Lydia R. Pulley
Vice President, General Counsel & Secretary
Virginia

600 E. Main St., Suite 1100
Richmond, VA 23219-2441
Voice 804-772-1547
Fax 804-772-2143
E-mail: lydia.r.pulley@verizon.com

March 17, 2003

Mr. Joel H. Peck, Clerk
State Corporation Commission
Document Control Center
Post Office Box 2118
Richmond, VA 23216

Dear Mr. Peck:

Re: Case No. PUC-2001-00226

Enclosed please find an original and fifteen (15) copies of the "Petition of Verizon Virginia Inc. for a Waiver of Certain Service Quality Results Measured Under the Performance Assurance Plan for January 2003."

Because the PAP performance report for the January 2003 report period will become final on April 29, 2003 and Verizon Virginia Inc. ("Verizon") then will be obligated to provide bill credits for the January 2003 report period, Verizon requests that the Commission act promptly to grant its Petition. An example of a schedule for addressing a Verizon exception petition under the PAP is set out in Appendix D of the PAP. Under this schedule, CLEC comments on Verizon's Petition would be due on April 1, 2003, and the Commission's ruling on the Petition would be due on April 15, 2003. If the Commission elects to adopt a procedural schedule for addressing Verizon's Petition that will result in a decision not being reached until after April 15, 2003, Verizon requests that the Commission grant a stay of Verizon's obligation to provide the bill credits that are the subject of Verizon's Petition until after the Commission issues its order resolving Verizon's Petition.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Original signed by LRP

Enclosure

Copy to:
William Irby
Kathleen Cummings
Service List

BEFORE THE
STATE CORPORATION COMMISSION
OF THE COMMONWEALTH OF VIRGINIA

Commonwealth of Virginia, ex rel.	**:**	
State Corporation Commission	**:**	
	:	**Case No. PUC-2001-00226**
Ex Parte: Establishment of a	**:**	
Performance Assurance Plan for	**:**	
Verizon Virginia Inc.	**:**	

PETITION OF VERIZON VIRGINIA INC. FOR A WAIVER OF CERTAIN SERVICE QUALITY RESULTS MEASURED UNDER THE PERFORMANCE ASSURANCE PLAN FOR JANUARY 2003

Lydia R. Pulley

600 East Main Street, 11th Floor
Richmond, Virginia 23219
Telephone No. 804-772-1547

Attorney for
Verizon Virginia Inc.

Dated: March 17, 2003

TABLE OF CONTENTS

EXHIBITS

BEFORE THE
STATE CORPORATION COMMISSION
OF THE COMMONWEALTH OF VIRGINIA

Commonwealth of Virginia, ex rel.	**:**	
State Corporation Commission	**:**	
	:	**Case No. PUC-2001-00226**
Ex Parte: Establishment of a	**:**	
Performance Assurance Plan for	**:**	
Verizon Virginia Inc.	**:**	

PETITION OF VERIZON VIRGINIA INC. FOR A WAIVER OF CERTAIN SERVICE QUALITY RESULTS MEASURED UNDER THE PERFORMANCE ASSURANCE PLAN FOR JANUARY 2003

Verizon Virginia Inc. ("Verizon") requests that the Virginia State Corporation Commission (the "Commission") waive certain service performance results for January 2003 that would otherwise be included in the calculation of monthly bill credits due to Competitive Local Exchange Carriers ("CLECs") under provisions of the Performance Assurance Plan ("PAP"). Certain systems employed by Verizon and its affiliated Operating Telephone Companies ("OTCs") were subject to an Internet computer attack by a worm during the weekend of January 25, 2003 (the "Slammer Worm"). Section II(J) of the PAP provides that Verizon may file for a waiver of service results when there is a situation that is beyond its "control that negatively affect[s] its ability to satisfy only those measures with absolute standards." (PAP at 23.)[1] This extraordinary event, which was beyond Verizon's control, prevented it

[1] Similar waiver petitions are being filed with state commissions in the Verizon East region that have adopted and effective PAPs based on the Verizon New York PAP.

from satisfying three of the PAP's pre-order wholesale measures with absolute standards during January 2003.[2] None of the parity metrics were affected.

