

110056-TP

charges on IP-originated and IP-terminated traffic with more than 40 companies. Verizon disputed these charges from carriers with whom [BEGIN CONFIDENTIAL] xxxxxxxx xxxxxx xxxxxxxxxx xxxx xxxx xxxxxx xxx xxxxxx xx xxxxxx xxxxxxxx [END CONFIDENTIAL] on IP-originated or IP-terminated traffic. Given the uncertainty associated with compensation for VoIP traffic and the importance of reciprocal arrangements that foreclose incentives to engage in asymmetrical arbitrage schemes, the great majority of these disputes have not resulted in litigation. Verizon currently has disputes regarding IP-originated and IP-terminated traffic with a highly diverse range of carriers. For example, it has entered into disputes (which it is working to resolve) with both CLECs and ILECs; cable company affiliates and traditional telephone companies; small, mid-sized, and large carriers; and rural as well as non-rural carriers. The formal disputes (not including multiple affiliates) include:

[BEGIN CONFIDENTIAL]

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[END CONFIDENTIAL]

Only three of those disputes (including Bright House) are presently being litigated before state public service commissions. The following include traffic the providers rated as intrastate traffic originating and terminating in Florida:

[BEGIN CONFIDENTIAL]

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[END CONFIDENTIAL]

2. For each dispute identified in response to Interrogatory 1, please provide the name of the local exchange telecommunications service provider; the precise nature of the dispute; the docket number assigned by the Commission or court if the dispute resulted in a complaint to the Commission or court; the amount in controversy; and the precise resolution of the dispute.

RESPONSE: Verizon objects to this request to the extent it characterizes VoIP providers as "local exchange telecommunications service providers," which is incorrect. Notwithstanding this objection, Verizon incorporates by reference its response to Interrogatory No. 1 and provides this list of open dockets concerning VoIP compensation disputes: