

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Review of Wireline Competition Bureau Data Practices	)	WC Docket No. 10-132
	)	
Review of Media Bureau Data Practices	)	MB Docket No. 10-103
	)	
Review of Wireless Telecommunications Bureau Data Practices	)	WT Docket No. 10-131
	)	

**COMMENTS OF VERIZON AND VERIZON WIRELESS**

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**I. INTRODUCTION AND SUMMARY.**

The Wireline Competition Bureau, Media Bureau, and Wireless Telecommunications Bureau (the Bureaus) seek comment on whether the Bureaus' current data collections should be retained or modified.<sup>2</sup> The Commission can, and should, discontinue several outdated data collections including its open network architecture and comparably efficient interconnection requirements; continuing property records requirements; international traffic reports (wireline and wireless); prepaid calling card traffic and revenue certifications; cable price surveys, operator reports, and cable system public inspection file requirements; and reports of complaints

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<sup>1</sup> In addition to Verizon Wireless, the Verizon companies participating in this filing ("Verizon") are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

<sup>2</sup> Public Notice, *Pleading Cycle Established for Comments on Review of Wireline Competition Bureau Data Practices*, WC Docket No. 10-132 (June 29, 2010); Public Notice, *Pleading Cycle Established for Comments on Review of Media Bureau Data Practices*, MB Docket No. 10-103 (June 29, 2010); Public Notice, *Pleading Cycle Established for Comments on Review of Wireless Telecommunications Bureau Data Practices*, WT Docket No. 10-131 (June 29, 2010) (collectively the "Public Notices"). The reason for and timing of the Public Notices is not entirely clear.

concerning equal employment laws for public mobile service providers. In addition, the Commission should take the following steps with respect to other data collections: streamline the FCC Form 477 broadband data gathering process; clarify that wholly owned wireless subsidiary licensees do not need to file a redundant FCC Form 602 containing licensee ownership data; permit electronic filing of FCC Form 608 for spectrum subleases; and eliminate the requirement on FCC Form 603 that wireless applicants for assignments or transfers of control identify constructed call signs.

These matters are addressed in greater detail on the matrix attached hereto as Attachment A. These items reflect antiquated reporting requirements—in some cases applicable to only a few among many competing providers—that are either no longer useful to consumers (if they ever were) or to the Commission in today’s competitive environment or should be changed to reflect the modern communications marketplace. In addition, going forward the Commission should adhere more closely to its statutory duties to examine, and to actually eliminate, outdated rules and other requirements on a regular basis.

**II. THE BUREAUS SHOULD DISCONTINUE OUTDATED DATA COLLECTIONS OF NO USE TO CONSUMERS OR TO THE COMMISSION AND MODIFY OTHER REPORTING REQUIREMENTS TO REFLECT THE MODERN COMMUNICATIONS MARKETPLACE.**

*ONA and CEI Requirements.* The Commission’s remaining open network architecture (ONA) and comparably efficient interconnection (CEI) requirements derive from the *Computer Inquiry* proceedings, which began decades ago when the communications landscape looked nothing like the marketplace that now exists.<sup>3</sup> At that time, the ILECs’ telephone networks were

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<sup>3</sup> *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities*, Report and Order, 20 FCC Rcd 14853, ¶ 21 (2005); *see also id.* ¶ 1 (“Those regulations were created over the past three decades under technological and marketplace conditions that differed greatly from those of today.”).

the “primary, if not sole, facilities-based platform available for the provision of ‘information services’ to customers,” and the CEI and ONA requirements were based on the “implicit, if not explicit, assumption that the incumbent LEC wireline platform would remain the only network platform available to enhanced service providers.”<sup>4</sup>

Among other things, the ONA rules require ILECs (in particular the former Bell Operating Companies) to develop and maintain detailed plans for unbundling and making available to enhanced service providers the basic components of their networks irrespective of whether their enhanced services operations utilize those components.<sup>5</sup> For purposes of the present inquiry, the ONA rules also subject the former Bell Operating Companies (BOCs) to detailed and extensive annual, semi-annual, and quarterly reporting requirements, as well as an obligation to file annual sworn declarations relating to those requirements.<sup>6</sup>

All of the remaining CEI and ONA rules (which have already been eliminated for broadband services) should be eliminated once and for all. Many separate and different technologies offered by the widest possible array of providers—including wireline, wireless, IP,

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<sup>4</sup> *Id.* ¶ 3; *see also id.* ¶ 47 (the *Computer Inquiry* rules were premised on the presence of a “single platform capable of delivering [enhanced] services ... and only a single facilities-based provider of that platform.”). For an extended discussion of the ONA and CEI requirements, and the history of these rules, *see* Comments of Verizon, *Biennial Regulatory Review of Regulations Administered by the Wireline Competition Bureau*, WC Docket No. 08-183 (Oct. 8, 2008).

