Item	Commentor	Metric	Addition to VA Proposal	Modification to VA Proposal	Verizon Comments
1	AT&T				Verizon is prepared to propose for Virginia Guidelines that are based on the January 16, 2001 New York Carrier-to-Carrier Guidelines. On April 13, 2001, Verizon submitted New York based Guidelines to collaborative participants in the District of Columbia and Maryland. Like the Guidelines for the District of Columbia and Maryland, the Guidelines for Virginia will require some revision to the New York Guidelines in order to reflect differences in systems and processes between New York and Virginia, and to address a small number of points at which Verizon has found that the New York Guidelines need to be clarified or updated to correct internal inconsistencies and similar problems. If New York based Guidelines are adopted in Virginia, an issue that will need to be addressed is how changes to the New York Guidelines will be dealt with by the Commission. In discussions in other Potomac jurisdictions, Verizon has observed that there may be some reservation on the part of the commission to an automatic adoption of the New York changes without an opportunity for comment by interested parties and review by the commission. Accordingly, Verizon would suggest the following approach. First, "consensus decisions" agreed to by Verizon and CLECs to change the New York Guidelines that result from the New York Collaborative facilitated by the New York PSC should be adopted as part of the Virginia Guidelines, subject to any modifications necessary to conform the New York changes to Virginia (e.g., to account for differences in systems or work processes). Second, there should be a strong presumption that any other changes to the New York Guidelines that result

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					from the New York Collaborative would also be adopted as part of the Virginia Guidelines, subject to any changes necessary to conform these changes to Virginia. Verizon would submit the New York Guidelines changes to the Commission within 30 days of the compliance filing in New York. All parties (including AT&T and Verizon) would have the opportunity to comment on whether the New York Guidelines changes should be adopted in Virginia. With respect to New York "consensus metrics" changes agreed to by Verizon and CLECs, the comments would be limited to the issue of whether the metric change appropriately adapts the New York metric change to Virginia. With respect to all other metric changes, the party opposing the change would have the burden of showing why the change should not be adopted in Virginia. Verizon agrees with AT&T that a prompt resolution of metrics issues by adopting New York based Guidelines will allow the parties to proceed with discussion of financial performance incentive issues. Verizon continues to support the financial incentives plan that it filed in August, 2000.
2	Cavalier	GE 1-1	New metric added to account for directory publishing errors.		Verizon disagrees. This metric has not been adopted in any other Verizon jurisdiction in the Mid-Atlantic or Northeast United States. Cavalier has not shown that there is a need for this metric. The only information that Cavalier has produced in collaborative sessions with regard to this issue is data produced in Maryland that claims a Verizon error rate of less than one percent for all listings published for Cavalier in the Richmond telephone directory. With such a low error rate, there is no need for a metric.

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					Verizon does not currently measure this performance. Tracking this performance would be difficult because Verizon will not know when a CLEC is correcting a listing error that resulted from Verizon causes. CLECs may change listings by various means, including submitting Local Service Requests ("LSRs"), which are not uniquely identified as containing directory listing corrections. Cavalier's proposed metric is also deficient because it fails to exclude from the measurement errors that could have been prevented by a CLEC, such as by reviewing the directory listing verification report provided to the CLEC by Verizon.
3	Cavalier	PR 9-10	New metric added to account for "premature disconnects"		Verizon disagrees. Premature disconnects are captured in Metric PR-9-01 as missed Hot Cuts, provided they are reported as per the Hot Cut process (i.e., to 1 877 Hot Cuts). The Carrier Working Group in NY agreed to eliminate the separate metric for premature disconnects.
4	Cavalier	BI -9	New metric added to account for CLEC customers "double billed" by Verizon.		Verizon disagrees. Double billing is a Retail Verizon issue involving the relationship between Verizon and its former customer.
5	Cavalier	NP-7	New metric added to account for the ordering and provisioning of dark fiber.		Verizon disagrees. Dark fiber metrics have not been adopted in other jurisdictions in the Mid-Atlantic or Northeast United States. Cavalier has not shown any need for these metrics for Virginia. The metrics proposed by Cavalier are unclear. Many of the metrics would not seem to produce meaningful information. For instance, whether dark fiber was available should not be measured because Verizon has no obligation to assure the availability of dark fiber.
6	Cavalier	GE-4	New metric added to		Verizon disagrees. The fact that data

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			account for drop in modem speed after cut-over.		transmission speeds on a customer's line may decline after a cut-over is not evidence of any service deficiency. It may simply indicate that the customer is now being served by a different type of facility which provides a lower maximum data speed. Further, Verizon makes no guarantees to its customers, either Retail or Wholesale, for data performance on a POTS line.

