

**LIST OF ISSUES
AMENDMENT NO. 2**

SU E	AMENDMENT SECTION	DESCRIPTION	TYPE OF ISSUE	PARTIES SEEKING TO ARBITRATE
	2.5	How should the Amendment reflect Verizon’s right to implement any rate increases and new charges established by the FCC in its final unbundling rules or elsewhere?	Legal issue; only briefing required.	Verizon, AT&T/CCG, MCI, ¹ WilTel
F& C ie m ds be d]	3.1	How should the Amendment reflect the FCC’s determination that Verizon has no obligation to provide unbundled access to newly built Fiber-to-the Premises (“FTTP”) loops?	Legal issue; only briefing required.	Verizon, AT&T/CCG, WilTel, MCI
F& C	3.1	How should the Amendment reflect the <i>Triennial Review Order’s</i> limitations on unbundled access to overbuilt FTTP loops (<i>i.e.</i> , FTTP loops that replace or are built parallel to existing copper loops).	Legal issue; only briefing required.	Verizon, AT&T/CCG, WilTel, MCI

¹ “MCI” includes both MCI WORLDCOM Communications, Inc. and MCImetro Access Transmission Services LLC. MCI’s position is that all of the Amendment 2 matters should be included in Amendment 1.

² AT&T (which includes both AT&T Communications of the Pacific Northwest Inc. and TCG Seattle) and CCG (which includes Comcast Phone of Washington LLC, the only CCG carrier as to which Verizon maintains this arbitration) filed a joint issues list on November 11, 2004. Verizon has listed the AT&T/CCG issues that appear to correspond to particular Verizon issues. In many cases, Verizon’s issue subsumes a number of AT&T/CCG issues, either because AT&T and CCG have listed essentially the same issue multiple times, but with different wording, or because the AT&T/CCG list breaks issues into unduly narrow subissues.

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Γ& C ies	N/A	Is it necessary for the Amendment to include language addressing Verizon’s retirement of copper loop facilities?	Legal issue; only briefing required	AT&T/CCG, MCI
& C ies	AT&T/CCG draft sections, e.g., 3.2, 3.2.6, 3.2.7, 3.2.8, 3.3, 3.4.9, Exhibit A, Exhibit B. MCI draft sections 4, 5, 6, 7.	Should the amendment include terms for issues that are extraneous to the TRO or for items that existing agreements already address, such as terms requiring Verizon to provide regular copper loops, NIDs, line-splitting, a hot cut process, and various loop-related issues (e.g., line sharing, repair, maintenance and testing of loops, line conditioning)?	Legal issue, only briefing required. However, if the Commission were inclined to require amendment terms for the extraneous issues, testimony might be required to address operational issues and rates.	AT&T/CCG, MCI, WilTel
Γ& C ie	3.2.2	How should the Amendment reflect the Triennial Review Order’s limitations on unbundled access to hybrid loops for the provision of broadband services?	Legal issue; only briefing required.	Verizon, AT&T/CCG, WilTel, MCI

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	3.2.3	How should the Amendment reflect the Triennial Review Order’s limitations on unbundled access to hybrid loops for the purposes of providing narrowband services?	Legal issue; only briefing required.	Verizon, AT&T/CCG, WilTel, MCI
Γ& C ie	3.2.4	How should the Amendment reflect Verizon’s obligation under the <i>Triennial Review Order</i> to satisfy CLEC requests to provide narrowband services through unbundled access to a loop where the end user is served via Integrated Digital Loop Carrier (“IDLC”)?	Legal issue; only briefing required.	Verizon, AT&T/CCG, WilTel, MCI
Γ& C ie	3.2.4.3	Should Verizon be subject to standard provisioning intervals or performance measurements and potential remedy payments, if any, in the underlying Agreement or elsewhere, in connection with its provision of unbundled loops in response to CLEC requests for access to IDLC-served hybrid loops?	Legal issue; only briefing required.	Verizon, AT&T/CCG, WilTel, MCI
Γ& C ies	3.3.1	How should the Amendment implement Verizon’s obligation under the Triennial Review Order to provide unbundled access to the distribution sub-loop facility?	Legal issue; only briefing required.	Verizon, AT&T/CCG, WilTel, MC

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F& C ies	3.4	How should the Amendment implement any obligation Verizon may have under 47 U.S.C. § 251(c)(3) and 47 C.F.R. Part 51 to permit commingling of UNEs or combinations of UNEs?	Legal issue; only briefing required.	Verizon, AT&T/ CCG, WilTel, MC
F& C ies	3.4.2	How should the Amendment implement the FCC's service eligibility criteria for any combinations and commingled facilities and services that may be required under 47 U.S.C. § 251(c)(3) and 47 C.F.R. Part 51?		Verizon, AT&T/ CCG, WilTel, MC
F& C	3.5.1, 3.5.1.1, 3.5.3	How should the Amendment reflect an obligation that Verizon perform routine network modifications necessary to permit access to already constructed loops,	Legal issue; only briefing required.	Verizon, AT&T, CCG, WiTel, MC

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ie		dedicated transport, or dark fiber transport facilities, where Verizon is required to provide unbundled access to those facilities under 47 U.S.C. § 251(c)(3) and 47 C.F.R. Part 51.		
Γ& C ie	3.5.2	Should Verizon be subject to standard provisioning intervals or performance measurements and potential remedy payments, if any, in the underlying Agreement or elsewhere, in connection with its provision of unbundled loops or transport (including dark fiber transport) that Verizon may be required to provide under 47 U.S.C. § 251(c)(3) and 47 C.F.R Part 51, and for which routine network modifications are performed?	Legal issue; only briefing required.	Verizon, AT&T/ CCG, WilTel, MC
Γ& C ie	4.7	Should the Commission adopt Verizon’s proposed definitions?	Legal issue; only briefing required.	Verizon, AT&T/CCG, WilTel, MCI
Γ& C ie	Exhibit A to the Pricing Attachment	Should the Commission adopt the rates specified in Verizon’s Pricing Attachment?	Briefing; testimony; supporting cost study; hearing.	Verizon, AT&T/CCG, WilTel, MCI

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