## **ORIGINAL**

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August 8, 2003

### VIA FIRST CLASS POSTAGE AND EMAIL

Ms. Blanca S. Bayo, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: In re: Petition by Global NAPS, Inc. for arbitration pursuant to 47 U.S.C. 252(b) of interconnection rates, terms and conditions with Verizon Florida Inc., Docket No. 011666-TP

Dear Ms. Bayo:

The Commission's Order followed the Staff's recommendation that "[i]n order to implement this decision, GNAPs should provide Verizon with details of its originating carrier proposal. At a minimum, this information should include responses to the eight questions found on page 6 of exhibit 2." Order No. PSC-03-0805-FOF-TP at 25(July 9, 2003), see also Staff Recommendation at 37. These questions are as follows:

- 1. Number of different calling plans Global offers its customers
- 2. Geographic scope of each calling plan Global offers its customers and its associated price
- 3. The geographic location of Global's customers that may originate traffic to Verizon
- 4. The Global calling plan selected by each customer
- 5. The proposed format of, and process of providing, the foregoing information to Verizon
- 6. The proposed format for updating the foregoing information (including the process for providing such updates and the proposed frequency for such updates)
- 7. Global's proposal for verification of the above information

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8. Global's proposal for identifying what traffic is subject to reciprocal compensation versus access charges and proposal for verification.

Although Global would like to be in a position to respond fully to the questions delineated, it is premature given Global's current competitive inroads in the Verizon service territory. Global requested interconnection with Verizon on August 20, 2002 and provided a draft memorandum of understanding for interconnection based on an identical interconnection in place between the two companies in New Jersey executed earlier this year. This was rejected by Verizon and the matter is now in front of the FCC with a mediation session scheduled for September 10. Currently there is no interconnection between the two companies and no traffic passes between them. Thus, until such time as exchanging traffic is a reality, responses to the questions are impossible and/or irrelevant. Notwithstanding, Global responds, in part, as follows:

#### 1 Number of different calling plans Global offers its customers

Global has no outbound calling plans in effect in Verizon service territory. It is proposing alterations to its tariff to accommodate a test pilot program if/when interconnection with Verizon is complete.<sup>1</sup>

2 Geographic scope of each calling plan Global offers its customers and its associated price

Global's intended geographic scope for its calling plan(s) is LATA-wide but may be modified later depending on the results of the test pilot program.

3 The geographic location of Global's customers that may originate traffic to Verizon

<sup>&</sup>lt;sup>1</sup> The proposed tariff modifications were filed via federal express on August 8, 2003.

A response to this question would be entirely hypothetical given the current state of interconnection between the two companies.

#### 4 The Global calling plan selected by each customer

A response to this question would be entirely hypothetical given the current state of interconnection between the two companies.

# 5 The proposed format of, and process of providing, the foregoing information to Verizon

Global shall provide to Verizon call data records (CDRs) in electronic format on a monthly basis.

6 The proposed format for updating the foregoing information (including the process for providing such updates and the proposed frequency for such updates)

Unless and until there is an established need for altering the process of providing CDRs, Global does not intend to alter its established practice.

#### 7 Global's proposal for verification of the above information

The information provided is computer driven and needs no verification. However, should there be a dispute, the terms and conditions already contain a process for resolving potential problems.

8 Global's proposal for identifying what traffic is subject to reciprocal compensation versus access charges and proposal for verification.

Global has proposed face-to-face discussions to implement such measures stemming from its interconnection agreement with Verizon in Massachusetts. It has exchanged information and

proposed an agenda as well as identifying Global's representatives. It has yet to receive a proposed agenda from Verizon, nor has Verizon identified relevant personnel.

Global shall, of course, supplement these responses as more information becomes available and/or when interconnection takes place between the two carriers. Please contact me if you should have any questions. Thank you.

Sincerely.

James R. J. Scheltema

Director - Regulatory Affairs

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#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by electronic mail and U.S. Mail to those listed below on this 7th day of August, 2003:

Lee Fordham, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

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