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APPLICATION FOR CERTIFICATE OF CONVENIENCE AND NECESSITY AS A COMPETITIVE LOCAL EXCHANGE COMPANY BEFORE THE VIRGINIA CORPORATION COMMISSION ("CLEC App")

Name, Address and Telephone number of Applicant:

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List of principals of the Applicant:

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"An individual, a computer programmer and a Notary Public in and for the Commonwealth of Virginia"

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Specification of requirements

Section (B) requirements

Pursuant to 20VAC5-400-180. *Rules governing the offering of competitive local exchange telephone service*, the applicant supplies the following information for section (B), *Certification requirements.* The original text of the requirement will be repeated, followed by the applicant's response.

1. An original and 15 copies of an application for a certificate of public convenience and necessity shall be filed with the Clerk of the State Corporation Commission.

Applicant's Response: Well, I kind of suspect you are reading it right now. A copy of the application and tariffs will be enclosed on floppy disk so additional copies may be made as desired.

2. Notice of the application shall be given to all local exchange carriers in the applicant's proposed service territory. Each applicant shall publish notice in newspapers having general circulation in the proposed service territory in a form to be prescribed by the commission.

Applicant's Response: Mail out one page letters or a postcard to all my about 300 alleged competitors telling them I'm going to try to run them into Chapter 11 if I can by doing better than they can, and maybe by charging less than they do, or do the same to myself if I don't, or at least have a lot of fun trying, and maybe make a lot of money doing it, or again, at least have a lot of fun trying and make a little money. Or have a lot of fun trying and eat some of the costs. Gotcha, I'll either do that once I have their addresses or I'll have done that before I file this. Put a notice up in the paper(s) saying I'm doing this using whatever you tell me I have to say. Okay, I think I can do that.

3. The application shall identify the applicant including (i) its name, address, and telephone number; (ii) the name, address, and telephone number of its corporate parent or parents, if any; (iii) a list of its officers and directors or, if the applicant is not a corporation, a list of its principals; (iv) the names, addresses, and telephone numbers of its legal counsel; and (v) any other identifying information

the commission determines to be necessary.

Applicant's Response: Been there, done that, see page 1.

4. Each incorporated applicant shall demonstrate that it is authorized to do business in the Commonwealth of Virginia as a public service company.

Applicant's Response: Not incorporated, not applicable, so there.

5. Applicants shall be required to show their financial, managerial, and technical ability to render local exchange telephone service.

Applicant's Response: Oh, well that might be a problem but let me take a swing at it.

a. As a minimum requirement, a showing of financial ability shall include the applicant's most recent audited financial statements, most recent stockholders annual report and most recent SEC Form 10-K if the company is publicly traded.

Applicant's Response: I have the strong suspicion those only apply to corporations so I'm going to say they are not applicable to me. If not and I have to say something in response, what I will say is that as for being able to pay for the cost of operating this business, generally I'll have the customers pay in advance for anything that's going to cost me much more than pocket change, especially anything I have to pay someone else to provide. I'll have a few dollars on hand to pay bills between the time I can charge the customers and my bills come due plus the inevitable unexpected costs, not to mention payments I have to make where someone occasionally stiffs me on paying. And it will be *very* occasionally as I won't be extending much credit, if any.

b. To demonstrate managerial experience, each applicant shall attach a brief description of its history of providing telecommunications or other relevant services, if any; shall list the geographic areas in which it has and is currently providing service; and shall list the experience of each principal officer.

Applicant's Response: This sounds sort of like some *Catch 22* that is used to keep upstarts like myself out of this racket, since you can't have experience providing communications service if you haven't done it before, but I think I can take a shot at it.

This is my first application as a CLEC so I guess that makes me a virgin as I have no experience as a CLEC and am not now providing service anywhere yet. Further, I thought the whole reason I had to file this paper is that I'm not allowed to lose my virginity until I get permission from God. Correction, change the previous sentence to read, "Further, I thought the whole reason I had to file this paper is that I'm not allowed to operate a CLEC until I have permission from the Commission."

