

THE VERIZON TELEPHONE COMPANIES

TARIFF FCC NOS. 1, 11, 14 AND 16

2005 4TH QUARTER
FEDERAL UNIVERSAL SERVICE FUND (FUSF) FILING

DESCRIPTION & JUSTIFICATION

TRANSMITTAL NO. 624

SEPTEMBER 16, 2005

DESCRIPTION AND JUSTIFICATION

1.0 INTRODUCTION

The Verizon Telephone Companies¹ hereby submit tariff pages and supporting data for proposed changes to the Federal Universal Service Fund rates associated with the fourth quarter 2005 federal universal service fund (“FUSF”) obligation in Verizon Tariffs FCC No. 1 and FCC No. 11 for Verizon-East, Tariffs FCC No. 14 and FCC No. 16 for Verizon-West. These tariff changes are being filed on 15 days notice for effect on October 1, 2005. This filing is in compliance with and includes the necessary supporting material required by the Commission's Price Cap CALLS Order,² Section 61.38 of the Commission's Rules,³ Report and Order and Second Further Notice of Proposed Rulemaking⁴ and the Waiver Order released March 14, 2003.⁵

¹ The Verizon Telephone Companies 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. These companies will now be referred to as Verizon-East. Verizon East is comprised of the former Bell Atlantic-North (NYNEX) and Bell Atlantic-South. The Verizon Telephone Companies also include Contel of the South Inc., The Micronesian Telecommunications Corp, Verizon California Inc., Verizon Florida Inc., Verizon North Inc., Verizon Northwest Inc., Verizon South Inc., Verizon Southwest Inc., Verizon West Coast Inc. These companies will be referred to as Verizon West. Verizon West is comprised of the former GTE Telephone Operating Companies (GTOC) and GTE System Telephone Companies (GSTC). Also, Hawaiian Telcom, Inc., which operates in the territory formerly served by Verizon Hawaii, Inc., is a concurring carrier effective May 17, 2005.

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 (rel. May 31, 2000) (“CALLS” Order).

³ CALLS Order, Appendix B, § 61.41 - 61.49.

⁴ *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order and Second Further Notice of Proposed Rulemaking, FCC 02-329, (rel. December 13, 2002) (“December Order”).

Federal Universal Service Fund End-User Charge Development

1.1 CALCULATION OF FUSF END-USER CHARGE

Pursuant to the May 2000 CALLS order,⁶ amounts assessed for various universal service support mechanisms are recovered directly from end users. Starting with the third quarter of 2000, the Common Line amount of the FUSF obligation is recovered through a per-line charge assessed to end user customers to whom End User Common Line (EUCL) and other interstate charges apply. The contribution and carrier recovery was further explained in the Commission's December Order and subsequent Waiver Order.

Per the December Order, and beginning with the second quarter 2003, with the limited exceptions granted in the Waiver Order, telecommunication carriers are limited to recovering their FUSF contribution using monthly end user rates that are equal to the total monthly interstate revenues for a customer times the relevant contribution factor. The Waiver Order preserves the carrier's option to assess the universal service end user charge on Centrex customers on a per-line basis using the "equivalency" relationships established for the multi-line business PICC for Centrex lines as identified in section 69.158 of the Commission rules. The Commission also allows carriers to average among multi-line business customers the net reductions in charges attributed to the use of the PICC equivalency structure. The interstate Special Access and interstate Incidental Revenue

⁵ *In the Matter of Federal-State Joint Board on Universal Service, Order and Second Order on Reconsideration*, FCC 03-58, (rel. March 14, 2003) ("Waiver Order").

⁶ CALLS Order, paragraph 221.

FUSF obligation amount is recovered through a FUSF percentage surcharge using the FCC-prescribed rate applied to interstate end-user revenues.

