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December 15, 2006

Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301

Re: DT 06-067 BayRing Communications Access Charges

Dear Ms. Howland:

Attached please find a series of call flow scenarios developed by Staff in the above-referenced docket. As noted in Staff's October 12, 2006 report of technical session in the same docket, Staff developed the attached scenarios, with input from parties, to illustrate the types of calls that traverse the Verizon tandem and applicable charges. We request that these scenarios be entered into the record for consideration by the Commission in this proceeding.

If you should have any questions, please do not hesitate to contact me at 603.271.6030.

Sincerely,


Lynn Fabrizio
Staff Attorney



TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

Glossary

8YY	Toll free services provided over an 800-; 866-; 877-; 888-, etc. NPA.
CCL	Carrier Common Line charges; per minute
CLEC	Competitive Local Exchange Carrier
Dedicated Transport	Facilities for Toll Providers that are directly connected to Verizon's tandem and incur monthly charges comprising a flat rate and per mile rates pursuant to FCC 11 (primarily)
End Office	The switching center that interconnects calls between end user customers and the telephone network.
FG2A Access	Feature Group 2A is an access service from Verizon's NHPUC Tariff 85 which provides trunks for Wireless Providers that connect directly to Verizon's tandem using WP-assigned telephone numbers and WP switching. This is also called Type 2A Interconnection in interconnection agreements.
Host Office	A switch which provides central call processing functions and services both the host office and its remote locations.
IA	Interconnection Agreement
ILEC	Incumbent Local Exchange Carrier
ITC	Independent Telephone Company
LS	Local Switching charges; per minute
LTF	Local Transport Facility charges; per minute per mile. <i>See</i> , for Verizon, Tariff 85 Section 3.1.2 L.1 - 3, which also refers to NECA tariff
LTT	Local Transport Termination charges; per minute. Verizon applies once per transport facility, and charged at 50% for shared facilities. <i>See</i> Tariff 85 Section 3.1.2 L.4 & 6. CLEC and ITC apply per termination.
LTTS	Local Transport Tandem Switching charges; per minute
MTSO	Mobile Telephone Switching Office
POI	Point of Interconnection, which is the point of demarcation between the CLEC's facilities and Verizon's facilities.
Remote End Office	A switch that is located away from its host or control office and requires central call processing from the Host Office.
Tandem	A switching center that connects trunks to trunks and does not connect any end user loops.
Tandem Transit Service	An offering provided by Verizon to requesting CLECs that enables the carrier whose customer originated an intraLATA call destined for a customer of another LEC (not a Verizon customer) to utilize a Verizon tandem switch as a means of establishing connectivity with the terminating CLEC. Not available to TPs.
TP	Toll Provider or interexchange carrier (IXC)
Type 1 Interconnection	Type 1 Interconnection, or Flexpath, is a retail service in Verizon's NHPUC Tariff 83 that provides high-capacity digital end office trunks for Wireless Providers with line-side treatment facilities, Verizon-assigned DID telephone numbers, and Verizon end-office switching.
WP	Wireless Provider, also CMRS (Commercial Mobile Radio Service) provider or cellular telephone service provider.

Assumptions

The presumption is that CLECs deliver outgoing traffic directly to the Verizon tandem (i.e., no meet point)

Some CLECs lease special access (dedicated transport) to the Verizon tandem.

Some CLECs have their own facilities into the Verizon tandem, as shown in Scenario 7.

Some CLECs do use a meet point arrangement, as shown in Scenarios 4 and 13.

Wireless carriers are typically shown here as having FG2A access between the MTSO and Verizon tandem (i.e., no meet point).

Verizon believes that there are very few Type 1 Interconnection arrangements still in use by Wireless Providers in New Hampshire.

Calls to and from Verizon users that traverse the tandem may originate at or terminate to an End Office, Host Office or Remote End Office.

CLECs typically have a Point of Interconnection, which is not always indicated on these pictograms in the interest of space.

CLEC special access circuits typically run between the CLEC POI and the Verizon tandem.

CLECs may choose to have special access circuits terminate at a colocation with Verizon instead of at the CLEC POI.

CLEC logos have been used for example only and not to imply that any given CLEC is the only CLEC experiencing these problems.

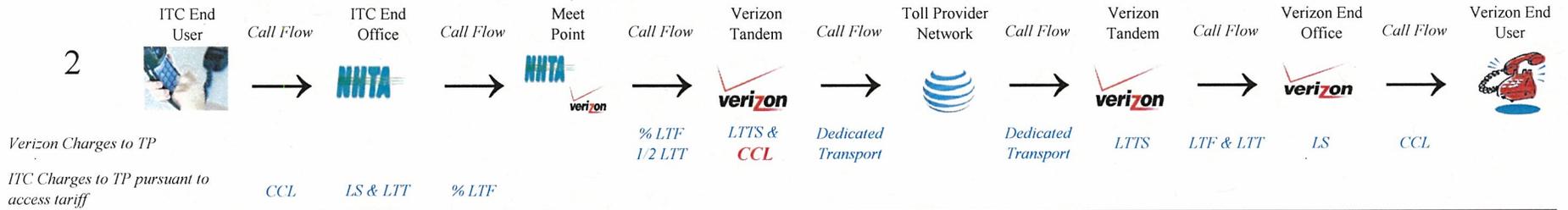
TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

