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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

2011 MAR 28 PM 4:51

IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF AN INVESTIGATION)
OF AN APPROPRIATE CERTIFICATION)
PROCESS FOR TELECOMMUNICATIONS)
COMPANIES THAT DO NOT PROVIDE)
BASIC LOCAL EXCHANGE SERVICE)

CASE NO. GNR-T-11-01

COMMENTS OF 360NETWORKS (USA) INC.

360networks (USA) inc. (360networks) hereby responds to the Idaho Public Utilities Commission's (Commission or ID PUC) Notice of Investigation, Notice of Modified Procedure, Order No. 32194 requesting comments addressing the need or purpose of a certification for telecommunications companies that provide local services other than basic local exchange service in Idaho. Specifically, the Commission solicits responses to the following questions:

1. Is certification by the Commission necessary for companies providing telecommunications services but not basic local exchange service?
2. If some sort of Commission certification is needed, what form or designation might it take?
3. What legal authority does the Commission have to issue certification that is not a Certificate of Public Convenience and Necessity?
4. What can the Commission do to ensure numbers are used efficiently by CLECs and other telecommunications providers?

DISCUSSION

Question No. 1: Is certification by the commission necessary for companies providing telecommunications services but not basic local exchange service?

In its Notice, the Commission explains that the background for this Investigation is its denial of a request by Time Warner Cable Information Services, LLC (TWCIS) for a Certificate of Public Convenience and Necessity (CPCN) authorizing it to provide telecommunications services because the Company was not planning to offer "basic local exchange service" as defined in Title 61, Idaho Code. "Basic local Exchange Service" means "the provision of access lines to residential and small business customers with the associated transmission of two-way interactive switched voice

communication within a local exchange calling area.”¹ In denying TWCIS’ request, the Commission observed that TWCIS advised that it would be operating as a *wholesale* local telecommunications provider in Idaho, not a *retail* provider. Thus, the Commission found that TWCIS would not be providing basic local exchange service itself but would be enabling other providers to do so and therefore, it was not appropriate under state law to grant its request. Order 31012 at p. 5 and Order No. 32059 at p. 9.

In the TWCIS orders referenced, the Commission acknowledges the rights of telecommunications carriers as defined by the 1996 federal Telecommunications Act, 47 USC Section 151 et seq. to provide telecommunications services in Idaho, including wholesale local telecommunications services. The denial was specifically based on a determination that under state law, TWCIS did not qualify for a CPCN since the state CPCN process is limited to retail basic local exchange providers. See Order 32059 at pp. 12-14. 360networks responds to the Notice with this background in mind and interprets the questions posed to relate to the “certification” of wholesale local exchange providers in Idaho.

In order to enter into interconnection agreements with Qwest, Verizon and CenturyTel, a CLEC is required by the incumbents to provide a certificate of authority from the Commission enabling it to do business as a CLEC in the state.² An Idaho specific CLEC certification is also required for a CLEC to obtain company codes that allow it to exchange information with other telecommunications providers for the proper routing and rating of telecommunications traffic transmitted between it and the rest of the industry.³ Furthermore, a CLEC is not able to obtain numbering resources in Idaho if it does not obtain written authorization from the Idaho PUC to provide local services here.⁴

It appears from the briefing and orders in the TWCIS docket that the Commission does not currently have a process in place to provide a written document demonstrating a wholesale carrier’s “authorization” to operate as a non retail local exchange carrier in Idaho. In order to exercise the above listed Section 251 rights, evidence of an “authorization” is required. Thus, if it is correct that no process exists today to address this issue, the undersigned recommends that the Commission adopt one.

Question No. 2: If some sort of Commission certification is needed, what form or designation might it take?

The Commission here in Idaho may adopt a process similar to that adopted by the Iowa Department of Commerce Utilities Board to award an alternative certificate to carriers that provide

¹ Idaho Code Section 62-603(1).

² See Exhibits A, B and C attached, web pages of Qwest, Verizon and CenturyTel instructing CLECs how to obtain interconnection.

³ See Exhibit D, NECA North American Company Code Assignment Procedures at pp. 1, 5 and 6.

