

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

Developing a Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
Connect America Fund)	WC Docket No. 10-90
)	
Universal Service Reform -- Mobility Fund)	WT Docket No. 10-208
)	
AT&T and CenturyLink Petitions for Limited Waiver of Call Signaling Rules)	

COMMENTS OF VERIZON¹

Verizon has urged the Commission to reconsider its failure to include technical feasibility and industry standards exceptions to the new traffic signaling rules.² If the Commission does not reconsider the rules in a timely fashion, it must grant necessary waivers to carriers that need them.³

¹ The Verizon companies participating in this filing are the regulated, wholly owned subsidiaries of Verizon Communications Inc., and Verizon Wireless (“Verizon”).

² See Petition for Clarification or, in the Alternative, for Reconsideration of Verizon, WC Docket Nos. 10-90 *et al.* (Dec. 29 2011) (“Verizon Reconsideration Petition”).

³ See *Wireline Competition Bureau Seeks Comment on AT&T Petition for Limited Waiver of Call Signaling Rules*, Public Notice, CC Docket Nos. 01-92 *et al.*, DA 12-34 (Jan. 10, 2012); *Wireline Competition Bureau Seeks Comment on CenturyLink Petition for Limited Waiver of Call Signaling Rules*, Public Notice, CC Docket Nos. 01-92 *et al.*, Public Notice, DA 12-104 (Jan. 30, 2012). Verizon also anticipates finalizing its internal review and soon requesting a limited waiver.

The record in this proceeding demonstrates that in many existing call-flows, it is not technically feasible to transmit calling party number or charge number information with currently-deployed equipment, and new technologies have only increased the range of potential call-flow options. Verizon Reconsideration Petition at 9-10. Verizon is sensitive to the Commission's concern that the exceptions not swallow the rule. Nonetheless, it is not feasible or practical to pass calling party number or charge number information in the call signaling stream in all instances. In addition, it makes little sense for providers to make extensive new investments in old signaling technology and facilities when intercarrier compensation will transition to bill-and-keep over the next few years.

Under the circumstances, the Commission should reconsider its new call signaling rules and provide for reasonable exceptions where compliance is technically infeasible or industry standards dictate otherwise. Barring timely reconsideration, the Commission should grant waivers to carriers that need them.

Respectfully submitted,

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