Intrastate Long Distance Calls using a Toll Provider - Verizon End User

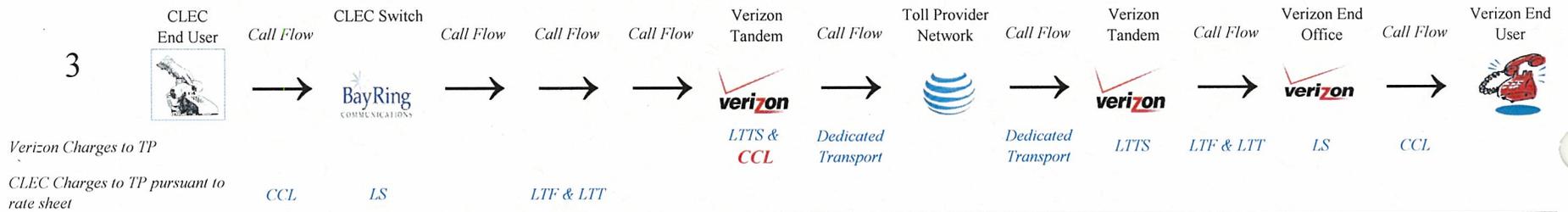
Intrastate long distance call from **Verizon** end user to **Verizon** end user (traditional intrastate long distance call)



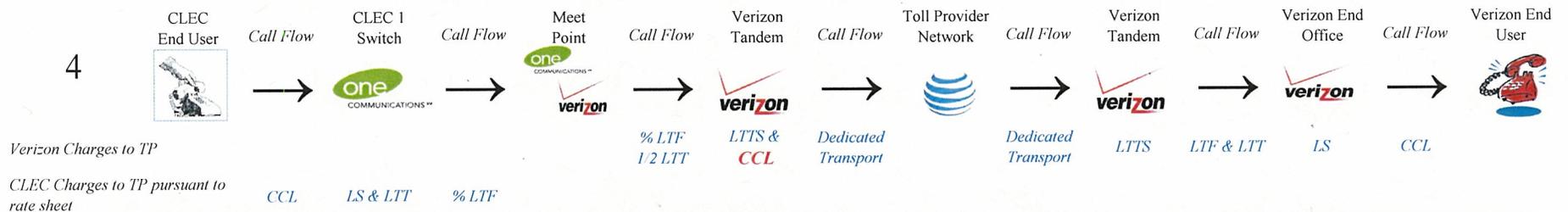
Intrastate long distance call from **ITC** end user to **Verizon** end user



Intrastate long distance call from **CLEC** end user to **Verizon** end user when CLEC owns dedicated transport to Verizon Tandem



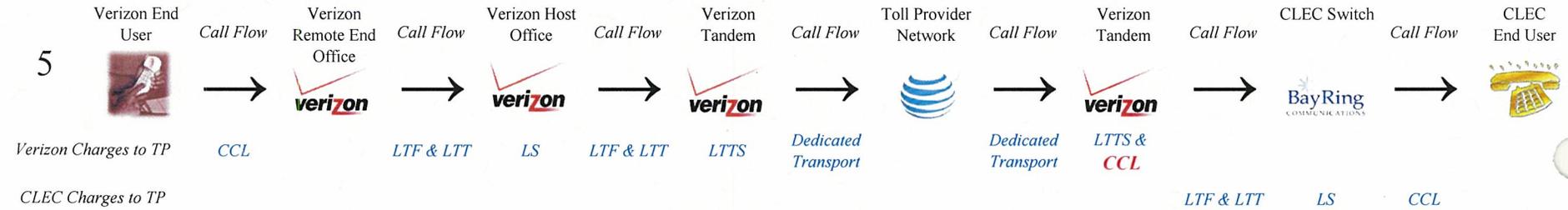
Intrastate long distance call from **CLEC** end user to **Verizon** end user - showing CLEC meet point



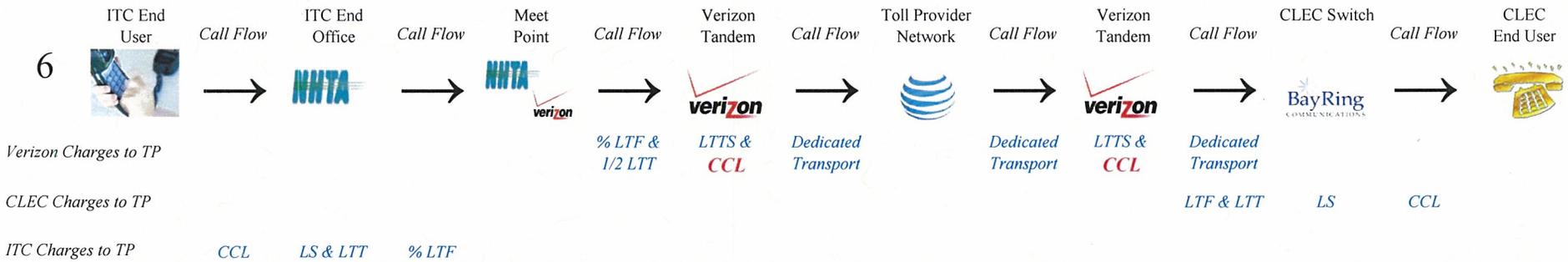
TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

Intrastate Long Distance Calls using a Toll Provider - CLEC End User

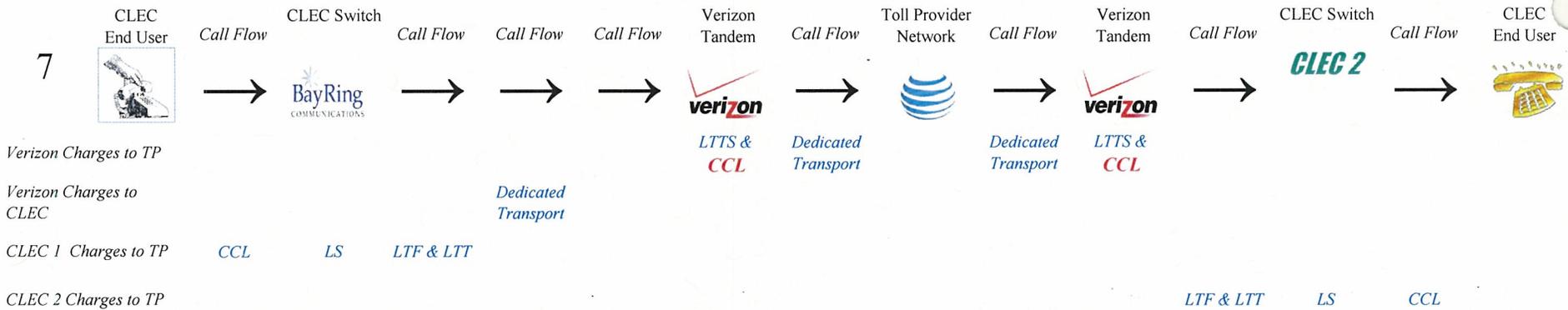
Intrastate long distance call from **Verizon** end user to **CLEC** end user where Verizon's end user is served out of a remote end office.