As for management experience, I was a telephone operator at a government agency, working for a government contractor. I was managing operator which means I had to answer the phones as well as schedule people because we ran continuous service, 24 hours a day, 7 days a week, and the contractor supplied operators were classified as essential government personnel. That means that we could even go to work if they declared Martial Law as we'd have a pass to get by. It may not be much, but in view of how important the service I managed provided was, I would say it fits into the requirements, so I think I can just squeak by.

c. The applicant shall demonstrate its technical ability by attaching a description of its experience in providing telecommunications or other relevant services, if any, or the applicant may provide other documentation which supports its technical abilities.

Applicant's Response: I installed the phone lines inside my house and they work. I've been doing that since I started taking phones apart - and putting them back together and they still were in operating condition - when I was 8 years old. So, since I'm over 40, I can claim over 30 years of experience in repairing, maintaining and installing telecommunications equipment. Since before 1995, I have hooked up and configured modems on mine and other people's computers and

I've been a telephone operator as I noted above. I've installed someone else's computer to a cable modem and configured their dialing capacity after I got rid of the piece of garbage Packard Bell computer they had and replaced it with a decent Hewlett Packard computer. I also set up the networking of computers I've installed (over 80) at the Consumer Product Safety Commission where I worked for a contractor. Before that I was a technical support operator for a subcontractor to a telephone company's Internet dial-up service, telling people over the phone on how to fix their computers settings from the way Microsoft misconfigured them (so it would work with its MSN service, I do believe) so that they would work with our service. So that gives me over 5 years of paid and volunteer experience in providing telecommunications services. Wow, I hadn't realized how much I really had done.

6. Each application for a certificate to provide local exchange service shall include the applicant's initial tariffs, which shall include rules, regulations, terms, and conditions. Applicants that desire to have any of their services deregulated or detariffed shall file such a proposal in accordance with subsection D of this section.

Applicant's Response: Tariffs will follow as a separate volume (because there's lots of noise in it). You want 'em, you got 'em. Whether you like 'em or not is not really important since they tell me I have to file new ones anyway if this application is approved.

7. The applicant shall file maps or other acceptable documents with the application for certification in sufficient detail to designate the actual geographic area or areas to be served. Such maps should also identify each proposed initial local calling area of the applicant.

Applicant's Response: See the pages in the tariff schedule under "Maps."

8. Each application shall include the applicant's proposed form of regulation for its services if such form of regulation differs from that set forth in subsection D of this section.

Applicant's Response: I can live with everything in section D, no biggie, no problem.

Section (C) requirements

Pursuant to 20VAC5-400-180. *Rules governing the offering of competitive local exchange telephone service*, the applicant supplies the following information for section (C), *Conditions for certification.* The original text of the requirement will be repeated, followed by the applicant's response.

1. In the public interest evaluation of the applicant's request for a certificate to provide local exchange service, the commission will, at a minimum, require a new entrant, either directly or through arrangements with others, to provide the following:

a. Access to 911 and E911 services;

Applicant's Response: Scenario 1: Customer dials 911, I'm using lines I'm buying at bulk from someone else and reselling them, I have no idea what you're doing as I have no control or concern about it, all I do is bill you for something more than what he charges me. He gives you dial tone, you dial the call, how and where it gets there, is his problem, not mine.

Scenario 2: Customer dials 911, I'm using my own lines that I've connected him to. I (meaning my equipment, I'm not stupid enough to sit around manually routing calls, I've got more important things to do) hand off his call with customer's phone number ("Automatic Number Identification" or "ANI") to whomever I'm buying the trunk lines that connect my network to the Public Switched Telephone Network ("PSTN"). I'll have given him the customer's name and address as part of the interconnection because I don't want the customer suing me because I didn't give them the address and his house burns down before the fire department shows up, or he drops dead with a heart attack and his heirs sue me because the ambulance couldn't find him. So anyway, my supplier is handed off the call, the ANI and has the customer info to tie into that ANI. He's got the call and now it's his problem, not mine.

