Before the **FEDERAL COMMUNICATIONS COMMISSION**

Washington, D.C. 20554

In the Matter of)
)
Offer of Comparably Efficient)
Interconnection to Providers of)
Enhanced Directory Assistance Service)

COMPARABLY EFFICIENT INTERCONNECTION PLAN

I. <u>Introduction and Summary</u>

The Verizon telephone companies ("Verizon") hereby propose to offer comparably efficient interconnection ("CEI") to competing providers of wholesale Enhanced Directory Assistance ("EDA") Service.¹

Verizon will comply fully with the nonstructural safeguards that apply to the offering of enhanced services on an integrated basis by the former Bell Operating Companies .² One of these

¹ This plan is being filed by the Verizon telephone companies that were formerly affiliates of Bell Atlantic Corporation and are identified in Attachment A. Other Verizon telephone companies that were formerly affiliates of GTE Corporation are not required to post a CEI plan before offering an enhanced service.

² See Amendment of Section 64.702 of the Commission's Rules and Regulations, (Computer III), CC Docket No. 85-229, Phase I, 104 FCC 2d 958 (1986) (Phase I Order), recon., 2 FCC Rcd 3035 (1987), further recon., 3 FCC Rcd 1135 (1988) Reconsideration Order, second further recon., 4 FCC Rcd 5927 (1989) (Phase I Second Further Reconsideration), Phase I Order and Phase I Reconsideration Order vacated, *California v. FCC*, 905 F.2d 1217 (9th Cir. 1990); Phase II, 2 FCC Rcd 3072 (1987) (Phase II Order), recon., 3 FCC Rcd 5927 (1988) (Phase II Further Reconsideration Order), further recon., 4 FCC Rcd 5927 (1988) (Phase II Further Reconsideration Order), Phase II Order vacated, *California v. FCC*, 905 F.2d 1217; *Computer III Remand Proceedings*, 5 FCC Rcd 7719 (1990) (ONA Remand Order), recon., 7 FCC Rcd 909 (1992), pets. for review denied, *California v. FCC*, 4 F.3d

safeguards is the requirement to create and post on the Internet a plan providing comparably efficient interconnection to competing enhanced service providers.³

II. Compliance with CEI Requirements

The Commission has specified nine CEI parameters that must be met to demonstrate how Verizon will provide competing enhanced service providers comparably efficient interconnection to its underlying telecommunications services.⁴ Verizon shows compliance with each of these parameters as follows:

A. Description of Service.

Verizon's wholesale Enhanced Directory Assistance (EDA) service will enable carriers and other wholesale customers of Verizon to offer movie listings, restaurant reviews, sports scores and other information to their respective wireline or wireless subscribers. This will not be offered as a retail service and will not be provided to Verizon's local exchange customers or the general public.

To obtain wholesale EDA services from Verizon, the customer must arrange for the necessary trunking and transport of its subscribers' calls to specified Verizon maintained operator switches. Once the wholesale customer delivers its calls to the specified Verizon switch, the calls will be queued and distributed to operator terminals where Call Attendants will respond to

1505 (9th Cir. 1993); Computer III Remand Proceedings: Bell Operating Company Safeguards and Tier 1 Local Exchange Company Safeguards, 6 FCC Rcd 7571 (1991) (BOC Safeguards Order); BOC Safeguards Order vacated in part, California v. FCC, 39 F.3d 919, 104 FCC 2d 10 Rcd (9th Cir. 1995), Computer III Further Remand Proceedings, CC Docket 95-20, Report and Order, 14 FCC Rcd 4289 (1999) (Computer III Remand Order), recon., 14 FCC Rcd 21628 (1999) (Computer III Remand Reconsideration Order).

³ Computer III Remand Order at ¶¶ 12-13, 20; Computer III Remand Reconsideration Order at ¶ 6.

callers' verbal requests. The wholesale customer may also arrange for access via telecommunications relay service (TRS) or TTY equipment, in which case Call Attendants will respond and reply to written or teletype requests.

Verizon's Call Attendants will offer and provide, upon request, a variety of information to the end users of the wholesale customers' service, including Movie Listings, Restaurant Guides, Sports Scores, Business Category Searches, Weather Conditions, Travel Directions and Stock Quotes. The actual information provided is dependent on the service to which Verizon's customer subscribes. The information provided will cover locations throughout the country.

Verizon Call Attendants will retrieve the pertinent information from Verizon information storage facilities that house data content obtained or licensed by Verizon from third parties.

Requested information may be provided by the call attendant or by audio recording

B. Unbundling of Telecommunications Services. ⁵

As shown in the illustrative tariffs contained in Attachment B, Verizon has unbundled and tariffed all of the underlying telecommunications services it will use to provide its EDA service.