<sup>5</sup> *Amendment of Section 64.702 of the Commission’s Rules and Regulations (Third Computer Inquiry)*, Report and Order, 104 F.C.C.2d 958, ¶ 28 (1986) (“*Computer III*”). Among many other things, the CEI rules also require former Bell Operating Companies’ enhanced services operations to obtain the basic services it uses to offer enhanced service pursuant to tariff, and to offer those basic services to unaffiliated enhanced service providers under the same tariffs and on an unbundled and functionally equal basis. *Id.* ¶ 27.

<sup>6</sup> *Filing and Review of Open Network Architecture Plans*, Memorandum Opinion and Order on Reconsideration, 5 FCC Rcd 3084, ¶ 26 (1990).

and other intermodal providers—now compete for the same residential and business customers. Yet only BOCs are subject to the last vestiges of the anachronistic CEI and ONA requirements, which can increase their costs of providing information services and inhibit competition. There is no reason for any of these requirements (reporting or otherwise)<sup>7</sup> to continue.

***Continuing Property Records.*** Like the remaining CEI and ONA rules, the Commission retains anachronistic rules that require incumbent LECs to generate unnecessary, detailed information for all plant accounts such as descriptions of property, location information, date of placement into service, and original cost data. *See* 47 C.F.R. § 32.2000. Under the Commission’s current price cap regulatory regime, which governs providers serving the vast majority of all consumers nationwide, cost data and property information such as this is irrelevant. Price caps are cost agnostic. The Commission concluded nearly a decade ago that continuing property records rules and reports should be eliminated, yet these requirements persist. *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, 16 FCC Rcd 19911, ¶ 212 (2001) (“[W]e tentatively conclude that we should eliminate our detailed [continuing property records] rules in three years.”).

***International Traffic Reporting.*** The Commission continues to collect a substantial amount of useless international data from certain common carriers regarding (among other things) international circuits, traffic volumes, revenue, and billings. *See, e.g.*, 47 C.F.R. §§ 43.61 (wireline and wireless traffic reports), 43.82 (international circuit status reports); and 47 C.F.R. § 64.1903 (international affiliate recordkeeping requirements). These reports and requirements are

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<sup>7</sup> The details of these and other data collections discussed herein are addressed on Attachment A.

meaningless as industry markers given the substantial growth in competition on international routes and competitive alternatives to placing a traditional international calls—e.g., e-mail and Skype. This conclusion was already confirmed by the International Bureau as part of the Commission’s last biennial review conducted pursuant to Section 11 of the Act. “[T]he reporting requirements for international services in Part 43 may no longer be necessary in the public interest, and [the Bureau] recommended that the Commission should consider whether to repeal or modify those requirements.”<sup>8</sup>

***Prepaid Calling Card Reports.*** In 2006, responding to the uncertainty regarding the classification of certain prepaid calling card services and related obligations, the Commission adopted a quarterly reporting and certification filing requirement whereby prepaid calling card providers must submit certain percentage of use and revenue information to the Commission. 47 C.F.R. § 64.5001; *see also Regulation of Prepaid Calling Card Services*, Declaratory Ruling and Report and Order, 21 FCC Rcd 7290, ¶¶ 38-39 (2006). The filing requirement was adopted out of an abundance of caution “to reduce further the incentive for carriers to report false or misleading information” amongst themselves. *Id.* Carriers have now been exchanging required prepaid calling card data for four years, and the prepaid calling card marketplace itself has substantially eroded in that time because of competitive alternatives. It has also never been clear what, if anything, the Commission itself actually does with this information.

