BEFORE THE
STATE CORPORATION COMMISSION
OF THE COMMONWEALTH OF VIRGINIA

ESTABLISHMENT OF A	**:**	
COLLABORATIVE COMMITTEE	**:**	**Case No. PUC000026**
TO INVESTIGATE MARKET	**:**	
OPENING MEASURES	**:**	

AT&T COMMUNICATIONS OF VIRGINIA, INC.'S
COMMENTS ON PROPOSED METRIC OR-6 ORDER ACCURACY

On June 23, 2001, Verizon circulated to the Collaborative its proposed metric OR-6-04 Order Accuracy.[1] Although AT&T believes the proposed metric is a reasonable measure - but only of *overall* directory listing order accuracy - the metric does not deal with directory listing order *completeness*. The proposed metric does not measure omissions from the directory. Furthermore, the measure should be revised to reflect order accuracy of stand-alone directory listing orders to insure a statistically-valid sampling of stand-alone orders, an issue raised by Cox, but unaddressed by Verizon cryptic July 30, 2001, response.

OR-6-04 measures the percentage of directory listing orders completed as ordered by the CLEC compared to the percentage of directory listing orders completed. If the listing is not complete, it is not measured. Directory listing errors have a severe impact on consumers. If directory listing information for a consumer is omitted or is listed incorrectly, there is no practical means to correct the error short of re-publishing the entire directory. As a practical reality, the consumer must usually endure the error and wait until the next directory a year later; loose-leaf errata directory sheets are no substitute for a correct listing in the directory. Consequently,

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[1] Verizon represented that the development of this metric sprung from the 271 hearings in Pennsylvania and the directory listings problems raised there.

OR-6-04 should be written to ensure that all types of directory error - including omissions - are reported accurately.

A. Completeness.

AT&T submits that Verizon's proposed directory listing metric is a reasonable measure of Verizon's directory listing order *accuracy*, but it does not address completeness and does not collect a statistically valid sample of stand-alone orders. OR-6-04 proposes that Verizon use a manual audit process to sample approximately 400 orders for Resale and 400 orders for UNE each month (20 orders randomly sampled each business day for Resale and UNE respectively and for orders with Directory Listing requests). Verizon then would compare required fields on the latest version of the LSR to the completed Verizon Service Order(s). If one of the sampled orders were inaccurate, Verizon would detect the error when it compares the internal Verizon order to the LSR version.

The proposed metric falls short, however, as a measure of directory listing order *completeness*. In CLECs' experience in Virginia, with which the Commission is only too familiar, a substantial number of directory listing errors occur when Verizon omits the customer's information from the directory entirely. For instance, a CLEC might send Verizon 100 directory listing orders, but 20 of the orders are somehow lost. No matter how many completed orders Verizon samples and compares to the LSR, the proposed metric will never capture the 20 missing orders. Instead, OR-6-04 will reflect 100% compliance if the 80 orders that can be accounted for were processed correctly. Omissions are serious errors, and OR-6-04 Order Accuracy ought to address them.

B. Stand-Alone Directory Listing Orders.

A second weakness of the proposed metric is that it does not adequately address the concerns raised by Cox, and amplified by AT&T. Cox, which provides

its own facilities-based services, questioned if stand-alone directory listings would be included in OR-6-04. AT&T amplified that a statistically valid number of stand-alone orders needed to be included in the sample, so that a determination can be made as to the accuracy of stand-alone orders. Currently, a small percentage of Verizon's directory listing orders are stand-alone orders. That is a small but critical subset because it represents the directory listing orders for CLECs who have devoted substantial resources to the development of their own facilities-based network. All of the orders of a facilities-based CLEC may be stand-alone orders; therefore the accuracy of directory listings *overall* is not particularly relevant to a facilities-based CLEC, but the accuracy of stand-alone directory listings is the relevant measure for such carriers and their customers. If Verizon samples just 20 random UNE orders each business day, only a small subset of those 20 orders are likely to be stand-alone orders; there may be none or too few stand-alone orders to reach a statistically valid conclusion that *stand-alone* directory listing orders were provisioned reasonably.

In its cryptic response, Verizon stated, "Stand-alone directory listings will not be excluded from the sampling process."[2] This is nonresponsive and unhelpful. Whether stand-alone directory listings are *excluded* from the sampling process is only half of the issue. The issue, raised by AT&T and recognized by Verizon, is whether the metric ensures that a statistically significant number of stand-alone directory listing will be *included* in the sampling process. Verizon does *not* affirmatively state that a statistically valid sample of stand-alone directory listing orders will be taken. AT&T recommends that OR-6-04 be revised to require a statistically significant sampling of stand-alone orders be made. A statistically valid sample of overall directory listing orders that may include an insignificant number of

[2] Open Issues on Proposed Verizon Virginia Carrier to Carrier Guidelines, Issue No. 4.

stand-alone orders is not adequate to capture discrepancies in the handling of stand-alone directory listing orders.

Respectfully submitted,

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