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June 23, 2010

Marlene H. Dorth
Secretary
Federal Communications Commission
455 12th Street, S.W.
Washington, DC 20554

RE: **Supplement to Verizon's June 8, 2010 Petition for Waiver of the Advance Notification Requirements of 47 C.F.R. § 64.1120(e); CC Docket No. 94-129; CC Docket No. 00-257**

Dear Ms. Dorth:

In response to questions from FCC Staff, Verizon provides the following additional information in support of its June 8, 2010 Petition for Waiver of the Advance Notification Requirements of 47 C.F.R. § 64.1120(e).

1. When did Verizon first find out that United Systems Access Telecom, Inc. (USAT) customers would no longer be able to receive service from USAT?

On about April 28, 2010, USAT filed paperwork with the New York Public Utilities Commission indicating that USAT intended to exit New York on or after June 1, 2010. On about May 3, 2010, USAT filed for bankruptcy. In light of USAT's bankruptcy petition, it was not clear whether USAT still intended to proceed with its voluntary exit from New York. On June 8, 2010 Verizon filed a petition to waive the 30 day notice requirement so that it could begin defaulting USAT's remaining resale customers as soon as possible after Verizon confirmed USAT's plans for the New York market. On about June 22, 2010, Verizon received confirmation that USAT still intends to exit New York while it undergoes bankruptcy.

2. When did Verizon first find out that a Verizon petition for waiver would be necessary?

USAT filed for bankruptcy shortly after indicating that it intended to exit New York. As a result of this bankruptcy filing, it was unclear whether USAT still intended to exit New York. Verizon filed its waiver petition while awaiting further word concerning USAT's plans. On about June 22, 2010, Verizon received confirmation that USAT still intends to exit New York while it undergoes bankruptcy.

3. Why could Verizon not send advanced customer notice?

Verizon could not send notice to USAT's remaining resale customers until it first confirmed that USAT intended to proceed with exiting New York. In addition, Verizon could not send notices until it received the list of USAT's remaining resale customers. USAT provided that list to the New York Commission on about June 22.

Verizon will notify USAT's remaining resale customers of the default as soon as possible after Verizon's waiver is granted.

4. Have USAT customers already been transferred to Verizon? If yes, what was the date of transfer?

Verizon has not transferred any of USAT's remaining resale customers to Verizon. However, USAT's remaining resale customers continue to be serviced over Verizon's network. Verizon is not receiving payment for continuing to provide service to these customers.

5. Did Verizon send notices to customers?

As explained above, Verizon has not yet notified the remaining USAT resale customers that they will be defaulted to Verizon. Verizon seeks waiver of the 30 notice requirement under 47 C.F.R. section 64.1120(e) so that it can default USAT's remaining resale customers as soon as possible.

6. Given that New York also has a 30-day notice requirement, what has New York stated or indicated concerning the situation?

The New York Public Utilities Commission has reviewed USAT's proposed exit plan. On about June 22, USAT provided the NY PUC with the list of its remaining resale customers so that the default process could begin.

7. In addition to the above requested information, provide whatever information you believe might be considered in order to demonstrate special circumstances supporting Verizon's waiver request.

As explained above, USAT's bankruptcy filing created uncertainty about their market exit. In light of these special circumstances, the Commission should grant Verizon's waiver petition.

Please let me know if you have any questions.

Sincerely,



cc: Nancy Stevenson
Bert Weintraub