

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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In the Matter of the Petition	)	
of Intrado Communications of Virginia, Inc. for	)	
Arbitration Pursuant to Section 252(b) of the	)	
Communications Act of 1934, as amended, to	)	WC Docket No. 08-33
Establish an Interconnection Agreement with	)	
Central Telephone Company of Virginia and	)	
United Telephone - Southeast, Inc.	)	

In the Matter of the Petition of	)	
Intrado Communications of Virginia, Inc. for	)	
Arbitration Pursuant to Section 252(b) of the	)	WC Docket No. 08-185
Communications Act of 1934, as amended, to	)	
Establish an Interconnection Agreement with	)	
Verizon South, Inc. and Verizon Virginia, Inc.	)	

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**THIRTY-FIRST CONSOLIDATED STATUS REPORT  
OF INTRADO COMMUNICATIONS OF VIRGINIA, INC.**

Intrado Communications of Virginia, Inc. (“Intrado”), by its attorneys, respectfully submits this Thirty-First Consolidated Status Report in response to the request from staff of the Wireline Competition Bureau (“Bureau”) of the Federal Communications Commission (“Commission” or “FCC”).

**Overview**

In past status reports, Intrado has noted that appeals of two state commission arbitration decisions were pending in federal court – one addressing Intrado’s arbitration with AT&T Ohio and one addressing Intrado’s arbitration with AT&T North Carolina. Intrado is also engaged in negotiations and state commission arbitration proceedings with AT&T Texas and various Verizon entities. Finally, Intrado is engaged in negotiations with various CenturyLink (formerly,

Embarq) entities, including state arbitration proceedings. This consolidated status report provides updated information regarding the status of each of the above matters.

**Ohio AT&T Litigation.** In prior status reports, Intrado has noted that an appeal of an arbitration decision rendered by the Public Utilities Commission of Ohio (“PUCO”) was pending in the Southern District of Ohio concerning Intrado’s arbitration with AT&T Ohio.<sup>1</sup> As noted in the Twenty-Seventh Consolidated Status Report, on April 6, 2010, Intrado, AT&T Ohio, and the PUCO filed briefs on the merits with the District Court. AT&T Ohio’s reply brief, Intrado’s notice of supplemental authority and AT&T Ohio’s response thereto were filed with the Twenty-Ninth Consolidated Status Report. There have been no additional developments in Ohio since the Thirtieth Consolidated Status Report.

**North Carolina AT&T Litigation.** Intrado has noted that an appeal of an arbitration decision rendered by the North Carolina Utilities Commission (“NCUC”) was pending in the Eastern District of North Carolina regarding Intrado’s arbitration with AT&T North Carolina (“AT&T”).<sup>2</sup> On April 26, 2010, Intrado, AT&T, and the NCUC filed motions for summary judgment and memoranda in support of those motions with the District Court, which were attached to the Twenty-Ninth Consolidated Status Report. On May 28, 2010, Intrado filed an opposition to AT&T’s motion for summary judgment (“Intrado’s Opposition”), NCUC filed a response to AT&T’s motion for summary judgment (“NCUC’s Response”), and AT&T filed a response to defendants’ motions for summary judgment and a memorandum in support of AT&T’s motion for summary judgment (“AT&T’s Response”). Intrado’s Opposition, NCUC’s

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<sup>1</sup> *The Ohio Bell Telephone Company v. Public Utilities Commission of Ohio, et al.*, Complaint for Declaratory and Injunctive Relief, Case 09-CV-00918-ALM-MRA (S.D. Ohio filed Oct. 15, 2009).

<sup>2</sup> *BellSouth Telecommunications, Inc. d/b/a AT&T North Carolina v. Finley*, Complaint for Declaratory and Injunctive Relief, Case 5:09-CV-00517-BR (E.D.N.C. filed Dec. 2, 2009).

Response and AT&T's Response were filed with the Thirtieth Consolidated Status Report. On June 28, 2010, AT&T filed a reply in support of its motion for summary judgment, attached hereto as **Attachment A**. Also on June 28, 2010, defendants Intrado and NCUC filed a reply to AT&T's Response, attached hereto as **Attachments B** and **C**, respectively.

**Texas AT&T Arbitration.**<sup>3</sup> Intrado and Southwestern Bell Telephone Company b/d/a AT&T Texas ("AT&T Texas") are engaged in interconnection arbitration proceedings before the Public Utility Commission of Texas ("PUCT"). An evidentiary hearing was scheduled in this proceeding for July 13, 2010. However, on July 8, 2010 Intrado and AT&T Texas filed a joint request for abatement of hearing. On July 8, 2010, the PUCT granted abatement until August 31, 2010 and ordered Intrado and AT&T Texas to file bi-weekly status reports with the PUCT, the first of which was filed July 23, 2010. A copy of the PUCT's order granting abatement is attached hereto as **Attachment D** and a copy of the first status report submitted to the PUCT is attached hereto as **Attachment E**.

