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September 6, 2005

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: D.T.E. 05-SL-10 -- John Ober v. Verizon Massachusetts

Dear Ms. Cottrell:

Enclosed for filing in the above-referenced matter is Verizon Massachusetts' Motion for Partial Reconsideration, and Motion for Stay and Extension of the Judicial Appeal Period.

Thank you for your assistance in this matter.

Sincerely,

Barbara Anne Sousa

Barbara Anne Sousa

Enclosure

cc: Service List

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Complaint filed by John K. Ober, pursuant to G.L. c. 93, §§ 108 et seq., with the Department of Telecommunications and Energy claiming that his local service was switched to Verizon New England, Inc., d/b/a Verizon Massachusetts, without authorization.	)	**D.T.E. 05-SL-10**

VERIZON MASSACHUSETTS'
MOTION FOR PARTIAL RECONSIDERATION

The Department should grant Verizon Massachusetts' ("Verizon MA") motion for partial reconsideration of the Department's August 19, 2005, Order in the above matter because the Department incorrectly found that Verizon MA's use of an automated third party verification ("TPV") system is not permissible under state and federal anti-slamming laws. *DTE Order* at 7-8.

As shown below, Verizon MA's automated TPV system is a valid and reliable method of recording a telephone subscriber's carrier selection and is consistent with both federal and state requirements. Neither the Federal Communications Commission's ("FCC") nor the Department's rules prohibit the use of an automated TPV system – nor do they require that the TPV record the customer's oral responses to *all* questions to authorize a change in service provider.

In a separate but related motion, Verizon MA also seeks an extension of the judicial appeal period pending the Department's ruling on this Motion.

I. STANDARD OF REVIEW

The Department's standards of review for reconsideration of its decisions are well-established. As demonstrated below, Verizon MA's Motion satisfies both standards in this instance and, therefore, should be granted.

The Department has stated that a motion for reconsideration "should bring to light previously unknown or undisclosed facts that would have a significant impact upon the decision already rendered." *Boston Edison Company*, D.P.U. 90-270-A, at 2-3 (1991); *Western Massachusetts Electric Company*, D.P.U. 85-270-C, at 12-13 (1987). It should not attempt to reargue issues considered and decided in the main case. *Commonwealth Electric Company*, D.P.U. 92-3C-1A, at 3-6 (1995); *Boston Edison Company*, D.P.U. 90-270-A, at 3 (1991). Rather,

> "[r]econsideration of previously decided issues is granted only when extraordinary circumstances dictate that the Department take a fresh look at the record for the express purpose of substantively modifying a decision made after review and deliberation." (*id.*)

Alternatively, a motion for reconsideration may be based on the argument that the Department's treatment of an issue was the result of mistake or inadvertence. *Massachusetts Electric Company*, D.P.U. 90-261-B, at 7 (1991); *New England Telephone and Telegraph Company*, D.P.U. 86-33-J, at 2 (1989); *Boston Edison Company*, D.P.U. 1350-A, at 5 (1983). It is also appropriate where parties have not been "given notice of the issues involved and accorded a reasonable opportunity to prepare and present evidence and argument" on an issue decided by the Department. *Re: Petition of CTC Communications Corp.*, D.T.E. 98-18-A, at 2, 9 (1998).

II. ARGUMENT

A. The Department Failed to Give Verizon MA Adequate Notice and An Opportunity to Be Heard Before Issuing Its *Order* As To Whether Use of An Automated TPV System Complies with Applicable State and Federal Law.

On May 18, 2005, John K. Ober filed a complaint with the Department, pursuant to Mass. General Laws c. 93, §§ 108 *et seq.*, alleging that his local telephone service provider was switched from AT&T Communications of New England, Inc. ("AT&T") to Verizon MA without his authorization. *DTE Order* at 1. The Department subsequently conducted an investigation and on July 6, 2005, the Department notified Verizon MA that it would hold an evidentiary hearing on this alleged slamming matter. Following discovery issued by the Department on July 19, 2005, the Department held an evidentiary hearing on July 27, 2005, at which time Verizon MA presented its witness, Mr. Christopher Bean. The Department conducted cross-examination and issued additional discovery in the form of record requests. Verizon MA responded in writing to all discovery.

