COMMONWEALTH OF VIRGINIA
BEFORE THE
STATE CORPORATION COMMISSION

COMMONWEALTH OF VIRGINIA, ex rel.

STATE CORPORATION COMMISSION   Case No. PUC000026

Ex Parte: Establishment of a Collaborative
Committee to Investigate Market
Opening Measures

COMMENTS OF
COX VIRGINIA TELCOM, INC.
ON PROPOSED METRIC OR-6-04

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August 3, 2001

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Pursuant to the Collaborative Committee's ("Collaborative") request for comments on proposed metric OR-6-04, Cox Virginia Telcom, Inc. ("Cox" or "Company") submits the following comments in the above-captioned case.

Cox appreciates Verizon-Virginia Inc.'s ("Verizon") voluntary proposal for a directory metric. In light of several directory-related challenges Cox has encountered with Verizon (see, for example, Cox Informal Complaint, filed on May 2, 2001), Cox is very much concerned about Verizon's performance in the area of directory accuracy.

Cox filed comments in the Collaborative regarding this issue on May 22, 2001. In those comments, Cox agreed with Cavalier Telephone LLC, another Virginia CLEC, and suggested that several directory-related metrics be added to the performance standards.

Although Cox welcomes Verizon's proposal, Cox remains concerned that OR-6-04 does not adequately measure the possible problems that can occur with directory listings, for the following reasons. First, the OR-6-04 metric falls short of meeting both Cox's and an end-user's expectation for accuracy by only requiring a 95% accuracy. Second, the OR-6-04 metric (by only comparing the CLEC-submitted order on the Local Service Request ("LSR") to the completed Verizon Service Order in Request Manager) fails to measure against the final product--the final version of the published telephone book. Third, the OR-6-04 metric reads as it will only extract this data for orders in LSOG-4; Cox believes the metric should extract information from the most recently released versions of the Verizon platform and should not be limited to a particular version of LSOG. Fouth, by design, the OR-6-04 metric appears to possibly exclude entire classes of orders including orders containing nonpublished listing type, stand-alone directory listing orders, and change and delete orders. Finally, the OR-6-04 metric fails to include review of five fields that can be critical for customers: the style code, the number of directories for annual delivery, the number of directories delivered on new connects or moves, the directory ID for directory delivery, and the yellow page heading code. As a result of these five shortcomings, Cox would propose the following revisions.

(1) Verizon should be required to comply with a 98% accuracy rate overall, which translates to a 99% accuracy requirement for Verizon's handling of directory listing information submitted by the CLEC.

Cox's concern is that a 95% accuracy rating for Verizon's end of directory listing order entry is too low, from two perspectives. First, the overall error rate is unacceptable. This means that for a set of 10,000 orders placed by Cox, it would be acceptable for Verizon to make 500 errors. Cox doubts that Verizon would accept this level of accuracy for its end-users, and suggests that a 98% accuracy rate for service to end-users is more appropriate. Second, even if Verizon does accept a five percent directory listing error rate for its end-users, then for Cox to meet this same standard for its end-users, Cox must have a zero error rate. This is not realistic or reasonable. In determining the acceptable error rate, Verizon must take into account the fact that two different local exchange companies are handling the directory listing orders (Cox and Verizon), and factor that into the overall accuracy. For example, in order to meet an overall 98% order accuracy, Verizon and Cox would each have to meet 99% order accuracy. To meet a 95% overall order accuracy, both companies would have to meet a 97.5% order accuracy. So the Commission's determination of a reasonable accuracy level must take into account Verizon's acceptable standard of accuracy with its end-users and then determine the allowable error rate factoring in Cox's reasonable handling of orders.

With a 5% error rate, Cox will have to expend additional resources to (a) escalate mistakes through the Verizon system and (b) handle customer inquiries regarding these mistakes. The metric for OR-0-04 should be 99%, to meet a 98% accuracy level overall.

