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March 7, 2005

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. 3662 – Verizon RI Proposed Revisions to PUC Tariff No. 18

Dear Ms. Massaro:

Enclosed for filing in the above matter are the original and nine copies of the Reply of Verizon Rhode Island to Comments of the Joint Commentors Regarding Proposed Tariff Revisions.

Please contact me if you have any questions. Thank you for your assistance in this matter.

Sincerely,

Alexander W. Moore

cc: Mr. Brian Kent
Alan M. Shoer, Esq.
Russell M. Blau, Esq.
Craig L. Eaton, Esq.

**BEFORE THE STATE OF RHODE ISLAND
AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

In Re: Verizon Rhode Island Proposed Revisions to PUC Tariff No. 18 filed On February 18, 2005)))))	Docket No. 3662
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**REPLY OF VERIZON RHODE ISLAND
TO COMMENTS OF THE JOINT COMMENTORS
REGARDING PROPOSED TARIFF REVISIONS**

The objections posed by the Joint Commentors to Verizon RI’s proposed revisions to PUC Tariff No. 18 merely reiterate, for the most part, objections previously made by other carriers. Verizon RI has already responded to those objections in its Reply to Comments of CLECs Regarding Proposed Tariff Revisions filed earlier today. Below, Verizon RI addresses the two arguments made by the Joint Commentors that were not addressed in that Reply.

1. The Joint Commentors complain that the Tariff does not define the term “fiber-based collocators” for purposes of ordering dedicated transport. Comments at 4. This is not accurate. Sections 2.1.1.A.2 and 5.3.1.A of the Tariff provide that the term shall have the meaning as set forth in the federal rule, 47 CFR §51.5, which itself contains a full definition of the term. Though the Joint Commentors may prefer that the Tariff not reference the federal rule, this is a common tariff practice and is eminently reasonable.

2. The Joint Commentors also complains that the Tariff revisions use negative language, giving the Tariff’s language on DS1 loops in §5.3.1.B.1 as an example. Comments at 4. Of course, Verizon RI is entitled to its tariff changes if they are just and reasonable, and whether they are written in the negative or the affirmative is entirely immaterial to that inquiry.

The Joint Commentors pointedly have made no claim that the “negative” language used in the Tariff amendments results in an outcome in any way inconsistent with that directed by the FCC’s rules. In any event, whether the Tariff’s language is more “negative” than that of the rules is an open question, in light of the FCC’s consistent use of the negative, as in, “Where incumbent LECs are not required to provide unbundled DS1 loops pursuant to [these rules], *requesting carriers may not obtain* new DS1 loops as unbundled network elements.” 47 CFR §51.319(a)(4)(iii) (emphasis added). Moreover, the existing tariff terms and conditions generally are written in the affirmative, thus the TRRO amendments necessarily are written to set out any and all exceptions to the existing offerings consistent with the FCC’s TRRO rules.

Conclusion

For the above reasons, the Commission should allow the revisions Verizon RI has proposed to PUC Tariff No. 18 to go into effect as written, on March 11, 2005.

Respectfully submitted,

VERIZON MASSACHUSETTS

By its attorneys,

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Dated: March 7, 2005