At no time during the proceeding did the Department indicate that it intended to address the issue of Verizon MA's use of its automated TPV system and whether such a system complied with state or federal law. The hearing notice did not suggest that the automated TPV system was at issue; the Department's discovery did not address the issue; and the matter was not addressed during the evidentiary hearing. Moreover, the Complainant Mr. Ober did not cite the automated TPV system as the basis for his complaint and did not contest that his voice is on the TPV presented by Verizon MA. Tr. 27:5-6.

Despite the lack of any notice that the use of an automated TPV system was an issue, the Department found in its *Order* that touch-tone responses to verification questions during a TPV do not satisfy the requirement for "oral" confirmation of authorization required by both Massachusetts and federal anti-slamming laws. *DTE Order* at 7. However, there is no record

evidence to substantiate the Department's findings. Rather, the Department simply relied on a recent decision[1] of the FCC's Consumer & Governmental Affairs Bureau ("the Bureau") to support its findings regarding the use of automated TPV systems. *Id.* at 7-8. The *DTE Order*, however, failed to acknowledge that Verizon filed a petition for reconsideration of that decision on February 25, 2005, which is pending at the FCC.[2]

Accordingly, in applying the established standard of review, it is clear that Verizon MA's Motion should be granted because Verizon MA had no notice and opportunity to be heard on the issue of how the use of its automated TPV system complies with both state and federal law prior to the Department ruling on that issue.

B. The Department's *Order* Misinterpreted State and Federal Anti-Slamming Rules As Requiring a Customer's Oral Authorization to Implement a Carrier Change.

In its *Order*, the Department ruled that Verizon MA "caused the switch in John K. Ober's local telephone service provider without authorization and in violation of the provisions of G.L. c. 93, § 109(a)." *DTE Order* at 12. The Department found that Verizon MA's use of an automated TPV system to verify the customer's change of service does not constitute oral confirmation of authorization, as required by state and federal anti-slamming rules. *Id.* at 7-8. That finding is the "result of mistake or inadvertence" by the Department and should be reconsidered. *See supra* at 2.

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1 *In the Matter of Verizon Long Distance Complaint Regarding Unauthorized Change of Subscriber's Telecommunications Carrier*, IC No. 04-S86027, DA 05-138, Order, 20 F.C.C.R. 1458 (rel. Jan. 26, 2005) (hereinafter referred to as "*FCC Bureau Order*").

2 On May 31, 2005, Verizon appealed another Bureau decision to the FCC on similar grounds. *In the Matter of Verizon Long Distance Complaints Regarding Unauthorized Change of Subscriber's Telecommunications Carrier*, IC Nos. 04-S87194 and 04-S88264, DA 05-1215, Order, 20 F.C.C.R. 8431 (rel. April 29, 2005).

1. Description of Verizon MA's Automated TPV System

Verizon MA's automated TPV system is designed to capture the keypad response of subscribers seeking to switch to Verizon MA by recording the audible tones associated with each button on the telephone keypad. As described in Exhibit I attached hereto, each keypad button has a distinct tone, enabling the subscriber's responses to the system's prompts to be clearly identified. In addition, the automated TPV system is programmed to record the subscriber's voice response to specific questions at designated times during the call. Thus, the system permits a customer to authenticate orally his/her identity and confirm a carrier change by pressing keys on a telephone keypad.

For instance, the automated TPV system captures the subscriber's voice response to questions regarding billing name, as well as month and day of birth. By requiring the subscriber to speak both name and birth date, the system creates a voice imprint on the TPV record, which can be compared to the voice of an authorized party in the event that the carrier change is subsequently challenged. As a practical matter, a keypad (tone) based system is preferable to verbal responses because the quality and decipherability of the automated TPV recording is unaffected by distractions, such as poor voice connections, excessive background noise, and unfamiliar accents or unusual speech patterns.

The automated TPV system enables a subscriber to transfer to a live operator at any time during the call by pressing the appropriate keypad button, as instructed. The subscriber may also default to a live operator if either an incorrect or no keypad response is received. The system is also designed to require that the customer complete the entire menu of questions before the order is confirmed.