Verizon estimates that if the instant waiver request is granted, the amount of monthly rebates due to CLECs will be reduced from approximately $1,011,418.00 to $124,599.00. Attached hereto as Exhibit 1 is a copy of the "Performance Assurance Plan – January 2003 Monthly Report" that has been made available to CLECs and the Commission Staff. Exhibit 2 contains the adjusted January 2003 Monthly Report, which reflects the modifications that should be made to the January 2003 Monthly Report to offset the effects of the Slammer Worm on the three pre-order metrics with absolute standards.[3]

For the reasons set forth below, the Commission should grant the waiver request and allow Verizon to exclude the effects of the Slammer Worm for the monthly service results that will comprise the performance levels against which it will be measured under the PAP for January 2003.

[2] The PO-2-02 pre-order availability metrics were affected by the Slammer Worm.

[3] The waiver requests and the proposed adjustment methodology should also be applied to any CLEC-specific calculations, including calculations related to the Individual Rule for Critical Measures. For those CLECs that have elected to receive CLEC-specific PAP reports, upon request by a CLEC, Verizon will provide it with a revised January 2003 CLEC-specific PAP report that reflects the modifications that should be made to offset the effects of the Slammer Worm on the three pre-order metrics with absolute standards. The CLEC-specific information has been adjusted pursuant to the methodology set forth in Section III, *infra*. The PAP performance reports for January 2003 set out in Exhibits 1 and 2 and the currently available CLEC-specific reports are preliminary reports, with performance scores of "-1" potentially being subject to revision to "0" based on performance scores for February and March.

I. THE SLAMMER WORM

A. THE EVENT

On January 25, 2003, at 12:30 AM Eastern Standard Time ("EST") corporate networks and the Internet began being flooded with vast quantities of traffic. One industry report estimates that "more than 90 percent of vulnerable computers [were infected] within 10 minutes." (*See* CNET News.com, "Week in Review: Worm's Wrath," February 7, 2003.) The source of the runaway traffic was traced to a worm called the SQL Slammer, also known as W32.Slammer and Sapphire (referred to herein as the Slammer Worm), which is self-propagating malicious code that exploits vulnerabilities in Microsoft SQL Server 2000, and certain other Microsoft products. The Slammer Worm crafts packets of 376 bytes and sends them to randomly chosen IP addresses on a specific port, in this case port 1434/udp.[4] The Slammer Worm targets systems running MS SQL Server 2000 and potentially affects systems running Microsoft Desktop Engine ("MSDE") 2000, which is included in third-party products, such as VisualStudio.Net, Asp.net, Microsoft Access and others. The Slammer Worm, itself, is file-less and resides only in memory. It does not create or delete files, but actively scans for other vulnerable servers. It was this aggressive scanning and propagating that created enormous network and Internet traffic.

The Slammer Worm hit the national (and international) network quickly and without warning. Although most firms do not speak publicly about their security programs and breaches, industry analysts estimate that 200,000 devices were affected. Verizon was affected as were many other corporations and carriers, and the Internet, itself. Industry and press reports indicate that major corporations, such

as Bank of America, the Canadian Imperial Bank of Commerce, Boeing, and J.P. Morgan Chase also were affected, as were telecommunications providers, such as AT&T, WorldCom, China Telecom and BellSouth. One of the most telling reports, however, came from Microsoft, which was infected and affected by the Slammer Worm. As Rick Devenuti, Microsoft's chief information officer stated in an interview on Monday, January 27, 2003, "[W]e are not sure how the virus got into our network.… . It just takes one machine to get it going." (CNET News.com, "Microsoft Fails Slammer's Security Test," January 27, 2003.)

B. EFFECT ON VERIZON'S SYSTEMS AND VERIZON'S RESPONSE

At 1:00 AM EST Saturday, January 25, 2003, Verizon Network Management detected network flooding. Verizon Network and Information Security teams immediately convened and began trouble-shooting the incident. Soon thereafter, the technical teams had identified traffic on what is known as the "1434 port" as the source of the traffic generation and began defensive actions to isolate and block port 1434 traffic on routers and firewalls. The internal data networks were isolated and quarantined into segments (North, Mid-Atlantic and West).

Later that morning, Verizon observed that its connections to the Internet were becoming flooded with very high utilization. This was highly irregular and gave Verizon technical teams evidence that Verizon was being attacked from the Internet. Given this alarming situation, and without the benefit of clear information from industry or government on the precise nature of the attack, Verizon determined that an external quarantine process was necessary to ensure the safety of its own and its partners'

(. . . continued)

[4] A port is a special purpose memory location to which communications messages are written and read.

networks and systems. At that time, the wholesale interfaces (Corba, EDI, LSI (aka WEB GUI), EBI) were brought down to speed isolation and recovery from the infection. Verizon provided contemporaneous notification to CLECs of this event through normal communication channels (e-mail) on January 25, 2003. Because the Internet was still congested by the Slammer Worm, Verizon also notified by telephone the one CLEC that was attempting to exchange transactions with Verizon at that time. Verizon subsequently issued an updated bulletin with projected interface restoral times via the standard e-mail notification at approximately 10:00 PM, on Saturday, January 25, 2003.