⁴ See 47 C.F.R. Section 52.15(g)(2)(i).

wholesale telecommunications services in its state. In Iowa, "a utility must have a certificate of public convenience and necessity issued by the board before furnishing land-line local telephone service in this state."⁵ The Iowa Board determined that "land-line local telephone service" either "amounts to (or a substitute for) regular dial tone service, the traditional focus of the Board's regulation."⁶ This service is only one of several services that may be provided by a carrier under the federal Act to qualify a carrier as a local exchange carrier. To close the gap between state and federal law and allow competitive local telecommunications service providers seeking to provide services in Iowa to exercise their Section 251 and 252 rights, the Board established a separate "certification" process to be used by those local exchange carriers that do not meet the state CPCN requirement but enables the providers to exercise rights, privileges and obligations under the federal Act.⁷ The Board found that establishing this separate "certification" process was consistent with the state legislature's intent to require the Board to "exercise regulatory flexibility in a changing telecommunications environment."⁸

Question No. 3: What legal authority does the Commission have to issue certification that is not a Certificate of Public Convenience and Necessity?

The Wireline Competition Bureau of the FCC determined, "wholesale providers of telecommunications services are telecommunications carriers for the purposes of sections 251(a) and (b) of the Act, and are entitled to the rights of telecommunications carriers under that provision."⁹ In reaching this conclusion, the Bureau observed,

[O]ur decision today is consistent with and will advance the Commission's goals in promoting facilities-based competition as well as broadband deployment. Apart from encouraging competition for wholesale services in their own right, ensuring the protections of section 251 interconnection is a critical component for the growth of facilities-based local competition. Moreover, as the Commission has recognized most recently in the VoIP 911 Order, VoIP is often accessed over broadband facilities, and there is a nexus between the availability of VoIP services and the goals of section 706 of the Act. Furthermore, as the Petition and some commenters note, in that order the Commission expressly contemplated that VoIP providers would obtain access to and interconnection with the PSTN through competitive carriers. Therefore, we also rely on section 706 as a basis for our determination today that affirming the rights of wholesale carriers to interconnect for the purpose of exchanging traffic with VoIP

⁵ Iowa Code Section 476.29

⁶ Iowa Department of Commerce Utilities Board, Docket Nos. TCU-02-1, March 15, 2002 Order at p. 2.

⁷ See Iowa Department of Commerce Utilities Board, Docket Nos. TCU-02-1, TF-05-31, SPU-05-21.

⁸ See Docket No. TCU-08-07 Order in Lieu Of Certificate (Issued July 25, 2008) at p. 2.

⁹ Memorandum Opinion and Order, *In the Matter of Time Warner Cable Request for Declaratory Ruling that Competitive Local Exchange Carriers May Obtain Interconnection Under Section 251 of the Communications Act of 1934, as Amended, to Provide Wholesale Telecommunications Services to VoIP Providers*, WC Docket No. 06-55, 22 FCC Rcd 3513 (rel. March 1, 2007) at para. 1.

providers will spur the development of broadband infrastructure. We further conclude that such wholesale competition and its facilitation of the introduction of new technology holds particular promise for consumers in rural areas. (Footnotes omitted)¹⁰

Moreover, the Act and implementing FCC orders provide that the states play a critical role in promoting local competition.¹¹

Idaho state law gives the Commission the full power and authority to implement the federal Telecommunication Act of 1996, and to promulgate rules and/or procedures necessary to carry out the duties authorized or required by the Act.¹² The Commission may use this authority under both state law and the Act to promulgate a process to issue a written certificate to a wholesale provider of telecommunications services wishing to operate in its state.

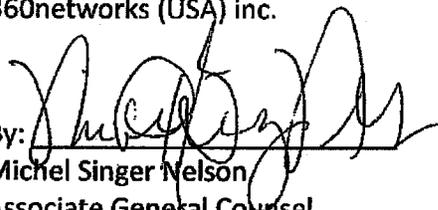
Question No. 4: What can the Commission do to ensure numbers are used efficiently by CLECs and other telecommunications providers?

No change to existing practice is required. Wholesale telecommunications providers requesting numbers from the North American Numbering Administrator have the same obligations as retail telecommunications providers under 47 C.F.R. Part 52. The wholesale provider extends the same obligations to any non-telecommunications provider customers through commercial agreements.