(2) OR-6-04, or another metric should compare a sample of CLEC-submitted orders to what is actually published in a directory.

Cox's customers are not concerned with how their listing appears in the Verizon Request Manager database. Simply, Cox's customers care about how their listing ends up appearing in the book. Hence, as a company, Cox is most concerned about how the customers' listings appear in the book. Regrettably, the metric, as proposed, fails to consider what is actually published. Cox would urge the Committee to consider a measurement that compares what is submitted by the CLEC to what Verizon actually prints.

(3) OR-6-04 should be revised to review all types of directory listings orders submitted in the most recent version of LSOG.

As proposed, the metric reads as though it would apply to LSOG 4. Cox wants to ensure that once LSOG 5 is launched, that this metric will still be in place. Hence, Cox would suggest that instead of referring to LSOG 4, the metric be revised to "apply to the most current two versions of LSOG software." To the extent that Verizon changes the fields, names, or definitions on the Directory Listing Form of the LSR, Cox requests that the metric reflect the newly named comparable fields in the next version of the software.

(4) Cox is concerned that entire classes of directory orders will escape review if this metric is adopted as currently worded: (a) nonpublished listing type; (b) stand-alone listings (which includes orders where a customer took a Cox telephone number instead of porting); and (c) change/delete orders.

(a) Cox urges that the Committee require that the listing type in field 13 should include review of nonpublished number orders. Since these orders are a particularly sensitive class of orders that create a customer expectation that their telephone number will not be published in the telephone book or directory assistance, this class of orders can have the severest of impacts if they are incorrect. For example, the safety of an individual could be compromised if a nonpublished number is inadvertently published. Hence, if nonpublished is not included here as a subset of the non listed definition, Cox would urge the Committee to consider adding "nonpublished" orders to the definition of field 13. [As a point of clarification, nonlisted orders are not in the telephone book but do appear in directory assistance. These differ from nonpublished orders, as indicated above].

(b) Cox currently submits directory listings separately from its local number porting order. Although Cox may be submitting the port order and directory listing order jointly at some point in the future, Cox requests that this metric be as broad as possible so as to consider all types of directory listings submitted by CLECs, regardless of whether they are submitted with the port order or not. Further, in situations where a customer takes a Cox number, there is no port, and every directory order is a stand-alone order. This is a particular issue with facilities-based providers such as Cox, and

(c) Cox is not clear on whether this metric would include change and delete orders that would be submitted separately from the port order; nor is Cox clear on whether a brand new listing for a customer who has taken a Cox-assigned telephone number, and not ported, would be reviewed. Cox would like to see these classes of orders included in the metric.

(5) Finally, Cox would suggest that additional fields be audited in the metric, since some of these stylistic changes can be critical to customers, including the following fields: the style code at field 15, the number of directories for annual delivery at field 86, the number of directories delivered on new connect or moves at field 87, the directory ID for directory delivery, and the Yellow Page heading code at field 94, respectively.

Currently the metric measures fourteen fields in the LSR. Because the style code contained in field 15 and the Yellow Page Heading code in field 94 is of particular import to commercial customers, Cox would ask that these fields be added to the list of fields that will be reviewed for orders for commercial end-users that are reviewed.

Also, fields 86-88 determine the number of directories that a customer receives as well as the actual directory that the customer is placed in. In order to avoid problems with directory delivery and misplacement of the listing in the wrong telephone book, for both residential and commercial end-users, Cox would ask that these fields be added to the list for review.

CONCLUSION

In closing, Cox would ask that the above suggested revisions be incorporated into Metric OR-6-04 or that another metric be created for tracking these areas. Cox asks that these recommendations be reviewed and considered by Staff and members of the Committee. Cox would welcome responses to its comments from Verizon, members of the Staff, and other members of the Committee.

WHEREFORE, Cox Virginia Telcom, Inc., respectfully urges the Committee to consider its comments on OR-6-04.

Respectfully submitted,

COX VIRGINIA TELCOM, INC.

By: ________________________________

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