***Cable Survey, Operator, and Public Inspection File Requirements.*** Selected cable systems must report various information that is not used by consumers such as channel line-ups,

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<sup>8</sup> Public Notice, *Commission Releases 2008 Biennial Review of Telecommunications Regulations*, CG Docket No. 08-177, EB Docket No. 08-178, IB Docket No. 08-179, ET Docket No. 08-180, PS Docket No. 08-181, WT Docket No. 08-182, WC Docket No. 08-183; DA 10-1269, at 2 (July 8, 2010) (“*2008 Biennial Review Public Notice*”).

prices, service offerings, and technical details in response to annual cable price surveys (assigned Form 333) and Form 325. These forms were designed for traditional monopoly cable systems. The forms do not fit competitive video providers such as Verizon and the way these companies market their services. Cable providers themselves—as well as popular media sources—also publish, on their websites and elsewhere, information that is more relevant to video products and consumer purchasing decisions. In addition, the Commission requires that cable systems collect and retain for public inspection in offices around the country a range for information such as leased access policies and political files. *See* 47 C.F.R. § 76.1700, *et seq.* As a practical matter, very few people ever access this information, and in a competitive marketplace for video services such haphazard “public file” requirements have outlived their usefulness.

***Reporting of Equal Employment Opportunities Complaints.*** The Commission should eliminate the Section 22.321(c) requirement that each public mobile service licensee submit an annual report to the Commission regarding all alleged violations of federal or state equal employment opportunity law filed against the licensee. 47 C.F.R. § 22.321(c).<sup>9</sup> The report must contain information about the parties involved, the forum in which the complaint is filed, the file number, and the disposition or status of the complaint. *Id.* This report requires substantial time and effort to compile, and, again, it is not apparent what, if anything, the Commission does with the information. In the ten years that Verizon Wireless has been submitting these reports, it has never heard from the Commission regarding the reports or any complaint noted therein. It is not clear why the Commission itself needs to collect any of the equal employment opportunity information on FCC Form 395. The Equal Employment Opportunity Commission, and federal and state courts, have jurisdiction over these matters. But at a minimum, the complaint reporting

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<sup>9</sup> In addition, all common carriers have certain additional equal employment opportunity reporting requirements. *See, e.g.,* 47 C.F.R. §§ 1.815, 101.311.

requirement should be eliminated.

***Form 477 Broadband Data Gathering Process.*** The Commission has an important and continuing interest in collecting data regarding broadband deployment. In particular, implementing the National Broadband Plan will require access to various broadband metrics for the foreseeable future. The Commission’s Form 477 process, however, should still be as streamlined as possible and should not duplicate data that the Commission can obtain from other sources. For example, each state is now collecting data from broadband providers on broadband coverage and offered speeds under grants from the National Telecommunications and Information Administration (NTIA) through the Broadband Data Improvement Act (BDIA).<sup>10</sup> Once this initial data gathering effort is finished, the state grantees will be obligated to update this information on broadband providers twice a year.<sup>11</sup> Each state is also required to make available to consumers interactive broadband maps,<sup>12</sup> and, some of these maps are already available.<sup>13</sup>

Pursuant to the NTIA grant program, the state grantees will make the state maps and broadband data available to NTIA and the Commission, and the NTIA and the Commission will compile national broadband coverage maps from the state efforts under the BDIA.<sup>14</sup>

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<sup>10</sup> See Department of Commerce, National Telecommunications and Information Administration, “State Broadband Data and Development Grant Program; Notice of funds availability (Notice) and solicitation of applications,” 74 Fed. Reg. 32545 (July 8, 2009) (“NTIA Mapping NOFA”).

<sup>11</sup> *Id.* at 32552.

<sup>12</sup> *Id.* at 32546.

<sup>13</sup> See, e.g., Connected Texas, [www.connectedtx.org](http://www.connectedtx.org).

<sup>14</sup> See NTIA Mapping NOFA at 32546 [“In addition, the awardees will submit all of their collected data to NTIA for use by NTIA and the Federal Communications Commission (FCC) in

Accordingly, much of the information that is being collected on geographic coverage and transfer rates on the Form 477 may soon be available to the Commission in even more detail through the BDIA state broadband mapping program. At that point, the Commission should consider to what extent the census-track level data on the Form 477 is still necessary.

More immediately, facilities-based providers of broadband services must populate certain Form 477 fields related to the number of subscribers, devices and coverage areas on a state-by-state basis. Files for each state are then uploaded to the Commission's Form 477 interface. As a result, providers that cover multiple states must complete and upload multiple Form 477 data files—and broadband providers with nationwide coverage (such as national wireless carriers) end up filing 50 or so separate files.