These telecommunications services consist of Operator Services Automated Call Distribution

("OS -ACD") service, which utilizes certain service features of Verizon-maintained Telephone

Operator Position System (TOPS?) switches that enable routing, queuing and management of

EDA calls to operator terminal equipment. ⁶ OS-ACD service will be accessible to unaffiliated entities under the same tariffed rates, terms and conditions as apply to Verizon. ⁷

⁴ Phase I Order at ¶¶ 147-166 Computer III Remand Order at ? 13.

⁵ Computer III Remand Order at ¶ 13; Phase I Order at ¶ 158.

⁶ TOPS switches are manufactured by Nortel.

⁷ OS-ACD is currently tariffed in Pennsylvania and at the Commission.

C. Technical Characteristics.8

Verizon will provide facilities that are comparably efficient in type, quality and all technical parameters to both affiliated and unaffiliated entities. All entities will interconnect with Verizon's telecommunications services through standard published interfaces.

D. Interface Functionality⁹

All entities, including Verizon's enhanced service provider, may connect the operator terminal equipment on their premises to Verizon's telecommunications network through standard, publicly disclosed network interfaces. These standard network interfaces support the transmission, switching and signaling functions that are identical to those used by Verizon in providing its own EDA services. The technical specifications for these interfaces were identified in Verizon's Network Disclosure Statement for Operator Services-Automatic Call Distribution (OS-ACD) Service. That disclosure was published as a short-term disclosure in May 2001 and no objection was filed. A copy of the FCC's Public Notice of that disclosure is attached as Attachment C. Any new interfaces that may be introduced in the future will be disclosed in advance, as required under the Commission's Network Disclosure requirements.

E. Resale. 10

Verizon's enhanced service provider will purchase all underlying telecommunications services at tariffed rates and resell them along with its EDA enhancements on an unregulated basis. Accordingly, both Verizon's enhanced service and nonaffiliated providers of comparable

⁸ Phase I Order at ¶ 160; Computer III Remand Order at ¶13.

⁹ Phase I Order at ¶ 157.

 $^{^{10}}$ *Id.* at ¶ 159.

services will pay the same amount for the underlying telecommunications services they acquire from Verizon.

F. Installation, Maintenance and Repair. 11

Verizon will provide comparable quality and time periods for installation, maintenance and repair of telecommunications services provided to affiliated and unaffiliated entities. Orders for installation, testing, and repair, for both affiliated and unaffiliated EDA providers, will be assigned and completed on a non-discriminatory basis. Unaffiliated entities will be able to report network service problems in a manner similar to the procedures used by affiliated entities. Verizon will continue to comply fully with the existing, and any revised, requirements regarding nondiscrimination reporting.

G. End User Access. 12

All entities will have an equal ability to provide their respective customers the same network capabilities as are available to Verizon's customers. Customers will be able to access affiliated and unaffiliated entities using Verizon's telecommunications services.

H. CEI Availability. 13

Verizon's underlying telecommunications services are available to both affiliated and unaffiliated entities in all geographical areas where Verizon provides EDA service.

I. Availability to All Interested Enhanced Service Providers 14

¹² *Id.* at ¶ 162.

¹¹ *Id.* at ¶ 161.

¹³ Computer III Remand Order at ¶ 13, Phase I Order at ¶ 163.

 $^{^{14}}$ Phase I Order at \P 165, Computer III Remand Order at \P 13.

All of the underlying telecommunications services that Verizon's enhanced service provider will use to provide its EDA services will be available to all unaffiliated enhanced service competitors for any lawful purpose. The availability of Verizon's CEI offering will therefore not be restricted to any particular category or class of customer.

J. Minimization of Transport Costs. 15

The Commission has held that the CEI parameter requiring minimization of transport costs is satisfied where, as here, affiliated and unaffiliated entities are charged the same rates for all underlying services.

III. Compliance with other Commission Requirements

A. Network Interface Disclosure.

Verizon has complied with the Commission's rules requiring disclosure of new interfaces or network changes that affect interconnection to the network and interoperability of network services. *See* 47 C.F.R §§51.325 *et seq*. In particular, Attachment C contains the network disclosure for the interface employed by Verizon.

B. Allocation of Joint and Common Costs.

Joint and common costs will be allocated pursuant to Verizon's Cost Allocation Manual (CAM). Verizon will file CAM changes to provide for the accounting of unregulated EDA service costs as required.

C. Customer Proprietary Network Information (CPNI).

¹⁵ Amendment of Section 64.702 of the Commission's Rules and Regulations, (Third Computer Inquiry), Memorandum Opinion and Order on Further Reconsideration and

Second Further Reconsideration, 3 FCC Rcd 5927, $\P\P$ 32-34 (1988).