Intrastate long distance call from **ITC** end user to **CLEC** end user



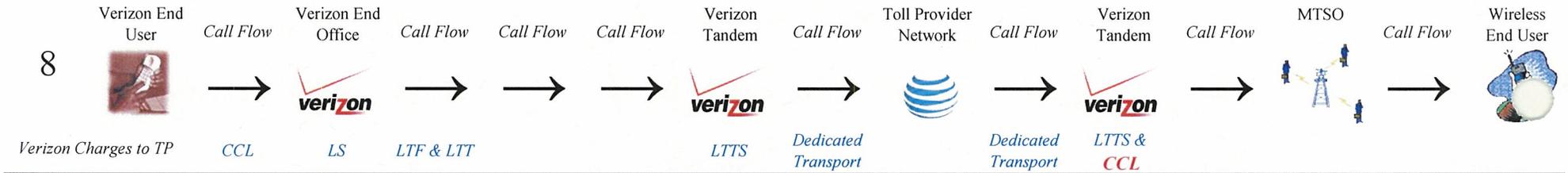
Intrastate long distance call from **CLEC** end user to **CLEC** end user



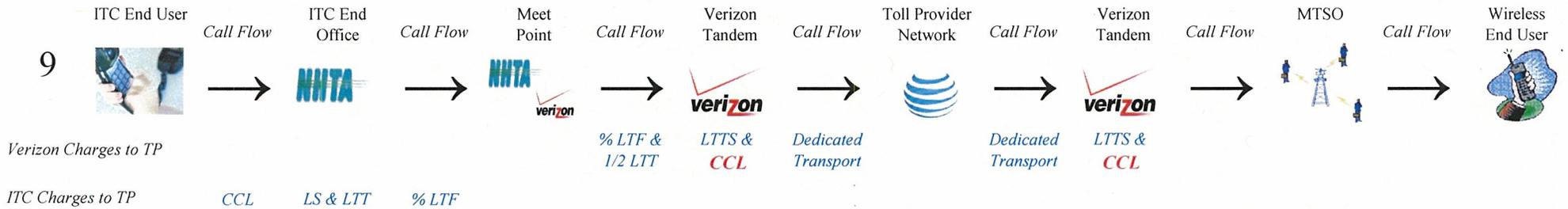
TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

Intrastate Long Distance Calls using a Toll Provider - Wireless End User

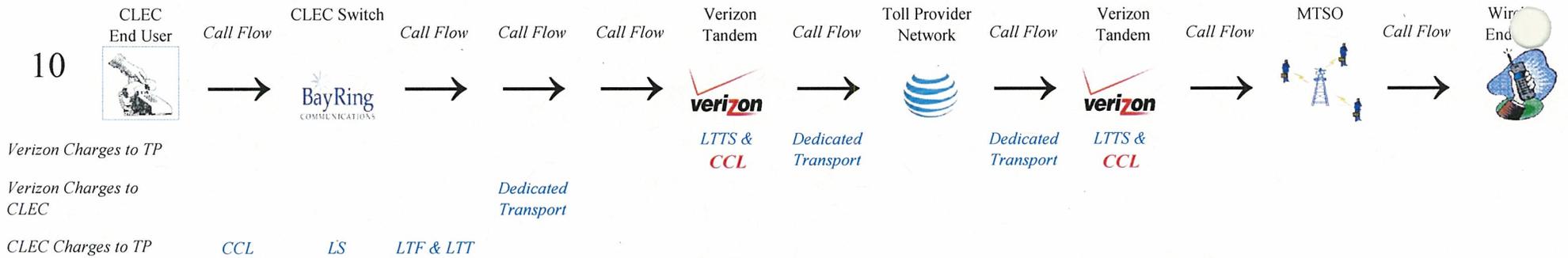
Intrastate long distance call from **Verizon** end user to **Wireless** end user



Intrastate long distance call from **ITC** end user to **Wireless** end user



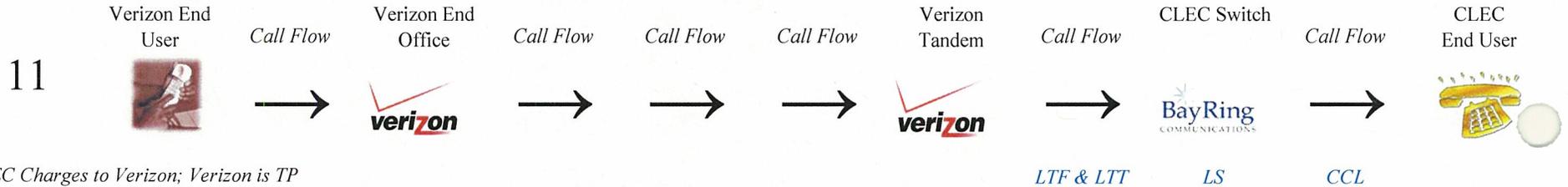
Intrastate long distance call from **CLEC** end user to **Wireless** end user



TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

Intrastate Long Distance Calls where the Local LEC as Toll Provider - CLEC End User

