

Advocacy Submits Comment to FCC on the Motion for Expedited Order on Verizon Petition for Forbearance

On August 13, 2007, Advocacy filed a letter with the Federal Communications Commission (“FCC” or “Commission”) in response to the Commission’s request for comment on the *Motion for Expedited Order on Verizon Petition for Forbearance* filed on July 25, 2007. In 2005, Advocacy and other interested parties filed letters suggesting that the FCC consider the impact of its procedural grant of forbearance to Verizon on small businesses. In its August 13 letter, Advocacy urged the Commission to consider the additional comments from industry regarding the grant of Verizon’s petition by operation of law. A complete copy of Advocacy’s letter may be accessed at:

<http://www.sba.gov/advo/laws/comments/>.

- The Commission’s process of granting forbearance relief to carriers should utilize transparency to the greatest extent possible. It is important that members of industry understand the reasoning utilized behind agency decisions, particularly when these decisions will have a significant impact on the market. Forbearance petitions are unique in this way, and Advocacy urges the FCC to conduct the appropriate analysis, including a small business impact statement and publish their findings with regard to Verizon’s grant of forbearance that was approved systematically via “operation of law.” That is, because the FCC failed to approve or disapprove the petition within a designated time, the petition was granted.
- The Commission should issue an Order in accordance with the *Motion for Expedited Order on Verizon Petition for Forbearance*. Advocacy urges the FCC to further delineate the types of “broadband services” intended to be covered in its grant of forbearance to Verizon, in order to address any confusion by small businesses on this matter.

For more information, visit Advocacy’s website at: <http://www.sba.gov/advo/> or contact Assistant Chief Counsel Cheryl Johns by e-mail at: cheryl.johns@sba.gov, or by phone at: (202) 205-6949.