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7	Cavalier	All as applic able		Eliminate all parity standards and establish performance benchmarks (TBD)	Verizon disagrees. Where a Verizon retail service exists that is comparable to the service being provided to CLECs, the standard should be "Parity with Verizon Retail." If a CLEC is receiving a quality of service that is at parity with Verizon Retail, the CLEC has a fair opportunity to compete with Verizon. Adoption of benchmark standards can have the effect of requiring Verizon to provide a quality of service to CLECs that is superior to the quality of service it provides to Verizon Retail customers. Such a requirement would be inconsistent with the Telecom Act.
8	WCOM	PO-1		Keep OSS test footnote. VZ should have improved on parity plus 7 seconds standard for GUI per PA PUC's 12/99 order and should not be given until 2002 to do so.	Verizon disagrees. The standard for this metric for Web GUI in other jurisdictions is parity plus 7 seconds. In a November 14, 2000 order, the PA PUC approved a parity plus 7 seconds standard for Web GUI until altered by the Commission. Additionally, the NY PSC approved the recommendation of the NY Carrier-to-Carrier Working Group that the standard would be parity plus 7 seconds. Verizon uses the same Web GUI for Virginia as it uses for NY and PA. Further, in actual practice for the bulk of PO-1 metrics, Verizon's experience in PA and NJ (which also uses the same Web GUI interface) has been that the Web GUI has not been able to meet the parity plus 4 seconds standard. Verizon does not anticipate being able in the near future to improve the Web GUI's performance to meet this standard. EDI and CORBA offer higher speed interfaces where the response time standard is parity plus 4 seconds. These interfaces are available to any CLEC.

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9	WCOM	PO 1-06	Add statement that describes time to pull up full loop makeup information, not just a statement of qualified or not qualified.	xDSL loop qualification should be measured separately from other facilities qualification queries.	Verizon disagrees. This metric measures Verizon's existing form of xDSL Loop qualification query. WCOM's proposal to include "full loop makeup information" is a proposal not simply to change Verizon's proposed metric but to change the underlying pre-order query transaction that is measured by the metric, by substantially increasing the amount of information that is provided by the transaction. This is not an appropriate proposal in the context of this metrics review. Any changes to the underlying business transaction should be proposed by WCOM through the applicable inter-carrier change management process and not through an attempt to modify the metrics.
10	WCOM	PO 1-08	Add NY Time Out Measurement and 0.33% standard.		Verizon disagrees. The measurement proposed by this metric is unnecessary because the data is already reported pursuant to the "Definition" section of Metric PO-1. Setting a standard for this metric is unnecessary and is inconsistent with Metric PO-2. This metric would measure the combined availability of Verizon's OSS interfaces (EDI, Web GUI, CORBA) and OSS. Availability of Verizon's OSS interfaces is already measured and subject to a standard under Metric PO-2. Availability of Verizon's OSS need not be measured or subject to a standard since the same OSS serve both CLECs and Verizon Retail and there is therefore inherent parity of OSS availability.

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11	WCOM	PO 2-02		Report scheduled down time excluded each month. Need to show that differing prime time for both VZ and CLECs are preserved from disruption on a parity basis. Prime time should be defined as hours between 6 a.m. to midnight like NY rules require.	Verizon disagrees. Reports of scheduled down-time are not needed since CLECs are already notified of scheduled down-time in accordance with the Verizon Change Management Guidelines. Prime time hours are 6AM-10PM, Monday through Saturday, excluding Holidays, for the Pre-Ordering/Ordering interfaces, and 6AM to 12PM, Monday through Saturday, excluding Holidays, for the Maintenance interfaces. These hours were established in the PA and NJ proceedings and should be the same for VA. WCOM has not shown that it will be submitting a substantial volume of Pre-Order/Ordering transactions between 10PM and Midnight and therefore that there is any need for this additional two hour interval to be included in Prime Time.
12	WCOM	PO-3		Are all help desks included (e.g., Wholesale Customer Care Center and RETAS Help Desk)?	This metric measures calls associated with orders and trouble tickets that are placed to the ordering center (National Market Center, formerly TISOC) and repair center (RCMC). Calls to the Wholesale Customer Care Center and RETAS Help Desk are not included.
13	WCOM	PO 8-01		See footnote on implementation through change management process. Please provide more specific implementation time. The change control process was begun last year in NY for this metric.	Verizon cannot begin to perform this measurement until the underlying OSS transaction that is to be measured is implemented. The Change Management request to implement the OSS transaction is scheduled for 10/20/01. It will take up to 120 days to implement a process to measure performance once the OSS transaction is up and running.