Dated this 28th day of March 2010.

Respectfully Submitted,

360networks (USA) inc.

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¹⁰ *Id.* at para. 13.

¹¹ See First Report and Order, *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, FCC 96-325 (rel. August 8, 1996) at para. 133.

¹² Idaho Code Section 62-615.



Wholesale Markets

Getting Started As A CLEC

Linking Our Strengths With Yours

A number of steps must be completed for you to successfully interconnect with Qwest as a Competitive Local Exchange Carrier (CLEC). Qwest provides this checklist to define our joint activities and results (by responsibility owner), where information is obtained and the timeframe suggested to perform the activity, many of which can be done as you obtain your state certification(s) as well as in parallel with each other.

Fulfilling Regulatory and Industry Related Requirements



Wholesale Markets

Activities and Results	Where to Obtain Information	Timeframe Suggested
<p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> Obtain certification as a telecommunications provider enabling you to do business as a CLEC. Secure unique Operating Company Number (OCN), Access Customer Name Abbreviation (ACNA) and Revenue Accounting Code (RAO) (if choosing Qwest as your RAO) identifiers for each state you will be operating as a CLEC. Create your E911 plan contacting the relevant Public Service Answering Point (PSAP) to negotiate a default Emergency Service Network (ESN) and establish default routing configurations for Automatic Number Identification (ANI). To provide your switch-based end-users numbers begin obtaining your NPA/NXX for each NPA you will be operating. Identify your Revenue Accounting provider for each state you will be operating as a CLEC. Note: Sales Executive assists with Centralized Message Distribution System (CMDS) hosting agreement if Qwest chosen as your Revenue Accounting provider. Determine Operator Services / Directory Assistance (OS/DA) provider, if applicable. Note: Separate agreement required if not within your Interconnect Agreement. Sales Executive will negotiate if applicable. Establish your initial Local Interconnection Service (LIS) forecast. 	<ul style="list-style-type: none"> State Public Utility Commission/Agency in state(s) you are operating as a CLEC. Step 2 of Getting Started as a Facility-Based CLEC: http://www.qwest.com/wholesale/clecs/lec_index.html OCN: National Exchange Carrier Association (NECA) 800-228-8597 ext 8249 or 973-884-8249 or http://www.neca.org/source/NECA_Home.asp ACNA & RAO: Telcordia 732-699-5281 or http://www.telcordia.com E911 & PSAP: http://www.qwest.com/wholesale/pcat/911.html NPA/NXX: http://www.qwest.com/wholesale/notice/npa_nxxProcess.html North American Numbering Plan Administration http://www.nanpa.com CMDS: http://www.qwest.com/wholesale/pcat/cmcs.html Operator Services (OS): http://www.qwest.com/wholesale/pcat/opserv.html and Regional Directory Assistance Database (DA): http://www.qwest.com/wholesale/pcat/voicedirasst.html LIS: http://www.qwest.com/wholesale/pcat/lis.html Forecasting forms: http://www.qwest.com/wholesale/guides/forecasting.html 	<ul style="list-style-type: none"> Before Negotiations



Wholesale Markets

Initiating Interconnection Agreement Negotiations

Activities and Results	Where to Obtain Information	Timeframe Suggested
<p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> Review Qwest's Negotiation Process flow and evaluate your options for creating your Qwest Interconnect Agreement. Initiate contact with Qwest to begin Interconnection Agreement Negotiations. <p>Qwest Responsibilities:</p> <ul style="list-style-type: none"> Qwest's Contract Negotiations Administrator assists you with initiating the Interconnection Agreement Negotiation process with Qwest. 	<ul style="list-style-type: none"> Step 3 in Getting Started as a Facility-Based CLEC: http://www.qwest.com/wholesale/clecs/clec_index.html Contact the Manager – Interconnection Agreements intagree@qwest.com by email, by telephone at 303-965-3029, or fax at 303-965-3527. 	<ul style="list-style-type: none"> Before Negotiations

