

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

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In Re:)
)
Rulemaking to Establish Requirements and)
Funding Mechanism to Support) Docket No. 05-00237
Telecommunications Services for Individuals)
With Hearing Loss and Speech Disabilities)

VERIZON'S POST-WORKSHOP COMMENTS

MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services and MCI Communications Services, Inc. d/b/a Verizon Business Services (collectively, "Verizon") submit these post-workshop comments to address Staff's proposed rule concerning operations and funding for the Tennessee Relay Service ("TRS"), Chapter 1220-4-14 (the "Proposed Rule").

A central purpose of the Proposed Rule is to expand the pool of carriers that fund the TRS and ensure that contributions are made on a competitively neutral basis. Verizon supports this policy. Verizon agrees with BellSouth, however, that the Authority should not determine contributions based on working telephone numbers, at least at this stage.¹ As BellSouth notes, the FCC is reviewing an allocation methodology based on telephone numbers for the Universal Service Fund. If the Authority were to implement its own allocation scheme based on working telephone numbers before the FCC completes its work, carriers would be required to make Tennessee-specific changes to their

¹ See Comments of BellSouth Telecommunications, Inc. (October 6, 2006), pp. 2-6.

billing systems, which would impose significant costs. Moreover, there are a number of problems with using a numbers-based approach that the FCC must resolve.² The best approach for the Authority to take, therefore, would be to allow the industry and the FCC to work through the issues posed by moving to a numbers-based system before considering the implementation of such a system in Tennessee.

Verizon disagrees with BellSouth, however, concerning the use of intrastate access charges to recover TRS funding costs. Currently 80% of TRS funding is obtained from a portion of the carrier common line charge, which means that IXC's disproportionately fund the service.³ The current approach is not competitively neutral. BellSouth's request that the Authority continue to permit the recovery of TRS assessments through intrastate access charges therefore should be rejected.

² John Manning with NANPA discussed these problems at the technical workshop held on October 6, 2005. Workshop Transcript, pp. 27-31.

³ Workshop Transcript, pp. 5-9, 40.

Respectfully submitted on October 30, 2006.

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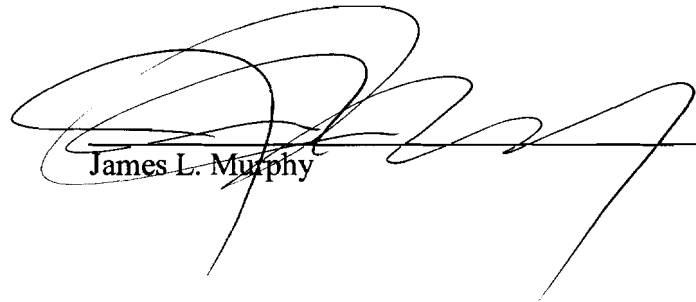
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded electronically and via U.S. Mail, postage prepaid, to:

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on this the 30th day of October, 2006.



James L. Murphy