Scenario 3: Customer dials 911, I'm using my own lines that I've connected him to, and I can make enough money to be worth the hassle and expense that would be involved in providing a direct connection to the Public Service Access Terminal ("PSAT") of the local Emergency Operations Center or whatever it is called, then I do that along with whatever else they need to identify the caller. Once I (again, meaning my equipment will) give them the call and the information, they've got the call and now it's their problem, not mine.

b. White page directory listings;

Applicant's Response: Verizon does that for everyone else (I have my own personal line through Starpower but it's listed in Verizon's book), so charge the customer whatever Verizon charges me, if anything.

c. Access to telephone relay services;

Applicant's Response: Someone else does that, Sprint, I think, is big on that. But again, see the info in 911 above. Either I'm just bulk reselling in which case I don't handle the calls, and it's the other guy's problem, not mine, or I just take whatever number they dial and hand it off to the trunk lines and the call goes through the network ("PSTN") and it's someone else's problem, not mine.

d. Access to directory assistance;

Applicant's Response: See white pages above. If it's not Verizon it will probably be whomever I buy my trunk lines from. As I said, they dial the call, either I'm bulk reselling and I don't do calls, or I hand it off to the PSTN and it's someone else's problem, not mine.

e. Access to operator services;

Applicant's Response: Applicant tediously repeats that response to this question is more-or-less identical to that provided in (c) and (d) above. To the extent necessary they are incorporated by reference.

f. Equal access to interLATA long distance carriers;

Applicant's Response: Same as in (c) through (e) except that if I'm handling my own lines and he's willing to loan me several thousand - or several hundred thousand - dollars worth of his equipment to connect his long distance network to mine, I'll be happy to do it and maybe he can pay me instead of my trunk line supplier too, and possibly pay me less so I still make money out of the deal and he saves money. And I wouldn't like it if I had to use some long distance company at whatever they wanted to charge just because the phone company is getting a kickback or rebate or a commission on each call, so I'm not going to do it either. The few cents on each call isn't worth the hassle and bad vibes from customers who feel - and rightly so - that I'm cheating them. I could not care less what 10-10 junk my customer wants to dial or which company he wants to use when he dials 1 plus the number.

g. Free blocking of 900- and 700-type services so long as the same requirement applies to incumbent local exchange companies; and

Applicant's Response: Those will go out directly over the PSTN and if I get charges I pass them on to the customer. If the customer doesn't pay I chargeback the supplier as it's not my problem. If the supplier complains I'll block the number but I still won't pay him if the customer is stiffing him; I'll give him the customer's name and address (he'll already have the phone number) and tell him to settle it between the two of them. If the customer doesn't want those type calls to go through I'll block them too.

This is again only applicable if I'm providing lines to customers directly, if I'm bulk reselling it's the supplier's problem other than I'll specifically tell them the customer wants the lines blocked, either via calling it in or using the automated system for installing lines or whatever. If the customer wants to call some sex line - or doesn't - it doesn't make any difference to me one way or the other, I just pass on the charges for them to pay or chargeback the ones the customers don't pay.

If my contract with my supplier makes me liable for customers 700 and 900 calls whether or not the customer pays me then those numbers will be automatically blocked from the get-go and the customer *will not be able* to unblock them unless I trust them *a lot*. *Nobody* spends my money without my permission.

h. Interconnection on a nondiscriminatory basis with other local exchange telephone service companies.

Applicant's Response: I'll hook up with anyone who'll let me. See my comments above in (f) above as applicable to long distance companies. If the other guy is willing to leave me the equipment to pass my customer's calls to him I'll be happy to do it, I don't care where the customer is calling.

2. To the extent economically and technically feasible, the new entrant should be willing and able to provide service to all customers in the same service classification in its designated geographic service area in accordance with its tariff offerings.