Obtaining Sales Executive & Service Manager Contacts

Activities and Results	Where to Obtain Information	Timeframe Suggested
<p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> No action required. <p>Qwest Responsibilities:</p> <ul style="list-style-type: none"> Sales Operations Manager requests Sales Executive and Service Manager assignments to establish your Qwest Account Team. Service Manager contacts you via telephone or email to provide your contact information. 	<ul style="list-style-type: none"> Assigned Sales Executive and Service Manager contacts can be obtained on Qwest Wholesale Information Tool (QWIT): http://www.qwest.com/wholesale/ccdb Account Team: http://www.qwest.com/wholesale/clecs/accountmanagers.html 	<ul style="list-style-type: none"> During Negotiations



Wholesale Markets

Completing Your Customer Questionnaire

Activities and Results	Where to Obtain Information	Timeframe Suggested
<p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> • Submit our *Customer Questionnaire, complete all sections required prior to placing service orders. All subsequent sections must be completed and submitted prior to implementation or receiving contractually required reports. <p><i>*A Customer Questionnaire required even if your Interconnection Agreement is signed.</i></p> <p>Qwest Responsibilities:</p> <ul style="list-style-type: none"> • Service Manager assists answering your questionnaire questions and coordinating a meeting if necessary. • Service Manager obtains your Qwest assigned Facility-Based CLEC Identifier (ZCID) and provides your assignment to you. • Service Manager obtains and informs you of your provisioning and billing center assignments. 	<p>Required sections identified in the Customer Questionnaire: http://www.qwest.com/wholesale/clecs/newcustquestionnaire.html</p>	<ul style="list-style-type: none"> • During Negotiations • When you submit your Customer Questionnaire • Before you place your initial order
<p>If Qwest is your Operator Services / Directory Assistance (OS/DA) Services provider:</p> <p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> • Download and complete our OS/DA Questionnaire. • Send your Service Manager when your OS/DA questionnaire is complete. <p>Qwest Responsibilities:</p> <ul style="list-style-type: none"> • Service Manager will assist you with completing your OS/DA questionnaire. • When complete, Service Manager forwards your questionnaire to Qwest's OS/DA Implementation Manger. 	<ul style="list-style-type: none"> • OS/DA questionnaire can be found at: http://www.qwest.com/wholesale/pcat/ospsserv.html 	<ul style="list-style-type: none"> • 30-45 days prior to placing initial order



Wholesale Markets

Defining Your Network Point of Interconnection (POI)

Activities and Results	Where to Obtain Information	Timeframe Suggested
<p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> • Refer to your Interconnection Agreement to determine your available POI options and establish a diagram of your proposed network. To assist us in understanding your network, your diagram should include: <ul style="list-style-type: none"> - Method of interconnection - Local calling area and NXXs - Your switch location(s) (CLLIs) - Qwest switch location(s) (CLLIs) - Number and type of LIS trunks - Trunking to Qwest's Tandems/end-offices - Ancillary Services (E911, Operator Services, etc.) 	<ul style="list-style-type: none"> • Your Qwest Interconnect Agreement • LIS Product Catalog (PCAT): http://www.qwest.com/wholesale/pcat/lis.html • Collocation general information and ordering forms can be found at: http://www.qwest.com/wholesale/pcat/collocation.html 	<ul style="list-style-type: none"> • 6 months before launch

Establishing Your POI and LIS Trunking Site Activation Requirements

Activities and Results	Where to Obtain Information	Timeframe Suggested
<p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> • In preparation for our Site activation meeting provide your Service Manager the following: <ul style="list-style-type: none"> - Network diagram identifying your Method of interconnections such as: <ul style="list-style-type: none"> • Mid-Span Meet Point of POI • Collocation • Entrance Facility (DS3 or above) - Initial LIS forecast - E911 plan and trunk requirements <p>Joint Responsibilities:</p> <ul style="list-style-type: none"> • Participate in LIS Site activation meeting to: <ul style="list-style-type: none"> - Review your Network Diagram - Verify initial LIS forecast and options for Interconnection with LIS Project Manager (LIS Project Manager will provide you a project number when you are ready to issue LIS Trunking orders.) - Sales Executive answers price questions - E911 Manager reviews plan and assists with requirements - State interconnect manager addresses local network issues - Service Manager coordinates post market launch activities <p>Meeting determines issues to address in future meetings.</p>	<ul style="list-style-type: none"> • LIS: http://www.qwest.com/wholesale/pcat/lis.html • Forecast: http://www.qwest.com/wholesale/guide/s/forecasting.html • E911: http://www.qwest.com/wholesale/pcat/911.html 	<ul style="list-style-type: none"> • After contract negotiations