From early morning Saturday, January 25, 2003 through late afternoon Sunday, January 26, 2003, Verizon proceeded to meticulously inspect, identify and remove infected devices, and where appropriate patch, test, and reconnect devices, thus incrementally restoring network segments. By 6:00 PM EST Sunday, January 26, 2003, internal networks and external interfaces were restored to business as usual.[5]

The attack, which affected many other large businesses and telecommunications carriers, had an impact on Verizon's operations, and created a situation that was beyond Verizon's control. In particular, the downtime required to effect and assure a thorough recovery had an adverse impact on many elements of Verizon's business operations that utilize the internal data network and OSS and, therefore, on wholesale pre-order metrics that measure the performance of these business functions. Directly affected were the performance measures for OSS Interface Availability,[6] as Verizon proactively

[5] The FBI's National Infrastructure Protection Center has not yet identified who might be responsible for the release of the Slammer Worm.

[6] The OSS Interface Availability metrics are the PO-2-02 metrics in the PAP and Carrier-to-Carrier Guidelines.

and defensively removed the interfaces from operation during prime time hours on Saturday, January 25, 2003 to aid in problem isolation and corrective action. As known by information security experts, this approach (blocking and monitoring network ingress and egress points) helps pinpoint compromised hosts and limit denial-of-service conditions based on bandwidth utilization.

Due to the network congestion caused by the Slammer Worm, individuals and systems attempting to perform transactions across the network were also affected. Dial tone service for Verizon retail and the CLECs purchasing services from Verizon was not affected.

C. VERIZON'S COMPUTER SECURITY PRACTICES

Verizon's computer security practices in the past have detected and helped mitigate the effects of other malicious virus or worm attacks. These practices enabled Verizon to quickly detect the Slammer Worm and begin defensive and recovery activities. In fact, Verizon was the first telecommunications company to report the incident to the National Communications Center – Information Sharing and Analysis Center ("NCC-ISAC"), an industry/government organization whose membership includes the major telecommunications carriers and the National Communications System. According to industry reports, the Slammer Worm "open[ed] a new era of fast-spreading viruses on the Internet… [it] doubled in size every 8.5 seconds when it first appeared…" compared to the Code Red worm in 2001 which doubled in size every 37 minutes. (CNET News.com, "Week in Review: Worm's Wrath," February 7, 2003.)

Verizon has an extensive security network in place to protect both its physical plant and its cyber assets, and one of the security practices employed by Verizon is participation in industry and government security information-sharing forums, such as the NCC-ISAC and the Computer Emergency Response Team Coordination Center at Carnegie Mellon University. Verizon also has engaged the

services of a third-party firm specializing in software security, which proactively notifies Verizon of impending cyber attacks. None of these external groups provided Verizon with advance warning of the Slammer Worm.

Verizon's normal practices of maintaining the software infrastructure also include the process for obtaining, evaluating, testing and then deploying "fixes" or improvements to software components across its various systems. This is not a trivial function. When a security vulnerability or other software defect is discovered either by the supplier of a software component or users of the software, the software supplier undertakes the development of a "fix" for the defect. At the discretion of the supplier, the fix may be released to users either as part of a package of changes in a new software version or upgrade or may be released as a discrete repair to be applied to an existing version of the software. A discrete repair is also known as a "patch." Given the large amount of software in Verizon's computing infrastructure and the frequency with which patches and upgrades are released by vendors, patch management is a complex and time-consuming function.