Intrastate long distance call from **Verizon** end user to **CLEC** end user



Intrastate long distance call from **ITC** end user to **CLEC** end user



Intrastate long distance call from **CLEC 1** end user to **CLEC 2** end user

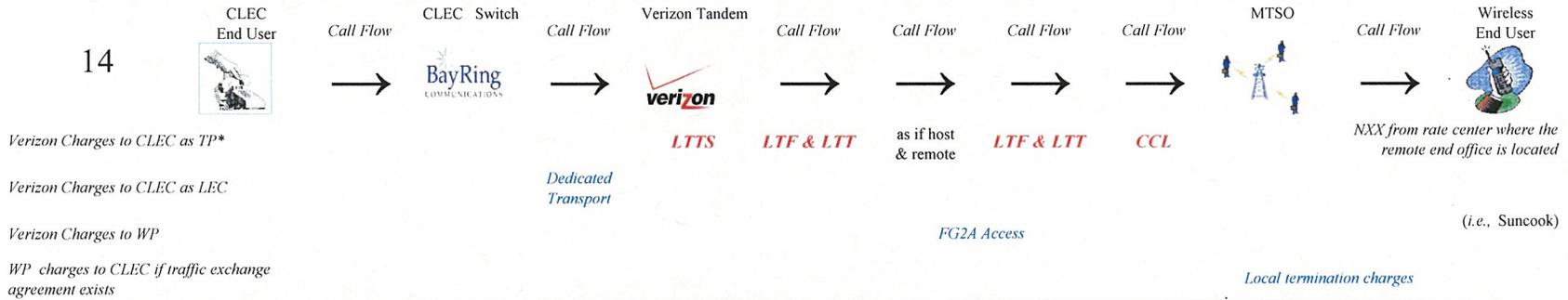


* 12 The CLEC may actually charge Verizon and the charge would be passed on to the ITC, depending on existing agreements.

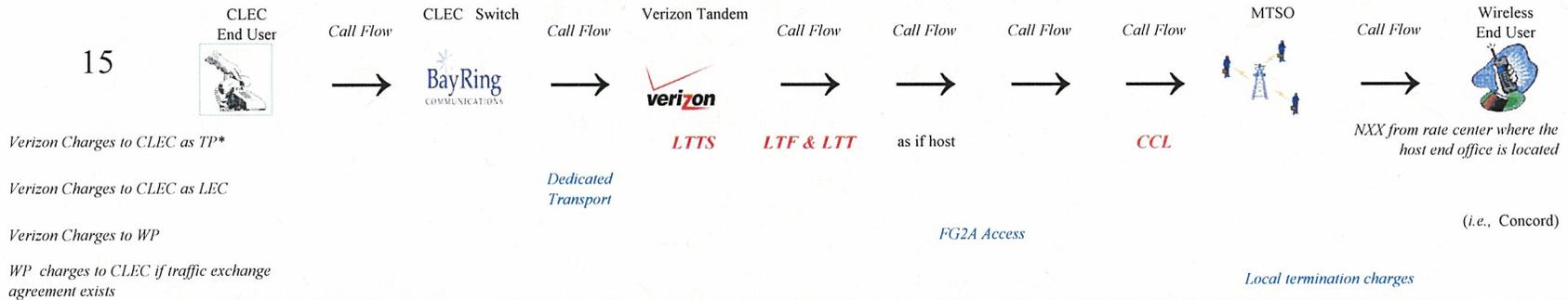
TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

Intrastate Long Distance Calls with CLEC as Toll Provider and Wireless Providers using FG2A Access - Wireless End Users

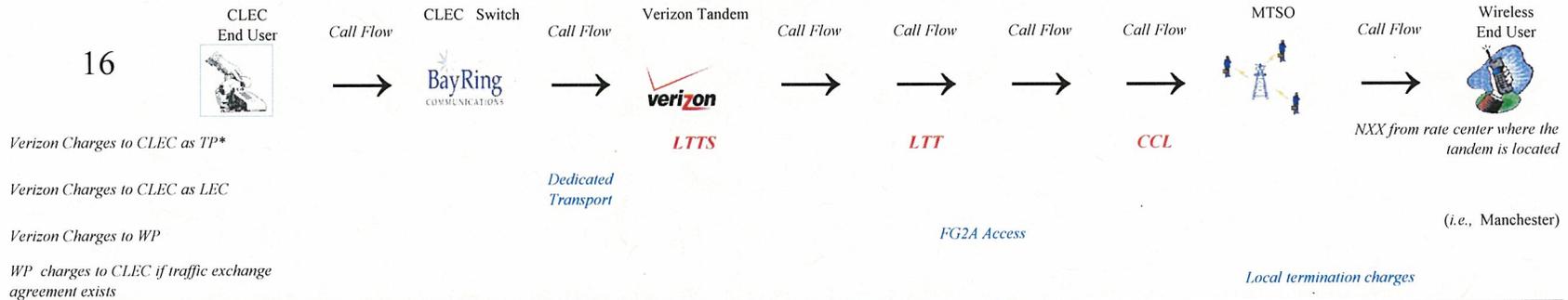
Intrastate long distance call from CLEC end user to Wireless end user; Wireless end user is assigned number by WP associated with Verizon remote end office NXX



Intrastate long distance call from CLEC end user to Wireless end user; Wireless end user is assigned number by WP associated with Verizon host office NXX



Intrastate long distance call from CLEC end user to Wireless end user; Wireless end user is assigned number by WP associated with Verizon tandem NXX

