



Suzanne C. Carmel
Director – Federal Regulatory Advocacy

1300 I Street, NW
Suite 400 West
Washington, DC 20005
(202) 515-2537
(202) 336-7922 (fax)

October 18, 2005

Application No. 148

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 Sections 61.54 and 61.59 of the Commission's Rules.

Verizon intends to submit tariff pages to reformat existing tariff regulations for its dedicated SONET ring service offerings. Specifically, IntelliLight[®] Dedicated SONET Ring (IDSR) will be renamed to Verizon Dedicated SONET Ring (DSR) in Verizon's Tariff F.C.C. Nos. 1 and 11, the same product name used in Verizon's Tariff F.C.C. Nos. 14 and 16. Switched Access and Special Access DSR regulations in Tariff F.C.C. Nos. 1 and 11 will be consolidated under a new section, Dedicated Ring and Optical Services, which will organize DSR regulations under subsections and subtitles. DSR regulations for Verizon's Tariff F.C.C. Nos. 14 and 16 will also be reformatted in order to align the regulations with the newly created format in Tariff F.C.C. Nos. 1 and 11.

Verizon therefore requests a waiver of Section 61.54(i) of the Commission's Rules in order to allow tariff regulations to relocate from existing Switched Access and Special Access DSR sections to a newly created section within Tariff F.C.C. Nos. 1 and 11 without adding appropriate symbols in the newly created section designating the relocated material. In lieu of symbols designating relocated material, Verizon plans to include support material that clearly shows the page number from which the material was moved and the new page number to which the material has been relocated. A portion of such support material is attached to this application for illustrative purposes. Any changes to relocated tariff material will be noted as required under Section 61.54(i) of the Commission's Rules.

In addition, Verizon requests a waiver of Section 61.59 of the Commission's Rules in order to change material that has either not yet become effective or has not been in effect for thirty (30) days. Changes to pending material or to material not yet in effect for 30 days will only

be made to the extent required to change the product name from IDSR to DSR in Tariff F.C.C. Nos. 1 and 11. Any pending material or material not yet in effect for thirty days will be noted as reissued material as required under Section 61.54(i) of the Commission's Rules.

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 \$720.00 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.

In accordance with the requirements of Section 61.21(a)(3) of the Commission's Rules, the F.C.C. 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. 1</u> | <u>Tariff F.C.C. No. 11</u> |
|----------------------------|-----------------------------|
| 0002-0112-78 | 0003-4694-42 |
| 0002-0732-03 | 0003-6289-71 |
| 0002-1092-13 | |
| 0002-1668-25 | |
| 0003-2717-98 | |
| 0003-2735-05 | |
| 0003-3166-92 | |

All correspondence and inquiries in connection with this application should be forwarded to Suzanne Carmel, 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
- Illustrative Description
- Attachments A&B
- Form 159