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14	WCOM		Add new metrics: (1) % Missing Notifier Trouble Tickets Cleared in 3 Days (2) % Other Trouble Tickets Cleared in 5 Days (3) Add metric on % Web GUI Outage/Slowdown Tickets Cleared in 24 Hours		Verizon disagrees. "Trouble ticket" measures are the ongoing subject of discussions in the NY Carrier Working Group. Verizon will support inclusion in the Virginia Guidelines of "trouble ticket" measures agreed to by Verizon and CLECs by consensus in NY for inclusion in the New York Guidelines, subject to any changes necessary to conform the measures to Virginia. With regard to "% Web GUI Outage/Slowdown Tickets," measuring this metric presents many problems. First, it is difficult to define a "slowdown." A slowdown can come and go or be intermittent over several days making it hard to determine when it is cleared. Also, it is difficult to diagnose where between the CLEC and Verizon the slowdown is occurring and who is causing it. Furthermore, this metric is unnecessary given Metric PO-2 which measures OSS interface availability and Metric PO-5 which measures average notification of interface outages.
15	WCOM	OR-1 (OR-2)		SOP down time: Should this much time be excluded? Isn't VZ moving to process with less SOP downtime?	Verizon is investigating whether SOP down-time hours can be reduced. Verizon indicated in its proposed Guidelines that it will advise the Commission no later than July 1, 2001 whether shorter SOP down-time intervals are feasible.

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16	WCOM	OR 1-19		Change business rules and calculation so that interval applies no matter whether Trunk Group Service Request is emailed or faxed or if CLEC negotiates agreement that it would send the ASR for inbound VZ to CLEC trunks. Business rules should define when a negative response would be appropriate and negative responses should not count as timely responses. Report Average Interval for Greater than 192 trunks (projects) or set standard interval.	Verizon disagrees. Verizon's proposed metric was a consensus item in NY and was developed at WCOM's request. Verizon's proposed metric is also included in the NJ Guidelines. This metric should not include TGSRs received via fax. Business relations between carriers are best served by submitting TGSRs via e-mail. E-mail provides better tracking, clarity of information being provided, and faster communications between parties. This metric also should not include references to CLEC submission of an ASR for inbound VZ to CLEC trunks because this is a business process that does not exist and to which Verizon does not expect to agree. The metric should not set business rules with regard to whether a negative response by Verizon to a CLEC request that Verizon order additional Verizon-to-CLEC trunks from the CLEC is an appropriate response. Verizon may properly decline to accept a CLEC request that Verizon order additional trunks to carry Verizon-to-CLEC traffic since Verizon must purchase these trunks from the CLEC and the CLEC has a substantial financial incentive to inflate its estimate of the number of trunks required in order to increase the payments it receives from Verizon. Moreover, attempting to second-guess the reasonableness of a Verizon business judgment that is based on trunk usage history and anticipated future usage is too complex an exercise to be feasibly included in the metric. In addition, it is unnecessary. If Verizon does not order enough trunks from a CLEC, this will result in trunk blockage, which will be measured under Metric NP-1.

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17	WCOM	OR-4-02		Keep OSS standard.	Verizon disagrees. The timeliness of SOP completion notices is measured by Metric OR-4-05 and need not be measured in this metric. The WFA measurement and standard should not be included in this metric because they do not accurately reflect the operation of Verizon VA's order completion systems and because the proposed standard requiring that 95% of order completion notices be sent within 30 minutes of order completion in WFA is simply unattainable. (See related Item 18 below.)
18	WCOM	OR 4-05	Add business rule that WFA will be used when completions are recorded in WFA. For all other orders SOP (Expresstrack) entry will be used.	Explain why completions have to be batched so that PA interval of 95% within 30 minutes of physical work completion cannot be used as starting time.	Verizon disagrees. Measurement of completion notice timeliness in NY, NJ and PA is based on completion in SOP for Metric OR-4-05. Measurement is not based on completion in WFA. The PA PUC has deleted its former requirement for WFA based reporting. It is not feasible to use order completion in WFA as a basis for measurement of order completion notice timeliness. Order completion notices cannot be sent to a CLEC from WFA. Rather, they must be sent from WFA to the SOP and then from the SOP to the CLEC. WFA simply tracks the completion of individual work steps associated with an order. SOP tracks when all work steps are completed, and, therefore, the order is completed. For the bulk of orders (No Dispatch orders), notice of completion of the order is sent from WFA to the SOP only three times a day. Verizon has not found a way for WFA to transmit completion notices for these orders to the SOP more frequently. Thus, for most orders, it simply is not possible for Verizon to provide notice within 30 minutes of order completion in WFA. This was recognized by the PA PUC, which deleted its former requirement that order completion notices

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					be sent within 30 minutes of order completion in WFA and replaced it with the requirement that order completion notices be sent within two hours of order completion in SOP (excluding scheduled SOP downtime).

