

DESCRIPTION AND JUSTIFICATION

1.0 INTRODUCTION

The Verizon Telephone Companies¹ hereby submit tariff pages and support data for their proposed Federal Universal Service Fund rate changes in Verizon Tariffs FCC No. 1 and FCC No. 11 for Verizon-East and Verizon Tariffs FCC No. 14 and FCC No. 16 for Verizon-West associated with the fourth quarter 2002 universal service fund (“USF”) obligation. These tariff increases are being filed on 15 days notice for effect October 30, 2002. This filing is in compliance with and includes the necessary support material required by the Commission's Price Cap CALLS Order² and Section 61.38 of the Commission's Rules.³

Federal Universal Service Fund (FUSF) End-User Charge Development

1.1 CALCULATION OF FUSF END-USER CHARGE

Pursuant to the May 2000 CALLS order,⁴ amounts assessed for various universal service support mechanisms are recovered outside of access rates. Starting with the third quarter of 2000, the Common Line amount of the USF obligation is recovered through a per-line charge assessed to end

¹ The Verizon-East Telephone Companies participating in this filing include 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, D.C. Inc.; and Verizon West Virginia Inc. The Verizon-West Telephone Companies participating in this filing include Verizon California Inc.; Verizon South Inc.; Verizon Mid-States; Verizon Hawaii Inc.; Verizon Florida Inc.; Verizon West Coast Inc.; Verizon Northwest Inc.; ; Verizon Southwest; Verizon North Inc.; and Micronesia Telecommunications Corp.

² In the Matter of Access Reform, Price Cap Performance Review for Local Exchange Carriers, Low-Volume Long Distance Users, Federal-State Joint Board on Universal Service. Sixth Report and Order in CC Docket Nos. 96-262 and 94-1. Report and Order in CC Docket 99-249. Eleventh Report and Order in CC Docket No. 96-45. Released May 31, 2000. (“CALLS” Order).

³ CALLS Order Appendix B, § 61.41 - 61.49.

⁴ CALLS Order at paragraph 221.

user customers to whom End User Common Line (EUCL) charges apply. The Special Access USF obligation amount is recovered through a FUSF percentage surcharge applied to Interstate End User Special Access revenues. However, in this filing, Verizon is not proposing a change to the FUSF percentage surcharge for Interstate End User Special Access. Below is a description of how the end user FUSF charges are developed.

1.11 End User FUSF Charges

Verizon's total contribution to the interstate Universal Service Fund is based on the FCC's contribution rate for the fourth quarter of 2002⁵ times Verizon's interstate end-user revenues for the second quarter of 2002 (April through June), plus an adjustment for the removal of universal service contributions for the previous quarter to eliminate circularity of assessment.⁶ See Appendix A—Section C 1.2.2 for work papers pertaining to the circularity adjustment to the universal service obligation for Verizon East and West.

While the total Verizon obligation is based on the quarterly factor and the reported revenues for the second quarter 2002, the net amount Verizon realistically expects to collect from end users will be somewhat less, as a small portion of the “billed revenues” will not become “collected revenues.” To account for these uncollectible FUSF amounts, in this filing Verizon is including an uncollectible adjustment factor in the rate calculation. The development of the uncollectible factor used in the rate calculation for the End User FUSF charge is explained in detail in Appendix B.

⁵ FCC Public Notice, Proposed Fourth Quarter 2002 Universal Service Contribution Factor, CC Docket No. 96-45, DA 02-2221, released September 10, 2002, .

⁶ FCC Further Notice of Proposed Rulemaking and Report and Order, CC Docket 96-45, released February 26, 2002.

This uncollectible factor is applied to the expected FUSF amount to ensure sufficient recovery of Verizon's universal service obligation from end users. By adjusting the universal service obligation to allow for uncollectibles, Verizon expects to collect net FUSF revenues more in alignment with the universal service obligation due to USAC. In the supporting workpapers, Verizon is using separate uncollectible factors for the Verizon East and Verizon West rate calculations. These factors are based upon the retail uncollectibles booked during the second quarter 2002, which is the same quarter as the revenues upon which the assessment is based. Going forward, the uncollectible factors used in the End User FUSF rate determination also will be for the same quarter as the contribution base.

The End User FUSF contribution amount is then divided by the total number of end user common lines,⁷ adjusted for Centrex equivalency and PRI ISDN equivalency, to calculate the FUSF monthly per-line charge. The rate calculations for Verizon-East Companies (Verizon-East) and Verizon-West Companies (Verizon-West) are performed the same. The fourth quarter 2002 FUSF monthly per-line charge is \$0.59 for Verizon-East and \$0.54 for Verizon-West.

The change in the per-line charges from the third quarter 2002 rates for both Verizon-East and Verizon-West is attributed to the net of erosion of retail lines, the removal of the previous quarter's FUSF surcharge revenues from the current quarter's contribution base, and changes in the retail uncollectible factors.⁸ The entire calculation methodology is described in the following six-step process.

⁷ Common lines exclude lifeline and resold basic exchange service.

⁸ FCC Further Notice of Proposed Rulemaking and Report and Order, CC Docket 96-45, released February 26, 2002. .

