

COMMONWEALTH OF MASSACHUSETTS

Before The

MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Richmond Telephone Company)
)
 and)
) **DOCKET NO.** _____
 Bell Atlantic Mobile of Massachusetts)
 Corp, Ltd , and Pittsfield Cellular Telephone)
 Company, each d/b/a Verizon Wireless)
)

**JOINT PETITION FOR APPROVAL OF NEGOTIATED
INTERCONNECTION AGREEMENT BETWEEN
RICHMOND TELEPHONE COMPANY AND
VERIZON WIRELESS**

Richmond Telephone Company (“LEC”) and Bell Atlantic Mobile of Massachusetts Corporation, Ltd., and Pittsfield Cellular Telephone Company, each d/b/a Verizon Wireless (“CELL”) do by this petition request that the Massachusetts Department of Telecommunications and Energy review and approve the attached Interconnection Agreement pursuant to Sections 252(a)(1) and 252(e) of the Telecommunications Act of 1996 47 U.S.C. §§ 252(a)(1) and 252(e) (the “Act”). In support of their request, the parties state as follows:

1. The Agreement was arrived at through good faith negotiations between the parties as contemplated by Section 252(a) of the Act and provides for interconnection as addressed in Section 251 of the Act.
2. Pursuant to Section 252(e)(2), the Commission may only reject a negotiated Agreement if it finds that (1) the Agreement discriminates against another carrier or (2) implementation of the Agreement would not be consistent with the public interest, convenience and necessity.

3. LEC will make the Agreement available to any other telecommunications carrier operating within its territory. Other carriers are also free to negotiate their own terms and conditions pursuant to the applicable provisions of the Act. For this reason, the Agreement is not discriminatory.

4. In addition, implementation of the Agreement is consistent with the public interest because it will promote competition and enhance CELL's ability to provide Massachusetts telecommunications users with a competitive alternative for Commercial Mobile Radio Services.

5. In accordance with Section 252(e)(4) of the Act, the Agreement will be deemed approved if the Commission does not act to approve or reject the Agreement within 90 days from the date of this submission.

6. A copy of the executed Agreement, designated as Exhibit 1, is attached hereto and is incorporated into this petition by reference.

WHEREFORE, LEC and CELL respectfully request that the Commission approve the attached Interconnection Agreement under Section 252(e) of the Act as expeditiously as possible.

Respectfully submitted this _____ day of _____

RICHMOND TELEPHONE COMPANY		VERIZON WIRELESS	
By Name	<u>/s/ Christa Proper</u>	By Name	<u>/s/ Edward A. Harrop</u>
Title	<u>Vice President</u>	Title	<u>Member Technical Staff</u>
Address	<u>1416 State Road</u>	Address	<u>One Verizon Place</u>
	<u>Richmond, MA 01254</u>		<u>Mail Code GA3B1REG</u>
Phone	<u>413-447-3787</u>	Phone	<u>Alpharetta, GA 30004</u>
			<u>678-339-4258</u>

STATE OF _____

)

COUNTY OF _____

)

)

ss:

VERIFICATION

Christa Proper, being duly sworn or affirmed, states on oath or affirmation that she is Vice President for Richmond Telephone Company, and that the facts stated in the foregoing Joint Petition for Approval of Negotiated Agreement are true and correct to the best of his knowledge, information and belief.

Subscribed and sworn to or affirmed before
me this _____ day of _____, 2004

Notary Public

STATE OF GEORGIA)
) ss:
COUNTY OF FORSYTH)

VERIFICATION

Edward A. Harrop, being duly sworn or affirmed, states on oath or affirmation that he is Member Technical Staff, for Verizon Wireless, and that the facts stated in the foregoing Joint Petition for Approval of Negotiated Agreement are true and correct to the best of his/her knowledge, information and belief.

Subscribed and sworn to or affirmed before
me this _____ day of _____, 200_

Notary Public