

BEFORE THE
ILLINOIS COMMERCE COMMISSION

VERIZON NORTH INC.,)
VERIZON SOUTH INC.)
AND VOICESTREAM WIRELESS)
CORPORATION)
)
Joint Petition of Verizon North Inc.)
Verizon South Inc. and)
VoiceStream Wireless Corporation)
Pursuant To 47 U.S.C. § 252 (i))
Regarding Adoption)
of an Interconnection Agreement)

JOINT PETITION OF VERIZON NORTH INC., VERIZON SOUTH INC. AND
VOICESTREAM WIRELESS CORPORATION REGARDING ADOPTION OF AN
INTERCONNECTION AGREEMENT

Verizon North Inc., Verizon South Inc. (collectively (“Verizon”)), and VoiceStream Wireless Corporation (“VoiceStream”), Joint Petitioners, pursuant to 47 U.S.C. §252(i), petition the Illinois Commerce Commission regarding the adoption of an interconnection agreement between Verizon and VoiceStream, on the following grounds:

1. Joint Petitioners Verizon North Inc. and Verizon South Inc. are telecommunication 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. VoiceStream represents that it is an FCC-licensed provider of two-way wireless service in the State of Illinois and that its adoption will cover services only in the State of Illinois.

3. Pursuant to Section 252(i) of the Telecommunications Act of 1996 (“Federal Act”), VoiceStream notified Verizon that it desired to adopt the terms of the interconnection agreement (the “Agreement”) between Verizon and AT&T Wireless Services., Inc. (“AWS”) approved by the Illinois Commerce Commission (the “Commission”) in Docket No. 97 NA-014, as amended. Subsequent to this, Verizon and VoiceStream signed a letter relating to VoiceStream’s adoption of the terms of the AWS Agreement. A copy of this letter is attached as Exhibit 1.

4. Section 252(i) of the Federal Act provides:

(i) Availability to other telecommunications carriers:

A local exchange carrier shall make available any interconnection, service, or network element provided under an agreement approved under this section to which it is a party to any other requesting telecommunications carrier upon the same terms and conditions as those provided in the agreement.

The Commission approved the Agreement pursuant to Section 252(e) of the Federal Act. Accordingly, per Section 252(i) of the Federal Act, VoiceStream has the right to adopt the Agreement’s terms.¹

5. Subject to the terms of the letter, there are no outstanding issues between Verizon and VoiceStream relating to such adoption.

¹ Verizon is submitting this petition pursuant to Section 252(i) of the Telecommunications Act of 1996 to notify the Commission of the adoption described herein. With respect to the prior applications of this nature, the Commission has elected to treat the adopted terms as a negotiated agreement. Because Section 252(i) requires the adoption to be implemented as a matter of law, Verizon does not agree with the Commission’s characterization of these adoptions as negotiated agreements. Nonetheless, Verizon shall abide by the adopted terms in accordance with, and subject to, the adoption letter executed by Verizon that is being submitted with this application as Exhibit 1.

6. As stated in the Statement in Support of an Adoption of Interconnection Agreement, attached as Exhibit 2, Verizon will continue to make the arrangements set forth in the Agreement available on the same terms and conditions to any duly authorized telecommunications carrier operating within the State of Illinois to the extent required and permitted under Section 252(i) of the Federal Act. Therefore, this filing is not discriminatory.

THEREFORE, Verizon and VoiceStream respectfully submit this Adoption of an Interconnection Agreement on this _____ day of _____, 2001.

VERIZON NORTH INC.
VERIZON SOUTH INC.

VOICESTREAM WIRELESS CORPORATION

By: _____

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
E-mail: ddziak@hunton.com

By: _____

Brett A. Snyder, Esq.
LeBouef, Lamb, Greene & MacRae, L.L.P.
1875 Connecticut Avenue, NW,
Washington, DC 20009-5728
Tel No. (202) 986-8008
Fax No. (202) 986-8102
E-mail: bsnyder@llgm.com