Because application of a patch for a specific problem, such as a security vulnerability, can adversely impact the operation of other functions or software components within a specific system or application, testing of patches is normally prudent. In fact, a rush to install a patch that has not had a significant amount of interoperability testing and broad-based user experience can result in unexpected consequences, since the patch may be later revoked by the supplier as ineffective or damaging, and may be superceded by a subsequent patch. Further, a security patch for a given software component may require, as a pre-condition to deployment, the installation of prior patches or intermediate releases having nothing at all to do with security, and/or it may require the installation or upgrade of a companion software component (for example, a given version of MS SQL Server will require a given version of

Windows NT). Finally, the downtime associated with the application of a specific patch (and any related upgrade or other patches) can be substantial and must be efficiently managed, especially in a business such as Verizon's with thousands of systems, and the large number of wholesale customers that interface with Verizon's systems. Because of the complex interdependence between various patches and software release levels, the possibility of an adverse impact on the target system, downtime and a number of other factors, patch management represents a very serious challenge for most large businesses. Unfortunately, this already substantial challenge increases exponentially when a supplier issues "patches," even security patches, on a frequent basis. As Microsoft's CIO Devenuti stated in his January 27, 2003 interview, "At any given point in time, it is hard to be 100% patched with any machine."

Unfortunately, when the Slammer Worm hit, there were servers in Verizon and many other organizations and corporations that had not yet received a patch to fend off the Slammer Worm, which attacked a security vulnerability in MS SQL Server 2000 and MSDE 2000. In fact, many media accounts about the Slammer Worm described the challenges of patch management and Verizon's experience was fairly typical of the way many large businesses were affected. While Microsoft had released security patches that addressed the specific vulnerability exploited by the Slammer Worm, it is only in hindsight that the specific patches to address the problem can be identified. In just the past 12 months alone, Microsoft has released 72 security patches to its various products. Among the latest was a patch issued in December 2002 for a vulnerability in its Windows NT 4.0, Windows 2000 and Windows XP products. This patch, however, was recently revoked on February 3, 2003 when it was determined that the patch for NT 4.0 machines would, under certain configurations, cause the operating

system to fail. Moreover, recently Microsoft has released new patches for the Slammer Worm which it believes are much more user friendly than those originally released.

II. VERIZON IS ENTITLED TO A WAIVER FOR PERFORMANCE ON THREE PRE-ORDER MEASURES WITH ABSOLUTE STANDARDS DURING JANUARY 2003 DUE TO THE SLAMMER WORM

A. THE PAP STANDARD

Section II(J) of the PAP provides that:

> Recognizing that C2C service quality data may be influenced by factors beyond [Verizon's] control, [Verizon] may file Exception or Waiver petitions with the Commission seeking to have the monthly service quality results modified on three generic grounds.
>
> . . . .
>
> The third ground . . . relates to situations beyond [Verizon's] control that negatively affect its ability to satisfy only those measures with absolute standards. The performance requirements dictated by absolute standards establish the quality of service under normal operating conditions, and do not necessarily establish the level of performance to be achieved during periods of emergency, catastrophe, natural disaster, severe storms, work stoppage, or other events beyond [Verizon's] control.

(PAP at 22, 23-24; *see also* PAP Appendix D (procedural schedule).)

The NY PAP, on which the VA PAP is based, has been in existence in New York since January 2000, and the New York Public Service Commission ("PSC") has recognized that events beyond Verizon's control entitle Verizon to waivers of the NY PAP's service quality standards. The New York PSC granted Verizon waivers of certain monthly service performance after a work stoppage in August 2000.[7] In addition, under the retail Performance Regulation Plan that existed in New York

[7] Case 99-C-0949, *et al., Petition of Bell Atlantic - New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan, filed in C 97-C-0271*, "Order Granting in

(continued . . .)

between 1995 and 2002,[8] the New York PSC granted Verizon waivers for work stoppages, arson and severe weather events.[9]

The Slammer Worm is an event similar to those waiverable events. It was an event beyond Verizon's control "that negatively affect[ed] its ability to satisfy . . . those measures with absolute standards." The Slammer Worm struck Verizon and numerous other companies that rely on Microsoft products without warning in the early hours of January 25, 2003. Verizon worked around-the-clock to resolve the problems the Slammer Worm created. Prior to the Slammer Worm attack, Verizon took

---

(. . . continued)

Part and Denying in Part Requests for Waivers of Service Quality Targets" (issued June 7, 2001) ("The Commission finds that the August work stoppage was an extraordinary event beyond the control of Verizon justifying the granting of waivers from the service quality requirements of the PAP"). Although the PAP has been in effect in New York since January 2000, the work stoppage waivers are the only waivers Verizon has requested under the PAP. After the September 11, 2001 terrorist attacks, the Commission, *sua sponte*, suspended the operation of the PAP for three months. To date, PAP waiver requests have not been filed with any other state commissions.