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19	WCOM	OR 5-01	Set benchmarks. Add disaggregation by UNE-loop, UNE-P, resale, xDSL and other services with standard percentage increasing over time in light of CLEC priorities for orders that flow through-i.e. standard for UNE-P should be 80% initially, rising to 85% in six months, 90% in a year; 95% in a year and a half.		Verizon disagrees. This metric is not disaggregated below the UNE and Resale product level in NY, NJ, and PA. Verizon is willing to consider further disaggregation of flow-through orders, but would recommend that OR-5-02 be eliminated. Instead, Verizon would disaggregate OR-5-01 into UNE Platform and UNE Loop/Other, and would leave Resale in total (it cannot be feasibly disaggregated further at this time.) Verizon cannot agree to a performance standard for total flow through (OR-5-01) since a variety of orders, such as orders requiring facility checks or loop qualification, expedite orders, special services orders, and orders for certain services such as Centrex, will never flow through due to the need for manual intervention. The total percentage of order flow-through is also heavily dependent on order mix and order quality. In addition, no standard is appropriate for this measure because it is a measure of a process, whether or not orders flow through, not of the substantive result, whether orders are completed in an accurate and timely manner. Timeliness of order completion is measured in Metric PR-4. Accuracy of orders is measured in Metric OR-6.
20	WCOM	OR-8		Delete footnote and proposed two month delay of measurement for CLECs moving to NetLink	Verizon disagrees. The two month lead time is necessary to ensure that the CLEC's connectivity arrangement to NetLINK is working properly. Commencing measurement of this metric two months after the CLEC migrates to NetLINK helps to keep the data clean of any start-up issues, thereby providing a more accurate picture of performance.

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21	WCOM	OR-10	Replace with Trouble Tickets Cleared in Three Days and Five Days as proposed by CLECs in NY.		Verizon disagrees. Verizon agrees that Metric OR-10 should not be included in the Guidelines. However, it does not support the metrics proposed by WCOM. "Trouble ticket" measures are the ongoing subject of discussions in the NY Carrier Working Group. Verizon will support inclusion in the Virginia Guidelines of "trouble ticket" measures agreed to by Verizon and CLECs by consensus in NY for inclusion in the New York Guidelines, subject to any changes necessary to conform the measures to Virginia.
22	WCOM	PR 1	Add Special Access and Line Splitting to disaggregation of submetrics.		Verizon disagrees. The Telecommunications Act of 1996 established local telecommunications services requirements for ILECs (Section 251) and BOCs (Section 271). The provision of special access services is not one of these requirements. Special access is not a UNE, Resale service, or local service Interconnection arrangement, and therefore should not be included in measurements pertaining to local telecommunications services. If interexchange carriers want metrics for Special Access services, this is an issue that needs to be addressed in a separate proceeding. Line splitting measures are being discussed by the NY Carrier Working Group. Verizon will support inclusion in the Virginia Guidelines of "line splitting" measures agreed to by Verizon and CLECs by consensus in NY for inclusion in the New York Guidelines, subject to any changes necessary to conform the measures to Virginia.
23	WCOM	PR 2	Add Special Access and Line Splitting to disaggregation of submetrics	Use standard (95% in 18 days for existing trunk groups, 30 for new trunk groups; establish interval for projects) for trunks	Verizon disagrees. The Telecommunications Act of 1996 established local telecommunications services requirements for ILECs (Section 251) and BOCs (Section 271). The provision of special access services is not one of these requirements.

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				rather than parity with Feature Group D service.	Special access is not a UNE, Resale service, or local service Interconnection arrangement, and therefore should not be included in measurements pertaining to local telecommunications services. If interexchange carriers want metrics for Special Access services, this is an issue that needs to be addressed in a separate proceeding. Line splitting measures are being discussed by the NY Carrier Working Group. Verizon will support inclusion in the Virginia Guidelines of "line splitting" measures agreed to by Verizon and CLECs by consensus in NY for inclusion in the New York Guidelines, subject to any changes necessary to conform the measures to Virginia. In NY, NJ, and PA, Verizon's performance in providing trunks to CLECs is compared to its performance in providing Feature Group D trunks to IXCs. This is appropriate and should be adopted in Virginia because Feature Group D trunks are technically similar to CLEC trunks and are provided to IXCs, customers whom Verizon has a strong interest in serving well due to the financial value of the IXC trunks to Verizon and the competitive alternatives readily available to IXCs. Feature Group D trunks therefore should be used in lieu of an absolute standard.
24	WCOM	PR 3		Delete "No Facilities" exclusion.	Verizon disagrees. The "No Facilities" exclusion, which is also included in the New York Guidelines, should be retained, but Verizon will agree to limit it to 2 Wire Digital Services, 2 Wire xDSL Loops and 2 Wire xDSL Line Sharing. Excluding orders delayed due to a lack of available facilities reflects the fact that such orders have longer provisioning intervals than orders that

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					are not delayed due to a lack of facilities, and therefore, it is not appropriate to mix the two types of orders in measurements. Furthermore, Verizon is not obligated to build facilities.

