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## Verizon Business Policy for Settlement-Free Interconnection with Internet Networks

### Background and Introduction

This document sets forth Verizon Business' Policy for Settlement-Free Interconnection with Internet Networks ("Policy"), also referred to as "peering". Verizon Business regularly updates its Policy and maintains the current version of its Policy on the Verizon Business public Web site at [www.verizonbusiness.com/peering](http://www.verizonbusiness.com/peering).

Part 1 of the Policy details the requirements that an Internet Network requesting interconnection (the "Requester") must meet in order to qualify for settlement-free interconnection. For purposes of this Policy, an Internet Network must be a single Autonomous System ("AS"). The Policy establishes separate requirements for each of Verizon Business' three regional Internet Networks, AS701 (Verizon Business-US), AS702 (Verizon Business-Europe), and AS703 (Verizon Business-ASPAC (Asia Pacific)), with the requirements scaled for each network. Verizon Business also will consider requests for settlement-free interconnection on a national level or in other regions of the world, with the same guiding principles and with appropriately scaled interconnection requirements. Part 2 of the Policy specifies the operational requirements for interconnecting networks, which both the Requester and Verizon Business must satisfy. Finally, Part 3 contains some general notifications regarding the Policy.

This Policy applies to all requests for settlement-free interconnection with a Verizon Business regional Internet Network, either via dedicated connections ("direct peering") or via traffic exchange at a multi-party network access point ("public peering").

### 1. Interconnection Requirements

- 1.1 **Geographic Scope.** The Requester shall operate facilities capable of terminating IP customer leased line connections onto a device in at least 50% of the geographic region in which the Verizon Business Internet Network with which it desires to interconnect operates such facilities. This currently equates to 25 states in the United States, 9 countries in Europe, or 3 countries in the Asia-Pacific region. The Requester also must have a geographically-dispersed network. In the United States, at a minimum, the Requester must have a backbone node in each of the following eight geographic regions: Northeast; Mid-Atlantic; Southeast; North Central; South Central; Northwest; Mid-Pacific; and Southwest.
- 1.2 **Traffic Exchange Ratio.** The ratio of the aggregate amount of traffic exchanged between the Requester and the Verizon Business Internet Network with which it seeks to interconnect shall be roughly balanced and shall not exceed 1.8:1.
- 1.3 **Backbone Capacity.** The Requester shall have a fully redundant backbone network, in which the majority of its inter-hub trunking links shall have a capacity of at least 9953 Mbps (OC-192) for interconnection with Verizon Business-US, 2488 Mbps (STM-16) for interconnection with Verizon Business-Europe, and 622 Mbps (OC-12) for interconnection with Verizon Business-ASPAC.
- 1.4 **Traffic Volume.** The aggregate amount of traffic exchanged in each direction over all interconnection links between the Requester and the Verizon Business Internet Network with which it desires to interconnect shall equal or exceed 1500 Mbps of traffic for Verizon Business-US, 150 Mbps of traffic for Verizon Business-Europe, and 30 Mbps of traffic for Verizon Business-ASPAC.
- 1.5 **Transit Autonomous Systems.** The Requestor shall provide transit services to a minimum number of Internet Networks (Autonomous Systems) as follows: 1500 unique transit networks for interconnection with Verizon Business-US; 100 unique transit networks for interconnection with Verizon Business-Europe; and 10 unique transit networks for interconnection with Verizon Business-ASPAC.

### 2. Operational Requirements

The following operational requirements apply both to the Requester and to the Verizon Business Internet Network with which it desires to enter into a settlement-free interconnection arrangement:

- 2.1 Each Internet Network must establish and maintain traffic exchange links of a sufficient robustness, aggregate capacity, and geographic dispersion to facilitate mutually acceptable performance across the interconnect links.
- 2.2 Each Internet Network must operate a fully functional 24x7 Network Operations Center.

- 2.3 Each Internet Network must set next hop to be itself, the advertising router of the network. Each Internet Network will propagate such routes to its transit customers with its own router as next hop.
- 2.4 Each Internet Network shall implement "shortest exit routing" and advertise routes consistent with that policy, unless both Internet Networks mutually agree otherwise based on special circumstances.
- 2.5 Each Internet Network will restrict its advertisements to non-transit routes originating within the geographic region for which peering is established and will not propagate the received route announcements outside such region.
- 2.6 Each Internet Network must operate a fully redundant network, capable of handling a simultaneous single-node outage in each network without significantly affecting the performance of the traffic being exchanged.
- 2.7 The two Internet Networks must exchange with each other prior to any settlement-free interconnection agreement a free shell or PPP account for testing and auditing purposes related to routing. This will be used for confirmation of traffic flows, troubleshooting of interconnection-related issues, and auditing purposes.
- 2.8 Each Internet Network must be responsive to unsolicited email and network abuse complaints, as well as routing and security issues, providing a knowledgeable technician within a two-hour period after notice.
- 2.9 For the purposes of Requirements 1.2 and 1.4 of the Policy, all traffic is to be measured over interconnection links. In the event that such links do not exist, the two Internet Networks may establish temporary test links for the purposes of traffic measurement. In the event that establishing such links is not feasible or desirable, traffic will be measured at peak utilization, based upon a representative sample consistent with industry practice.
- 2.10 For the purposes of Requirements 1.2 and 1.4 of the Policy, the traffic to be measured will include only what is being exchanged by the two Internet Networks and their respective customers (excluding any transit traffic) in the specific geographic region for which settlement-free interconnection has been requested.
3. General Policy Notifications
  - 3.1 The two Internet Networks must enter into a Mutual Non-Disclosure Agreement and an Interconnection Agreement.
  - 3.2 The requirements in Part 1 must be met at the time the request for settlement-free interconnection with Verizon Business is made.
  - 3.3 All requirements of the Policy must continue to be met to continue a settlement-free interconnection relationship. Status under the policy will be evaluated periodically. In the case of a change in ownership or control of an Internet Network with which Verizon Business has an interconnection agreement, status under the policy will be evaluated within 30 days of such change.
  - 3.4 Verizon Business will continue to monitor the development of the Internet and traffic conditions and make appropriate changes in this Policy as the Internet continues to evolve. Verizon Business reserves the right to modify this Policy at any time. Any contractual rights shall arise out of a bilateral interconnection agreement, not this Policy.
  - 3.5 All requests for settlement-free interconnection should be submitted to Verizon Business via e-mail at [peering@verizonbusiness.com](mailto:peering@verizonbusiness.com). An Internet Network may submit a request for interconnection once per calendar quarter.

