

June 29, 2001

Ms. Cummings:

Attached are Verizon Virginia Inc.'s suggested revisions to the AT&T-WorldCom Collaborative Proposal for introducing changes to the New York Guidelines into the Verizon Virginia Inc. Guidelines. I will contact counsel for AT&T and WorldCom next week and see if we can resolve these points prior to the July 10 collaborative session.

Verizon's principal comments are as follows:

1. All Paragraphs. The proposal should be clarified to state that this process applies to the Guidelines that will be applicable to Verizon Virginia Inc. (formerly Bell Atlantic—Virginia, Inc.). The Guidelines that have been under discussion have not been proposed for Verizon South Inc. (formerly GTE South Incorporated). Verizon's filing of July 19, 2000 proposed a separate set of metrics for Verizon South Inc., which are not based on the New York Guidelines.
2. Paragraph 3. Verizon VA believes that the appropriate version of the New York Guidelines that should be adopted for Virginia is the version that Verizon VA is filing today. Nothing in this paragraph should be viewed as foreclosing that position.
3. Paragraph 4. Verizon proposes a footnote to clarify the definition of "consensus decisions." The key point that should be made is that a "consensus decision" in New York requires the agreement of all of the participants in the New York Collaborative Working Group, including both Verizon NY and CLECs.
4. Paragraphs 4 and 5. Verizon proposes deleting the 45 day implementation requirement for metrics changes. While 45 days may be reasonable in some cases, in other cases (such as where extensive computer systems work is required) substantially longer implementation periods may be needed. Instead, Verizon proposes that in each case it will file a proposed implementation interval with an explanation of why this interval is needed. The appropriate implementation interval can then be decided by the Commission on a case-by-case basis.
5. Paragraphs 4 and 5. Verizon proposes deleting the portions of these paragraphs that make changes to the Guidelines effective 45 days after filing unless the changes are rejected by the Commission. In order to assure that proposed changes to the Guidelines, and in particular "Non-consensus" changes, have been fully reviewed and parties' comments on the changes considered, the changes should be affirmatively approved by the Commission before they become effective.

Paul Rich

AT&T and WorldCom Joint COLLABORATIVE PROPOSAL

AT&T and WorldCom jointly propose that the Collaborative Committee adopt metrics and standards in Virginia using the following guidelines:

1. **Virginia should use the work of the existing Metrics Collaborative in New York to update the Verizon Virginia Inc. ("Verizon VA") Carrier-to-Carrier Guidelines metrics definitions and performance standards.** A single lead collaborative is the most efficient means to address metrics issues. The existing Metrics Collaborative in NY has been in operation for nearly four years and has matured to include active participation by a number of CLECs including many that do business in Virginia. The collaborative is open to all CLECs -- and can be participated in via phone call or face-to-face.
2. **The Virginia Collaborative Committee should be continued in order to supplement the work of the Metrics Collaborative in New York.** This collaborative would meet as needed (but usually no more than quarterly unless special circumstances warrant a more frequent meeting) to discuss Virginia specific metrics issues and administrative issues relating to the Virginia C2C Guidelines. The meetings would follow these rules:
 - The meetings would be monitored and facilitated by SCC staff. The meetings would be open to participation by Verizon, all CLECs and the Division of Consumer Counsel, Office of the Attorney General.
 - The meetings would be for the purpose of discussing modifications to the Verizon VA metrics (as discussed below) and metrics administration issues.
 - The Virginia collaborative would also discuss Virginia-specific metrics changes that parties may propose to address an issue unique to Virginia that is not appropriate to raise in the NY metrics collaborative. Virginia-specific metrics issues that are not resolved via consensus may be pursued by the filing of a separate petition to raise the issue with the Commission.
 - The collaborative would be informal. There would be no transcript, although minutes would be kept and circulated (through a member of the Virginia Commission Staff or a CLEC delegate designated by the parties).
3. **The existing New York Carrier to Carrier Guidelines would be adopted as the Verizon Virginia Inc. C2C Guidelines -- allowing for state specific modifications such as different holiday schedules, differences in OSS and differences in geography.** Verizon VA has circulated to the parties a "Virginia version" of the New York metrics and standards for review by the parties to confirm that they conform to the New York Guidelines. These Guidelines would be adopted by the SCC after review and any necessary revisions.

4. **On a going-forward basis, any "consensus decisions" (as defined by the New York Collaborative¹) to change the New York Guidelines that result from the New York Collaborative facilitated by the New York Public Service Commission ("PSC") will be adopted as part of the Verizon Virginia Inc. C2C Guidelines, subject to the minimal state-specific changes outlined in ¶ 3, above.**
- Verizon VA shall file consensus metrics change(s) and a proposed implementation interval(s) (including an explanation of the time required for implementation of the change(s)) with the Virginia Commission within 30 calendar days of the submission date of the compliance filing in New York.
 - All parties would have the opportunity to comment on whether the metrics change(s) appropriately adapts the New York metric to Virginia, and on the proposed implementation interval(s).
 - The metrics change(s) will be reviewed by the SCC, which will issue an order as to whether the change(s) will be adopted. Metrics changes will become effective only if they have been approved by the SCC. The SCC will also review Verizon VA's proposed implementation interval(s) for the metrics changes and Verizon VA's explanation of the time required to implement the metrics changes and based upon this review will designate the date(s) by which the metrics changes shall be implemented by Verizon VA. (While Verizon VA expects that many metrics changes will be able to be implemented within 90 days after the Commission approves the change, in some cases, such as where extensive computer systems work is required, a longer implementation period may be needed.)
5. **On a going-forward basis, any "non-consensus" decisions to change the New York Guidelines that result from an Order of the New York PSC shall be filed by Verizon VA in Virginia and will be adopted as part of the Verizon Virginia Inc. C2C Guidelines, subject to the minimal state-specific changes outlined in ¶ 3, above, if the "non-consensus" change is approved by the SCC.**
- There will be a strong presumption that NY PSC-ordered "non-consensus" metrics changes should also be adopted as part of the Virginia Guidelines.
 - Verizon VA must file any metric changes ordered by the NY PSC and a proposed implementation interval(s) (including an explanation of the time required for implementation of the change(s)) with the SCC within 30 calendar days of the submission date of the compliance filing in New York. If Verizon VA opposes the adoption and implementation of a NY PSC-ordered "non-consensus" metrics change, Verizon VA shall set forth its reasons for its opposition in its initial filing of the metrics change.
 - All other parties shall have an opportunity to comment on whether the metrics change(s) should be implemented in Virginia, and on the proposed implementation interval(s).
 - The metrics change(s) will be reviewed by the SCC, which will issue an order as to whether the change(s) will be adopted. Metrics changes will become effective only if they have been approved by the SCC. The SCC will also review Verizon VA's proposed implementation interval(s) for the metrics changes and Verizon VA's explanation of the time required to implement the metrics changes and based upon this review will designate the date(s) by which the metrics changes shall be implemented by Verizon VA. (While Verizon VA expects that many metrics changes will be able to be implemented within 90 days after the Commission approves the change, in some cases, such as where extensive computer systems work is required, a longer implementation period may be needed.)

¹ "Consensus decisions" are changes to the New York Guidelines that have been agreed to by Verizon NY and CLECs participating in the New York Collaborative and approved by the New York Public Service Commission.