Verizon recommends that the Form 477 interface be redesigned so that each filer has the option to fill in the information for all parts of all applicable states and then upload the information as one data file. Such a redesign would substantially reduce the time necessary to complete the process of filing the Form 477 for many broadband providers. The same information would be available to the Commission, and, if warranted, the Commission could reconstruct the data on a state-by-state basis. For many Form 477 filers, significant time is indeed required to complete the form because of the number of states covered. Also, the information must be frequently gathered and compiled from various sources, imposing additional burdens and time requirements. Allowing a combined “all-state” filing for all parts of Form 477 would help reduce the burden without limiting the information received by the Commission.

***Wireless Telecommunications Ownership Reporting.*** The Commission should clarify

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developing and maintaining the national broadband map, which will be displayed on an NTIA Web page before February 17, 2011.”].

that wholly owned wireless subsidiaries do not need to file a separate FCC Form 602 reporting ownership where the wholly owned subsidiary is listed on its parent company's Form 602 and the parent company's ownership report is current. Neither the rules nor the instructions to Form 602 address this issue. A clarification would ensure that all licensees are satisfying the Commission's data collection requirement in the same manner. Such a change would greatly reduce the number of these forms that large carriers like Verizon Wireless file while still providing the Commission with all of the same information relevant to the ultimate ownership of the wireless licensee.

***Spectrum Secondary Markets--Subleasing and Assignment and Transfer Applications.***

The Commission should permit spectrum subleasing applications to be filed electronically on FCC Form 608—just as it does for leases, rather than requiring that the applicants file a paper copy which is burdensome on licensees as well as Commission staff. The delay in delivery can often unnecessarily delay deployment of new services given the additional time that is required for delivery, sorting, and approval of the paper applications. There is no reason to continue paper filings when other leases may be filed electronically.

Further, the Commission's application for assignments and transfers of control of wireless authorizations (FCC Form 603) requires applicants to identify whether the facilities associated with each license have been constructed (Item 116). This information, however, is already available to the Commission. Pursuant to Section 1.946(d), wireless radio licensees are required to notify the Commission when they have met the coverage or substantial service obligations associated with their license.<sup>15</sup> Requesting this information on FCC Form 603 is

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<sup>15</sup> 47 C.F.R. § 1.946(d) ("*Licensee notification of compliance*). A licensee who commences service or operations within the construction period or meets its coverage or substantial services obligations within the coverage period must notify the Commission by filing FCC Form 601.

duplicative and unnecessary.

### **III. EXISTING CONGRESSIONAL MANDATES REQUIRE REGULAR ANALYSIS AND ELIMINATION OF UNNECESSARY DATA COLLECTIONS.**

The history of the Commission’s efforts to streamline its data collections and actually eliminate outdated reporting requirements makes clear that meaningful reform will require a strong resolve. The Commission has at least three congressional mandates to regularly analyze and eliminate regulatory reporting obligations when no longer necessary. First, Section 11 of the Communications Act (the “biennial review”) requires the Commission “in every even-numbered year” to review all of its regulations, including but not limited to all regulations with attendant data collections, and make an affirmative finding “whether any such regulation is no longer necessary in the public interest as the result of meaningful economic competition.” 47 U.S.C. § 161(a). Section 11 further directs the Commission to “repeal or modify any regulation it determines to be no longer necessary in the public interest.” 47 U.S.C. § 161(a). Regrettably, Section 11 is honored, at best, only in spirit. The Commission does collect comments every two years on regulations that are no longer necessary, but little, if anything ever results from this effort. For example, the product of the last biennial review conducted in 2008 was a public notice—issued two years later in advance of the next biennial review, which is due to kick off soon—largely just announcing that the Commission had conducted the review and that various bureaus made recommendations for further consideration.<sup>16</sup>

Second, Section 10 of the Communications Act requires that the Commission forbear

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The notification must be filed within 15 days of the expiration of the applicable construction or coverage period.”).

