

CAPTION SHEET

CASE MANAGEMENT SYSTEM

- 1. REPORT DATE: 00/00/00
- 2. BUREAU: OSA
- 3. SECTION(S):
- 5. APPROVED BY: DIRECTOR: SUPERVISOR:
- 6. PERSON IN CHARGE:
- 8. DOCKET NO: A-310489 F7039
- 4. PUBLIC MEETING DATE: 00/00/00
- 7. DATE FILED: 03/16/06
- 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: COMCAST PHONE, LLC

RESPONDENT/APPLICANT: CELLCO PARTNERSHIP

COMP/APP COUNTY:

UTILITY CODE: 310489

ALLEGATION OR SUBJECT

JOINT PETITION OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS & COMCAST PHONE, LLC FOR APPROVAL OF AN INTERCONNECTION AGREEMENT UNDER SECTION 252(E) OF THE TELECOMMUNICATIONS ACT OF 1996.

DOCUMENT FOLDER

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MAR 29 2006

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WASHINGTON, D.C. 20036

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March 16, 2006

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA UPS

Mr. James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor, Room N201
Harrisburg, PA 17120

Re: Request for Commission Approval of An Interconnection Agreement
between Comcast Phone, LLC and Cellco Partnership d/b/a Verizon
Wireless

A-310489 F7039

Dear Mr. McNulty:

Enclosed please find an original and three (3) copies of the above-captioned document for filing with the Pennsylvania Public Utility Commission. Also enclosed is a duplicate copy of this filing, and a self-addressed, postage-paid envelope. Please date-stamp the duplicate upon receipt and return it in the envelope provided.

Should you have any questions concerning this matter, please contact me at (202) 955-9766 or via email at eemmott@kelleydrye.com. Thank you for your attention to this matter.

Respectfully submitted,

Erin Weber Emmott

Erin Weber Emmott

Enclosures

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**BEFORE THE
COMMONWEALTH OF PENNSYLVANIA PA PUBLIC UTILITY COMMISSION
PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU**

Request for Commission Approval of)
An Interconnection Agreement between) Docket No. A- 310489 F7039
Comcast Phone, LLC and)
Cellco Partnership d/b/a Verizon Wireless)

JOINT PETITION

Comcast Phone of Pennsylvania, LLC d/b/a Comcast Digital Phone ("Comcast Phone"), a competitive local exchange carrier ("CLEC") and Cellco Partnership d/b/a Verizon Wireless ("Verizon Wireless"),¹ a commercial mobile radio service ("CMRS") provider (collectively, the "Parties"), pursuant to *In Re: Implementation of the Telecommunications Act of 1996, Docket No. M-00960799 (Order entered on June 3, 1996; Order on Reconsideration entered on September 9, 1996); see also Proposed Modifications to the review of Interconnection Agreements (Order entered on May 3, 2004) (the "Implementation Orders")*, and to the extent applicable, Section 252(e) of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 252(e), hereby jointly submit to the Pennsylvania Public Utility Commission ("Commission") an Interconnection and Reciprocal Compensation Agreement for Commercial

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¹ The following Verizon Wireless entities are also parties to the Interconnection Agreement: Allentown SMSA Limited Partnership, Northeast Pennsylvania SMSA Limited Partnership, Pennsylvania 3 Section 2 Limited Partnership, Pennsylvania 4 Sector 2 Limited Partnership, Pennsylvania RSA 1 Limited Partnership, Pennsylvania RSA 6 (I) Limited Partnership, Pennsylvania RSA No. 6 (II) Limited Partnership, Pittsburgh SMSA Limited Partnership and Verizon Wireless Power Partners Inc., all CMRS providers.

Mobile Radio Service (CMRS) (the "Interconnection Agreement") for review and approval.² In support of this joint petition, Comcast Phone and Verizon Wireless state as follows:

1. The Parties have entered into good faith negotiations and have executed an interconnection agreement. The Interconnection Agreement was fully executed as of January 5, 2006. A copy of the Interconnection Agreement, duly executed by the Parties, is submitted with this joint petition as **Attachment A**.

2. The Interconnection Agreement establishes arrangements for the exchange of Local and IntraMTA traffic between the Parties in Pennsylvania. In addition, the Interconnection Agreement provides the terms for interconnecting the Parties' networks and establishes reciprocal compensations arrangements for Local and IntraMTA traffic. The Interconnection Agreement carries a term of two years.

3. In accordance with Section 252(e) of the Act, the Commission is charged with approving or rejecting a negotiated Interconnection Agreement within 90 days of its submission. The Act provides that the Commission may only reject such an agreement if it finds that the agreement or any portion of the agreement discriminates against a telecommunications carrier who is not a party to the agreement or the implementation of the agreement or any portion thereof is not consistent with the public interest, convenience and necessity.

4. The Interconnection Agreement was voluntarily negotiated and agreed to by Comcast Phone and Verizon Wireless, and does not discriminate against a telecommunications

² While it is not clear that Section 252 applies to interconnection agreements such as the one between the Parties, out of an abundance of caution, and without waiving any right to assert that the agreement is not subject to the jurisdiction of the Commission, the Parties submit their Interconnection Agreement for Commission review. *See Qwest Communications International Inc. Petition for Declaratory Ruling on the Scope of the Duty to File and Obtain Prior Approval of Negotiated Contractual Arrangements under Section 252(a)(1)*, WC Docket No. 02-89, Memorandum Opinion and Order, 17 FCC Rcd 19337, 19341-42 (2002)(noting the role of the state commissions to determine which agreements require filing for approval).

