



Jennifer M. Granholm
GOVERNOR

STATE OF MICHIGAN
PUBLIC SERVICE COMMISSION
DEPARTMENT OF LABOR & ECONOMIC GROWTH
KEITH W. COOLEY
DIRECTOR

Orjiakor N. Isiogu
CHAIRMAN

Monica Martinez
COMMISSIONER

Steven A. Transeth
COMMISSIONER

April 18, 2008

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington D.C. 20554

In re: WC Docket 07-139: In the Matter of Petition of AT&T Inc. for Forbearance under 47 U.S.C. § 160 (c) from Enforcement of Certain of the Commission's ARMIS Reporting Requirements.

&

WC Docket 07-273: In The Matter of Petition of Verizon for Forbearance under 47 U.S.C 3 160(c) from Enforcement of Certain of the Commission's Record Keeping and Reporting Requirements

Dear Ms. Dortch,

On April 18, 2008, the undersigned, on behalf of the Michigan Public Service Commission sent a copy of the attached letter, via email, to each of Chairman Kevin J. Martin, Commissioner Michael J. Copps, Commissioner Jonathan S. Adelstein, Commissioner Debra Taylor Tate, and Commissioner Robert M. McDowell urging the FCC to deny the Petitions for Forbearance in the above mentioned dockets.

Sincerely,

Robin Ancona, Director
Telecommunications Division
Michigan Public Service Commission

Enclosure



Jennifer M. Granholm
GOVERNOR

STATE OF MICHIGAN
PUBLIC SERVICE COMMISSION
DEPARTMENT OF LABOR & ECONOMIC GROWTH
KEITH W. COOLEY
DIRECTOR

Orjiakor N. Isiogu
CHAIRMAN

Monica Martinez
COMMISSIONER

Steven A. Transeth
COMMISSIONER

VIA EMAIL

April 18, 2008

Chairman Kevin J. Martin
Federal Communications Commission
445 Twelfth Street, S.W.
Washington D.C. 20554

In re: WC Docket 07-139: In the Matter of Petition of AT&T Inc. for Forbearance under 47 U.S.C. § 160 (c) from Enforcement of Certain of the Commission's ARMIS Reporting Requirements.

&

WC Docket 07-273: In The Matter of Petition of Verizon for Forbearance under 47 U.S.C 3 160(c) from Enforcement of Certain of the Commission's Record Keeping and Reporting Requirements

Dear Chairman Martin,

The Michigan Public Service Commission (MPSC) strongly believes that the Petitions of AT&T Inc. and Verizon for Forbearance from ARMIS reporting requirements should be denied. ARMIS reports have provided the MPSC with valuable data that is otherwise unavailable to state commissions. Having access to the information contained in these reports remains an essential component in many of the MPSC regulatory proceedings.

In fact, witness testimony filed on August 31, 2007, in a current Verizon North, Inc. and Contel of the South, Inc. d/b/a Verizon North Systems TSLRIC/TELRIC case before the MPSC¹ relies on data from ARMIS Reports as supporting documentation for Verizon North Systems cost study assumptions. Verizon North System's witnesses pointed specifically to two reports, 43-03 and 43-08, as support for the areas of avoided costs, retail percentage, and projection of access lines losses.² Because ARMIS reports are available for public review, the Michigan Public

¹ Documents filed in this case, Case No. U-15210, are available for review on the MPSC's website.

See specifically, Direct Testimony of Joseph S. Williams on behalf of Verizon North Inc. and Contel of the South, Inc. d/b/a Verizon North Systems, pages 27 and 33, referencing ARMIS report 43-03 and Direct Testimony of

Service Commission may easily cross-check these cost study assumptions. The Michigan Public Service Commission believes this is just one example of the strong evidence that state commissions are continuing to need access to the information contained in ARMIS reports.

Following are links to the comments filed by the Michigan Public Service in WC Docket 07-139 on August 20, 2007 and WC Docket 07-273 on February 5, 2008. The Michigan Public Service Commission again encourages the FCC to deny the petitions of AT&T Inc. and Verizon with regards to their Petitions for Forbearance in WC Dockets 07-139 and 07-273.

[WC 07-139 Comments](#)

[WC 07-273 Comments](#)

Sincerely,

A handwritten signature in cursive script that reads "Robin Ancona".

Robin Ancona, Director
Telecommunications Division
Michigan Public Service Commission