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James L. Murphy, III  
(615) 252-2303  
Fax: (615) 252-6303  
Email: jmurphy@boultcummings.com

TRADE SHOW ROOM

November 2, 2006

Honorable Sara Kyle  
Chairman, Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

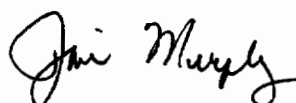

Re: Rulemaking to Establish Requirements and Funding Mechanism to  
Support Telecommunications Services for Individuals With Hearing Loss and  
Speech Disabilities  
Docket 05-00237

Dear Chairman Kyle:

On October 30, 2006 Verizon filed comments in the above-captioned proceeding. This filing is to correct the caption of the filing and one reference in the text from Post-Workshop Comments to Post-Hearing Comments. We apologize for any confusion this may have caused.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:    
James L. Murphy, III

JLM/cw

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

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-HEARING 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-hearing 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.<sup>1</sup> 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 billing systems, which would impose significant costs. Moreover, there are a

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

number of problems with using a numbers-based approach that the FCC must resolve.<sup>2</sup> 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 IXCs disproportionately fund the service.<sup>3</sup> 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.


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

<sup>3</sup> Workshop Transcript, pp. 5-9, 40.

Respectfully submitted on November 2, 2006.

By:   
James L. Murphy III  
Boult, Cummings, Conners & Berry, PLC  
1600 Division Street, Suite 700  
Nashville, Tennessee 37203  
Phone: (615) 252-2303  
Fax: (615) 252-6303  
Email: [jmurphy@boultcummings.com](mailto:jmurphy@boultcummings.com)

By:   
Dulaney L. O'Roark III  
General Counsel, Southeast Region  
6 Concourse Parkway, Suite 600  
Atlanta, Georgia 30328  
Phone: (770) 284-5498  
Fax: (770) 284-5488  
Email: [de.oroark@verizon.com](mailto:de.oroark@verizon.com)

Attorneys for MCI metro Access Transmission  
Services LLC d/b/a Verizon Access  
Transmission Services and MCI  
Communications Services, Inc. d/b/a Verizon  
Business Services

## **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:

Guy Hicks  
BellSouth Telecommunications, Inc.  
333 Commerce Street  
Suite 2101  
Nashville, TN 37201-3300

Edward Phillips  
United Telephone-Southeast, Inc. d/b/a Embarq  
14111 Capital Boulevard  
Wake Forest, North Carolina 27587-5900

on this the 2nd day of November , 2006.

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James L. Murphy