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25	WCOM	PR 4	Add Special Access and Line Splitting to disaggregation of submetrics. Add business rule that on-time performance for inbound (VZ-CLEC) trunks is measured against negotiated due date and any extension (VZ supped due date) not requested by CLEC is a miss.	Use standard (95% in 18 days for existing trunk groups, 30 for new trunk groups; establish interval for projects) for trunks rather than parity with Feature Group D service.	Verizon disagrees. The Telecommunications Act of 1996 established local telecommunications services requirements for ILECs (Section 251) and BOCs (Section 271). The provision of special access services is not one of these requirements. Special access is not a UNE, Resale service, or local service Interconnection arrangement, and therefore should not be included in measurements pertaining to local telecommunications services. If interexchange carriers want metrics for Special Access services, this is an issue that needs to be addressed in a separate proceeding. Line splitting measures are being discussed by the NY Carrier Working Group. Verizon will support inclusion in the Virginia Guidelines of "line splitting" measures agreed to by Verizon and CLECs by consensus in NY for inclusion in the New York Guidelines, subject to any changes necessary to conform the measures to Virginia. PR-4 does not measure on time performance for Verizon-to-CLEC trunks because these trunks are not provided by Verizon to CLECs. Instead, they are provided by CLECs to Verizon. Therefore, the business rule suggested by WCOM is inappropriate. In NY, NJ, and PA, Verizon's performance in providing trunks to CLECs is compared to its performance in providing Feature Group D trunks to IXCs. This is appropriate and should be adopted in Virginia because Feature Group D trunks are technically similar to CLEC trunks and are provided to IXCs, customers whom Verizon has a strong interest in serving well due to the

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					financial value of the IXC trunks to Verizon and the competitive alternatives readily available to IXCs. Feature Group D trunks therefore should be used in lieu of an absolute standard.

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26	WCOM	PR 4-08	Add to business rules that these Missed Appointments will not be excluded as Customer Not Ready.		Verizon disagrees. This measure merely indicates the coincidence that an LSRC was late. It is not necessarily the reason that the customer missed the appointment. The LSRC may have been 1 hour late – which would have no impact on whether the customer missed the appointment. Customer unavailability would not be related to a late LSRC.
27	WCOM	PR-5	Add Special Access and Line Splitting to disaggregation of submetrics	Use standard (95% in 18 days for existing trunk groups, 30 for new trunk groups; establish interval for projects) for trunks rather than parity with Feature Group D service.	Verizon disagrees. The Telecommunications Act of 1996 established local telecommunications services requirements for ILECs (Section 251) and BOCs (Section 271). The provision of special access services is not one of these requirements. Special access is not a UNE, Resale service, or local service Interconnection arrangement, and therefore should not be included in measurements pertaining to local telecommunications services. If interexchange carriers want metrics for Special Access services, this is an issue that needs to be addressed in a separate proceeding. Line splitting measures are being discussed by the NY Carrier Working Group. Verizon will support inclusion in the Virginia Guidelines of "line splitting" measures agreed to by Verizon and CLECs by consensus in NY for inclusion in the New York Guidelines, subject to any changes necessary to conform the measures to Virginia. In NY, NJ, and PA, Verizon's performance in providing trunks to CLECs is compared to its performance in providing Feature Group D trunks to IXCs. This is appropriate and should be adopted in Virginia because Feature Group D trunks are technically similar to CLEC trunks and are provided to IXCs, customers whom Verizon

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					has a strong interest in serving well due to the financial value of the IXC trunks to Verizon and the competitive alternatives readily available to IXCs. Feature Group D trunks therefore should be used in lieu of an absolute standard.

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28	WCOM	PR 5-04	Add metric (% Orders Cancelled by CLEC – No Facilities)		Verizon disagrees. This is a new metric that is not a NY consensus item. Installation appointments missed due to a lack of facilities are already adequately measured by Metrics PR-5-01 through 03. Furthermore, Verizon has no ability to measure this performance. There is no indicator on a CLEC LSR cancellation that indicates the reason for cancellation. Orders are cancelled for many reasons. CLECs can track their own performance. Finally, Verizon is not obligated to build facilities, so this metric, if required (which it should not be), would have to have no standard.
29	WCOM	PR 5-05	New metric added to account for cancelled orders due to "no facilities" after an FOC is received		Verizon disagrees. This is a new metric that is not a NY consensus item. Installation appointments missed due to a lack of facilities are already adequately measured by Metrics PR-5-01 through 03. Furthermore, Verizon has no ability to measure this performance. There is no indicator on a CLEC LSR cancellation that indicates the reason for cancellation. Orders are cancelled for many reasons. CLECs can track their own performance. Finally, Verizon is not obligated to build facilities, so this metric, if required (which it should not be), would have to have no standard. In addition, for orders of less than six lines, which represent the bulk of CLEC orders, this proposed metric does not provide any information in addition to the existing metrics that measure order due dates missed due to a lack of facilities. For these orders, a facilities check is not performed until after the order confirmation is issued. Accordingly, for these orders, all appointments missed due to a lack of facilities will occur after the order confirmation is issued.

