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February 4, 2011

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

Re: **Data Requested in Special Access NPRM, WC Docket No. 05-25 and RM-10593**

REDACTED FOR PUBLIC INSPECTION

Dear Ms. Dortch:

In response to a request from Commission staff, Verizon submits an additional copy of the attached "Verizon Methodology for Data Submitted in Response to Data Request," initially filed on January 27 as a protected part of Verizon's voluntary submission of data in the *Special Access NPRM*.¹ This copy has been redacted for public inspection.

Please contact me should you have any question

Sincerely,

A handwritten signature in black ink that reads "Donna Epps".

Enclosure

cc: Marvin Sacks

¹ Public Notice, *Data Requested in Special Access NPRM*, 25 FCC Rcd 15146 (2010).

REDACTED FOR PUBLIC INSPECTION

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
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Data Requested in <i>Special Access NPRM</i>)	WC Docket No. 05-25
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Verizon Methodology for Data Submitted in Response to Data Request

In responding to the FCC’s special access public notice, Verizon¹ retrieved data from its various business systems for its mass market, wholesale, wireless, and enterprise business segments. Verizon does not routinely report this type of information to the FCC or to other government agencies. As such, in many instances, it was necessary to pull this information from different resources and databases to provide the information requested by the FCC. This process required substantial resources and manual efforts to synchronize and coordinate the data, and some imprecision may be inadvertently introduced due to variations in how the databases collect and maintain data.

The following describes the data retrieval methods that Verizon utilized for each part of the public notice:

¹ In addition to Verizon Wireless, the Verizon companies participating in this response (“Verizon”) are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

III.A

Verizon submits a response stating whether Verizon, operating as a CLEC outside its incumbent area, has any connections that it owns or that it leases from another entity under an infeasible right of use agreement.

III.B.1

Verizon retrieved the information for the connections that it provisions as a competing high capacity service provider outside its incumbent region in the Listed Statistical Areas. These connections terminate at an end user location or at a CMRS provider cell site and are sold to either an end user or a carrier customer.

Verizon identified the address, location, type of medium and potential capacity for each connection. Verizon retrieved this connection information for locations where it provides high capacity services to its customers. Verizon determined the potential capacity based on the facilities in place for the specific connections by summing the upstream and downstream capacities.² Verizon also provided information pertaining to connections that are leased on an IRU basis.

The information regarding the type of location, however, is not readily available in Verizon's systems for its out-of-region enterprise operations. Collecting this information would require a time-consuming physical inspection. Since the vast majority

² In items III.B.1.j and k of the public notice, the Commission requested "total capacity sold (upstream and downstream)" of the connection. What is unclear, however, is whether that requests the actual summation of the capacity (which should be symmetrical for dedicated high capacity services). In this instance, Verizon treated the request as seeking a summed capacity, but other respondents may have different interpretations. Future requests should clarify whether the Commission is requesting summed capacity in this instance.

of locations are in fact building locations, all location types are designated as buildings. Similarly, due to inherent system limitations, significant expense, and/or other concerns, Verizon is not providing information regarding whether fiber strands are lit or dark, or information regarding sold capacity.

The data for this part of the public notice are provided as of November 24, 2010.

III.B.2: Verizon retrieved from its business systems information for its physical and virtual collocation arrangements in ILEC wire centers that are outside its incumbent regions in each of the Listed Statistical Areas. Verizon retrieved the address and location information for each arrangement. As noted in its comments, this does not include data regarding other collocation arrangements, including those at non-ILEC locations, or about competition using other providers' facilities.

The data for this part of the public notice are provided as of November 16, 2010.

III.B.3: Verizon submits maps in .pdf format for some of the Listed Statistical Areas in which it operates outside its incumbent region as a CLEC. The remaining maps will be produced on or around February 7th, 2011.

III.C: Verizon retrieved the cell site data from multiple engineering databases. Verizon identified the address, location, type and name of the providing party for the sites in the Listed Statistical Areas. The information also indicates whether the connection to the site is self-provisioned; the provider designation for such connections is Verizon Wireless, "VZW" or "Microwave". To the extent there is more than one provider at a particular cell site, multiple provider names are listed.

The data for this part of the public notice are provided as of December 1, 2010.

III.D: Verizon submits a description of the business rules it uses to determine the conditions under which it would build facility to a customer's location when Verizon operates as a CLEC outside its incumbent region.