Wholesale Markets

Activities and Results	Where to Obtain Information	Timeframe Suggested
<p>If Qwest is your Signaling System 7 (SS7) connectivity provider:</p> <p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> • Contact your Service Manager to request a meeting to discuss SS7 requirements as defined in your Interconnection Agreement. • Issue A link and SS7 facility orders after preorder meeting. <p>Qwest Responsibilities:</p> <ul style="list-style-type: none"> • Service Manager facilitates preorder meeting to discuss SS7 connectivity and Link Data Sheet requirements. 	<ul style="list-style-type: none"> • SS7: http://www.qwest.com/wholesale/pcat/csacss7.html 	<ul style="list-style-type: none"> • After site activation meeting
<p>If Qwest is your provider of these SS7 Database services:</p> <ul style="list-style-type: none"> - Line Information Data Base (LIDB) to provide accurate billing for calling cards for your end-users - 800 Data Base Access Service for 8XX toll-free service to originating end-users - Offer your end-users "Caller ID and Name" with InterNetwork Calling Name Service (ICNAM) <p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> • Contact your Sales Executive for possible Interconnection Agreement Amendment. • Contact your Service Manager to include SS7 database service on Link Data Sheet. <p>Qwest Responsibilities:</p> <ul style="list-style-type: none"> • Service Manager facilitates preorder meeting to discuss Link Data Sheet requirements. 	<ul style="list-style-type: none"> • LIDB: http://www.qwest.com/wholesale/pcat/lidb.html • 800 Data Base: http://www.qwest.com/wholesale/pcat/800.html • ICNAM: http://www.qwest.com/wholesale/pcat/icnam.html 	<ul style="list-style-type: none"> • After site activation meeting

Achieving E911 Interconnection Requirements



Wholesale Markets

Activities and Results	Where to Obtain Information	Timeframe Suggested
<p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> • Provide E911 interconnection plan and trunk requirements if not covered during Site activation meeting. • Prepare and submit E911 T1 trunk orders. <p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> • Service Manager initiates Service Planning meeting to review E911 interconnection requirements, if necessary. • Service Manager coordinates E911 message trunk orders once your E911 T1 facility is ordered. 	<ul style="list-style-type: none"> • E911: http://www.qwest.com/wholesale/pcat/911.html 	<ul style="list-style-type: none"> • During or after site activation meeting • E911 T1 trunks one month prior to market launch • E911 message trunks after ordering T1 trunks



Wholesale Markets

Evaluating and Establishing OSS Connectivity

Activities and Results	Where to Obtain Information	Timeframe Suggested
<p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> Evaluate access and tools to support your preorder, ordering, repair, billing functions with Qwest: (e.g., Interconnect Mediated Access (IMA GUI or Extensible Markup Language (XML), Customer Electronic Maintenance and Repair (CEMR), Directory Listing Inquiry (DLIS) Fiber data report Tool, etc). Request specifics concerning establishing dedicated access with Qwest from your Service Manager. <p>Qwest Responsibilities:</p> <ul style="list-style-type: none"> Service Manager obtains details on how to setup a Dedicated Access system-to-system interface via dedicated electronic method. Service Manager coordinates technical OSS connectivity setup meeting with you and our IT Implementation & Deployment Team. 	<ul style="list-style-type: none"> Overview of Qwest's Electronic Access and Tools can be found at: http://www.qwest.com/wholesale/clecs/electronicaccess.html 	<ul style="list-style-type: none"> 4 to 8 weeks prior to desired implementation date to establish files. NOTE: Connectivity for dedicated access requires addition time. Verify requirement during setup meeting.