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30	WCOM	PR 6	Add Special Access and Line Splitting to disaggregation of submetrics. Add metric reporting the numbers excluded due to lack of CLEC cooperative testing.	Use standard (95% in 18 days for existing trunk groups, 30 for new trunk groups; establish interval for projects) for trunks rather than parity with Feature Group D service.	Verizon disagrees. The Telecommunications Act of 1996 established local telecommunications services requirements for ILECs (Section 251) and BOCs (Section 271). The provision of special access services is not one of these requirements. Special access is not a UNE, Resale service, or local service Interconnection arrangement, and therefore should not be included in measurements pertaining to local telecommunications services. If interexchange carriers want metrics for Special Access services, this is an issue that needs to be addressed in a separate proceeding. Line splitting measures are being discussed by the NY Carrier Working Group. Verizon will support inclusion in the Virginia Guidelines of “line splitting” measures agreed to by Verizon and CLECs by consensus in NY for inclusion in the New York Guidelines, subject to any changes necessary to conform the measures to Virginia. With regard to adding a metric reporting the numbers excluded due to lack of CLEC cooperative testing, this metric is unnecessary as the vast majority of CLECs ordering UNE 2 Wire xDSL Loops participate in cooperative testing. Furthermore, the metric result would not provide any meaningful insight into the quality of Verizon provisioning. In NY, NJ, and PA, Verizon’s performance in providing trunks to CLECs is compared to its performance in providing Feature Group D trunks to IXCs. This is appropriate and should be adopted in Virginia because Feature Group D trunks are technically similar to CLEC trunks and are provided to IXCs, customers whom Verizon

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					has a strong interest in serving well due to the financial value of the IXC trunks to Verizon and the competitive alternatives readily available to IXCs. Feature Group D trunks therefore should be used in lieu of an absolute standard.

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31	WCOM	PR 6-03		Include repeats during first 30 days of install.	Verizon disagrees. Verizon scores the first trouble report after installation (within 7 or 30 days) as an installation trouble. Any additional trouble within that period is scored as a repeat trouble in MR-5. Verizon measures repeat reports – even if a repeated installation report – in MR-5.
32	WCOM	PR 6-04	New metric added to account for "no dial tone on turn up" troubles.		Verizon disagrees. The metric is redundant with existing measures. A no dial tone situation on turn-up would be counted as a missed installation appointment and therefore is already measured in Verizon's proposed metrics. For instance, for Hot Cut Loops, a lack of dial tone on turn-up will be reflected in Metric PR-9-01 as a cut-over not completed within the commitment window. If no dial tone is discovered after turn up, then a trouble report is entered and measured under Metric PR-6. In addition, the lack of dial tone may be the result of a CLEC service failure. Orders requiring "turn-up" are generally Hot Cut orders. The CLEC is responsible for providing dial tone on Hot Cuts. If the no dial tone condition is attributable to a CLEC problem, the Hot Cut will need to be rescheduled due to CLEC reasons.
33	WCOM	PR 7	Add disaggregated reporting by UNE-loop, UNE-platform, UNE Specials, DSL, line sharing, line splitting, Special Access and use all missed appointments for product in the		Verizon disagrees. Verizon's proposed metric is substantially the same as the metric in NY, NJ and PA. WCOM has not shown why its proposed changes are needed.

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			denominator. Also report Average notice interval for all or compare to standard stated (but not measured) in business rules: 48 hours for facilities misses and 24 hours for other types of misses VZ now sends electronic jeopardies, which it did not do when this metric was first discussed in NY.		
34	WCOM	PR 8	Add Special Access and Line Splitting to disaggregation.		Verizon disagrees. The Telecommunications Act of 1996 established local telecommunications services requirements for ILECs (Section 251) and BOCs (Section 271). The provision of special access services is not one of these requirements. Special access is not a UNE, Resale service, or local service Interconnection arrangement, and therefore should not be included in measurements pertaining to local telecommunications services. If interexchange carriers want metrics for Special Access services, this is an issue that needs to be addressed in a separate proceeding. Line splitting measures are being discussed by the NY Carrier Working Group. Verizon will support inclusion in the Virginia Guidelines of "line splitting" measures agreed to by Verizon and CLECs by consensus in NY for inclusion in the New York Guidelines, subject to any changes necessary to conform the measures to Virginia.

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35	WCOM	PR 9-08		Reinstate description. Change standard to 95% in 1 hour.	Verizon disagrees. The description of this metric is consistent with the description of the metric in the NY Guidelines (although Verizon's Virginia metric uses clearer language). The standard for this metric in New York at present is "No standard." This is a measure of mean time to repair on Hot Cut installation troubles at turn-up. It would be impossible to meet this standard if there was a trouble report that was in the loop – as it is not possible to dispatch a technician, isolate the trouble, fix it and close it within one hour. Drive time alone may exceed that time frame. Even a central office trouble may not be fixed within one hour if there is no technician on the premises. Additionally, joint testing might be required to isolate the trouble, if it is in the CLEC collocation cage. This is an unreasonable, impossible standard.