Applicant's Response: I have no problem with that. If I am reselling in bulk, the more customers I sell the more money I make. If I'm providing my own lines, I'll rent them out to anyone if I can get to them and I have the available capacity. If they're willing to pay me it's worth the effort to try.

3. The new entrant shall have procedures to prevent deceptive and unfair marketing practices.

Applicant's Response: The procedure for that is really simple. I probably won't advertise. That costs money and I dislike spending money unnecessarily. If they want someone who spends a lot of money on advertising let them go to MCI (if it's still in business since its owner Worldcom just went belly up) or Verizon. If I do advertise, I'll tell people exactly what I'm doing and what they can expect from me. I don't want some guy to think he's been cheated and either leave (and thus I lose money) or come punch me in the nose for lying to him. Besides that, not only would he get mad, he'll almost certainly bad mouth me to his friends and there's more customers I'll never get to sell to.

4. The new entrant shall comply with applicable commission service and billing standards or rules.

Applicant's Response: Where it's reselling of bulk service the service part is the supplier's problem, not mine; he has the Commission to watch over him. As far as billing is concerned, I'm going to send my bills out right away, I want to be paid. And I'll make sure they're right because I don't want to be on the phone all day with customers complaining about errors in their bills.

Where the service is provided over my lines, the standards will be as specified in the appropriate tariffs or as otherwise required by law to the extent it is possible to comply. This will become clear when reading the tariffs, which you should do the next time you have severe insomnia and need instant relief.

5. The new entrant shall, at a minimum, comply with the applicable intraLATA access requirements of incumbent local exchange telephone companies as determined in Case No. PUC850035, Commonwealth of Virginia, ex rel. State Corporation Commission Ex Parte: Investigation of competition for intraLATA, interexchange telephone service (20VAC5-400-120).

Applicant's Response: Applicant incorporates response to 1(f), above, by reference as if it were set down here in full. Cut, copy, paste.

D. Regulation of new entrants providing local exchange telephone service.

Applicant's Response: Ooh, that big word 'regulation' sounds scary but I'll take a crack at it.

1. Unless otherwise allowed by the commission, tariffs are required for all local exchange service offerings except those that are comparable to "competitive" offerings of the incumbent telephone company that do not require tariffs. The

commission may convene a hearing to determine the applicable requirements and classification of any new entrant's local exchange service offerings.

Applicant's Response: Translation, if Verizon can sell it without filing a tariff, I can too. Otherwise I have to file one. Gotcha.

2. The new entrant may petition the commission to consider deregulation or detariffing treatment for any of its specific service offerings.

Applicant's Response: Translation, if I want to sell something without a tariff I can sit on my hind legs at a commission hearing and beg like a dog to do so. Okay, if it comes to that I'll do that.

3. Unless otherwise allowed by the commission, prices for local exchange services provided by the new entrant shall not exceed the highest of the comparable tariffed services provided by the incumbent local exchange telephone company or companies in the same local serving areas. Tariff changes within this price ceiling plan shall be implemented as follows:

Applicant's Response: Well, duh, that's kind of obvious, nobody's going to pay me more than they'll pay Verizon for the same thing. Unless I'm doing something so fantastic Verizon can't touch it. Which probably ain't that hard to do but chances are I can still do it for less, I don't have the overhead they do.

a. Price decreases shall become effective on one-day notice to the commission.

Applicant's Response: You mean I can't cut prices *then* tell people? I guess I can live with that.

b. Price increases below ceiling rates shall become effective after 30 days notice is provided to the commission, and notice to customers is provided through billing inserts or publication for two consecutive weeks as display advertising in newspapers having general circulation in the areas served by the new entrant.

Applicant's Response: Well, yeah, you're not supposed to bait and switch people. Too bad you can't make cable companies follow the same rules.

c. Price ceilings shall be the highest tariffed rates as of January 1, 1996, for comparable services of any incumbent local exchange telephone company or companies serving within the certificated local service area of the new entrant. Price ceilings shall be increased as the highest tariffed rate of an incumbent is raised through applicable regulatory procedures. Unless otherwise determined by the commission, price decreases for an incumbent's service, whether initiated by the carrier or adopted by the commission, shall not require a corresponding decrease in the price ceilings applicable to the new entrant.

