

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Division of Public Utilities and Carriers

Memorandum

DATE: February 21, 2006

TO: Commissioners: Elia Germani, Robert Holbrook, Mary Bray

FROM: Brian Kent, MBA CMA CPA
Telecommunication Specialist

SUBJECT: Verizon – Rhode Island Docket No. 3721 Revision to RIPUC Tariff No. 18, wire centers that do not qualify for Unbundled Network Elements (UNEs).

The Division has reviewed Verizon – Rhode Island documents, worksheets and tariffs, for conformity to the RI PUC's directives in Order 18310. We have found the filing has completed the requirements of the order, except for Verizon- Rhode Island wording reserving the right to disconnect service providers. The following sentence, contained in paragraph 2.1.1.D.1 and 5.3.1.D.1 is not in compliance.

“Under no circumstances will the Telephone Company be required to elect the above options, and it reserves its right to disconnect any such remaining DS1 or DS3 loops at the end of the transition period.”¹

The above wording is in conflict with paragraph (a) in order 18310 that essentially requires Verizon – Rhode Island to convert DS1 and DS3 service to retail rates and inherently eliminating the disconnection option at the transition date.

RECOMMENDATION

The Division recommends the deletion of the disconnect option as quoted above. Additionally, according to the documentation and worksheets provided by the company, the Divisions finds the “exempt wire centers” are in compliance with the FCC guidelines and the Commission order.

¹ This “above options” references procedures and conditions Verizon lays out for conversion of DS1 and DS3 services. Attached are copies of paragraphs referencing the ‘disconnect’ option.