Accessing Qwest's Operations Support Tools

Activities and Results	Where to Obtain Information	Timeframe Suggested
<p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> Request access to Qwest tools completing and emailing forms to wholesale.servicesupportteam@qwest.com with "Digital Certificate" subject line: <ul style="list-style-type: none"> Dedicated access to IMA GUI or IMA XML. Complete an IMA System Administrator Setup Request form Digital Certificate access to requested tools <p>Qwest Responsibilities:</p> <ul style="list-style-type: none"> Wholesale Systems Security Administrator emails notification to you and your Service Manager. 	<ul style="list-style-type: none"> External User Access Request and IMA System Administrator Setup forms at: http://www.qwest.com/wholesale/clecs/electronicaccess.html Digital Certificate access information at: http://www.qwest.com/wholesale/systems/generalinfo.html 	<ul style="list-style-type: none"> 4-6 weeks prior to initial order 30 days prior to initial order or on request



Wholesale Markets

Participating in Change Management Process and Training Opportunities

Activities and Results	Where to Obtain Information	Timeframe Suggested
<p>CLEC Responsibilities:</p> <ul style="list-style-type: none"> Participating in Qwest's CMP (Change Management Process) 	<ul style="list-style-type: none"> Details on CMP can be found at: http://www.qwest.com/wholesale/cmp/index.html 	<ul style="list-style-type: none"> As you choose to participate
<p>Qwest's instructor-led, web-based and downloadable training opportunities are available to learn more about our products and services, how to use our Operations Support Systems, and how to do business with us.</p> <p>Joint Responsibilities:</p> <ul style="list-style-type: none"> Contact your Service Manager to request training information that will assist you with navigating our training web page. 	<ul style="list-style-type: none"> Select our course catalog at: http://www.qwest.com/wholesale/training 	<ul style="list-style-type: none"> As you choose to participate

Additional reference information is available at following web sites as desired:

External:

- Federal Communications Commission (FCC) <http://www.fcc.gov/>
- Alliance for Telecommunication Industry Solutions (ATIS) <http://www.atis.org>
- Telcordia - Exchange Carrier Code (ECC), Local Exchange Routing Guide (LERG) (at 732-699-6700), Common Language Location Identifier (CLLI) <http://www.telcordia.com>
- National Emergency Number Associations (NENA) <http://www.NENA.org>
- Number Portability Administration Center (NPAC) <http://www.NPAC.com>

Internal Qwest's Wholesale Interconnection:

- Wholesale Interconnection Products and Services <http://www.qwest.com/wholesale/pcat/index.html>
- Technical Publications <http://www.qwest.com/techpub/>
- Access Service Ordering Guidelines (ASOG) - Access Service Requests (ASRs) <http://www.qwest.com/wholesale/systems/asr.html>
- Local Service Ordering Guidelines (LSOG) - Local Service Requests (LSRs) <http://www.qwest.com/wholesale/clecs/isog.html>
- Interconnect Mediated Access (IMA) User Guide <http://www.qwest.com/wholesale/ima/gui/document.html>
- Wholesale Customer Contacts <http://www.qwest.com/wholesale/clecs/customercontacts.html>
- Escalation process <http://www.qwest.com/wholesale/clecs/exesclover.html>



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Verizon Global Wholesale \ Doing Business

Establish & Maintain Account for Local Services

Doing Business

Local

**Establish &
Maintain Account**

Ordering

Provisioning

Trouble Admin

Billing

Welcome to Verizon Wholesale Local Services. This section covers information you need to know about Verizon to begin doing business with Verizon and maintain your account information as your business changes and grows.

To establish a wholesale relationship with Verizon, you will have to understand state and federal regulatory requirements and the tariffs under which you can purchase services from Verizon. Next, you will need to negotiate an interconnection agreement with Verizon, make yourself familiar with and obtain the appropriate industry codes, and will need to create and maintain a Local Services Profile via the [Customer Profile Self-Service Tool \(CPSST\)](#). You will need to establish connectivity and establish billing arrangements before being able to submit transactions to Verizon. Local Services Profile data must be submitted prior to requesting connectivity. As your needs may change and business grows, returning to this site will help ensure you are able to maintain the accuracy of your account.

After finalizing your agreement with Verizon, you will need to begin implementation of your network plans. Depending on your network considerations, you may require access to Poles, Conduits, Rights of Way and Joint User Agreements, or want to apply for collocation arrangements with Verizon. Finally, we will require regular forecasting input from you.

Once your relationship is established with Verizon, other sections of the web site will help you conduct day-to-day operations with us.

Requirements

Regulatory and Verizon requirements define what information is needed to do business with Verizon. Learn more about these requirements and industry codes by accessing the selections below.