<sup>16</sup> See *2008 Biennial Review Public Notice*.

from any regulation or provision of the Act unless the regulation is “necessary” to ensure just and reasonable rates or to protect consumers. 47 U.S.C. § 160. Here, too, as a practical matter Section 10 rarely serves as a vehicle to eliminate an unnecessary data collection except for the few occasions where a party files a petition and the Commission is forced to justify a reporting requirement under threat of a carrier petition being “deemed granted” by operation of law.<sup>17</sup> 47 U.S.C. § 161(c).

Third, and with respect to each individual data collection in particular, the Paperwork Reduction Act requires the Commission to determine before collecting any data—and again before seeking Office of Management and Budget approval to renew any data collection, which the Commission must do at a minimum every three years for each collection—whether the data is truly “necessary” and has “practical utility.” 44 U.S.C. § 3506, *et seq.* More specifically, the Paperwork Reduction Act requires that the Commission seek comment on 60-days’ notice regarding (1) whether the collection of information is necessary and has practical utility; (2) the estimate of the burden (in terms of devoted time) of the collection on the industry; (3) whether there are ways to “enhance the quality, utility, and clarity” of the collection; and (4) whether there are ways to “minimize the burden” on those required to respond. 44 U.S.C. § 3506(c)(2)(A) (for collections of information that are part of a proposed rulemaking, the

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<sup>17</sup> See, e.g., *Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160 from Enforcement of Certain of the Commission's Cost Assignment Rules*; *Petition of BellSouth Telecommunications, Inc. for Forbearance Under 47 U.S.C. § 160 from Enforcement of Certain of the Commission's Cost Assignment Rules*, Memorandum Opinion and Order, 23 FCC Rcd 7302 (2008), *pet. for recon. pending, pet. for review pending*; *Petition of Qwest Corporation for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c)*; *Petition of Verizon for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of the Commission's Recordkeeping and Reporting Requirements*, Memorandum Opinion and Order, 23 FCC Rcd 13647 (2008) (collectively granting relief from various recordkeeping and reporting obligations, including certain ARMIS reports).

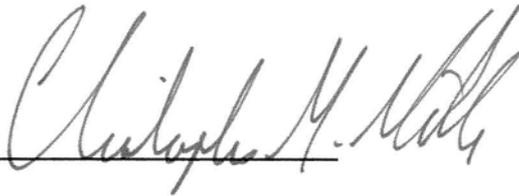
Commission is required by 44 U.S.C § 3506(c)(2)(B) to provide for notice and comment on the same issues in the notice of proposed rulemaking). As with the Commission's biennial review and forbearance proceedings, however, Commission data collections are rarely, if ever eliminated as part of the Paperwork Reduction Act process, and renewals are sought as a matter of course.

None of this is to discourage the Bureaus' new initiative "to improve [the Commission's] fact-based, data-driven decision making," which if successful in eliminating unnecessary regulatory reporting requirements will help the Commission satisfy its existing, independent statutory obligations. Public Notices at 1.

**IV. CONCLUSION.**

For these reasons, the Commission should eliminate the outdated and unnecessary data collections, or modify or clarify those collections, as discussed herein and identified on Attachment A.

Respectfully submitted,

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**ATTACHMENT A**

**FCC REPORTING REQUIREMENTS TO ELIMINATE, CLARIFY, OR MODIFY**

<b>PRA/OMB Control Number</b>	<b>Data Collection</b>	<b>Requirements</b>	<b>Reasons to Eliminate, Clarify, or Modify</b>
<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).</p>	<p>ONA - Quarterly Nondiscrimination Report (eliminate)</p> <p>CC Docket Nos. 92-256, 88-2 and 96-128</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Must include information on total orders, due dates missed and average intervals for a set of service categories specified by the Commission.</li> <li>• If a filer demonstrates in the ONA plan that the 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 and maintenance services provided to its own information services operations with services provided to a sampling of all customers.</li> </ul>	<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>See above.</p>	<p>ONA - Semi-Annual Report (eliminate)</p> <p>CC Docket Nos. 92-256, 88-2 and 96-128</p>	<ul style="list-style-type: none"> <li>• Consolidated Bell Operating Company matrix of ONA services and state and federal ONA tariffs.</li> <li>• File computer diskettes and print-outs of data regarding state and federal tariffs.</li> <li>• File a printed copy and computer diskette of the ONA Services User Guide.</li> <li>• File updated information contained in Appendix A of the January 31, 1991 <u>Cross Reference Guide</u> on Enhanced Service</li> </ul>	<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. At a minimum, the requirement for a matrix consolidated by the remaining Bell Operating Companies is unnecessary and should be eliminated.</p>