2. The FCC's Anti-Slamming Rules Authorize the Use of Automated TPV Systems Provided Federal Requirements Are Met.

Verizon MA's automated TPV system fully conforms with the FCC rules implementing Section 258 of the Telecommunications Act of 1996 (the "Act"), which prohibits any telecommunications carrier from "submit[ting] or execut[ing] a change in a subscriber's selection of a provider of telephone exchange service or telephone toll service except in accordance with such verification procedures as the Commission shall prescribe." 47 U.S.C. § 258(a). The FCC rules specifically provide that "[a]utomated third party verification systems and three-way conference calls *may be used* for verification purposes *so long as the requirements of paragraphs (c)(3)(ii) through (c)(3)(iv) of this section are satisfied.*" 47 C.F.R. § 64.1120(c)(3)(i) (emphasis added). This includes, at a minimum, verification of the identity of the subscriber (*e.g.*, from the subscriber's date of birth or social security number); confirmation that the person on the call is authorized and wants to make the carrier change; the names of the carriers affected by the change; the telephone numbers to be switched; and the types of service involved. *Id.*

In its *Order*, the Department points to the *FCC Bureau Order*,[3] which incorrectly stated that "third party verification rules ... require carriers to obtain oral authorization." *FCC Bureau Order* at ¶ 4; *DTE Order* at 7. Although the FCC's reference to "the subscriber's oral authorization" in 47 C.F.R. 64.1120(c)(3) originally applied to a "live representative" form of

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3 Verizon has appropriately filed for reconsideration of the *FCC Bureau Order* because the FCC rules do not require that an automated TPV obtain "oral authorization", but rather require only conformance with the requirements set forth in sections (c)(3)(ii) through (c)(3)(iv) – which the Verizon's automated TPV system, in fact, does.

TPV,[4] the FCC, in effect, broadened that interpretation by affirmatively allowing the use of automated TPV in its *Slamming Third Report and Order*.[5] The FCC concluded "that automated systems that preserve the independence of the third party verification process *may be used* to verify carrier change requests." *Id.* at ¶ 43 (emphasis added). According to the FCC, "the use of automated third party verification systems not only promotes consistency in the verification process and adequacy of the information provided to subscribers, but also gives carriers a cost-effective way to create a readily accessible record of each order confirmation." *Id.*

Nothing in either the FCC rules or the *Slamming Third Report and Order* prohibits the use of an automated TPV system that utilizes a telephone keypad, rather than oral responses, to authorize a carrier change. Indeed, the FCC stated that its "rules do not generally prohibit automated third party verification systems." *Id.* at ¶ 45. Rather, the FCC requires only that "these systems should elicit, at a minimum, the same information that our rules currently require," without regard to a particular method. *Id.* at ¶ 44. Thus, under the plain language of the FCC rules and the *Slamming Third Report and Order*, Verizon MA may use an automated TPV system so long as it complies with the requirements set forth in 47 C.F.R. 64.1120(c)(3).

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4 It should be noted that the original language in 47 C.F.R. 64.1120(c)(3) was established by the FCC in its *Report and Order* issued January 9, 1992 in CC Docket No. 91-64 — which preceded the FCC's adoption of automated TPV, as codified at 47 C.F.R. 64.1120(c)(3)(i) in 2001. *In the Matter of Policies and Rules Concerning Changing Long Distance Carriers*, CC Docket No. 91-64, FCC 91-398, *Slamming Report and Order*, 7 F.C.C.R. 1038 (1992).

5 *See In the Matter of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996 and Policies and Rules Concerning Unauthorized Changes of Consumers Long Distance Carriers*, CC Docket No. 94-129, FCC 00-255, Third Report and Order and Second Order in Reconsideration, 15 F.C.C.R. 159996 (2000) (hereinafter referred to as "*Slamming Third Report and Order*"). The FCC's slamming rules were adopted on July 21, 2000, and became effective on April 21, 2001.