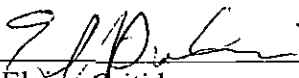
carrier not a party to the Interconnection Agreement. Approval of the Interconnection Agreement is consistent with the public interest, convenience and necessity.

WHEREFORE, Comcast Phone, LLC and Cellco Partnership d/b/a Verizon Wireless jointly request Commission approval of the Interconnection Agreement pursuant to the *Implementation Orders* and Section 252(e) of the Act as expeditiously as possible.

Respectfully submitted,

Cellco Partnership d/b/a Verizon Wireless

Comcast Phone, LLC

By: 
Name: Elaine Critides
Title: Senior Attorney

By: 
Name: John Sullivan
Title: VP and Chief Counsel Telephony

Date: 2/14/06

Date: 03/8/06

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Attachment A

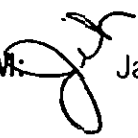
Interconnection Agreement

COMMONWEALTH OF PENNSYLVANIA
PUBLIC UTILITY COMMISSION

DATE: March 29, 2006

SUBJECT: A-310489 F7039

TO: Office of Special Assistants

FROM:  James J. McNulty, Secretary

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MAR 29 2006

**DOCUMENT
FOLDER**

Joint Petition of Cellco Partnership d/b/a Verizon Wireless and
Comcast Phone, LLC for Approval of an Interconnection Agreement
under Section 252(e) of the Telecommunications Act of 1996.

Attached is a copy of a Joint Petition for Approval of an Interconnection Agreement filed in connection with the above-docketed proceeding.

Enclosed is a copy of the notice that we provided to the Pennsylvania Bulletin to be published on April 8, 2006. Comments are due on or before 10 days after the publication of this notice.

This matter is assigned to your Office for appropriate action.

Attachment

cc: Bureau of Fixed Utility Services
Office of Administrative Law Judge-copy of memo only

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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MAR 29 2006

NOTICE TO BE PUBLISHED

Joint Petition of Cellco Partnership d/b/a Verizon Wireless & Comcast Phone, LLC for Approval of an Interconnection Agreement under Section 252(e) of the Telecommunications Act of 1996.

Docket Number: A-310489 F7039

DOCUMENT FOLDER

Cellco Partnership d/b/a Verizon Wireless & Comcast Phone, LLC by its counsel, filed on March 16, 2006, at the Public Utility Commission, a Joint Petition for approval of an Interconnection Agreement under Sections 251 and 252 of the Telecommunications Act of 1996.

Interested parties may file comments concerning the petition and agreement with the Secretary, Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265. All such Comments are due on or before 10 days after the date of publication of this notice. Copies of the Cellco Partnership d/b/a Verizon Wireless & Comcast Phone, LLC Joint Petition are on file with the Pennsylvania Public Utility Commission and are available for public inspection.

Contact person is Cheryl Walker Davis, Director, Office of Special Assistants, (717) 787-1827.

BY THE COMMISSION

James J. McNulty

James J. McNulty
Secretary

PA. CODE & BULLETIN

06 MAR 29 PM 1:15

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May 10, 2006

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VIA FACSIMILE (717) 783-6324 AND UPS

Mr. James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor, Room N201
Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION
SECRETARIAT/BUREAU

**DOCUMENT
FOLDER**

Re: **Docket No. A-310489F7039**: Interconnection Agreement between Comcast Phone of Pennsylvania, LLC and Cellco Partnership d/b/a Verizon Wireless

Dear Mr. McNulty:

Per discussion with Pennsylvania Public Utility Commission Staff George Strella, by this letter Comcast Phone of Pennsylvania, LLC and Cellco Partnership d/b/a Verizon Wireless hereby agree to comply with all federal and state statutes, regulations, rules, judicial decisions, and administrative rulings where applicable regarding 911 and E911 requirements in Pennsylvania.

Enclosed is an original and three (3) copies of this letter for filing with the Pennsylvania Public Utility Commission. Also enclosed is a duplicate copy of this filing, and a self-addressed, postage-paid envelope. Please date-stamp the duplicate upon receipt and return it in the envelope provided. Should you have any questions please contact me at (202) 342-8588 or via email at awartanian@kelleydrye.com. Thank you for your attention to this matter.



KELLEY DRYE & WARREN LLP

Mr. James J. McNulty, Secretary
Pennsylvania Public Utility Commission
May 10, 2006
Page Two

Respectfully submitted,

Katherine Barker Marshall
Annie G. Wartanian

cc: George Strella (via facsimile)

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June 13, 2006

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA UPS

Mr. James J. McNulty, Secretary
Pennsylvania Public Utilities Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor, Room N201
Harrisburg, PA 17120

Re: **Docket No. A-310489F7039:** Joint Petition of Cellco Partnership d/b/a Verizon Wireless and Comcast Phone, LLC for Approval of an Interconnection Agreement under Section 252(e) of the Telecommunications Act of 1996 - Electronic Copy of Interconnection Agreement

Dear Mr. McNulty:

Attached by diskette, please find an electronic copy of the Interconnection Agreement between Cellco Partnership d/b/a Verizon Wireless ("Verizon") and Comcast Phone, LLC ("Comcast"), as required by the Commission's Opinion and Order, dated May 19, 2006, in the above captioned case.

In addition, enclosed is an original and three (3) copies of this letter for your records as well as a duplicate copy and a self-addressed, postage-paid envelope. Please date-stamp the duplicate upon receipt and return it in the envelope provided. Should you have any questions please contact me at (202) 342-8858 or via email at awartanian@kelleydrye.com. Thank you for your attention to this matter.

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Sincerely,



Annie G. Wartanian
Counsel to Comcast Phone, LLC

Enclosures

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