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<b>PRA/OMB Control Number</b>	<b>Data Collection</b>	<b>Requirements</b>	<b>Reasons to Eliminate, Clarify, or Modify</b>
		<p>Provider (ESP) requests received and how they were addressed with details and matrices.</p> <ul style="list-style-type: none"> <li>• File updated information contained in Appendix B of the January 31, 1991 <u>Cross Reference Guide</u> on responses to the requests and matrix.</li> <li>• File updated information contained in Appendix C of the January 31, 1991 <u>Cross Reference Guide</u> on services offered in response to the requests.</li> </ul>	
See above.	<p>ONA - Annual Report (eliminate)</p> <p>CC Docket Nos. 92-256, 88-2 and 96-128</p>	<ul style="list-style-type: none"> <li>• Annual projected deployment schedules for its ONA services by type of ONA service in terms of percentage of access lines served system-wide and by market area.</li> <li>• New ONA service requests from ESPs and their disposition.</li> <li>• Those ONA service requests previously deemed technically infeasible, and their disposition.</li> <li>• SS7, ISDN, and IN projected deployment in terms of percentage of access lines served system-wide and on a market area basis.</li> <li>• New ONA services available through SS7, ISDN and IN, and plans to provide these services.</li> <li>• Progress on the efforts in the Information Industry Liaison Committee on continuing</li> </ul>	<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>

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<b>PRA/OMB Control Number</b>	<b>Data Collection</b>	<b>Requirements</b>	<b>Reasons to Eliminate, Clarify, or Modify</b>
		<p>activities for the implementation of service-specific and long-term uniformity issues.</p> <ul style="list-style-type: none"> <li>• Progress in providing billing information, and call detail services to ESPs.</li> <li>• Progress in developing and implementing OSS services and ESP access to those services</li> <li>• Progress on the uniform provision of OSS services</li> <li>• List of BSEs used in the provision of a the filers' own enhanced services.</li> </ul>	
See above.	<p>Annual Affidavit of Compliance (eliminate)</p> <p>CC Docket Nos. 92-256, 88-2 and 96-128</p>	<ul style="list-style-type: none"> <li>• Signed by officer of the Company principally responsible for installation procedures.</li> <li>• 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.</li> <li>• State Company policy related to non-discrimination in either installation or maintenance of regulated network services</li> <li>• 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.</li> </ul>	<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>
3060-0370 (encompasses	Continuing Property Records	<ul style="list-style-type: none"> <li>• These rules specify detailed information that an incumbent LEC must maintain for</li> </ul>	<p>Like the ARMIS reports, the property rules were developed under rate-of-return regulation and serve no</p>

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<b>PRA/OMB Control Number</b>	<b>Data Collection</b>	<b>Requirements</b>	<b>Reasons to Eliminate, Clarify, or Modify</b>
proceedings addressing reviews of and revisions to Part 32 accounting rules)	<p>Rules (eliminate)</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>	<p>all plant accounts, including detailed descriptions of the property, location information, date of placement into service, and original cost data and supporting records.</p>	<p>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.</i>, Report and Order and Further Notice of Proposed Rulemaking, 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>
N/A	<p>International traffic data reports (eliminate)</p> <p>47 C.F.R. § 43.61 47 C.F.R. § 43.82</p>	<ul style="list-style-type: none"> <li>• These international telecommunications traffic rules pertain to international traffic reports required by communication common carriers (including wireless carriers) and certain affiliates. Various reports include annual and quarterly traffic filings and annual international circuit reports.</li> </ul>	<p>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. Recent reform of regulatory fees for international</p>

