reliant on Verizon to keep in constant communication with everyone - especially given my travel schedule," said Mobarak. "Without Verizon, I would never be able to keep up with everything that

has to be done. From my Internet, e-mail, and voice mail to my Verizon Wireless mobile device, it doesn't matter if I am in Dallas, Houston or on the Texas coast; Verizon brings my world together."

Debert Cook runs a national magazine business in New York City that provides a one-of-its-kind quarterly publication for African-Americans who are avid golfers. "I used another provider a few years back, and the situation with the phone lines, service delays and customer service responses was terrible," said Cook. "I switched to Verizon for my broadband needs at the office and on the go, with a Verizon Wireless Internet card.

"My business' phone is on Verizon's reliable landline network, and my wireless carrier is also Verizon," Cook said. "Switching to Verizon was one of the best business decisions I ever made. I can work from almost anywhere in the world because of Verizon - and often times I do, with my heavy international travel schedule."

Verizon offers a broad range of products and services for businesses of all sizes. Some businesses may qualify to enroll in the Verizon Business Link Rewards program, which enables companies to earn and redeem points for various items such as high-definition TVs, gift cards and certificates at leading retailers, meals at top-rated local restaurants, and tickets to professional sporting and entertainment events.

Since the launch of the new Verizon Small Business Center, Verizon has offered free webinars to provide insights to small-business owners across the country. The next webinar takes place Wednesday (May 20) at 2 p.m. Eastern time and will feature Anita Campbell, a well-known small-business expert. Campbell will discuss how small businesses can market their business online. To register for the free webinar or to see previous webinars, visit <http://smallbusiness.verizon.com/webinar/>.

For more information on Verizon's products and services for businesses and how they can help business owners boost productivity and compete successfully in today's challenging economy, visit www.verizon.com.

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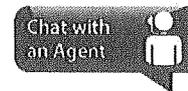
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Up to 15 Mbps / 5 Mbps	\$64.99
Up to 25 Mbps / 25 Mbps	\$84.99
Up to 35 Mbps / 35 Mbps	\$99.99
Up to 50 Mbps / 20 Mbps	\$149.99
One Year Contract	
Up to 15 Mbps / 5 Mbps	\$69.99
Up to 25 Mbps / 25 Mbps	\$89.99
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- Option to add premium services

Static IP Dynamic IP

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Packages	Features	Maximum Connection Speed	Activation Fee	Modem	Price per Month
Premium					
7.1 Mbps Top connection speeds with premium email and Web space features.	20 MB of Web space Up to 10 verizon.net email boxes or three domain names Free Wi-Fi in select areas for qualifying customers One free license for Verizon Internet Security Suite	Up to 7.1 M/768K	Up to \$99.99	FREE with online order	\$149.99 or \$199.99*
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