Verizon will comply with all applicable CPNI requirements. The affiliated entities' EDA sales and marketing personnel will be precluded by password restrictions from accessing any CPNI of unaffiliated entities.

ATTACHMENT A

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the following local exchange carriers affiliated with Verizon Communications Inc. These are:

Verizon Delaware Inc.

Verizon Maryland Inc.

Verizon New England Inc.

Verizon New Jersey Inc.

Verizon New York Inc.

Verizon Pennsylvania Inc.

Verizon Virginia Inc.

Verizon Washington, DC Inc.

Verizon West Virginia Inc.

ATTACHMENT B

SAMPLE TARIFFS

ACCESS SERVICE

REFERENCE TO TECHNICAL PUBLICATIONS AND INFORMATION PUBLICATIONS (Cont'd)

The following publications are referenced in this tariff and may be obtained from Manager, LNP Implementation - 1 East Pratt Street, Baltimore, Maryland.

Illinois Number Portability Workshop Generic Operator Services Switching Requirements for Number Portability Issue 1.1 June 20, 1996

Illinois Number Portability Workshop Generic Switching and Signalling Requirements for Number Portability Version 1.05 August 1, 1997

Illinois Number Portability Workshop Generic Requirements for SCP Application and GTT Function for Number Portability

Issue 0.99 January 1, 1997

Local Number Portability Capability Specification
Document No. GR-2936, Issue 2
Issued: July 30, 1999 December,
1996

Available: December 1996

The following publications referenced in this tariff may be obtained from IBM Publications Support Center, P.O. Box 29570, Raleigh, NC; Telephone No. 800 879-2755. Note: ESCON® is a registered trademark of the International Business Machines (IBM) Corporation.

Enterprise Systems Architecture /390 ESCON I/O Interface, Physical Layer SA23-0394-02 Update: September 1997

ESA/390 ESCON I/O Interface

SA22-7202-02 Update: September 1997

ESCON® Introduction

GA23-0383-01 Update: September 1997

The following publications referenced in this tariff may be obtained from the Advanced Television Systems Committee (ATSC), 1750 K Street NW, Suite 1200, Washington, DC 20006.

ATSC Standard A/53, Digital Television Standard Revised: April 6, 2001

(T)(X)

ATSC Document A/54, Guide to the Use of ATSC Digital Television Standard Issued: October 4, 1995

The Collocation Space Summary, which is referenced in this tariff, may be obtained from the Telephone Company's Internet website at http://www.Bellatlantic.com/wholesale/html/res_site_summ.htm.

The following publication referenced in this tariff may be obtained from Nortel Networks, Inc., 4006 East Chapel Hill, Research Triangle Park, Raleigh, NC 27709, (919)991-8679.

Nortel Document No. Q214-1 Issued: March 5, 1999

(S) (N)(X)

(S)

- (S) Reissued material filed under Transmittal No. 77 and scheduled to become effective August 18, 2001.
- (X) Filed under authority of Special Permission No. 01-091 of the Federal Communications Commission.

(This page filed under Transmittal No. 83)

Issued: August 14, 2001 Effective: August 18, 2001

Vice President 2980 Fairview Park Drive, Falls Church, Virginia 22042

ACCESS SERVICE

9. <u>Directory Assistance Service</u> (Cont'd)

9.8 Operator Services-Automatic Call Distribution Service

A) General

The Telephone Company will use Nortel's Telephone Operator Position System (TOPS") to provide Operator Services.
Automatic Call Distribution (OS-ACD) Service. (TOPS" is a Nortel registered trademark.) OS-ACD Service will provide operator distribution functionality to customers who deliver calls to the Telephone Company's network. The Telephone Company will queue, route, and manage calls to customerprovided operator terminals that are compatible with Nortel's Open Position Protocol (OPP). Each call can be branded with a customized announcement as an optional feature of OS-ACD Service. The number of positions served and the call processing capacity of OS-ACD Service is engineered based on the customer's requirements and the Telephone Company's available capacity.

- The customer is responsible for transport facilities required to transport calls to the designated OS-ACD switch.
- 2) The customer is responsible for interconnecting facilities between the designated OS-ACD switch and the customer's OSP.

B) Availability

OS-ACD Service is available at switch locations designated by the Telephone Company and as identified in National Exchange Carrier Association (NECA) Tariff F.C.C. No. 4. Effective August 18, 2001, OS-ACD Service will be available to customers in the state of Pennsylvania. Additional switch locations will be added, and will be published in the NECA Tariff F.C.C. No. 4, as facilities become available.

