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June 22, 2004

Mr. William H. Davenport
Chief, Investigations and Hearings Division
Enforcement Bureau
Federal Communications Commission
455 12th Street, S.W.
Washington, DC 20554

Re: BA/GTE Merger Order, CC Docket No. 98-184 – Post-Merger Audit Requirements

Dear Mr. Davenport:

As requested by your staff in response to Mr. Ward's April 28 letter requesting to discontinue post-merger audits, attached please find information regarding the sunset of merger conditions (6) Uniform and Enhanced OSS and Advanced Services OSS, (11) Carrier-to-Carrier Promotions: Unbundled Loop Discount, and (12) Carrier-to-Carrier Promotions: Resale Discount.

Sincerely,

Sara Cole

Enclosure

cc: Hugh Boyle
Pete Young
Diana Lee

Merger Condition 6
Sunset Dates

Condition Requirement	Implementation Date	Sunset Date
EBI - offer	6/30/2000	12/31/2002
Electronic Jep Notification - East	10/15/2000	10/15/2003
Line Loss Rpt - EDI - East	10/15/2000	10/15/2003
UNE NIDS - East	10/15/2000	10/15/2003
IDSL - East	10/22/2000	10/22/2003
CSR Parsed via EDI - West	12/4/2000	12/4/2003
CSR Parsed via CORBA - West	12/4/2000	12/4/2003
CSR Parsed via WebGUI - West	12/4/2000	12/4/2003
Loop Qual xDSL via CORBA - West	12/4/2000	12/4/2003
Loop Qual xDSL via EDI - West	12/4/2000	12/4/2003
Uniform Sys Hrs - Svc Order Inquiry& LSR	3/17/2001	3/17/2004
Uniform E911 - DC, VA, WV	3/13/2001	3/31/2004
Uniform EMI for DUF - East	4/21/2001	4/21/2004
Uniform Sys Hrs - Install status inquiry, M&R and ISDN Loop Qual	4/21/2001	4/21/2004
Change Mgmt Process	7/2/2001	7/2/2004
Premise Access hours for M&R - West	8/12/2001	8/12/2004
Uniform LIDB - East	8/19/2001	8/19/2004
Uniform E911- MD	9/22/2001	9/22/2004
Transport & Security	9/28/2001	9/28/2004
Uniform Sys Hrs - Product & Svc availability, Due date availability, CSR unparsed, CSR parsed	12/16/2001	12/16/2004
IDSL - West	2/26/2002	2/26/2005
Plan of Record (all items)	10/15/2000	12/22/2005
Uniform Billing Acct. Structure - East	12/22/2002	12/22/2005
BOS BDT - East	12/22/2002	12/22/2005
PAVA - VA conversion	5/19/2002	5/19/2005
PAVA - PA conversion (estimated date)	7/19/2004	7/19/2007

VERIZON MERGER DISCOUNT SUNSET DATES

CONDITION 11

STATE	WINDOW CLOSURE TRIGGER DATE[1]	SUNSET DATE[2]
VZ- West States		
Alabama	OOR – 11/1/01	12/1/04
California	OOR – 11/1/01	12/1/04
Florida	OOR – 11/1/01	12/1/04
Hawaii	OOR – 11/1/01	12/1/04
Idaho	OOR – 11/1/01	12/1/04
Illinois	OOR – 11/1/01	12/1/04
Indiana	OOR – 11/1/01	12/1/04
Kentucky	OOR – 11/1/01	12/1/04
Michigan	OOR – 11/1/01	12/1/04
Missouri	OOR – 11/1/01	12/1/04
Nevada	OOR – 11/1/01	12/1/04
North Carolina	OOR – 11/1/01	12/1/04
Ohio	OOR – 11/1/01	12/1/04
Oregon	OOR – 11/1/01	12/1/04
Pennsylvania	OOR – 11/1/01	12/1/04
South Carolina	OOR – 11/1/01	12/1/04
Texas	OOR – 11/1/01	12/1/04
Virginia	OOR – 11/1/01	12/1/04
Washington	OOR – 11/1/01	12/1/04
Wisconsin	OOR – 11/1/01	12/1/04
VZ-East States		
Connecticut	271 – 7/20/01	8/20/04
Delaware	OOR – 11/1/01	12/1/04
District of Columbia	OOR – 11/1/01	12/1/04
Maine	OOR – 11/1/01	12/1/04
Maryland	OOR – 11/1/01	12/1/04
Massachusetts	271 – 4/16/01	5/16/04
New Hampshire	OOR – 11/1/01	12/1/04
New Jersey	OOR – 11/1/01	12/1/04
New York	271 – pre merger	N/A
Pennsylvania	271 – 9/19/01	10/19/04
Rhode Island	OOR – 11/1/01	12/1/04
Vermont	OOR – 11/1/01	12/1/04
Virginia	OOR – 11/1/01	12/1/04
West Virginia	OOR – 11/1/01	12/1/04

[1] For states in which offering window was closed due to OOR spending, the trigger date is upon the last dates of expenditures, October 31, 2001, and the FCC's order released June 24, 2002, ordering paragraph 3, which states that Verizon satisfied the OOR expenditures in November 2001. For states in which the offering window was closed due to 271 approval, the trigger date was the 271 order effective date.

[2] Per Merger Condition paragraph 35b, orders placed before offering window closure with installed dates within 30 days of window closure receive the discount. Sunset date is 30 days after the window closure trigger date.

VERIZON MERGER DISCOUNT SUNSET DATES

CONDITION 12

STATE	CLEC NOTICE DATE	FCC NOTICE DATE	PUC NOTICE DATE	MONTH 100% LINES MET	SUNSET DATE[3]
VZ- West States					
Alabama	4/18/01	5/1/01	5/1/01	4/17/01	5/17/04
California					8/30/06
Florida	8/7/02	8/5/02	8/5/02	6/30/02	7/30/05
Hawaii					8/30/06
Idaho					8/30/06
Illinois					8/30/06
Indiana	3/12/03	3/7/03	3/10/03	1/31/03	3/02/06
Kentucky	3/7/02	3/12/02	3/13/02	12/31/01	1/30/05
Michigan					8/30/06
Missouri					8/30/06
Nevada					8/30/06
North Carolina	8/7/02	8/5/02	8/1/02	6/30/02	7/30/05
Ohio					8/30/06
Oregon					8/30/06
Pennsylvania					8/30/06
South Carolina	5/8/01	5/14/01	5/11/01	4/1/01	5/30/04
Texas	4/3/02	4/2/02	4/3/02	2/28/02	3/30/05
Virginia					8/30/06
Washington					8/30/06
Wisconsin					8/30/06
VZ-East States					
Connecticut					8/30/06
Delaware					8/30/06
District of Columbia	8/2/02	8/5/02	8/8/02		5/30/05
Maine					8/30/06
Maryland	12/23/02 & 3/7/03	1/7/03 & 3/5/03	1/7/03 & 3/6/03	11/30/02	12/30/05
Massachusetts					8/30/06
New Hampshire					8/30/06
New Jersey					8/30/06
New York					8/30/06
Pennsylvania					8/30/06
Rhode Island					8/30/06
Vermont					8/30/06
Virginia					8/30/06
West Virginia					8/30/06

[3] Per Merger Condition paragraph 37a, resold services placed in service less than 30 days after the end of the Offering Window, shall be eligible for a promotional resale discount. Sunset date is 30 days after the threshold was met. For those states not meeting the maximum number of lines, the offering window closes on 7/30/03.