As demonstrated by the TPV transcript[6] appended hereto as Exhibit II, Verizon MA's automated TPV of the Complainant Mr. Ober satisfied all of those FCC requirements. More specifically, Verizon MA's automated TPV system elicited the following information: (1) the identity of the complainant; (2) confirmation that the person on the call was authorized to make the carrier change; (3) confirmation that the person on the call wanted to make the change; (3) the names of the carriers affected by the change; (4) the telephone numbers to be switched; (5) and the types of service affected by the transaction. 47 C.F.R. § 64.1120(c)(3)(ii). Verizon MA's TPV system also met the other verification requirements, *e.g.*, the sales representative dropped off the call once the three-way connection was established; no marketing occurred during the automated TPV; the customer did not receive marketing information about preferred carrier freeze procedures during the verification process; and the subscriber had the option to be connected with a live agent. 47 C.F.R. § 64.1120(c)(3)(iii)-(iv). Therefore, the Department's reliance on the FCC's "oral authorization" language to support its conclusion that *all* "oral" responses are required for automated TPV systems is inappropriate and inconsistent with the stated intent of the FCC rules and *Slamming Third Report and Order*. *Order* at 7-8.

Finally, Verizon MA's automated TPV system is comparable to keypad response systems previously accepted by the FCC in other contexts. For example, in 1999, the FCC approved the former Bell Atlantic's use of an automated system to verify preferred carrier freeze requests from

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6 It should be noted that the prompting of each new question in the transcript shows that the customer's response to the previous question confirmed his intent to authorize a change in service provider. If the customer indicated a contrary intent, the system would have aborted the automated TPV session. It did not.

New York customers.[7] That system, commonly referred to as Voice Response Unit ("VRU") is virtually identical in functionality to Verizon MA's automated TPV.[8]

In granting its approval of the VRU system,[9] the FCC stated that "we believe that Bell Atlantic's VRU system is consistent with the spirit of our rules because it provides consumer protection against slamming while guarding against anticompetitive conduct." *VRU Order*, ¶ 6. As the FCC regulations governing the verification of carrier changes and the verification of preferred carrier freezes are essentially the same (*compare* 47 CFR §64.1120 with 47 CFR §64.1190), the FCC's approval of the keypad response based VRU system for preferred carrier freeze verifications is clear evidence of the FCC's intention to permit such automated TPV systems.

3. The Massachusetts Anti-Slamming Rules Do Not Prohibit the Use of Automated TPV Systems For Verification Purposes.

Like the FCC rules, the Massachusetts anti-slamming regulations permit the use of an automated TPV system. *See e.g.*, 220 C.M.R. 13.03(3) ("[u]nless TPV call is automated ..."). The Department established those rules in D.T.E. 99-18, in accordance with Mass. General Laws c. 93, §§ 108-113. *See* D.T.E. 99-18, *Rules Order*, issued November 12, 1999. It is apparent

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7 *See In the Matter of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996 and New York Telephone Company d/b/a Bell Atlantic-New York Request for Waiver*, CC Docket No. 94-129, DA 99-1548, Order, 14 F.C.C.R. 12230, at ¶ 6, released August 6, 1999 (Common Carrier Bureau) (hereinafter referred to as "*VRU Order*").

8 Verizon New York's automated preferred carrier freeze verification (and removal) system requires customers to enter their ten-digit telephone numbers and customer codes (*i.e.*, 6 digit code that appears on a customer's telephone bill), and then to press 1, 2 or 0 on the keypad to perform the available functions. Pressing 1 will freeze a customer's regional toll or long distance service. Pressing 2 will unfreeze a customer's regional toll or long distance service. Pressing 0 will transfer the customer to a live attendant.

9 At the time Bell Atlantic New York (now Verizon New York) sought a waiver to introduce the VRU system in 1999, the FCC had not yet issued its *Slamming Third Report and Order*, which expressly authorized the use of automated TPV systems for verification purposes, as discussed above.

that the Department attempted to model its rules after the FCC rules in effect at that time.[10] *Id.* at 4.

Mass. General Laws c. 93, § 109(c) and 220 C.M.R. 13.03(1) identify the customer-specific information required for verification purposes. Significantly, the *DTE Order* in this proceeding did not find that Verizon MA's automated TPV system did not comply with any of these state verification requirements. Instead, it simply stated that

> G.L. c. 93, § 109(a) provides that a change in a customer's local service provider shall only be considered to be authorized if the "LEC [local exchange carrier] that initiated that change provides confirmation that the customer did authorize such change ... through a signed LOA [letter of agency] or <u>oral</u> <u>confirmation</u> or authorization obtained by a company registered with the department to provide TPV services in the Commonwealth."

G.L. c. 93, § 109(a) (emphasis added).

