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Joseph A. Post
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January 23, 2012

Honorable Jaclyn A. Brillling
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Re: Case 09-M-0527: Comments of Verizon New York Inc. on Further Extension of Transition Fund

Dear Secretary Brillling:

In the January 4, 2012 Notice accompanying the issuance of Judge Jack's Recommended Decision ("RD"), the Commission sought comments on:

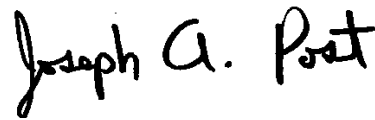
a proposal to further extend the Transition Fund, with pro rata contributions from the current contributors. The additional contributions are proposed to be no greater than \$350,000 and are designed to be sufficient to continue current Fund obligations on a monthly basis until such time as the Commission renders a decision on Phase II issues relating to the establishment of a state universal service fund.

Verizon New York Inc. ("Verizon") — which, together with its regulated wireline affiliates in New York has been the largest contributor to the Temporary Transition Fund Extension ("TTFE") approved by the Commission in July 2010 — and which would continue to be the largest contributors to this proposed further extension of the Transition Fund — supports

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the Commission's proposal.¹ As the briefs and testimony in this proceeding made clear, Verizon strongly opposes the creation of a state high-cost universal service fund ("SUSF") such as the one proposed in the RD, and intends to file exceptions to the RD's recommendations. Nevertheless, we supported the TTFE, largely on the pragmatic grounds that it would avoid any perceived necessity for a "rush to judgment" on issues related to the creation of an SUSF, and provide the opportunity for a reasoned and considered exploration of those issues. Similar considerations warrant a limited further extension here. Accordingly, Verizon supports the Commission's proposal, provided that: (a) the total amount collected under this extension would be strictly limited to \$350,000; (b) the extension would be governed by the provisions of the TTFE related to the identity of contributors, recipient eligibility, contribution methodology, refund methodology, and reservation of rights.

Respectfully submitted,

A handwritten signature in black ink that reads "Joseph A. Post". The signature is written in a cursive, slightly slanted style.

Joseph A. Post

cc: Hon. Howard A. Jack
Active Party List

¹ Cellco Partnership, d/b/a Verizon Wireless, has also authorized me to state that it supports the proposal.