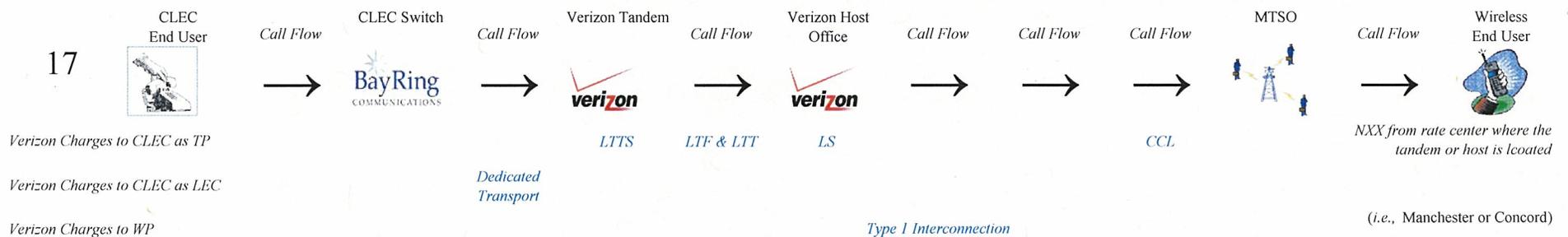


* 14, 15 & 16 BayRing asserts that this charge should be Tandem Transit Service.

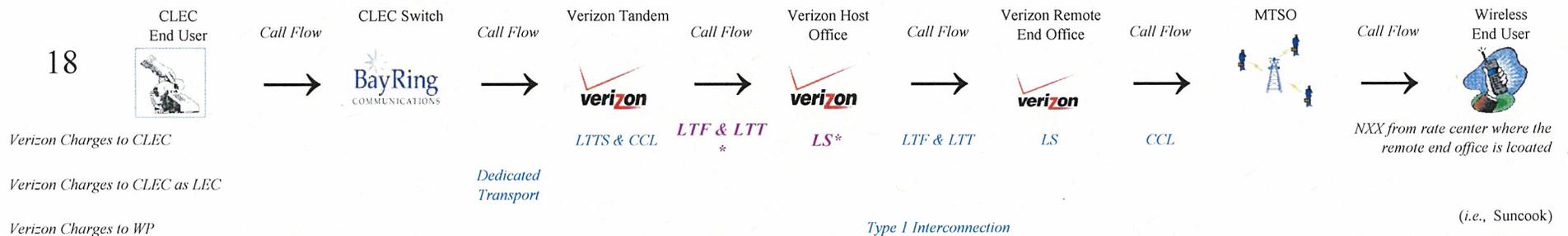
TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

Intrastate Long Distance Calls from CLEC end user to Wireless end user where WP uses Type 1 Interconnection

Intrastate long distance call from CLEC end user to **Wireless** end user; Wireless end user is assigned Verizon DID number associated with Verizon remote end office NXX



Intrastate long distance call from CLEC end user to **Wireless** end user

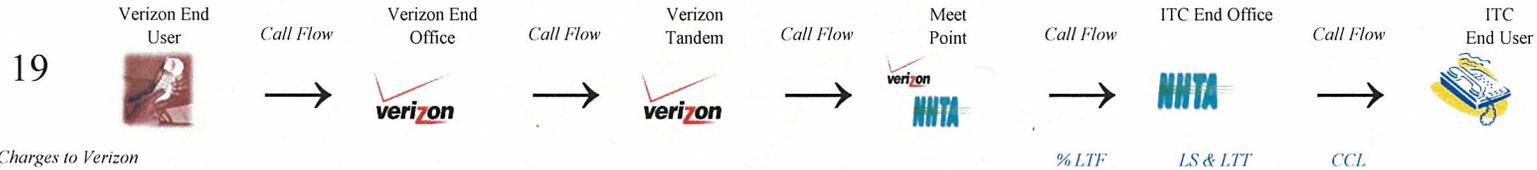


* **18 CLECs dispute these charges.** Verizon acknowledges that LS charge at host office is a billing error that will be corrected and credited. Verizon further states (and Staff concurs) that the additional LTF & LTT between tandem and host is allowed per NHPUC #85, 6.2.1 G and 6.7.4 G & J.

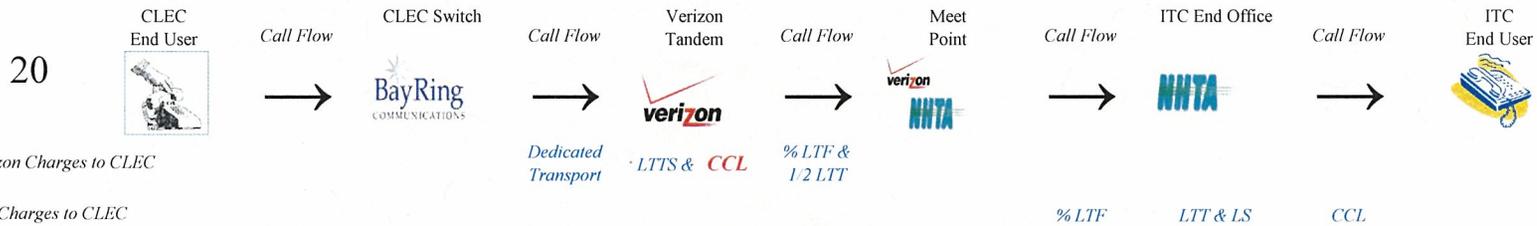
TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

Intrastate Long Distance Calls with Originating LEC as Toll Provider - All End Users

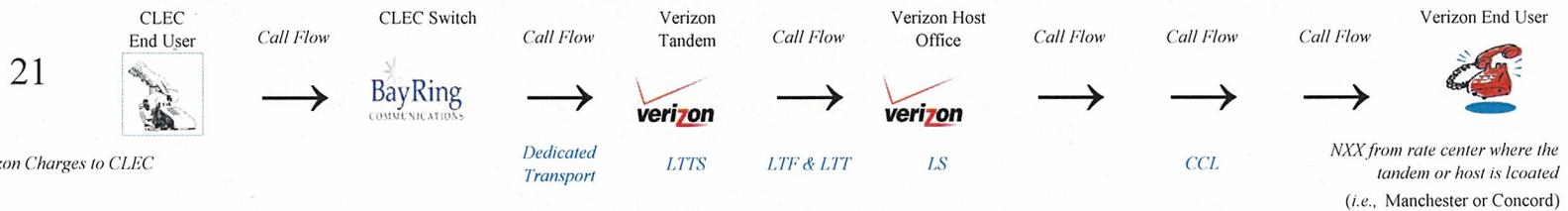
Intrastate long distance call from **Verizon** end user to **ITC** end user