Although Section 109(a) does refer to "oral confirmation of authorization," it does *not* require that Verizon MA obtain verbal responses for all customer-specific verification information. Likewise, while Section 13.03(1) of the Department's regulations recognizes that a proper authorization must confirm certain information (*e.g.*, social security number, date of birth, etc.), it does not require that all of the subscriber's responses be spoken. *See e.g.*, 220 C.M.R. 13.03(2). Thus, as with the FCC's rules, nothing in the Department's regulations *prohibits* the use of an automated TPV system that complies with these requirements.

Indeed, the TPV transcript in Exhibit II to this Motion demonstrates Verizon MA's compliance with the mandatory requirements to obtain and confirm the following information: (1) identity of the person spoken to, as well as appropriate verification data (*e.g.*, customer's date of birth); (2) the authority of the person spoken to regarding a change in carrier; (3) authorization

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[10] The Department's intent to follow the FCC's anti-slamming rules is also evidenced by the fact that it has officially "opted in" to the FCC's anti-slamming enforcement provisions.

given to change the carrier for a particular telephone line; and (4) the identity of the carrier which the customer authorized to be the new service provider. G.L c. 93, § 109(c)(2)(i)-(iv); 220 C.M.R. § 13.03(1)(b).& (2). Therefore, Verizon MA's automated TPV system – which requires customers to authenticate orally their identity and permits them to confirm a carrier change via a telephone keypad - does not conflict with any state rule.

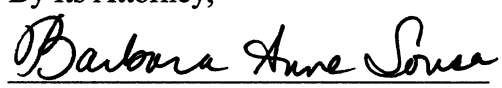
III. CONCLUSION

For the foregoing reasons, the Department should grant Verizon MA's Motion for Partial Reconsideration of the *Order*.

Respectfully submitted,

VERIZON MASSACHUSETTS

By Its Attorney,



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Dated: September 6, 2005

EXHIBIT I

Verizon's Automated TPV system is provided by Interactive Telesis (an independent TPV vendor). It is based on Dual Tone Multiple Frequency technology – a technology that has been widely used for almost 100 years. A brief summary of the underlying technology is as follows:

- Telephone keypad functionality: Each button on a telephone keypad produces a unique tone called DTMF (Dual Tone Multiple Frequency). A valid DTMF tone is comprised of two tones (dual) a high frequency tone and a low frequency tone that is unique to every button on the telephone keypad (1, 2, 3, 4, 5, 6, 7, 8, 9, *, 0 and #). These tones are the industry standard and used in all telephony environments i.e. landline, wireless etc., this standard has been in place for nearly 100 years. These tones enable networks to clearly identify the selected tone as DTMF vs. a human voice, static or any other noise on a telephone line that can sometimes occur.

DTMF Frequency Chart

Code	Tone Pair Frequencies (Hz)	Default Length (ms)
1	697, 1209	100
2	697, 1336	100
3	697, 1477	100
4	770, 1209	100
5	770, 1336	100
6	770, 1477	100
7	852, 1209	100
8	852, 1336	100
9	852, 1477	100
0	941, 1336	100
*	941, 1209	100
#	941, 1477	100

- Dual Recording is the process of recording **all sound** on a telephone line, *i.e.*, two-way conversations, three parties on one call as well as all the DTMF tones that may occur on a call.

- Interactive Telesis, has a tool that detects sound and non-sound (silence), the decibel level of the sound or non-sound and duration of utterance monitoring.

- IVR (Interactive voice response) is the technology used to interpret touchtone or keypad responses by specific tone. An IVR system performs the same functions as a computer, only with a telephone interface that can be used to gather information into a database as well as disseminate information for verification or informing purposes.

EXHIBIT II

TPV Transcript Dated 3/5/2004
Customer Name: John K. Ober
Telephone No. (508) 478-2527
Vendor: Interactive Telesis

Verizon Business Office Representative (BOR) dials the TPV Automated System (TPVAS)

TPVAS: Enter a center identification code followed by the pound key

BOR: Enters 100G

TPVAS: You entered 100G, if this is correct press 1

BOR: Enters 1

TPVAS: If the service changes being verified are for a BTN only, press 1

BOR: Enters 1

TPVAS: Enter the billing telephone number

BOR: Enters 5084782527

TPVAS: You entered 5084782527. If this is correct, press 1.