Applicant’s Response: See my answer to 3, above, again, nobody’s going to buy something from me if they can buy it elsewhere for less. And I don’t have to cut my prices just because Verizon does.

d. The commission may permit pricing structures or rates of a new entrant's local exchange service(s) that do not conform with the established price ceilings, unless there is a showing that the public interest will be harmed.

Applicant’s Response: Meaning I can ask to charge more if I want. Well, as I said before, I think it would be very difficult to get people to pay me, someone they don’t even know, more than lil’ ol’ Verizon.

e. These pricing requirements shall not apply to a new entrant's services that: (i) are comparable to services classified as competitive for the incumbent, or (ii) have been provided regulatory treatment different than that specified by these rules.

Applicant’s Response: Meaning I can charge anything I want to for detariffed services.

4. Services offered by the new entrant that are not comparable to services offered by the incumbent and for which the commission has not provided regulatory treatment different than that specified by these rules shall be filed with 30-days notice to the commission. Price decreases for these services shall become effective on one-day notice to the commission. Price increases shall become effective after 30-days notice to the commission and notice to customers in the manner prescribed by subdivision 3 b of this subsection.

Applicant’s Response: If you’ve never seen it before, you have to see if it’s reasonable for me to charge whatever I want to gouge people for it. Oh, excuse me, insert, “charge a price determined by the commission based on cost of providing the service plus reasonable profit” where "gouge" appears.

5. A new entrant may, pursuant to §56-481.2 of the Code of Virginia, submit an alternative regulatory plan to that described in this section for the commission's consideration in the applicant's certification proceedings or at a later date.

Applicant's Response: Translation, I can pick some other way of doing this if I want.

6. No form of earnings regulation shall be required for the regulation of new entrants. However, new entrants shall be required to file financial and other reports as identified in subsection E of this section to enable the commission to evaluate the effectiveness of local exchange telephone competition.

Applicant's Response: I don't have to prove what I'm charging goes beyond gouging (see definition, above) but I have to tell you how much money I do rip the customers off for, or whether I'm losing my shirt in the process. Gotcha.

7. No new entrant providing local exchange telephone service shall abandon or discontinue local exchange service except with the approval of the commission, and upon such terms and conditions as the commission may prescribe.

Applicant's Response: Well, if I'm doing bulk reselling all I'm doing is charging an override; if he quits then I can buy it from someone else. If it's a steep increase in costs then I'll pass them on to the customers after telling the commission and putting ads in the papers and waiting 30 days.

If I am providing my own lines it will be subject to the appropriate requirements as specified in the Tariffs.

8. Should the commission determine that the form of regulation of new entrants does not effectively, or is no longer necessary to, regulate the prices of their services, it may, pursuant to §56-481.2 of the Code of Virginia, modify the form of regulation.

Applicant's Response: Translation: if the rules for how the game is played don't work anymore then you can change them or get rid of them.

Financial and reporting requirements for new entrants.

1. All providers of local exchange telephone service certificated under this regulation shall be required to file the following reports with the commission's Division of Economics and Finance:

a. Annual report on the number of access lines by local exchange area and classified by residential and business lines.

Applicant's Response: So I have to let them know how many lines I've got running. Since if I'm charging people for them I have to know that in order to bill them and get paid, that shouldn't be a problem.

b. Annual price list for all detariffed competitive local exchange telephone services provided by the applicant.

Applicant's Response: Show what I charge for what I don't have to have tariffs for. Ok.

c. Quarterly statement of units and revenues for all competitive telephone services provided by the applicant.

Applicant's Response: Oh, more paperwork but I can live with it if I have to.

d. Audited financial statement, stockholders annual report, SEC Form 10-K and FCC Form M for the parent company and the new entrant, if available.

Applicant's Response: Not incorporated, not applicable.

2. Reports and information required by the Division of Public Service Taxation in performing its functions under §§58.1-2600 through 58.1-2690 of the Code of Virginia shall be filed with the commission's Division of Public Service Taxation.

Applicant's Response: Well, they gotta go somewhere, so it might as well be there.

3. A new entrant shall be required to remit the telecommunications relay surcharge amount to the commission pursuant to the October 5, 1990, order issued in Case No. PUC900029, Commonwealth of Virginia at the relation of the State Corporation Commission *Ex Parte: In the matter of implementing dual-party relay service* pursuant to Article 5, Chapter 15, Title 56 of the Code of Virginia (20VAC5-400-170). The remittance, along with any other required information, shall be made to the commission's Division of Public Service Taxation.

Applicant's Response: I suspect all that long talk refers to the deaf relay tax

	or E-911 surcharges. Whatever, customer pays it (or I do if it's circuits for my own account) and I pay it to the DPST.

4. Any expansion or reduction of the geographic service area of a new entrant that does not involve an expansion of the territory covered by an existing certificate shall require the filing of amended maps or other acceptable documentation with the commission's Division of Communications.

Applicant's Response:	If I change where I'm offering service I have to update the map.

5. Upon request of the commission staff, any new entrant shall file such other information with respect to any of its services or practices as may be required of public service companies under Virginia law.

Applicant's Response:	Bend over on request and submit to proctology exam.

6. A new entrant, determined by the commission to have a monopoly over any of its services, whether or not those services are telephone services, shall file annual data to demonstrate that its revenues from local exchange telephone services cover the long run incremental costs of such local exchange telephone services in the aggregate.

Applicant's Response:	Translation, we aren't supposed to subsidize monopoly services as a means to make it impossible for competitors to offer something else which competes with ours by making it impossible for them to sell it except by eating part of the cost. If I ever get to be the monopoly provider of anything it would have to be because I'm making money hand over fist, so I doubt that's going to happen. I'd probably have incorporated the business long before then and - as is my usual response - it won't be my problem then .

F. Interconnection.

1. Interconnection arrangements between local exchange carriers shall make

available network features, functions, interface points, and other service elements on an unbundled basis. The commission shall, on petition by any party to the proposed interconnection or on its own motion, determine the reasonableness of any interconnection request.

Applicant's Response: I can buy what I need to set up phone services for my customers ala carte, I don't have to take one service from a company just because I get something else from them. And I can come running and complain if I think they're being greedy or playing games to keep from providing service to a potential competitor, or the commission can do that too.

2. Interconnection arrangements should apply equally and on a nondiscriminatory basis to all local exchange carriers.

Applicant's Response: To quote infamous bank robber and poster child for the police benevolent association Rodney King, "We all have to get along." Or something like that.

3. Interconnection arrangements shall be made available pursuant to a bona fide written request. No refusal or unreasonable delay by any provider to another carrier will be tolerated.

Applicant's Response: Yeah, right. You would not believe the number of stunts a company can pull to create all sorts of delays, none of which you could put your finger on to really prove they were "unreasonable." But I have no reason to pull stunts like that if someone wants something from me because I'm going to charge him for it and the faster I do the faster I get paid. If he's willing to bother with me instead of going with one of my much larger companies who can probably do more (and probably take longer than I will, but that's beside the point.)

4. Local exchange carriers shall provide nondiscriminatory use of pole attachments, conduit space, and rights-of-way.

Applicant's Response: I certainly hope they will for me, but see (3) above. As I don't own any of these, they don't apply. Yet. But if I do, I got no problem as long as the standard practice for masturbation is used: do it privately so you don't scare the public with the appearance of the equipment, and clean up after themselves once they are finished playing around.

5. Negotiation of interconnection agreements should be completed within 90 days of a bona fide request. Interconnection agreements shall be filed with the commission within 10 days of their execution. Upon complaint of any affected party or on its own motion, the commission may initiate a proceeding to determine if any such agreement is reasonable and nondiscriminatory.