[8] *See* Case 92-C-0665, *Proceeding on Motion of the Commission to Investigate Performance-Based Incentive Regulatory Plans for New York Telephone Company*, "Opinion and Order Concerning Performance Regulatory Plan," Opinion No. 95-13 (issued August 16, 1995).

[9] *See* Case 98-C-1415, *et al., Petition of Bell Atlantic - New York for a Waiver of Certain Performance Standards Measured Under the Performance Regulatory Plan of the Month of August 1998, filed in C 92-C-0665*, "Order Granting In Part and Denying In Part Request for Waivers of Service Quality Targets" (issued November 22, 1999) at 4 (the 1998 waiver request for the work stoppage related only to retail measures under the Performance Regulation Plan since the PAP had not yet been adopted); Case 99-C-1193, *et al., Petition of Bell Atlantic - New York for a Waiver of the Requirements of Certain Performance Results Measured Under the Performance Regulatory Plan for July 1999, Filed in Case 92-C-0665*, "Ordering Granting Waiver" (issued August 28, 2000) (waiver justified under particular circumstances for cable outage caused by arson); and Case 99-C-1500, *et al., Petition of Bell Atlantic - New York for a Waiver of the Requirements of Certain Performance Results Measured Under the Performance Regulatory Plan for September 1999, filed in C 92-C-0665*, "Order Granting in Part and Denying in Part Request for Waivers of Service Quality Targets" (issued July 20, 2000) ("BA-NY has demonstrated that Tropical Storm Floyd was an extraordinary event, as evidenced by Governor Pataki's request for Federal Disaster Aid, and the documentation submitted in support of the petition.").

reasonable precautions to protect its computer systems from attack. In fact, Verizon's detection, isolation and recovery from the attack in approximately 40 hours was made possible by Verizon's ongoing business practices and its management of a secure, heterogeneous and complex computing infrastructure. Verizon's use of secure access infrastructure utilizing firewalls, ongoing security vigilance to detect and repudiate attacks, 24x7 network traffic monitoring, and 24x7 network device, server and system availability monitoring for critical systems, allowed Verizon to restore functions and operations incrementally and fully emerge from the crisis by Sunday night. The Slammer Worm and other malicious incidents demonstrate the inherent vulnerability of shared and interconnected data networks. The collective information technology industry, including Verizon's Information Technology organization, and government continue to work together to further protect and secure this shared resource.

Some parties may argue that Verizon should not be granted the waiver because it should have had patches in place to prevent the Slammer Worm from infecting its systems. Any such arguments should be rejected. The threshold question is not whether Microsoft patches existed to prevent the Slammer Worm from infecting Microsoft systems, but whether Verizon exercised reasonable, prudent judgment, in operating and protecting its cyber facilities. The PAP states that Verizon must demonstrate "[w]hy the Company's normal reasonable preparations for difficult situations proved inadequate… ." (PAP at 24.) Verizon has made that showing.

Indeed, the record demonstrates that Verizon acted in a prudent, reasonable manner. As outlined above, Verizon has sophisticated and extensive procedures for the operation and protection of its cyber facilities, including the OSS available for CLECs. Moreover, patch management is an extremely complex task. Many other well-respected and well-run companies were also infected by the Slammer Worm and Verizon's experience appears to have been typical of these companies. Verizon

operated and protected its system in a reasonable fashion, similar to other large corporations. In fact, in determining whether Verizon's actions in defending its systems from being infected by the Slammer Worm were reasonable, the Commission need look no further than Microsoft, the developer of the infected systems and the associated security

patches. The fact that Microsoft, itself, was infected by the Slammer Worm speaks volumes about the difficulties of being "100% patched" at all times.

In the days following the Slammer Worm attack, the press included a number of articles addressing the challenges related to patch management, and a number of security experts opined on the difficulties of patch management. For example, Bruce Schneier, chief technology officer for network protection firm Counterpane Internet Security stated "[The Slammer Worm] shows that the notion of patching doesn't work. Publicly, they [Microsoft] are saying it's not our fault, because you should have patched. But Microsoft's own actions show that you can't reasonably expect people to be able to keep up with patches." (CNET News.com, "Microsoft Fails Slammer's Security Test," by Robert Lemos, January 27, 2003). Mr. Schneier also pointed out that "numerous software patches are released every week. Systems managers are thus expected 'to patch their systems about once a day, for ever'. This is unrealistic. And even if most systems are patched, an unpatched minority can wreak havoc." (The Economist (US) February 1, 2003, v366). One article noted that "Microsoft released a service pack that would have fixed the problems the week before Slammer hit. But not only are there too many patches to keep up with, people are reluctant to install them for fear they will interfere with their systems. Microsoft admits making a mistake with the SQL fix and has 'egg on our face' over being hit by the worm, ... 'What this demonstrates and what we [Microsoft] readily acknowledge is the patch

