

Dulaney L. O’Roark III
Vice President & General Counsel, Southeast Region
Legal Department



5055 North Point Parkway
Alpharetta, Georgia 30022

Phone 678-259-1449
Fax 678-259-1589
de.oroark@verizon.com

December 31, 2008 – **VIA ELECTRONIC MAIL**

Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No.
Joint Petition of MCImetro Access Transmission Services LLC d/b/a Verizon Access
Transmission Services; MCI Communications Services, Inc. d/b/a Verizon Business
Services; TTI National Inc.; Teleconnect Long Distance Services & Systems Co. d/b/a
Telecom*USA; and Verizon Florida LLC for Waiver of Rule 25-4.118, F.A.C.

Dear Ms. Cole:

The above-referenced Joint Petition for Waiver of Rule 25-4.118, F.A.C. is enclosed for
filing. Service has been made as indicated on the Certificate of Service. If there are
any questions concerning this filing, please contact me at 678-259-1449.

Sincerely,

s/ Dulaney L. O’Roark III

Dulaney L. O’Roark III

tas

Enclosures

MCImetro Access Transmission Services LLC d/b/a Verizon Access
Transmission Services
22001 Loudoun County Parkway
Ashburn, VA 20147
678-259-1449 (phone)
678-259-5105 (facsimile)

MCI Communications Services, Inc. d/b/a Verizon Business Services
22001 Loudoun County Parkway
Ashburn, VA 20147
678-259-1449 (phone)
678-259-5105 (facsimile)

TTI National Inc.
22001 Loudoun County Parkway
Ashburn, VA 20147
678-259-1449 (phone)
678-259-5105 (facsimile)

Teleconnect Long Distance Services & Systems Co. d/b/a Telecom*USA
22001 Loudoun County Parkway
Ashburn, VA 20147
678-259-1449 (phone)
678-259-5105 (facsimile)

Verizon Florida LLC
201 North Franklin Street
P. O. Box 110
37th Floor – MC FLTC0007
Tampa, FL 33602
678-259-1449 (phone)
678-259-5105 (facsimile)

2. The name, address, telephone number and facsimile number of
Petitioners' attorney is as follows:

Dulaney L. O'Roark III
201 North Franklin Street
P. O. Box 110
37th Floor – MC FLTC0007
Tampa, FL 33602
678-259-1449 (phone)
678-259-5105 (facsimile)

BACKGROUND

3. MCI provides local exchange and long distance services in Florida on a stand-alone basis and as part of integrated calling plans with calling features.² MCI also provides certain non-presubscribed services such as collect calling and the placing of calls for customers who have not subscribed to MCI long distance or local toll service. MCI offers these services both inside and outside Verizon's service territory. Within Verizon's service territory, MCI provides the majority of its local exchange services to residential and small business customers (so-called "mass market" customers) by purchasing Wholesale Advantage services, a complete platform of network elements, from Verizon. MCI does not provide facilities-based mass market local exchange service.

4. As of October 2008, in Verizon's service territory MCI had 190 local residential customers, 10,385 stand-alone long-distance residential customers, 432 local small business customers and 3,752 stand-alone long-distance small business customers. MCI will fully discontinue services to these mass market customers and exit the presubscribed residential and small business telecommunications market in Verizon's service territory on or before September 1, 2010.³ MCI expects that most local service transfers will occur within the first sixty days of this period. Long distance only customers will migrate in a second phase.

² Integrated calling plans include vertical services (e.g., caller id, call waiting and call forwarding), voicemail, intraLATA toll and long distance services.

³ MCI is not discontinuing its service to large business and enterprise customers in Verizon's Florida service territory, nor is it discontinuing any of its services outside Verizon's service territory in Florida. MCI also will continue to provide non-presubscribed services in Florida, both within and outside of Verizon's territory. Residential and small business end users in the Verizon service territory will continue to be able to access the MCI network on a non-presubscribed basis, for services such as collect calling and "dial around" services, or where their local exchange carrier installs MCI as the long distance PIC without the customer directly signing up with MCI for any calling plan.

5. MCI has made arrangements with Verizon, a duly certificated carrier in Florida, to take over service for any of MCI's presubscribed mass market customers in Verizon's service territory who do not choose an alternative service provider. Verizon will provide the same or substantially similar services to any such customers, and those customers will not be charged any additional amounts for the transfer of their service from MCI to Verizon. Accordingly, the transfer should take place smoothly for those customers.

6. MCI will notify its presubscribed residential and small business customers in Verizon's service territory of its market exit and will inform customers of their options to (a) select an alternative provider; (b) call Verizon directly to select a plan of their choice; or (c) be converted to Verizon during the migration process. A sample of the discontinuance letter that will be sent to presubscribed mass market customers at least thirty days before discontinuance of service is attached hereto as Attachment 1. In addition, customers will receive bill messages and at least one automated message 10-30 days prior to migration.

REQUEST FOR WAIVER

7. Pursuant to Rule 28-104.002, F.A.C., Petitioners request a waiver of Rule 25-4.118, which, among other things, prohibits a carrier from changing a customer's service provider without the customer's authorization; describes the means by which such authority may be obtained; requires certain disclosures by a carrier soliciting a change in service; and requires certain credits for unauthorized charges.