Applicant's Response: Translation, I will try to get it done while the other side stalls as much as it can until it can figure out whom to bribe in order to get away with stalling further in hopes I'll go away.

6. No sooner than 45 days from the initial interconnection request, any party to the request may petition the commission for a hearing in lieu of negotiations or as a result of unsuccessful negotiations. Upon such petition, the commission shall establish a proceeding to determine tariffed prices and service arrangements for interconnection.

Applicant's Response: Translation, same as (5) only the other side will stall faster.

7. Unbundled functional elements of a local exchange carrier's network that are made available through interconnection agreements shall also be made available on an individual tariffed basis within 60 days of filing unless otherwise ordered by the commission.

Applicant's Response: I can trade connections with them if I can get them to agree or I can buy them. And other people can trade connections with me or I can sell them to them.

G. Terminating traffic compensation.

1. Any compensation arrangement for the mutual exchange of local traffic should reflect the reciprocal relationship between local exchange carriers and the development of local exchange competition.

Applicant's Response: Meaning the one who uses more of the other guy's lines should end up paying more when settlements time comes around.

2. The commission may establish at any time, upon application or its own motion, appropriate compensation levels for mutual exchange of local traffic.

Applicant's Response: Anyone can ask to have the rates changed if they don't like them, or the commission can too.

3. Local exchange carriers may only deliver local traffic for termination on another carrier's local network at the compensation level established in conformance with this regulation.

Applicant's Response: Kickbacks and overcharging are frowned upon.

4. Any compensation arrangements for the mutual exchange of local traffic shall provide for equitable treatment or rates between the local exchange carriers.

Applicant's Response: Don't cheat each other.

H. Number portability and number assignment.

1. Consumers shall have the ability to retain the same telephone number if they remain in the same geographic area where the NXX is normally provided, regardless of their chosen local exchange carrier.

Applicant's Response: Update the switch software to import and export phone numbers to and from competitors.

2. True number portability shall be made available when technically and economically feasible.

Applicant's Response: Finally, the phone company no longer owns the customer's phone number. Hallelujah! It's about time someone finally did that.

3. Interim number portability arrangements shall be utilized until true number portability is available.

Applicant's Response: A kluge of call forwarding or other gimmick is okay until (2) above can be made to work.

4. To the extent feasible, the incumbent local telephone company shall provide new entrants with reservations for a reasonably sufficient block of numbers for

their use.

Applicant's Response: To which they will do everything they can to charge too much for providing them, if they don't simply delay "reasonably," just delay reasonably over and over and over and...

I. Universal service. The goals of universal service and affordability of basic local exchange telephone service need to be maintained in a competitive local exchange environment for the citizens of Virginia. The following requirements shall apply:

1. The commission may, if necessary, establish a Universal Service Fund and applicable payment mechanism. Any such fund shall require the participation and support of all local exchange carriers.

Applicant's Response: Just another tax to charge the customer and possibly a government subsidy. Pass the tax on to the customer so the subsidy can be paid, most likely, to our friends at Verizon.

2. The establishment of a Universal Service Fund shall first require the evaluation of the definition of basic local exchange telephone service and the calculation of the subsidy required to support the ubiquity of such service.

Applicant's Response: Determine what, in the range from two tin cans and a string, to an OC45 Sonet ATM connection delivered by fiber optics, is sufficient for most customers who need subsidized service, and how much it is going to cost to provide that subsidized service.

3. The incumbent local exchange companies shall be designated as the carriers of last resort in their current local serving areas until such time as the commission determines otherwise.

Applicant's Response: Verizon has to do it if nobody else will.

J. Commission authority. The commission may, in its discretion, waive or grant exceptions to any of these rules and may also attach conditions or limitations to any certificate issued under these rules or §56-265.4:4 C of the Code of Virginia.

Applicant's Response: If I need help I can pray to God, err, I mean if I need relief I may file a prayer for same with the

Commission. Probably not much difference in terms of the likelihood of a favorable response for either option.