management process is too complex'. . . . 'Microsoft is committed to reorganizing [its] patch system and delivering high-quality patches in a streamlined way." (CNN.com, "Experts: Microsoft Security Gets an 'F'," February 1, 2003). *See also* CNET News.com, *supra*, "Week in Review: Worm's Wrath." ("The worm's most significant casualty may be the perception that companies can remain secure by keeping up with software patches and other protective updates. Instead, security experts say, companies need to begin treating such attacks as inevitable and focus on limiting their damage, rather than expending every effort trying to create an ironclad perimeter.")

In short, Verizon acted reasonably under the circumstances. 20-20 hindsight should not be used to find otherwise. Thus, Verizon should be entitled to a waiver of the absolute service standards that it could not satisfy as a result of the Slammer Worm.

B. THE PO-2-02 METRICS

For the purposes of this waiver, Verizon has identified three specific measures with absolute standards that the Commission should waive: (1) PO-2-02-6020 "OSS Interface Availability – Prime – EDI"; (2) PO-2-02-6030 OSS Interface Availability – Prime – Corba"; and (3) PO-2-02-6080 "OSS Interface Availability – Prime – Web GUI." These measures, which measure activity in prime time (6:00 AM to 12:00 AM EST Monday through Saturday, (excluding major holidays)) have a standard of equal to or greater than 99.5%. Each measure is included in the UNE and Resale MOEs of the PAP, as well as in Critical Measure No. 1.

As demonstrated in the tables below, prior to the Slammer Worm attack, Verizon satisfied each of these measures on a regular, monthly basis.

Performance on PO-2-02 Metrics

Eight Month View (%)

	June	July	Aug	Sept	Oct	Nov	Dec	Jan
PO-2-02-6020 (EDI)	100	100	99.89	99.98	99.99	99.9	99.98	97.44
PO-2-02-6030 (Corba)	100	100	99.96	100	100	99.96	100	98.65
PO-2-02-6080 (Web GUI)	99.75	100	99.71	100	99.78	99.87	100	96.94

But for the Slammer Worm, Verizon would have been able to provide satisfactory service on these measures. As noted above, the interfaces, including EDI and Corba, were brought down Saturday to speed the isolation and recovery from the Slammer Worm. In addition, the Web GUI, which operates via the Internet, was affected by the Internet flooding that the Slammer Worm caused. Accordingly, the Commission should waive the service quality results recorded under the PO-2-02 measures and allow Verizon to adjust the service quality results for these measures using the process outlined below.

III. THE MONTHLY DATA SHOULD BE ADJUSTED BY EXCLUDING THE AFFECTED TIME PERIOD

The PAP is silent on how the service data affected by an abnormal event should be treated in calculating a revised monthly report. For example, there is no indication whether the affected data should be excluded completely from the report or whether a normalization methodology should be used to adjust the data. A normalization methodology would take out the influence of the Slammer Worm on the data and use the adjusted data along with the unadjusted data for the remaining measures to

calculate the amount of bill credits due to CLECs under the PAP. This is the methodology that Verizon proposed be used for the New York August 2000 Work Stoppage Waivers. In that case, the abnormal event occurred over numerous days. Here, only the performance on one day, Saturday January 25, 2003, is relevant to the calculation of the monthly data for the affected metrics.[10] A more appropriate method in this case would be to exclude the affected day. Accordingly, Verizon proposes that Saturday, January 25, 2003 be excluded from the calculation of the PO-2-02 metrics for the January performance month, and the reports annexed as part of Exhibit 2 reflect these exclusions.

IV. NO PARITY MEASURES WERE ADVERSELY AFFECTED BY THE SLAMMER WORM

The PAP provides that "[t]his waiver process shall not be available for those metrics for which [Verizon's] wholesale performance is measured by comparison to retail performance (parity metrics)." (PAP at 24.) The PAP, however, requires Verizon to ". . . include an analysis of the extent to which the parity metrics (retail and wholesale) were affected by the subject event . . .". (*Id*. at 24.) In this case, the Slammer Worm attack did not prevent Verizon from providing parity service to the CLECs. In fact, Verizon has been providing excellent service to its wholesale customers.