C) <u>Technical Requirements</u>

Nortel's Open Position Protocol (OPP) is used as the network interface between OS-ACD Service and the customer's OSPs. The OPP network interface is defined in Nortel Document No. Q214-1. Compatible customer provided equipment (CPE) and software will also be required.

- (S) Reissued material filed under Transmittal No. 77 and scheduled to become effective August 18, 2001.
- (X) Filed under authority of Special Permission No. 01-091 of the Federal Communications Commission.

(This page filed under Transmittal No. 83)

Issued: August 14, 2001 Effective: August 18, 2001

Vice President 2980 Fairview Park Drive, Falls Church, Virginia 22042 (S) (C)(X)

(S)

(C)(X) (S)

(C)(X) (C)(X) (S)

(S)

(S)

(C)(X) (C)(X) (S)

(S)

ACCESS SERVICE

- 9. <u>Directory Assistance Service</u> (Cont'd)
 - 9.8 Operator Services-Automatic Call Distribution Service (Cont'd)
 - D) Rate Regulations

(N)

- Rates are applied per call delivered to the Telephone Company's network.
- 2) Testing and implementation is required and will be priced on an individual case basis.
- E) Rates and Charges

OS-ACD Service, per call

\$0.0524

(N)

(This page filed under Transmittal No. 77)

Issued: August 3, 2001 Effective: August 18, 2001

Vice President 2980 Fairview Park Drive, Falls Church, Virginia 22042

(C)

OPERATOR SERVICES-AUTOMATIC CALL DISTRIBUTION SERVICE

A. GENERAL

This tariff section contains a schedule of rates and regulations applicable to Operator Services-Automatic Call Distribution Service (OS-ACD) provided by Verizon Pennsylvania Inc. to information service providers (ISPs) for the purpose of providing enhanced directory assistance services.

B. REGULATIONS

- 1. OS-ACD Service will provide users access to an use of the automatic call distribution functionality of Nortel's Telephone Operator Position System $(TOPS^{m})$.
- 2. OS-ACD Service will be available at switch locations designated by the Telephone Company. Additional locations will be added, as facilities become available.
- 3. For calls delivered to the Telephone Company's operator services network by the customer, OS-ACD service will queue, route, and manage calls to customer-provided operator service positions (OSPs) that are compatible with Nortel's Open Position Protocol (OPP).
- 4. Customized branding is an optional feature of OS-ACD. It will be provided at no charge.
- 5. The number of positions served and the call processing capacity of OS-ACD is engineered based on the customer's requirements and the Telephone Company's available capacity.
- 6. The customer is responsible for transport facilities required to transport calls to the designated OS-ACD switch and for the interconnecting facilities between the designated OS-ACD switch and the customer-provided OSPs.
- 7. Testing and implementation are required and will be priced on an individual case basis.

C. RATES

ATTACHMENT C

FCC'S PUBLIC NOTICE OF NETWORK DISCLOSURE

Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

News Media Information 202 / 418-0500 Fax-On-Demand 202 / 418-2830 TTY 202 / 418-2555 Internet: http://www.fcc.gov

COMMON CARRIER BUREAU NETWORK CHANGE NOTIFICATION FILED BY VERIZON

Report No. NCD-506

June 28, 2001

By the Chief, Network Services Division, Common Carrier Bureau

25477

Re: NETWORK CHANGE SHORT TERM CERTIFICATION RECEIVED

Verizon, an incumbent local exchange carrier (LEC), has filed certification that short term public notice of network change has been provided through its publicly accessible Internet site, as required by section 51.329(a) of the rules of the Federal Communications Commission (FCC), together with certification of service on identified interconnecting carriers, as required by section 51.333(a). Upon initial review the filing appears to be complete. See 47 C.F.R. §§ 51.325 through 51.335. Specific network change information can be obtained on the Internet at:

http://www.bellatlantic.com/disclose

The incumbent LEC's certification refers to the change identified below:

Verizon will provide Operator Services-ACD Service.

The incumbent LEC Contact:

Suzanne Carmel
Manager – Regulatory Affairs
Verizon
1300 I Street, N.W., Suite 500 East
Washington, DC 20005

Phone: (202) 515-2537

An objection to an incumbent LEC's short term notice may be filed by an information service provider or telecommunication service provider that directly interconnects with the incumbent LEC network. Such objections must be filed with the Commission, and served on the ILEC, no later than the ninth business day following the release of this public notice. See 47 C.F.R. § 51.333(c).

For further information, contact Carmell Weathers, (202) 418-2325 (voice), or cweather@fcc.gov (email), of the Network Services Division, Common Carrier Bureau. The TTY number is (202) 418-0484.