Regulatory Requirements
[State Certification and Tariff Information](#)

Verizon Requirements
[Negotiating an Agreement](#)

[Account Security Requirements](#)

[Industry Codes and Contacts](#)

[Customer Profile Self-Service Tool \(CPSST\)](#)

Billing and Connectivity Options
[Establish System Connectivity](#)

[Establish Billing Arrangement](#)

Key Network and Services Decisions

The information below will assist you in making decisions about the network and services that may need to be cared for to begin doing business in the Verizon Region.

Determining how and what facilities need to be provided (by either Verizon or another provider) is a key driver to business decisions that need to be made to do business with Verizon. The steps that a CLEC will take to interconnect to the Verizon network depend heavily on the network facility decisions made by the CLEC.

Network

[Network Facility Decisions](#)

[Network Interconnections](#)

- [Facilities Based Interconnections](#)

Network Design Request Forms:

- [Verizon Operator Services Questionnaire](#)

- [LATA Presence Request Form - North](#)

- [LATA Presence Request Form - South](#)

- [LATA Presence Request Form - West](#)

- [Line Class Code Provisioning Form](#)

[Poles, Conduits and Rights of Way](#)

[Collocation](#)

[E911](#)

[Forecasting](#)
[Forecasting Overview](#)

[New York Sold House and Riser Assets](#)

Last Updated August 1998

A listing by general geographic area in the State of New York served by Verizon that provides the names of the original purchasers and the addresses to whom Verizon - New York (formerly New York Telephone) sold some or all of the Outside Plant Cable assets categorized in the accounting system as House and Riser facilities.

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[Queens \(39k pdf file\)](#) 

[Suffolk \(69k pdf file\)](#) 

[Westchester/Putnam/Rockland \(78k pdf file\)](#) 

[Western Area \(64k pdf file\) \(includes Buffalo, Olean\)](#) 

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State Certification and Tariff Information

Doing Business

Local

[Establish & Maintain Account](#)

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State

Public Utilities Commission (PUC) approval is required from the state utility commission in the state you want to do business. This approval will include a Certificate of Operating Authority. A contact number for your state Commission can be found in the local telephone directory or via the [NARUC](#).

Federal

The Federal Communications Commission (FCC) may impose various requirements on CLECs with regard to enforcement of the Telecommunications Act (Communications Act of 1934 as amended by the Telecommunications Act of 1996). Review the Federal tariffs to understand the Regulations, Rates and Charges.

See [Verizon Tariffs](#) for State and Federal Tariff information.

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Forms

Getting Started

To become a Facility Based or a Reseller CLEC within the CenturyLink territory, follow these steps:

[CLEC Issue Resolution](#)

Step 1

Obtain certification from the Public Utilities Commission in the state(s) where you plan to operate.

Get answers to [Frequently Asked Questions](#)

Step 2

Fill out the [Negotiation Request form](#) for the desired negotiations and e-mail it to the [CLEC Account Negotiation Team](#).

Step 3

Once CenturyLink receives the completed CLEC Negotiation Request form, you will be e-mailed a CLEC Interconnection Agreement template, a pricing list for each state requested, and a 160-day letter.

Step 4

Once both parties have signed the Interconnection Agreement, an account manager will be assigned as your contact within CenturyLink for implementation services. Please see the Customer Contact section of this site for more contact information.

Start-Up Forms

To establish billing accounts for Competitive Local Exchange Carriers (CLECs), the following eight forms and/or documents must be completed and submitted to CenturyLink. CLECs will not be able to process any Access Service Requests (ASRs) or Local Service Requests (LSRs) until these documents have been received, approved and processed by your Sales Manager; and the deposit requirements fulfilled.

Required documentation:

Please submit copies of your original of the following two items:

- Public Service Commission (PSC)/Public Utilities Commission (PUC) Certification - a copy of the letter received from the appropriate state commission is required.
- Operating Company Number (OCN) - a copy of the notification from the National Exchange Carrier Association (NECA) is required. If you have not yet applied for an OCN, you may contact NECA at 888-221-8322.

Required forms:

Download the following forms and email them to your Sales Manager. Additionally, provide hard copies of those documents requiring a signature (if electronic signature is not available).