V. CONCLUSION

Despite its best efforts, Verizon was unable due to the Slammer Worm to satisfy the service quality standards for the PO-2-02 metrics in the PAP for January 2003. Accordingly, Verizon should be granted a waiver for the performance on the PO-2-02 metrics.

---

[10] The Slammer Worm also affected Sunday, January 26, 2003, but Sunday is not a prime time day and is not covered by the PO-2-02 metrics.

Respectfully submitted,

Original Signed by LRP

Lydia R. Pulley

600 East Main Street, 11th Floor
Richmond, Virginia 23219
804-772-1547

Attorney for
Verizon Virginia Inc.

Of Counsel
Paul A. Rich
William D. Smith

Dated: March 17, 2003

Exhibit 1

Exhibit 2

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of March, 2003, a copy of the "Petition of Verizon Virginia Inc. for a Waiver of Certain Service Quality Results Measured Under the Performance Assurance Plan for January 2003" in Case No. PUC-2001-00226 was sent as stated below:

Don R. Mueller, Esquire
State Corporation Commission
Office of the General Counsel
Post Office Box 1197
Richmond, Virginia 23218
(Hand-delivered)

C. Meade Browder, Esquire
Office of Attorney General
2nd Floor
900 East Main Street
Richmond, Virginia 23219
(U.S. Mail)

Performance Standards/Remedy Plans Subcommittee of the Collaborative Committee
(E-Mail)