1.11 End User FUSF Charges

Verizon's preliminary obligation to the Federal Universal Service Fund for the fourth quarter of 2005⁷ is based on the FCC's contribution rate rounded to the nearest tenth of a percent times Verizon's projected interstate end-user revenues for the fourth quarter of 2005 (October through December).⁸ Verizon's recovery of this obligation is derived through end user FUSF per-line rates for Switched Access services. These rates are determined in a three-step process.

First, interstate monthly charges that apply to each end user line for EUCLs and line ports are determined for all residential and business lines for each tariff entity. These rates are specified in the appropriate interstate access tariff. The line port charge applies only to digital lines in excess of basic service. Once the tariff rates are identified and summarized for each type of end user service (*e.g.*, single line residential or business, non-primary residence), the next step of the process begins.

Second, the sum of these interstate per-line charges that apply each month for each type of service is multiplied by the fourth quarter's FCC prescribed contribution rate to determine the FUSF

⁷ FCC Public Notice, Proposed Fourth Quarter 2005 Universal Service Contribution Factor, CC Docket No. 96-45, DA 05-2454, Released September 15, 2005.

⁸ Waiver Order at paragraphs 22-23.

per-line charge. Interstate rates for each type of service require a corresponding and separate per-line FUSF rate in accordance with the Commission's December Order. For example, a separate FUSF rate is required for primary residential (excluding Lifeline) customers, non-primary residential, and various types of multi-line business services.

Third, the product of these individual per-line rates billed on a current basis would recover Verizon's FUSF obligation for the same period. However, the Waiver Order allows Verizon to bill FUSF charges using the PICC equivalency structure for Centrex customers in accordance with existing FCC rules. The net contribution recovery shortfall caused by billing the PICC structure for Centrex customers is then calculated. The net contribution recovery shortfall is divided by the total contribution requirement to determine a rate adjustment factor ("RAF"). Then, this uniform RAF is applied across all multi-line rates to develop FUSF rates that fully recover Verizon's quarterly obligation.

The rate calculations for Verizon-East Companies (Verizon-East) and Verizon-West Companies (Verizon-West) are calculated using the same methodology for each tariff entity. The states of Maine, Massachusetts, New Hampshire, Rhode Island and Vermont have one common access tariff described as New England. All other states have unique tariffs as shown by WP USF-1.

For both Verizon-East and Verizon-West the proposed changes to the FUSF rate for residential, non-primary residential, and single line business can be attributed to the proposed changes to the EUCL rates⁹ (where applicable). Only Verizon-East New Jersey had a change to the residential,

⁹ On June 30, 2005 the FCC released a new Telecommunications Relay Service (TRS) factor for the period of July 1, 2005 through June 30, 2006. Therefore, it was necessary to update

non-primary residential, and single line business rates. Also, for both Verizon-East and Verizon-West, the proposed changes to the multi-line rates can be attributed to the proposed changes to EUCL rates (where applicable) and updated line counts associated with the multi-line equivalency calculation. Further, the Centrex rates for Verizon-East Virginia changed methods in the way they are billed from a separate rate for each Centrex line quantity to a flat rate for the first 1-9 lines and a per-line rate on lines 10 and over. This is due to an update to the tax-processing component of the billing engine.

STEP 1 – CALCULATE BASE USF LINE RATE

For each type of end user customer (i.e., single line residence and business, non-primary residence, and multi-line business), the fourth quarter 2005 FUSF factor from the FCC's Public Notice is multiplied by the sum of the end-user tariff charges applicable each month for the subscriber line and the line port (if appropriate) for each tariff entity to calculate the full-rate FUSF per-line charge. This methodology results in actual per-line FUSF charges for primary residential/single-line business and non-primary residential services; whereas, the resulting multi-line rates become the baseline for multi-line averaging as permitted in the Waiver Order. The calculated full-rate (before the Waiver Order) FUSF charge for each service type and study area is found in WP USF-2.

the exogenous cost data filed in the 2005 Annual filing to reflect the most current factor. Due to the timing of the notice and other filings, the exogenous amount calculated then had to be adjusted to collect the 12 month amount over 9 months. The impact on rates resulted in increases in certain EUCL rates in certain jurisdictions.