8. Petitioners request that Rule 25-4.118 be waived with respect to MCI's mass market customers in Verizon's service territory who are transferred to Verizon after they do not affirmatively select one of the three options available to them. In all probability, many of these customers will make no selection because they understand that by taking no action they will be transferred to Verizon. In any event, allowing these customers to be transferred to Verizon will permit their service to continue without disruption and they will remain free to switch carriers later if they decide to do so.

9. Rule 25-4.118 was implemented pursuant to Florida Statutes, section 364.603, which authorizes the Commission to adopt rules "to prevent the unauthorized changing of a subscriber's telecommunications service." Waiver of Rule 25-4.118 in these circumstances serves the purposes of the underlying statute because the procedures outlined above will ensure that customers will be notified of MCI's exit from the presubscribed mass market and informed of their available options. All customer transfers will be done with customers' knowledge and with their express or implied consent, thus promoting the purposes of section 364.603.

10. The waiver Petitioners seek would be temporary, for the period March 30, 2009 to September 1, 2010, for the sole purpose of effectuating MCI's exit from the residential and small business market in Verizon's service territory.

CONCLUSION

WHEREFORE, Petitioners respectfully request that the Commission approve their request for a waiver of Rule 25-4.118.

Respectfully submitted on December 31, 2008.

By: s/ Dulaney L. O'Roark III
Dulaney L. O'Roark III
P. O. Box 110, 37th Floor
MC FLTC0007
Tampa, Florida 33601-0110
Phone: (678) 259-1449
Fax: (678) 259-1589
Email: de.oroark@one.verizon.com

Attorney for Verizon Florida LLC

MCI
P.O. Box 3404
Cedar Rapids, IA 52406-3404

Verizon
P.O. Box 9000
Annapolis, MD 21401-9000

[Customer name]
[Customer address]
[City, FL #####-#####]

February 23, 2009
Account no: [MCI acct no.]

VERIZON WELCOMES MCI CUSTOMERS!

Dear [Customer name],

Verizon and MCI are pleased to announce the opportunity to deliver ongoing value to MCI customers by transitioning service from MCI to Verizon - a company with the strength of carrying over one billion calls a day at 99.9% network reliability.

MCI will no longer provide residential and small business local, toll and long distance service in your area, subject to state and federal approvals. While you will experience a change in providers, you will continue to enjoy exceptional telecommunications service.

According to our records, your local, local toll, and/or long distance service is provided by MCI. If MCI is not your current provider for local, local toll, and/or long distance service, your service with another provider will not be impacted. Please review this letter and consider your options to replace your MCI service.

You have three options to choose from:

1. CALL VERIZON directly before March 30, 2009 and select the plan of your choice. Turn the table on the economy by taking advantage of our current promotions! Contact Verizon at 1-877-953-5552 to learn about our wide variety of voice, video and internet product and bundle options.
2. CHOOSE NOT TO TAKE ANY ACTION and your service will be easily and automatically transferred to Verizon at no cost to you.
3. SELECT ANOTHER PROVIDER. To make this change, you must call that provider directly. You will be responsible for any charges imposed by the new provider for making this change.

If you have arranged a local, toll and/or long distance preferred carrier freeze(s) or call blocking option(s) through your local carrier on the service(s) involved in this transfer, the freeze(s) and call blocking option(s)

will be removed in order to transition your service to Verizon. You must contact your local carrier, after the transfer, to re-establish a freeze or call blocking option. If you are transferring your service to another provider, you will have to call MCI to lift the freeze before that service can be installed.

If you do not contact Verizon and you do not select another provider before March 30, 2009, your telephone service will be changed to Verizon and your calling plan will be Freedom Essentials. It includes unlimited calling within the United States and Canada. Also included are Call Waiting, Caller ID and Home Voice Mail (where available) for one low rate of \$49.99 per month. Certain calling features you may have used will not be included in your new calling plan. If you have an MCI international calling plan, your international calls will be billed under the International Choice Plan with City Rates. You'll be able to call abroad with the lowest rates Verizon Long Distance offers to over 240 countries and over 55 international cities for a low monthly fee of \$4.99. Rates apply 24 hours a day, seven days a week, and vary by country. If you spend \$10 per month or more making international calls, our International Single Rate plans may provide you with a better value. Contact us for details.

After the transfer, you will receive a final bill from MCI, and your new monthly bill will come from Verizon. You will be notified in your monthly bill if there are any changes to your rates, terms or conditions. You will not incur any charges for the automatic transfer to Verizon and you may change your calling plan, at no cost, by calling Verizon after the transfer.

If you have any questions regarding this notice, your MCI account, billing issues, complaints, or the discontinuation of service, please call MCI at 1-800-444-0003.

Verizon looks forward to the opportunity to serve your telecommunications needs. For questions regarding your new Verizon account or Verizon service options, don't hesitate to call us at 1-877-953-5552 or visit www.verizon.com.

Sincerely,

Verizon and MCI

MCI refers to the following companies: MCImetro Access Transmission Services LLC, MCI Communications Services, Inc.; TTI National, and Teleconnect Long Distance Services and Systems Company (d/b/a Telecom*USA).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent via U.S. mail on
December 31, 2008 to:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

s/ Dulaney L. O'Roark III