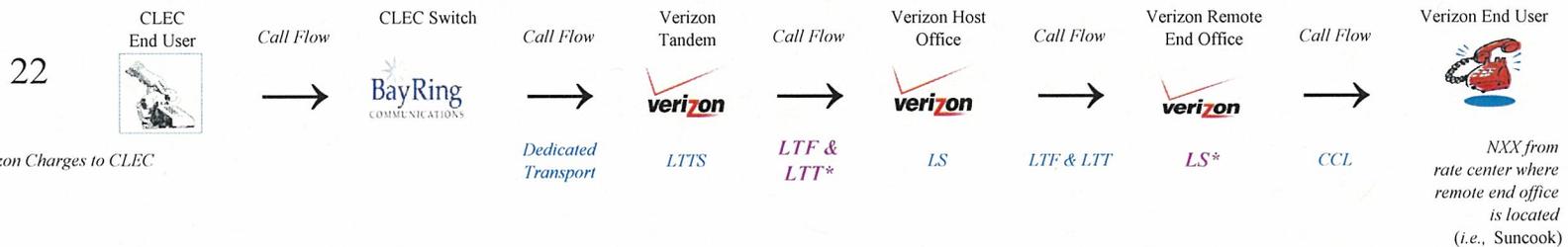
Intrastate long distance call from **CLEC** end user to **ITC** end user



Intrastate long distance call from **CLEC** end user to **Verizon** end user assigned Verizon DID number associated with Verizon remote end office NXX or tandem NXX



Intrastate long distance call from **CLEC** end user to **Verizon** end user

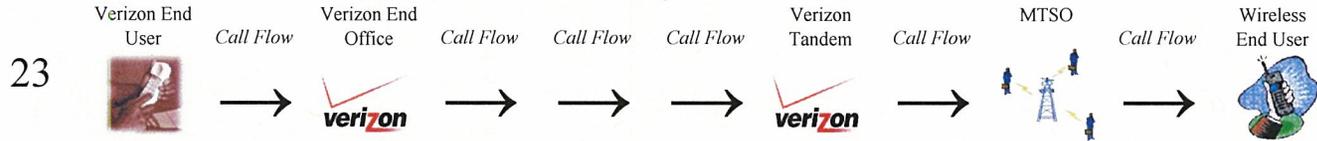


* 22 CLECs dispute these charges. Verizon acknowledges that the LS charge at host office is a billing error that will be corrected and credited. Verizon further states (and Staff concurs) that the additional LTF & LTT between tandem and host is allowed per NHPUC #85, 6.2.1 G and 6.7.4 G & J.

TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

Intrastate Long Distance Calls with Wireless End User

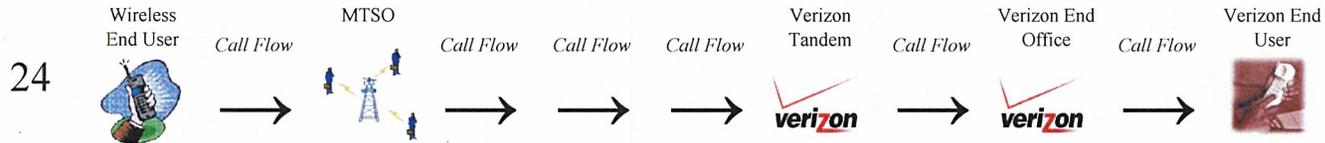
Intrastate long distance call from **Verizon** end user to **Wireless** end user



WP Charges to Verizon pursuant to wireless interconnection agreement

Local termination charges

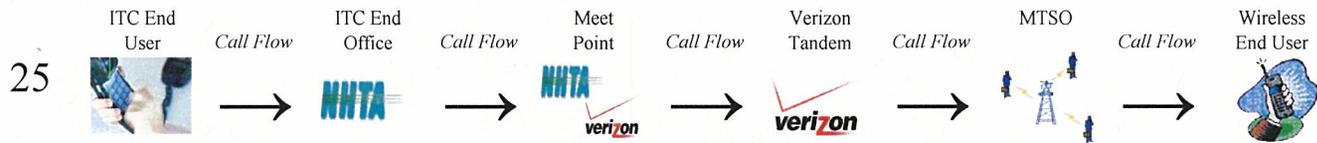
Intrastate long distance call from **Wireless** end user to **Verizon** end user



Verizon Charges to WP pursuant to wireless interconnection agreement

Local termination charges

Intrastate long distance call from **ITC** end user to **Wireless** end user



Verizon Charges to ITC

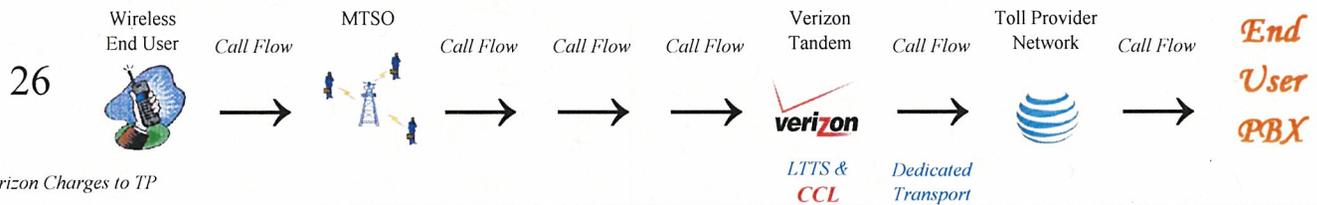
% LTF & 1/2 LTT

*LTTS & CCL**

WP to ITC if traffic exchange agreement exists

Local termination charges

Intrastate 8YY call from **Wireless** end user to **Toll Provider** end user



Verizon Charges to TP

LTTS & CCL

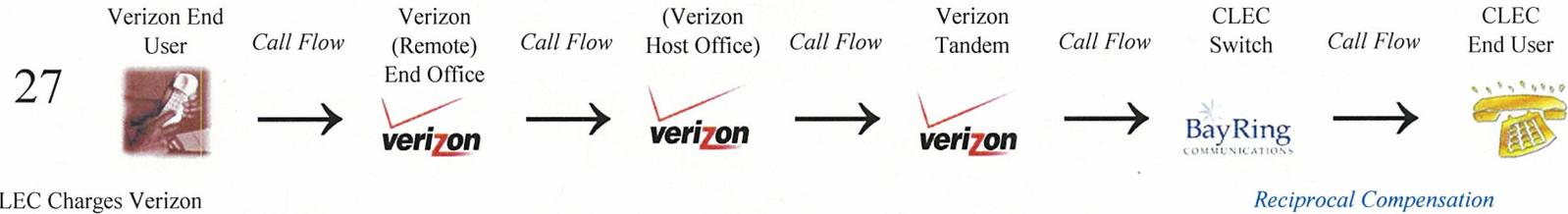
Dedicated Transport

* 25 The ITCs do not dispute this charge, although the CLECs dispute it in similar cases where there is no Verizon local loop.

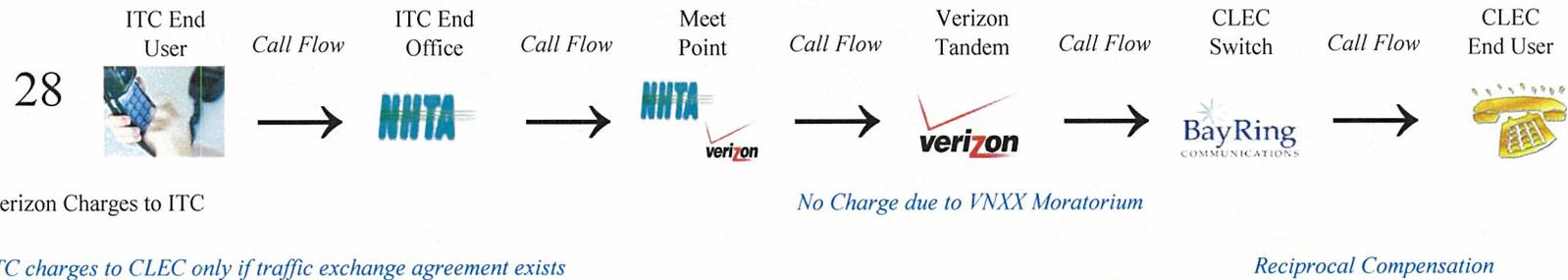
TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

Local calls to CLEC End User

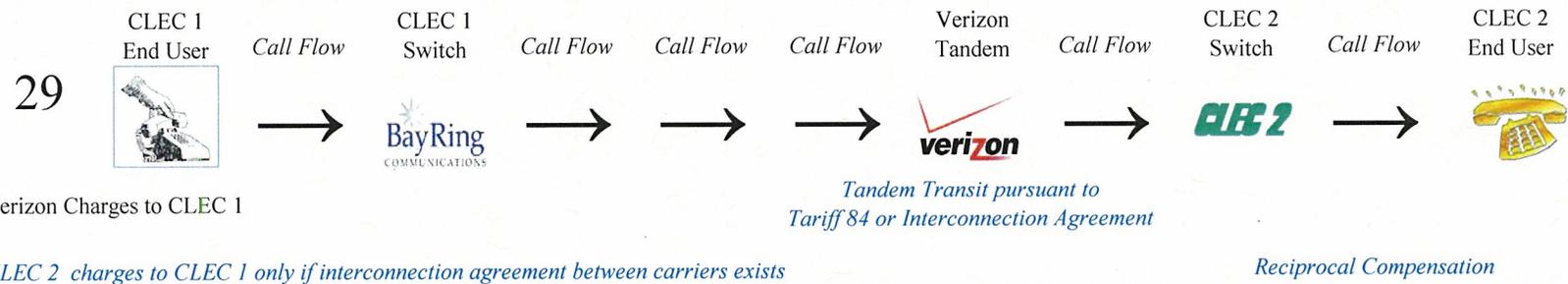
Local call from **Verizon** end user to **CLEC** end user



Local call from **ITC** end user to **CLEC** end user



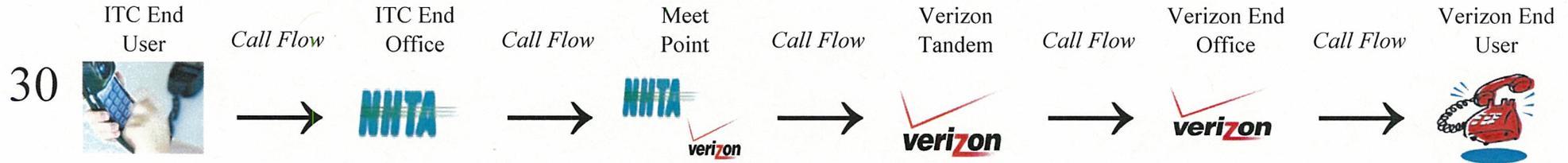
Local call from **CLEC** end user to **CLEC** end user



TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

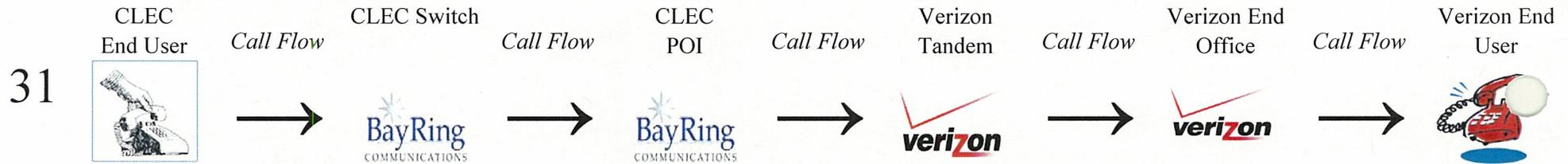
Local calls to Verizon End User

Local call from **ITC** end user to **Verizon** end user (traditional EAS call)



Bill and Keep or EAS Settlements covered by EAS agreements; many EAS routes are directly trunked and do not traverse tandem

Local call from **CLEC** end user to **Verizon** end user



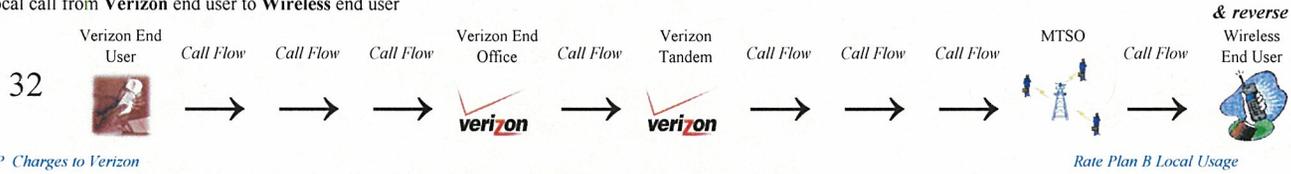
Verizon Charges to CLEC

Reciprocal Compensation

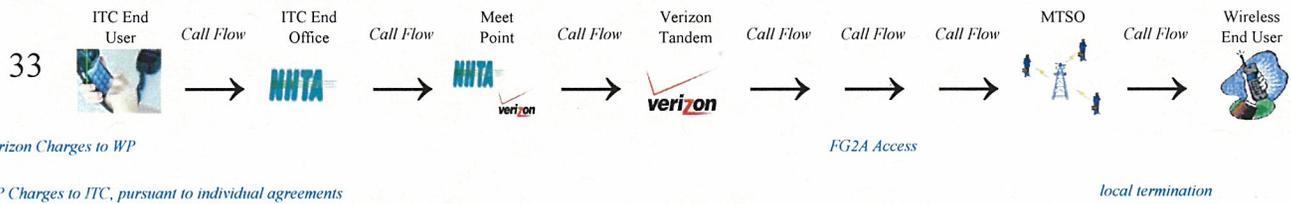
TYPES OF CALLS THAT TRAVERSE VERIZON'S TANDEM

Local calls to Wireless End User

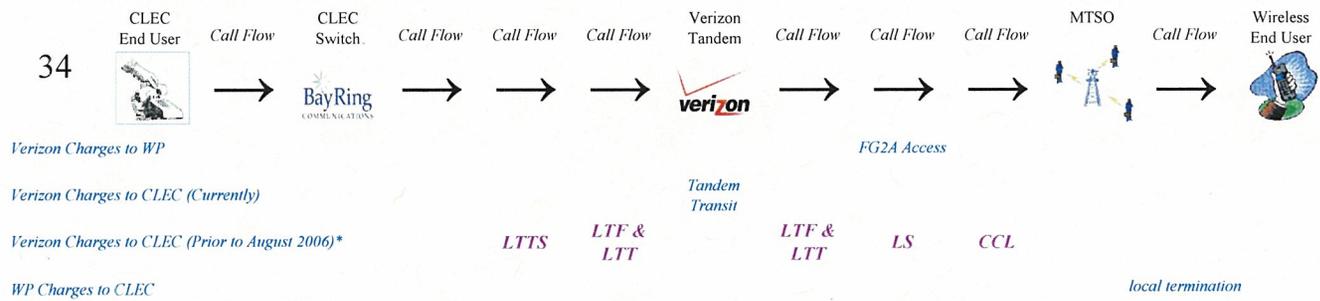
Local call from Verizon end user to Wireless end user



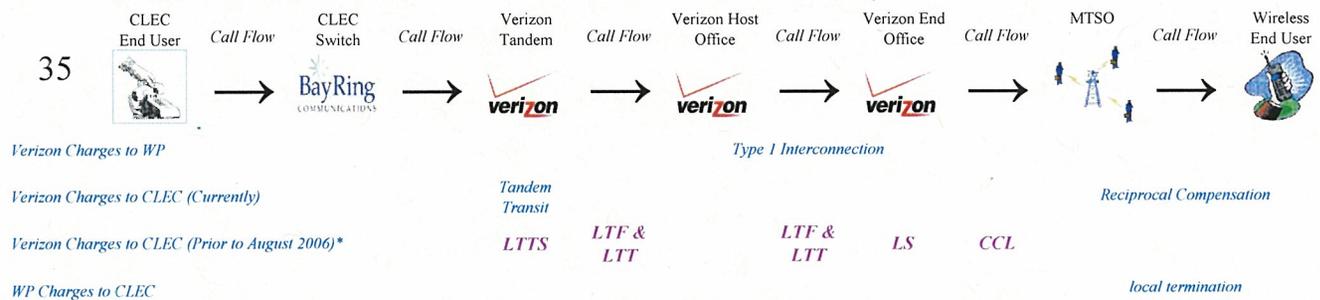
Local call from ITC end user to Wireless end user



Local call from CLEC end user to Wireless end user



Local call from CLEC end user to Wireless end user



* 34 & 35 BayRing disputed these charges in its initial filing. Verizon acknowledges that these charges are a billing error that will be corrected and credited.