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35	WCOM	MR-2		Use largest private line customers and not FGD as retail analog for trunks and Specials.	Verizon disagrees. A private line is not at all like an interoffice trunk. Verizon therefore compares CLEC trunks to FGD Trunks provided to IXCs, which are technically similar to CLEC trunks. For UNE and Resale Specials, Verizon compares its performance for these services to its performance for Retail Specials, which include specials for the largest private line customers. However, while some UNE and Resale specials are like private lines, others, such as IOF or DS3s, are far more complex. Verizon is investigating the UNE and Resale Specials commonly purchased by CLECs to determine the appropriate mix of Retail Specials for comparison.
36	WCOM	MR 2-04,05		Change standard to parity as required for PA FOK/TOK/CPE metric.	Verizon disagrees. "No Standard" for these metrics is appropriate. For MR-2-04, the percentage of subsequent calls is entirely within the control of the retail customer or CLEC and is not controlled by Verizon. Subsequent reports are generally requests for status on open troubles. While status is always available in RETAS or EB, Verizon cannot control the number of times that a CLEC checks status. Subsequent reports are not a measure of Verizon performance and vary by customer. No standard applies to this metric in NY, NJ and PA. For Metric MR-2-05, measurements of the percentage of troubles closed to FOK/TOK/CPE for a CLEC will not be fairly comparable to measurements of the percentage of troubles closed to FOK/TOK/CPE for Verizon Virginia Retail customers. This is because the percentage FOK/TOK/CPE for a CLEC will largely be controlled by the accuracy of CLEC testing and trouble reporting and the performance of CLEC

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					customer CPE. More specifically, if a CLEC fails to accurately test for the location of troubles and as a result reports to Verizon troubles in the CLEC's network, these troubles will be closed by Verizon Virginia as FOK/TOK/CPE, since no trouble was found in Verizon Virginia's network. As a consequence, there is the potential, through no fault of Verizon Virginia, for the rate of troubles closed by Verizon Virginia to FOK/TOK/CPE for the CLEC to be substantially higher than the rate of troubles closed by Verizon Virginia to FOK/TOK/CPE for Verizon Virginia Retail customers. No standard applies to Metric MR-2-05 in NY and NJ.
37	WCOM	MR 3	Add NY MR 3-04 and 05 metrics on % Missed Repair Appointment –No Double Dispatch and % Missed Repair Appointments Double Dispatch Add Special Access and Line Splitting disaggregations.	Use largest private line customers and not FGD as retail analog for trunks and Specials.	Verizon disagrees. Verizon disagrees with including these metrics. These metrics simply duplicate Metric MR-3-01. These performance metrics were ordered in NY to measure a changed process for handling CLEC troubles. This process is not in place in Virginia (and should not be adopted in Virginia, since experience in New York has shown that it does not provide better service to CLECs). Measuring double dispatches is merely a measure of Verizon productivity and would have no value to CLECs. The Telecommunications Act of 1996 established local telecommunications services requirements for ILECs (Section 271) and BOCs (Section 271). The provision of special access services is not one of these requirements. Special access is not a UNE, Resale service, or

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					local service Interconnection arrangement, and therefore should not be included in measurements pertaining to local telecommunications services. If interexchange carriers want metrics for Special Access services, this is an issue that needs to be addressed in a separate proceeding. Line splitting measures are being discussed at the NY Carrier Working Group. Verizon will support inclusion in the Virginia Guidelines of "line splitting" measures agreed to by Verizon and CLECs by consensus in NY for inclusion in the New York Guidelines, subject to any changes necessary to conform the measures to Virginia. WCOM's proposed standard for UNE/Resale Specials and CLEC Trunks is not appropriate because Specials and CLEC trunks are not measured under MR-3.
38	WCOM	MR 4		Use largest private line customers and not FGD as retail analog for trunks and Specials	Verizon disagrees. A private line is not at all like an interoffice trunk. Verizon therefore compares CLEC trunks to FGD Trunks provided to IXCs, which are technically similar to CLEC trunks. For UNE and Resale Specials, Verizon compares its performance for these services to its performance for Retail Specials, which include specials for the largest private line customers. However, while some UNE and Resale specials are like private lines, others, such as IOF or DS3s, are far more complex. Verizon is investigating the UNE and Resale Specials commonly purchased by CLECs to determine the appropriate mix of Retail Specials for comparison.