Name	Description
Blanket Letter of Agency	Authorize CenturyLink to process LSRs. This form does not relieve the CLEC of securing and maintaining end user customer authorization.
Certificate of Exemption	Provide proof of Federal Excise tax exemption on Communications Services.
Bill Media or Change	Establish bill media preferences for invoices and/or daily usage files. The form is also used for billing address changes.
CLEC Checklist and Company Profile	Required to set up accounts and obtain CLEC services from CenturyLink.
CLEC Contact Number for Mis-Directed End	Contact list used by the CenturyLink business office when an end-user contacts CenturyLink instead of the CLEC.

Users	
<u>CLEC Porting Contacts</u>	Required for each new CLEC. Allows for timely communication/removal of roadblocks on LNP activations, porting delays and after hours LNP escalations.
<u>Local Service Forecast</u>	Required for each new CLEC or existing CLEC that wishes to become active in a new state to provide a local service forecast.
<u>Network Outage Notification/Waiver Outage</u>	Due to parity reporting, it is mandatory that all CLECs complete either the report request or the report waiver forms.
<u>Uniform Sales & Use Tax Certificate</u>	Provide proof of state and local sales tax exemption on Communication Services.

The following forms may be useful to you while purchasing services from CenturyLink.

Name	Description
<u>Bi-Directional Trunking Request</u>	Use this form to initiate the process to convert Reciprocal (RC12) and Local (RC14) trunks to Bi-directional (RC 18) trunks.
<u>Billing Dispute</u>	Notify CenturyLink of billing disputes.
<u>Collocation Application</u>	Establish a new collocation, augment a collocation, or decommission a collocation.
<u>Collocation Direct Cabling LOA</u>	Request for collocation co-carrier direct cabling.
<u>CSPRS Request</u>	Request user ID and password for access to CSPRS CLEC Performance Reports
<u>Contact Form</u>	Required to establish new contacts, change existing contacts, select types of notifications and reports each contact is to receive from CenturyLink Notice.
<u>Customer Service Records</u>	This form is used when seeking CenturyLink customer service records, and should only be used when records can not be obtained through the Integrated Request Entry System (IRES).
<u>Fiber Application</u>	This form is required to initiate the dark fiber application process with CenturyLink.
<u>EASE Access Request</u>	Request access to EASE. This system is used for processing electronic Local Service Requests (LSRs) and Access Service Requests (ASRs).
<u>EEL Criteria Certification Letter</u>	In addition to the qualifying service criteria, a CLEC must provide certification that it satisfies the service eligibility criteria for each new or converted circuit to obtain EELs.
<u>Facility Access/Photo ID</u>	Required to gain access to CenturyLink Property.
<u>Interconnection POI Profile</u>	Initiate discussions about planned interconnection trunk arrangements in areas where the CLEC and CenturyLink will exchange local traffic.
<u>Interconnection Trunk Forecast</u>	Required for each Point of Interconnection (POI). All trunks (local/intraLATA, reciprocal, interLATA and E911) required for each POI can be combined on one forecast report.
<u>Investigation Request Form</u>	Request an informal investigation into an issue. The Service Performance team generally works the customer investigation within 10 business days or less.
<u>Local Number Portability Bona Fide Request</u>	Request for porting a local telephone number.
<u>Quote Request</u>	Request transport and special access services.
<u>S25 Blanket Exemption</u>	Certifies that a Special Access Service purchased from CenturyLink is not interconnected with local exchange service.
<u>Scheduled Maintenance Request</u>	Request scheduled maintenance.
<u>Special Access Termination Plan</u>	Establish, change or extend a Special Access Premier Term Discount Plan.
<u>Special Access Revenue Volume Discount Plan Agreement</u>	Establish a Special Access Revenue Volume Discount Plan.
<u>Special Access</u>	Establish, change or extend a Special Access Term Discount

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Term Discount Plan Agreement	Plan.
SIG and MSAG Data Extract Request	Request street information within CenturyLink service areas.
Traffic Study Request	Request traffic studies.
Tower Floor Space Lease Application	Used to request collocation or the rearrangement of radio frequency equipment at specific locations. Also used to request lease floor space in an CenturyLink building.

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*North American
Company Code
Assignment Procedures*