**Verizon Matters.** Intrado is engaged in ongoing negotiations with Verizon North Inc., Verizon Florida, LLC, GTE Southwest Incorporated, Verizon South, Inc., Verizon Pennsylvania Inc., and Verizon Virginia, Inc. (collectively, "Verizon"), regarding interconnection agreements and state arbitration proceedings between Intrado and Verizon in Texas, Delaware, Florida, Illinois, Pennsylvania, and North Carolina. The parties continue to discuss compromise agreements covering operations in these states.

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<sup>3</sup> *Petition of Intrado, Inc. for Arbitration Pursuant to Section 252(b) of the Communications Act of 1934, As Amended, to Establish an Interconnection Agreement with Southwestern Bell Telephone Company d/b/a AT&T Texas*, PUC Docket No. 36176.

Texas Verizon Interconnection Agreement & Arbitration. As noted in the Thirtieth Consolidated Status Report, Intrado and Verizon were engaged in arbitration proceedings before the Public Utility Commission of Texas (“PUCT”).<sup>5</sup> However, Intrado and Verizon signed a Section 251(c) interconnection agreement (“Agreement”) in a related docket,<sup>6</sup> pursuant to 47 U.S.C. § 251(c), which was filed with the PUCT on June 30, 2010. A copy of the Agreement is attached hereto as **Attachment F**. The Texas Commission on State Emergency Communications and the Texas 9-1-1 Alliance filed comments with the PUCT in support of the Agreement, which are attached hereto as **Attachment G**.

On July 6, 2010, while the Agreement was pending PUCT approval, Intrado filed a motion to withdraw its petition for arbitration because, effective as of PUCT approval, all issues raised in the proceeding would thereby become moot. On July 15, 2010, the PUCT approved the Agreement. On July 19, 2010, the PUCT granted Intrado’s motion to withdraw and dismissed the arbitration proceeding,<sup>7</sup> without prejudice. A copy of the PUCT’s order dismissing the proceeding is attached hereto as **Attachment H**.

Pennsylvania Verizon Interconnection Agreement. On April 29, 2010, Intrado and Verizon Pennsylvania, Inc. filed an executed interconnection agreement (“Agreement”) covering the State of Pennsylvania for approval by the Pennsylvania Public Utility Commission (“PPUC”). A copy of the filed Agreement was provided with Intrado’s Twenty-Ninth

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<sup>5</sup> *Petition of Intrado, Inc. for Compulsory Arbitration with GTE Southwest Incorporated d/b/a Verizon Southwest Under the FTA Relating to Establishment of an Interconnection Agreement*, PUC Docket No. 36185.

<sup>6</sup> *Joint Application of Verizon Southwest and Intrado Communications Inc. for Approval of a Comprehensive Agreement Under PURA and the Telecommunications Act of 1996*, PUC Docket No. 38399.

<sup>7</sup> *See supra* note 5.

Consolidated Status Report. On June 16, 2010, the PPUC adopted an Order approving the Agreement, which was filed with the Thirtieth Consolidated Status Report. There have been no other developments since the Thirtieth Consolidated Status Report.

Other Verizon Matters. There has been no activity in the state arbitration proceedings between Intrado and Verizon in Florida and Delaware since the last status report. Intrado has signed a Section 251(c) interconnection agreement with Verizon in North Carolina but this agreement has yet to be filed with the Commission.

Intrado has signed a Section 251(c) interconnection agreement with Verizon in Illinois (“Agreement”). On June 30, 2010, the Agreement was filed with the Illinois Commerce Commission (“ICC”). A copy of the Agreement filed with the ICC is attached hereto as **Attachment I**. On July 20, 2010, a hearing was held before an ICC Administrative Law Judge regarding the adoption of the Agreement. As of the date of this Report, Intrado is awaiting approval of the Agreement by the ICC. The ICC is due to reach a decision on August 18, 2010, barring intervention.

Further, as mentioned in the Thirtieth Consolidated Status Report, Intrado reached a Section 251(c) interconnection agreement (“Agreement”) with Verizon Virginia, Inc., pursuant to 47 U.S.C. § 251(c). On June 22, 2010, the Agreement was filed with the Virginia Corporation Commission, a copy of which is attached hereto as **Attachment J**. Intrado is in the process of executing an agreement with Verizon South, Inc. in Virginia as of the date of this Report.

CenturyLink Matters. As noted in the Thirtieth Consolidated Status Report, Intrado is engaged in ongoing negotiations with the Central Telephone Company of Virginia and United Telephone – Southeast, Inc. (collectively, “CenturyLink”), including the status of other state

arbitration proceedings pending between Intrado and CenturyLink entities. There have been no developments since the Thirtieth Consolidated Status Report.

Respectfully submitted,

**INTRADO COMMUNICATIONS OF VIRGINIA, INC.**

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Date: July 26, 2010

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**CERTIFICATE OF SERVICE**

I, Christopher S. Koves, hereby certify that on the 26th day of July 2010, I served a copy of the foregoing Consolidated Status Report to the following parties via the method indicated:

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