

BEFORE THE  
ILLINOIS COMMERCE COMMISSION

VERIZON NORTH INC. F/K/A )  
GTE NORTH INCORPORATED, )  
VERIZON SOUTH INC. F/K/A )  
GTE SOUTH INCORPORATED, )  
AND CAT COMMUNICATIONS )  
INTERNATIONAL, INC. D/B/A CCI )  
)  
Joint Petition of Verizon North Inc. f/k/a )  
GTE North Incorporated, )  
Verizon South Inc. f/k/a )  
GTE South Incorporated, and )  
Cat Communications International, Inc. )  
d/b/a CCI )  
For Approval Pursuant To 47 U.S.C. )  
§§ 252 (a)(1) and 252(e), )  
of a Resale Agreement )

\_\_\_\_\_

JOINT PETITION  
FOR APPROVAL OF A RESALE AGREEMENT AMONG  
VERIZON NORTH INC. F/K/A GTE NORTH INCORPORATED, VERIZON SOUTH  
INC. F/K/A GTE SOUTH INCORPORATED, AND CAT COMMUNICATIONS  
INTERNATIONAL, INC. D/B/A CCI

Verizon North Inc. f/k/a GTE North Incorporated and Verizon South Inc. f/k/a GTE South Incorporated (collectively (“Verizon”)), and Cat Communications International, Inc. d/b/a CCI (“CCI”), Joint Petitioners, pursuant to 47 U.S.C. §§252(a)(1) and 252(e) and Ill. Admin. Code tit. 83, § 763, petition the Illinois Commerce Commission to approve the Resale Agreement (the “Agreement”) between Verizon and CCI, on the following grounds:

1. Petitioners Verizon North Inc. and Verizon South Inc. are each telecommunications carriers within the meaning of Section 13-202 of the Universal Telephone Protection Act of 1985, 220 ILCS 5/13-100, et seq. and each is authorized to provide and is

currently providing, intraMSA exchange and interexchange telecommunications services to customers within certain certificated areas of the State of Illinois.

2. Petitioner CCI is a certified provider of local two-way wireline dialtone service.

3. The proposed Agreement (attached to this petition as Exhibit No. 1) was negotiated voluntarily between Verizon and CCI. Accordingly, Verizon and CCI are requesting approval of the Agreement pursuant to 47 U.S.C. §§ 252(a)(1) and 252(e).

4. Under the Telecommunications Act of 1996, Public Law 104-104, 110 Stats. 56 (effective February 8, 1996), this Commission must approve the filed Agreement unless:

- (i) the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or,
- (ii) the implementation of such an agreement or portion is not consistent with the public interest, convenience, and necessity. *See* 47 U.S.C. § 252(e)(2).

5. Nor do agreements voluntarily negotiated between or among parties have to comply with the standards set forth in 47 U.S.C. § 251(b) & (c) or the pricing standards set forth in 47 U.S.C. § 252(d).<sup>1</sup>

6. As stated in the attached verified Statement in Support of a Resale Agreement, Exhibit No. 2, Verizon will make the arrangements set forth in the filed Agreement available on the same terms and conditions to any duly authorized telecommunications carrier operating within the State of Illinois. Therefore, this Agreement is not discriminatory.

---

<sup>1</sup> VOLUNTARY NEGOTIATIONS- Upon receiving a request for interconnection, services, or network elements pursuant to section 251, an incumbent local exchange carrier may negotiate and enter into a binding agreement with the requesting telecommunications carrier or carriers without regard to the standards set forth in subsections (b) and (c) of § 251. See 47 U.S.C.A. § 252(a)(1).

7. Among other things, this Agreement establishes the terms and conditions for resale of telecommunications services. Such agreements are to be encouraged. Thus, the Agreement is consistent with the public interest, convenience, and necessity.

8. The rates set forth in the Agreement are reasonable and compensatory.

THEREFORE, Verizon and CCI respectfully request that the Agreement Among Verizon North Inc. f/k/a GTE North Incorporated, Verizon South Inc. f/k/a GTE South Incorporated, and Cat Communications International, Inc. d/b/a CCI be approved as filed.

Respectfully submitted this \_\_\_\_\_ day of \_\_\_\_\_ 2000.

VERIZON NORTH INC.  
VERIZON SOUTH INC.

CAT COMMUNICATIONS  
INTERNATIONAL, INC. D/B/A  
CCI

By: \_\_\_\_\_

Tracy D. Pagliara, Esq.  
Verizon Services Group  
600 Hidden Ridge  
HQE03J36  
Irving, TX 75038  
Tel. No. (972) 718-6362  
Fax No. (972) 718-1250

By: \_\_\_\_\_

Mr. Norman D. Mason  
Cat Communications International, Inc. d/b/a CCI  
4142 Melrose Avenue, NW #25  
Roanoke, VA 24017  
Tel. No. (540) 265-2555 x118  
Fax No. (540) 362-8600  
e-mail nmason@ccitelecom.com

Douglas Dziak, Esq.  
HUNTON & WILLIAMS  
1900 K Street, NW  
Suite 1200  
Washington, D.C. 20006  
Tel. No.: (202) 955-1880  
Fax No.: (202) 778-2201  
email: ddziak@hunton.com

ATTORNEYS FOR VERIZON NORTH INC.  
AND VERIZON SOUTH INC.



STATE OF \_\_\_\_\_ )  
 )  
COUNTY OF \_\_\_\_\_ ) ss VERIFICATION

\_\_\_\_\_, being first duly sworn, deposes and states that he/she is the \_\_\_\_\_ of Cat Communications International, Inc. d/b/a CCI (“CCI”); that he/she is authorized by CCI to make this verification; that he/she has read the above and foregoing Joint Petition for and Statement in Support of the Approval of a Resale Agreement Among Verizon North Inc. f/k/a GTE North Incorporated, Verizon South Inc. f/k/a GTE South Incorporated and CCI and knows the contents thereof; and that said contents are true to the best of his/her knowledge, information and belief.

\_\_\_\_\_  
\_\_\_\_\_

Subscribed and sworn to before me, a notary public for the State of \_\_\_\_\_  
this \_\_\_\_\_ day of \_\_\_\_\_ 2000.

\_\_\_\_\_  
Notary Public

My commission expires: \_\_\_\_\_