STEP 1 – CALCULATE USF OBLIGATION TO BE RECOVERED

The calculation of Verizon's USF obligation is determined using current factors times Verizon's contribution base. The fourth quarter 2002 FUSF factor from the FCC's Public Notice⁹ is multiplied by Verizon's contribution base (April through June 2002 total interstate end user revenues less adjustments) to determine the USF contribution to be recovered for fourth quarter 2002. These revenues are determined from Form 499-Q filed August 1, 2002 as shown on Workpaper USF-2. Interstate End User Switched revenues, less Interexchange End User revenues, are multiplied by the quarter's assessment to determine the expected recovery. The expected End User FUSF obligation is grossed up by the actual uncollectibles experienced. As indicated, a separate factor is determined for the East and West for the quarter ending, June 30, 2002.

The total obligation amount, including an expected uncollectible amount, is then divided by the total number of forecasted end user common lines¹⁰ for the midpoint of the fourth quarter 2002 (November 15, 2002) to develop the per-line rate as shown on Workpaper USF-1. Interstate End User Special Access revenues, derived from the same 499-Q data, are multiplied by the FCC fourth quarter's contribution rate to determine the expected recovery, as shown on Workpaper USF-7 for both Verizon-East and Verizon-West.

⁹ Id at 5.

¹⁰ Id at 6.

STEP 2 – EUCL DEMAND MINUS LIFELINE

The demand used is forecasted midpoint fourth quarter 2002 (November 15, 2002) EUCL data. Since Verizon's FUSF per-line rate is not charged to Lifeline customers, the demand units for Lifeline are removed from the calculation. These calculations are shown on Workpaper USF-3.

STEP 3 – ADJUST EUCL DEMAND FOR CENTREX EQUIVALENCY STRUCTURE

Pursuant to section 69.158, the FUSF charge is calculated using the equivalency relationships established for the multi-line business PICC¹¹ for ISDN PRI and Centrex lines. The calculations for the Centrex EUCL's using the PICC structures are shown on Workpaper USF-4 for both Verizon-East and Verizon-West.

STEP 4 - ADJUST EUCL DEMAND FOR ISDN PRI AND CENTREX EQUIVALENCIES

To develop total adjusted ISDN PRI demand, the ISDN PRI demand is multiplied by 5. Adjusted Centrex demand is developed by taking each demand amount and dividing it by the number of Centrex lines in each line-size grouping for both Verizon-East and Verizon-West. For example, the Centrex 2-line demand is divided by 2, the 3-line demand is divided by 3, and so on. For 9 lines and greater, the demand is divided by 9. The product of these calculations, along with the unadjusted EUCL demand, produces the total USF per-line adjusted demand with ISDN PRI and Centrex equivalencies. These calculations are shown on Workpaper USF-5 for both Verizon-East and Verizon-West.

¹¹ Code of Federal Regulations, Part 69.158.

STEP 5 – CALCULATE BASIC FUSF PER LINE RATE

The Verizon USF obligation recovered in Step 1 is divided by the adjusted USF demand in Step 4 to produce the basic FUSF per-line charge of \$0.59 for Verizon-East and \$0.54 for Verizon-West. These calculations are shown on Workpaper USF-1. All per-line recovery amounts are shown on Workpaper USF-6 for both Verizon-East and Verizon-West.

STEP 6 – CALCULATE FUSF CHARGE FOR ISDN PRI AND CENTREX

The ISDN PRI and Centrex rates are adjusted to ensure that no more than one FUSF per-line charge is applied for each Centrex service billed; whereas, five basic FUSF charges are applied to PRI customers. The basic rate developed in Step 5 is multiplied by 5 for ISDN PRI. Likewise, the per-line rate for Centrex 2-line service is the rate developed in Step 5 divided by 2, the rate for 3-line service is divided by 3, etc. The per-line rate for Centrex 9-line and greater is divided by 9. These calculations are shown in Column B of Workpaper USF-5 for Verizon-East and Verizon-West. This is consistent with the ISDN PRI and Centrex PICC methodology currently in the FCC rules.¹²

C 1.1.2 SPECIAL ACCESS END USER FUSF CHARGE

The Special Access FUSF charge is a factor assessed to the retail (end user) interstate special access revenues. This Special Access FUSF rate is the same as the percentage factor provided in FCC Public Notice¹³. The expected quarterly and Annual Special Access USF recovery amounts are found on Workpaper USF-7 for both Verizon-East and Verizon-West. Because of the nature of the

¹² See C.F.R 69.153 (d) and (e)

¹³ Id at 5

customer base to which the Special Access FUSF rate is applied, there is no adjustment to the factor for uncollectible amounts. The FCC's published factor is the applicable percentage applied.

C 1.2 WORKPAPERS

C 1.2.1 Introduction

Verizon has provided the necessary detail to support the calculations of the FUSF per-line charge.

The following is the index of such Workpapers.

C 1.2.2 INDEX TO WORKPAPERS

	<u>Verizon-East/West</u>
Workpaper USF-1	Calculation of FUSF per-line Charge
Workpaper USF-2	Calculation of Switched USF Contribution
Workpaper USF-2a	Circularity Elimination Detail
Workpaper USF-3	Unadjusted EUCL Demand
Workpaper USF-4	Conversion of CTX EUCL Lines to PICC Structure
Workpaper USF-5	ISDN PRI and CTX Equivalency
Workpaper USF-6	Ratemaking for FUSF per Line, ISDN PRI, and Centrex Equivalency
Workpaper USF-7	Interstate Special Access End User FUSF Charge