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August 30, 2002

Mr. William Irby
Director
Division of Communications
State Corporation Commission
Post Office Box 1197
Richmond, Virginia 23218

STATE CORPORATION COMMISSION
RECEIVED
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DIVISION OF COMMUNICATIONS
RICHMOND, VA

Re: Performance Measurements and Standards for Verizon South Inc.

Dear Mr. Irby:

This will respond to your letter of July 19, 2002, in which you asked that Verizon South Inc. submit a revised proposal for carrier-to-carrier service quality performance measurements and standards for discussion by the Performance Standards/Remedy Plan Subcommittee, and in which you indicated your desire that these performance measurements and standards be the same as those utilized for Verizon Virginia Inc.

After giving careful consideration to the question of what would be the most practical and effective approach for performance measurements and standards for Verizon-South, Verizon proposes that the "Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports" ("VA Guidelines") that the Commission has adopted for Verizon Virginia Inc. be extended to also apply to Verizon South. Under this proposal, performance data for Verizon Virginia and Verizon South would be reported together on a combined basis in a single consolidated monthly report. In effect, Verizon Virginia and Verizon South would be treated as a single combined company for reporting purposes under the VA Guidelines.

This approach is the most practical one available. The volume of CLEC transactions for Verizon South is not large enough to justify a separate performance report for Verizon South.

Consolidated reporting for Verizon Virginia and Verizon South will have the additional advantage of providing a complete picture of Verizon's performance for the whole of the Commonwealth of Virginia in a single consolidated monthly report. This approach will also simplify review of performance data by CLECs and the Staff.

Verizon anticipates that it should be able to begin performance reporting that includes both Verizon Virginia and Verizon South performance data, for the third calendar month after the month in which the Commission adopts an order approving consolidated reporting of Verizon Virginia and Verizon South performance data. For instance, if the Commission adopted an order in October 2002 approving consolidated reporting of Verizon Virginia and Verizon South performance data, Verizon would begin such reporting for the month of January 2003. The consolidated data would be included in the report for January 2003 issued at the end of February 2003.

Verizon is reviewing the VA Guidelines to ascertain whether any revisions are needed for the VA Guidelines to properly apply to Verizon South. If any revisions are needed, Verizon will present them to the Subcommittee for its consideration.

Verizon looks forward to discussing its proposal with the other participants in the Subcommittee.

Very truly yours,


Stephen C. Spencer

Copy to:

Kathleen A. Cummings

Performance Standards/Remedy Plan Subcommittee (electronically distributed)