BOR: Enters 1

TPVAS: The confirmation code is 1eh6m7. Again the confirmation code is 1eh6m7. To repeat the confirmation code, press 1; otherwise press 2.

BOR: Enters 2

TPVAS: Enter the order

BOR: Enters c5ub7866

TPVAS: You entered c5ub7866. If this is correct, press 1

BOR: Enters 1

TPVAS: After the tone clearly say the billing name followed by the pound key

BOR: "John Ober"

TPVAS: You said "John Ober". If this is correct, press 1

BOR: Enters 1

TPVAS: After the tone say the caller's name followed by the pound key

BOR: "John Ober"

TPVAS: What service is being verified for?

BOR: Enters 1

TPVAS: You selected service option number 1, for local service to Verizon.

BOR: Enters 1

TPVAS: To verify

BOR: Enters 2

TPVAS: To verify

BOR: Enters 2

TPVAS: To add

BOR: Enters 2

BOR: Enters 2

TPVAS: To properly

BOR: Enters # key to transfer

Verizon BOR Conferences in Customer

BOR: Hello, Mr. Ober

Customer: Yes

BOR: Thank you for holding. I'm going to transfer you to the verification system. I do have to press the star key so you may hear a tone before the system starts so just be another moment here

Customer: OK

Verizon BOR Transfers Customer to TPVAS

TPVAS: Hello and welcome to the independent automated third party verification system. At anytime during this process you may press zero to be transferred to a live agent. This call will only take a few minutes. With your permission and to avoid errors, we would like to record this conversation. If you agree to the recording of this conversation, press 1; otherwise press 2.

Customer: Presses 1

TPVAS: I have the billing name as "John Ober." If this is correct, press 1; otherwise press 2.

Customer: Presses 1

TPVAS: After the tone, please say your first and last name. When finished, press the pound key.

Customer: "John Ober"

TPVAS: Are you an authorized party allowed to make changes to this account? If yes, press 1

Customer: Presses 1

TPVAS: I have your one telephone number as "5084782527." I am now verifying the choice of Verizon as your local service provider and that you have authorized Verizon to provide your local telephone service. If this is correct press 1

Customer: Presses 1

TPVAS: Your change will only apply to the numbers that you have requested, and only one local service provider may be selected per telephone number. To complete this verification, please say the month and day you were born. For example, if you were born on April 15th, say April 15th. Now, after you hear the tone, say the month and day you were born. When you have finished speaking, press the pound key.

Customer: June 25th

TPVAS: You said: "June 25th". If this is correct, press 1

Customer: Presses 1

TPVAS: Thank you for your time. Your verification is complete and your request will be processed. For Vermont customers, please feel free to call 17004141 to verify that your local toll regional toll request has been processed or 17005554141 to verify that your long distance request has been processed. Thank you for your time and have a pleasant day. Goodbye.

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Complaint filed by John K. Ober, pursuant to G.L. c. 93, §§ 108 et seq., with the Department of Telecommunications and Energy claiming that his local service was switched to Verizon New England, Inc., d/b/a Verizon Massachusetts, without authorization.	)	**D.T.E. 05-SL-10**

VERIZON MASSACHUSETTS' MOTION FOR STAY AND EXTENSION OF THE JUDICIAL APPEAL PERIOD

Verizon Massachusetts ("Verizon MA") requests that the Department stay its August 19, 2005, Order and extend the 20-day judicial appeal period pending a Department decision on Verizon MA's Motion for Partial Reconsideration filed September 6, 2005.

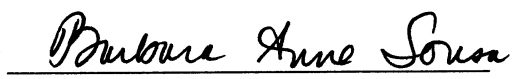
As set forth in that Motion, Verizon MA seeks reconsideration of the Department's ruling that the use of an automated third party verification ("TPV") system is not allowed because state and federal anti-slamming laws require oral authorization to confirm a carrier change. Motion at 4-10. By requesting that the Department extend the judicial appeal period pending ruling on Verizon MA's Motion for Partial Reconsideration, Verizon MA preserves its right to appeal to the Court should the Department not grant the relief requested.

WHEREFORE, for the reasons set forth above, Verizon MA's Motion for Stay should be granted.

Respectfully submitted,

VERIZON MASSACHUSETTS

By Its Attorney,



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