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			bearer circuits also reduces the rationale for these reports.
3060-0775	International affiliate recordkeeping (eliminate)  47 C.F.R. § 64.1903	<ul style="list-style-type: none"> <li>• Various international affiliate recordkeeping requirements for incumbent LECs. Independent LECs wishing to offer international, interexchange services must comply with separate affiliate requirements. One of these requirements is that independent LEC's international, interexchange affiliate must maintain books of account separate from such LEC's local exchange and other activities.</li> </ul>	See above.
3060-1096	Prepaid calling card quarterly reports and certifications (eliminate)  47 C.F.R. § 64.5001	<ul style="list-style-type: none"> <li>• Requires prepaid calling card providers to report and certify quarterly on interstate usage factors and universal service contributions.</li> </ul>	Certification rules were a stop-gap measure when there were disputes about prepaid calling card contributions to the universal service fund and classification of certain services for intercarrier compensation purposes. These matters have been settled for several years.
3060-0647	Cable Price Surveys – Form 333 (eliminate)	<ul style="list-style-type: none"> <li>• Requires selected cable systems to provide information concerning prices, channel line-ups, etc. on an annual basis</li> </ul>	These forms were designed to collect information in the context of traditional, monopoly cable systems. The forms do not fit competitive providers like Verizon and the way we market our services. Competitive providers are also not subject to rate regulation, and therefore there is no need for price surveys.
3060-0061	Cable Operator Report – Form 325 (eliminate)	<ul style="list-style-type: none"> <li>• Requires selected cable operators to provide detailed information concerning particular systems, including details about channel line-ups, service offerings, and technical details of the system.</li> </ul>	This form was also designed for traditional cable operators, and many of the questions do not make sense in light of the technology Verizon and other competitive video providers use, and the way these providers structure their offerings.

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3060-0214	Cable System Public inspection file requirements (eliminate)  47 C.F.R. 76.1700, <i>et seq.</i>	<ul style="list-style-type: none"> <li>Requires a range of information (e.g., kid-vid certifications, EAS test results, political files, leased access policies, etc.) to be included in publicly available files in cable system offices throughout the country.</li> </ul>	Maintaining these files for each cable system requires significant resources with little public benefit. Very few people request access to Verizon’s public inspection files. In a competitive video marketplace, this requirement has outlived its usefulness.
3060-0076	Annual Employment Reports – Form 395 (eliminate compliant reporting)  47 C.F.R. 22.321	<ul style="list-style-type: none"> <li>Requires reporting of equal employment opportunity complaints filed against the licensee in any venue together with the status and description of each as well as an update of any outstanding matters reported in the previous year’s report.</li> </ul>	There is no evidence that the FCC does anything with these complaint reports that some, but not all, Commission licensees must file. The Equal Employment Opportunity Commission as well as federal and state courts have jurisdiction over resolution of these complaints.
3060-0816	Broadband Reporting – Form 477 (modify)	<ul style="list-style-type: none"> <li>Requires a separate report upload for each state with respect to subscriber numbers (each with seven questions) resulting in 50 separate files. Requirement is particularly burdensome for national and regional carriers that offer broadband service in multiple states—in some cases every state.</li> </ul>	<p>It would be more efficient if the form were amended to permit a filer to answer each of the seven questions for each state in a single file that could be uploaded to the FCC—thereby eliminating multiple filings for nationwide carriers.</p> <p>Much of the information that is being collected on geographic coverage and transfer rates on the Form 477 may also soon be available to the Commission in even more detail through the Broadband Data Improvement Act state broadband mapping program. At that point, the Commission should consider to what extent the census-track level data on the Form 477 is still necessary.</p>
3060-0799	Wireless	<ul style="list-style-type: none"> <li>Requires wholly owned wireless</li> </ul>	The FCC should clarify that wholly owned subsidiaries

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	Ownership Disclosure Information – Form 602 (clarify)	subsidiaries to file separate ownership reports.	do not need to file separate ownership reports where the wholly owned subsidiary is listed on its parent company’s Form 602 and that report is current. Separate reporting is entirely redundant.
3060-0800	Wireless Applications for Assignments and Transfers of Control – Form 603 (modify)	<ul style="list-style-type: none"> <li>Requires wireless applicants for assignments or transfers of control to indicate whether the call sign that is being transferred/assigned is constructed.</li> </ul>	The FCC should eliminate this requirement on the form because the same information is already contained in the FCC records. Pursuant to 47 C.F.R. § 1.946(d), wireless radio licensees are required to notify the Commission when they have met the coverage or substantial service obligations associated with their license.
3060-1058	Application for Spectrum Leasing Arrangements – Form 608 (modify)	<ul style="list-style-type: none"> <li>Spectrum subleases may only be filed on paper.</li> </ul>	The FCC should amend its electronic filing system to permit spectrum subleases to be filed electronically, eliminating administrative burdens on applicants and FCC staff.