STEP 2 – CALCULATE FUSF PER-LINE RATES FOR CENTREX EQUIVALENCY

The baseline multi-line FUSF calculated rates from WP USF-2 are carried forward to WP USF-3 so they will align by tariff entity and type of applicable EUCL. As stated above, the exact state specific FUSF rate applies without modification to all residential primary/single-line business and non-primary residential customers. The rate calculation for multi-line business customers begins with a “full-rate revenue calculation,” which is the product of the billing lines for each type of EUCL times the calculated base FUSF rate. Based on the Waiver Order and pursuant to Section 69.158 of the Commission's rules, the FUSF charge for Centrex is calculated using the equivalency relationship established for the multi-line business PICC. The detailed multi-line calculations and resulting FUSF rates for each element and tariff entity are found in WP USF-3 and WP USF-3a.

The full-rate Centrex amounts are converted to the PICC structure in column (d) of WP USF-3. This is calculated by dividing the FUSF rate by 9 for Centrex systems with 9 lines or greater, dividing the FUSF rate by 8 for Centrex systems with 8, etc. The monthly contribution recovery shortfall caused by using PICC rates for Centrex is then calculated in column (e) of WP USF-3. An adjusted revenue base is then determined for all multi-line EUCLs by multiplying the units times the PICC rate and adding the other unadjusted multi-line amounts to the total. A RAF is then determined by dividing the Centrex shortfall by the adjusted revenue base, i.e., the difference between the full-rate revenues and those adjusted for the Centrex recovery shortfall. A RAF is then applied to all multi-line rates including Centrex, which produces a new per-line FUSF rate that accounts for the Centrex recovery shortfall.

The product of the new adjusted FUSF rates times the billing lines produces the same recovery revenue as the full-rate revenue (before the Centrex PICC structure). Both Verizon-East and Verizon-West reflect the appropriate calculations for each tariff entity as shown on WP USF-3. An additional calculation is required for PBX Trunks with Port Charges for Verizon-East since these trunks cannot be uniquely identified. As a result, the baseline multi-line FUSF charge for only this product as calculated on WP USF-2 is carried forward to WP USF-3a. The baseline rates for PBX Trunks with Port Charges for each Verizon-East state are then multiplied by the appropriate RAF factor to determine the appropriate rate element.

1.1.2 FUSF CHARGES APPLIED ON A PERCENTAGE BASIS

The Special Access FUSF rate is the same as the percentage factor provided in FCC Public Notice rounded to the nearest tenth of a percent.¹⁰ The FCC's published factor is applied to each dollar of interstate Special Access end user revenue in Verizon's billing systems.

Also, the FUSF end-user charge applied to incidental types of service is assessed on the same percentage basis as prescribed by the FCC in its Public Notice.¹¹ Incidental service consists of nonrecurring charges for the Presubscribed Interexchange Carrier (PIC) and the recurring Primary Interexchange Carrier Charge assessed to end users. The FUSF charge will also apply to interexchange carriers that pay the PIC change charge on behalf of the end user customer. The FUSF charge on interstate incidental services will also apply to Lifeline customers.

¹⁰ Id at 7.

¹¹ Id at 7.

1.2 WORKPAPERS

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.

1.2.2 INDEX TO WORKPAPERS

Verizon-East/West

Workpaper USF-1	Summary of 4th Qtr 2005 FUSF per-line Charges
Workpaper USF-2	Calculation of Maximum Switched USF per-line before Waiver Order
Workpaper USF-3	Multi-line Ratemaking for FUSF per-line using Centrex Equivalency
Workpaper USF-3A	FUSF Calculation for PBX Trunks with Port Charges (East only)
Workpaper USF-4	Interstate Special Access End User FUSF Charge