III.E: Verizon retrieved the information for the incumbent LEC connection count data from its engineering systems. Specifically, where Verizon operates as an incumbent LEC in the Listed Statistical Areas, Verizon identified connections over which it currently provisions high capacity,³ FIOS or DSL business services to its customers. Verizon determined the number of connections in each relevant wire center by capacity and by technology medium (e.g., fiber or copper). These connections terminate at end user locations or CMRS provider cell sites and are sold to either end user or carrier customers.

Verizon, for its incumbent LEC operations, utilizes different engineering systems for special access provisioned over fiber, special access provisioned over copper, DSL and FIOS. Further, Verizon operations in the eastern and the western parts of its footprint may utilize different systems. Due to these discrepancies, in some instances, Verizon had to adjust the data as described herein to facilitate coordination and combination of the data from these multiple systems.

Verizon determined the number of connections by aggregating multiple connections provisioned over the same technology medium that terminated at a single location. Verizon reported such connections as a single connection. In some instances, Verizon was unable to determine the number of "overlapping" locations due to

³ For purposes of high capacity services, Verizon provided data for DS1 and higher services. Verizon did include connections over which Verizon provisions DSL service below 1.5 MBPS capacity.

differences in the records between engineering systems. In such cases, Verizon adjusted its connection counts by estimating the number overlapping locations. In some New York Statistical Area wire centers, Verizon was unable to determine if **[BEGIN HIGHLY CONFIDENTIAL]**

[END HIGHLY CONFIDENTIAL] Verizon made this determination by comparing the cable facility records from both systems. When the number of connections from both systems for a cable facility record is different, Verizon selected the higher number of connections. For example, if for a particular cable record, system A yielded 4 connections and system B yielded 7 connections, Verizon would assign 7 connections for that cable facility. As such, when examining all the cable facility records, this method resulted in excluding approximately **[BEGIN HIGHLY CONFIDENTIAL]**

[END HIGHLY CONFIDENTIAL]

Using records from the FIOS and the special access engineering systems, Verizon was also unable to determine which locations overlap for purposes of counting its fiber connections. To adjust for this potential overlap, Verizon took a random sample of

records from its engineering system to develop a factor of overlapping locations. Verizon applied this factor to its records to reduce the reported counts, for the estimated overlapping locations. The factor was developed and applied for each capacity category.

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Secondly, Verizon added the available capacity (actual and maximum) for the multiple connections provisioned over the same technology medium at the same location. Verizon then classified the total capacity (upstream plus downstream) for the connections at each location by technology type in one of the four capacity categories specified in the public notice.⁴ In some instances, Verizon was unable to determine the actual FIOS capacity at the location level for purposes of classifying the connection in one of the four categories specified in the public notice. In those instances, Verizon applied the average FIOS capacity for the relevant wire centers to the number of FIOS connections in those wire centers.⁵

⁴ For example, if three DS1s and 1 DSL connections are provisioned to a single location, the total capacity would be the sum of the capacity of the three DS1s and the DSL (upstream and downstream). Illustratively, assuming the DS1 and DSL capacities are 1.5 MBPS upstream/downstream and 1.5 MBPS / 0.5 MBPS upstream/downstream for DS1 and DSL, respectively, the total capacity would be $(3 \times 1.5) \times 2 + (1.5 + 0.5) = 11$ MBPS. This connection would be classified in the 1.5 to < 20 MBPS category.

⁵ **[BEGIN HIGHLY CONFIDENTIAL]**

[END HIGHLY CONFIDENTIAL]

Last, once all the connections were classified for each location, Verizon summed and reported the total count of connections by capacity (actual and maximum) and by technology for each wire center. Verizon also reported the grand total number of connections for each wire center.

Verizon also provided a count of locations aggregated by location type where these connections terminate.⁶ Verizon counted a single location with multiple connections as one location. In some instances, Verizon estimated and eliminated overlapping connections, as described above, to avoid double counting locations. Verizon determined the total number of locations and the number of cell site locations from its engineering systems. Verizon then determined the number of building locations by subtracting the count of cell site locations from count of total locations.

The data for this part of the public notice are provided from different engineering systems as of January 2011.

⁶ Unlike Verizon's system for out-of-region CLEC operations, Verizon's ILEC systems provide more information regarding location type.