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Transmittal No. 1191 – 2nd Amended

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
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On June 18, 2012, the Verizon Telephone Companies (Verizon) issued Transmittal No. 1191, which revised its Tariff FCC Nos. 1, 11, and 16, Access Service, and Tariff FCC No. 14, Facilities for Interstate Access. Transmittal No. 1191 is hereby being amended in order to re-file certain Inter-carrier Compensation workpaper support.

The Virginia State Corporation Commission, Communications Division Staff (“Virginia Staff”) recently informed Verizon and other carriers that a preexisting Virginia statute overrides certain FCC inter-carrier compensation rules and orders. The Virginia statute at issue, in Virginia Staff’s view, prohibits new rate elements – including the transitional per-minute charge permitted under the FCC’s new rules (*see* 47 C.F.R. §51.907(b)(2)(v)) – and prohibits rate increases – including technical increases for individual rate elements that the FCC Wireline Competition Bureau expressly permitted just a few weeks ago in order to achieve a unified rate structure. *See Connect America Fund, et al.*, Order, WC Docket No. 10-90, ¶¶ 7-8 (Rel. June 5, 2012) (“[W]e clarify that, for carriers required to make reductions to intrastate switched access rates in 2012 under the inter-carrier compensation transition, achievement of unified rate levels and rate structure overrides the prohibition on rate element increases included in the adopted transition rules.”). The FCC’s recent inter-carrier compensation orders and related regulations supersede contrary Virginia rate mechanisms or restrictions (administrative and statutory). Verizon expressly reserves all rights and objections regarding this matter, and Verizon has communicated its views to Virginia Staff. Nonetheless, without prejudice to Verizon’s view of the comprehensive nature of the FCC’s reforms and the effect of those reforms at the state level, Verizon has re-submitted its Virginia state tariff filing in an effort to ensure approval of that tariff reflecting the Step 1 access reductions by July 1, 2012.

The revised Virginia state submission requires minor changes to certain Verizon worksheet figures with respect to Transmittal No. 1191 but does not change any rates or bottom-line calculations. Verizon has, therefore, revised certain Inter-carrier Compensation workpapers originally filed under Appendix B of Transmittal No. 1191 to reflect the revised Virginia filing.

Some of this information is filed with a request that it be treated as confidential under the Freedom of Information Act. A letter requesting that it be placed under the Protective Order designated in the Tariff Streamlining Order was included as an attachment to Transmittal No. 1191.

This amended transmittal letter and associated attachments are being filed electronically today via the Federal Communications Commission's Electronic Tariff Filing System (ETFS).

All correspondence and inquiries in connection with this transmittal should be forwarded to Frederick Moacdieh, Executive Director, Federal Regulatory Affairs, via facsimile on (202) 336-7922, or by hand-delivery to 1300 I Street NW, Suite 400 West, Washington, DC 20005.

A handwritten signature in black ink, appearing to read 'F. Moacdieh', with a long horizontal flourish extending to the right.

Attachments:

Revised Workpaper Support