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November 2, 2007

Honorable Eddie Roberson, Chairman
c/o Sharla Dillon, Docket & Records Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

ELECTRONICALLY

filed electronically in docket office on 11/05/07

**RE: Level 3 Communications, LLC's Tariff Filing to Revise T.R.A. Tariff
No. 3 (Tariff No. 2007-0122), TRA Docket No. 07-00219**

Dear Chairman Roberson:

The above-captioned matter is on the Tennessee Regulatory Authority's ("Authority") November 6, 2007, Conference Agenda. For the reasons set forth below, the Verizon companies¹ respectfully request that the Authority continue the current suspension of Level 3's Proposed Tariff No. 3 until the Authority's next regularly scheduled Authority Conference.

Level 3 Communications, LLC ("Level 3") has filed tariff revisions similar to Proposed Tariff No. 3 across the country. Verizon and Level 3 are currently engaged in productive, high-level negotiations aimed at settling all of the similar tariff proceedings around the country in which Level 3's proposed tariff revisions have been either suspended or rejected. Given the progress that has already been made, Verizon is confident that a global settlement, which will include Level 3's tariff in Tennessee, will be reached very soon.

Due to circumstances unrelated to the above-referenced negotiations, Level 3 filed its Tennessee tariff revisions with the Authority on October 25th without the benefit of consulting with Verizon about the revised language. Since then, the negotiations have continued, and Level has agreed to additional changes. Though the agency may be under the impression that the negotiations between Verizon and Level 3 have been concluded, Verizon and Level 3 have continued to exchange additional language and related information to address outstanding concerns subsequent to Level 3's October 25th filing, including as recently as the eve of November 1st. Since the final language is still being negotiated, it follows that the proposed

¹ These companies include MCIMetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services ("Verizon Access"), MCI Communications Services, Inc. ("MCI"), Bell Atlantic Communications, LLC ("Bell Atlantic"), NYNEX Long Distance Company ("NYNEX"), and Verizon Select Services, Inc. ("VSSI") (collectively, "Verizon" or "Petitioners").

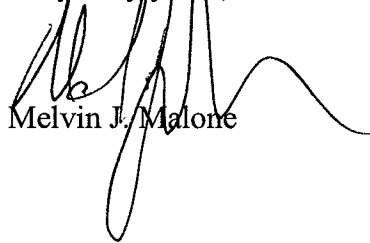
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tariff cannot be ripe for approval. Clearly, the proposed tariff, as demonstrated by the ongoing negotiations of the parties, remains a work in progress.

Hence, Level 3's current proposed tariff in Tennessee, though an improvement over its initial filing, does not adequately address the whole of the concerns raised by Verizon and AT&T Tennessee ("AT&T"). Accordingly, Verizon submits that the best course of action is to extend the current suspension of Level 3's proposed tariff until the next regularly scheduled Authority Conference. Further, the parties should be directed to continue the good faith negotiations that have been so productive to date.² Given the fact that Verizon and Level 3 are fairly close to a complete resolution of all outstanding issues, the public interest would be served by permitting, and in fact encouraging, continued negotiations for a short time. We trust that this conciliatory, good faith approach is acceptable to the Authority. If, however, the Authority chooses to act on Level 3's proposed tariff during its November 6th Conference, the public interest requires the Authority to reject the proposed tariff for the reasons set forth by both AT&T and Verizon.

An additional copy of this filing is enclosed to be "File Stamped" for our records.

Very truly yours,



Melvin J. Malone

cc: Parties of Record

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² Verizon agrees with AT&T about the potential usefulness of an industry workshop or generic proceeding to examine whether changes are needed in order to ensure that CLECs' switched access rates are in parity with corresponding ILEC rates. *See Response of AT&T to Level 3 Filings Regarding Proposed Tariff No. 3*, p. 5 (Oct. 31, 2007). Of course, such a proceeding should not delay the Authority's approval of Level 3's tariff in this docket after the parties present the final results of the negotiations.