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39	WCOM	MR 4-02	Add standard for Special Access of 4 hours.		Verizon disagrees. Special Access measures should not be included in the Guidelines. The Telecommunications Act of 1996 established local telecommunications services requirements for ILECs (Section 271) and BOCs (Section 271). The provision of special access services is not one of these requirements. Special access is not a UNE, Resale service, or local service Interconnection arrangement, and therefore should not be included in measurements pertaining to local telecommunications services. If interexchange carriers want metrics for Special Access services, this is an issue that needs to be addressed in a separate proceeding.
	WCOM	MR 4-03	Add standard of 1 hour for Special Access		Verizon disagrees. Special Access measures should not be included in the Guidelines. The Telecommunications Act of 1996 established local telecommunications services requirements for ILECs (Section 271) and BOCs (Section 271). The provision of special access services is not one of these requirements. Special access is not a UNE, Resale service, or local service Interconnection arrangement, and therefore should not be included in measurements pertaining to local telecommunications services. If interexchange carriers want metrics for Special Access services, this is an issue that needs to be addressed in a separate proceeding.

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40	WCOM	MR-4-09 and 10	Add NY metrics on % Missed Repair Appointment –No Double Dispatch and % Missed Repair Appointments Double Dispatch		Verizon disagrees. These metrics should not be included in the Guidelines. These metrics simply duplicate other MR-4 submetrics. These performance metrics were ordered in NY to measure a changed process for handling CLEC troubles. This process is not in place in Virginia (and should not be adopted in Virginia, since experience in New York has shown that it does not provide better service to CLECs). Measuring double dispatches is merely a measure of Verizon productivity and would have no value to CLECs.
41	WCOM	MR-5		Use largest private line customers and not FGD as retail analog for trunks and Specials	Verizon disagrees. A private line is not at all like an interoffice trunk. Verizon therefore compares CLEC trunks to FGD Trunks provided to IXCs, which are technically similar to CLEC trunks. For UNE and Resale Specials, Verizon compares its performance for these services to its performance for Retail Specials, which include specials for the largest private line customers. However, while some UNE and Resale specials are like private lines, others, such as IOF or DS3s, are far more complex. Verizon is investigating the UNE and Resale Specials commonly purchased by CLECs to determine the appropriate mix of Retail Specials for comparison.

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42	WCOM	NP-1	Add standard.		Verizon disagrees. Metric NP-1-04 already has an appropriate standard, the same standard that applies in NY, NJ and PA. Under this standard, no trunk group may block for more than three consecutive months. NP-1-01, 02 and 03 do not require a standard. First, no standard is required for trunk group blockage on common trunks (measured in NP-1-01 and 02). Since common trunks carry both retail and CLEC traffic, inherently there will be parity with Verizon Retail. Second, no standard should be applied under Metrics NP-1-01, 02 and 03 for dedicated final trunks. Adopting a standard for a shorter interval than three months (measured in NP-1-04) would not be appropriate. A blocking situation may result from poor CLEC forecasts or a one time anomaly. Thus, one or even two months of blocking data may not be indicative of a problem that requires correction. Once it is determined that a trunk needs augmentation, Verizon must take the necessary actions to ensure that blocking does not continue – frequently ordering more trunks from CLECs. This usually takes time to accomplish.
43	WCOM	NP-2	Add disaggregation for augments and intervals for different levels of augments; i.e. 30 day, 45 day, 60 day augment classifications.	Change to dissaggregate by each submetric only and apply 95% standard.	Verizon disagrees. The intervals for collocation augments are established in Verizon's tariffs based on applicable Commission orders. The intervals should not be stated in the Guidelines since they may change as Verizon's tariffs change. The 95% standard is included for Metrics NP-2-01 and 07, which measure percent performed on-time.

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					A standard is not appropriate for the remaining measures since they simply measure average intervals for activity that is already subject to a standard under NP-2-01 and 07. Also a percent standard is not applicable to average interval measures.

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44	WCOM	BI 1	Add new metric on DUF errors corrected in X Days.		Verizon disagrees. This metric has not been adopted in any other Verizon state. WCOM has not shown why it is needed. DUF errors are a rare occurrence. If a usage record is sent to the wrong party, the investigation of this is not a simple matter. WCOM does not even suggest a number of days for a correction interval – as it would be difficult to establish what a reasonable number of days is for a standard. This measure would be manual and very expensive to create and maintain. CLECs can monitor the performance themselves.
45	WCOM	BI 2	Add new metric on Carrier Bill errors corrected in X days. Include electronic transmission formats.		Verizon disagrees. Again, WCOM has not shown why this new metric is needed and cannot even suggest a count of days for a standard. The complexity of billing issues and disputes over whether there is an error make it infeasible to set any standard for correction of a claimed error. This measure, like the one above, does not appear to be necessary and would be manual. The CLECs can monitor the issue themselves and work directly with Verizon on a case- by-case basis.
46	WCOM	BI 3	% Billing Adjustments – Need measure of both total dollars and number of adjustments made.		Verizon disagrees. What matters in assessing billing accuracy is the percentage of charges adjusted. A small dollar amount of error adjustments meets the CLEC need to know that it can pay its bill with confidence that the bill is correct. The number of adjustments is not relevant in meeting this need.