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Application No. 108

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S. W.
Washington, D.C. 20554

Attention: Wireline Competition Bureau

The Verizon Telephone Companies (Verizon) hereby apply for Special Permission for a waiver of Section 61.74 of the Commission's Rules.

Verizon intends to introduce Internet Protocol - Virtual Private Network (IP-VPN Service) in its Tariff FCC No. 20, Communications Services and Tariff FCC No. 1, Access Services. IP-VPN Service is a connection-less, packet-based advanced communications network service that provides connectivity between customer locations. In its Tariff FCC No. 20, Verizon must reference its Access Service Tariffs (Tariff FCC Nos. 1, 11 and 14) in order to direct IP Port customers to the appropriate regulations, rates, and charges for the optical services that are required to connect to the IP Port component of IP-VPN Service. In its Tariff FCC No. 1, Verizon will direct IP Port customers to the appropriate regulations, rates and charges in other sections of the same tariff.

As part of this filing, Verizon also intends to introduce Service Response Credits for IP-VPN Service. Certain Service Response Credit metrics will be based upon data collected in every territory where a customer has IP-VPN Service. Therefore, Verizon must cross reference Tariff FCC No. 1, Access Service to Tariff FCC No. 20, Communications Services, and vice versa, in order to specify that measurements collected in accordance with Service Response Credit programs in both tariffs will be used to determine credit eligibility.

Verizon requests special permission to waive the requirements of Section 61.74 in order to make reference to The Verizon Telephone Companies Tariff F.C.C. No. 1, Access Service, The Verizon Telephone Companies Tariff F.C.C. No. 11, Access Service, The Verizon Telephone Companies Tariff F.C.C. No. 14, Facilities for Interstate Access Service, and The Verizon Telephone Companies Tariff F.C.C. No. 20, Communications Services, for the prior-mentioned reasons.

Illustrative tariff pages are included with this application. This application and associated attachments are being filed electronically today via the Federal Communications Commission's Electronic Tariff Filing System (ETFS).

Payment in the amount of \$695.00 has been electronically transmitted to the Mellon Bank in Pittsburgh, Pennsylvania, in accordance with the fee program procedures. The Form 159 is being transmitted electronically via ETFS as a proprietary document.

In accordance with the requirements of Section 61.21(a)(3) of the Commission's Rules, the FCC Registration Number (FRN) for Verizon is 0003-7085-00. Verizon is filing this application on behalf of issuing carriers with the following FRNs:

<u>Tariff F.C.C. No. 20</u>		<u>Tariff FCC No. 1</u>
0001-5209-80	0002-0732-03	0002-0112-78
0001-5364-24	0002-1092-13	0002-0732-03
0001-5832-44	0002-1668-25	0002-1092-13
0001-6802-63	0003-2717-98	0002-1668-25
0001-8248-04	0003-2735-05	0003-2717-98
0001-8555-43	0003-4694-42	0003-2735-05
0001-9625-88	0003-6289-71	0003-3166-92
0002-0112-78	0004-1917-89	
	0004-3502-37	

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



Attachments:

Illustrative Tariff Pages
Form 159