Original signed by LRP

_____

Lydia R. Pulley

Verizon VA **271 Backslide Report** **January-03**

UNE

		VZ	CLEC					Diff.	Perf. Score	Wgt.	Wgtd. Score
	Pre-Ordering										
PO-1-01-6020	**Customer Service Record - EDI**	0.23	2.89					2.66	0	**15**	0.000
PO-1-01-6030	**Customer Service Record - CORBA**	0.23	1.15					0.92	0	**5**	0.000
PO-1-01-6050	**Customer Service Record - WEB GUI**	0.23	2.54					2.31	0	**5**	0.000
PO-1-02-6020	Due Date Availability - EDI	1.16	5.12					3.96	0	5	0.000
PO-1-02-6030	Due Date Availability - CORBA	1.16	2.38					1.22	0	2	0.000
PO-1-02-6050	Due Date Availability - WEB GUI	1.16	3.90					2.74	0	2	0.000
PO-1-03-6020	Address Validation -EDI	4.47	6.32					1.84	0	5	0.000
PO-1-03-6030	Address Validation - CORBA	4.47	4.91					0.44	0	2	0.000
PO-1-03-6050	Address Validation - WEB GUI	4.47	5.79					1.32	0	2	0.000
PO-1-04-6020	Product and Service Availability - EDI	9.53	NA						0	0	0.000
PO-1-04-6030	Product and Service Availability - CORBA	9.53	NA						0	0	0.000
PO-1-04-6050	Product and Service Availability - WEB GUI	9.53	12.64					3.11	0	2	0.000
PO-1-05-6020	Telephone Number Availability and Reservation - EDI	5.47	8.92					3.45	0	5	0.000
PO-1-05-6030	TN Availability and Reservation - CORBA	5.47	6.53					1.06	0	2	0.000
PO-1-05-6050	TN Availability and Reservation - WEB GUI	5.47	8.04					2.57	0	2	0.000
PO-2-02-6020	**OSS Interface Availability - Prime - EDI**		97.44						-2	**20**	-0.067
PO-2-02-6030	**OSS Interface Availability - Prime - CORBA**		98.65						-1	**10**	-0.017
PO-2-02-6080	**OSS Interface Availability - Prime - WEB GUI**		96.94						-2	**10**	-0.033
PO-3-02-3000	% Answered within 30 Seconds - Ordering		91.84						0	10	0.000
PO-3-04-3000	% Answered within 30 Seconds - Repair		87.44						0	10	0.000
OR	**Ordering**			Observations							
OR-1-02-3320	**% On Time LSRC - Flow Through - POTS - 2hrs**		98.17		37,645				0	**20**	0.000
OR-1-04-3100	**% OT LSRC/ASRC -No Facil Ck(Elec.-No Flow Thru)-POTS**		95.85		5,838				0	**5**	0.000
OR-1-04-3200	% OT LSRC/ASRC - No Facil Ck (Elec.-No Flow Through)-Specials		100.00		38				0	5	0.000
OR-1-06-3320	**% On Time LSRC/ASRC -Facil Ck(Electronic) - POTS**		98.17		438				0	5	0.000
OR-1-06-3200	% On Time LSRC /ASRC -Facil Check (Electronic) - Specials		97.74		133				0	5	0.000
OR-2-02-3320	**% On Time LSR Reject - Flow Through - POTS**		99.10		8,074				0	**15**	0.000
OR-2-04-3320	**% OT LSR/ASR Rej.-No Facil Ck (Elec.-No Flow Thru)-POTS**		99.29		4,202				0	**5**	0.000
OR-2-04-3200	% OT LSR/ASR Rej. -No Facil Ck (Elec.-No Flow Through)-Specials		100.00		3				0	5	0.000
OR-2-06-3320	**% On Time LSR/ASR Reject -Facil Ck (Electronic) - POTS**		95.90		195				0	**5**	0.000
OR-2-06-3200	% On Time LSR/ASR Reject -Facil Check (Electronic) - Specials		96.88		32				0	5	0.000
OR-4-09-3000	**% SOP to Bill Completion Sent w/in 3 Business Days**		99.35		18,762				0	**15**	0.000
OR-5-03-3000	% Flow Through - Achieved - POTS & Specials		96.10		39,664				0	20	0.000
PR	**Provisioning**	VZ	CLEC	VZ	CLEC	VZ Standard Deviation	Sampling Error	Stat. Score			
PR-3-08-3142	% Completed w/in 5 Days (1-5 lines-No Disp.)-UNE-P/Other	99.03	99.81	79,795	5,143		0.14	5.5178	0	10	0.000
PR-3-09-3142	% Completed w/in 5 Days (1-5 lines-Dispatch)-UNE-P/Other	94.48	99.35	13,195	155		1.85	2.6432	0	5	0.000
PR-4-01-3200	**% Missed Appointment - VZ - Total - Specials**	11.01	0.82	981	122		3.00	3.3910	0	**10**	0.000
PR-4-01-3510	**% Missed Appointment - VZ - Total - EEL**	28.09	7.69	235	13		12.80	1.5926	0	**10**	0.000
PR-4-01-3530	% Missed Appointment - VZ - Total - IOF	0.00	0.00	15	4		0.00	0.0000	0	10	0.000
PR-4-02-3100	Average Delay Days - Total - POTS	4.29	2.20	2,497	50	13.23	1.89	1.1071	0	10	0.000
PR-4-02-3200	Average Delay Days - Total - Specials	8.59	1.00	108	1	25.78	25.90	0.2932	0	10	0.000
PR-4-04-3140	% Missed Appointment - VZ - Dispatch - Platform	7.42	4.82	20,755	353		1.41	1.8511	0	10	0.000
PR-4-04-3113	**% Missed Appointment - VZ - Dispatch - New Loop**	7.42	3.74	20,755	749		0.97	3.7764	0	**10**	0.000
PR-4-05-3140	**% Missed Appointment- VZ - No Dispatch - Platform**	0.76	0.01	125,391	16,646		0.07	10.4623	0	**20**	0.000
PR-5-01-3100	% Missed Appointment - Facilities - POTS	1.40	0.09	20,755	1,110		0.36	3.6148	0	10	0.000
PR-5-01-3200	% Missed Appointment - Facilities - Specials	2.04	0.76	489	132		1.39	0.9269	0	10	0.000
PR-5-02-3100	% Orders Held for Facilities > 15 days - POTS *	0.15	0.36	20,755	1,110		0.12	-1.2831	-1	5	-0.008
PR-5-02-3200	% Orders Held for Facilities > 15 days - Specials	0.20	0.00	489	132		0.44	0.4610	0	5	0.000
PR-6-01-3121	% Installation Troubles within 30 days - POTS Other	1.38	0.85	262,162	19,886		0.09	6.1313	0	15	0.000
PR-6-01-3200	% Installation Troubles within 30 days - Specials	1.80	2.55	1,778	196		1.00	-0.7508	0	15	0.000
PR-6-02-3520	**% Installation Troubles within 7 days - Hot Cut**		1.19		927				0	**15**	0.000
PR-9-01-3520	**% On Time Performance - Hot Cut**		95.81		477				0	**20**	0.000
MR	**Maintenance & Repair**							Diff.			
MR-1-01-2000	Average Response Time - Create Trouble	5.82	2.50					-3.32	0	5	0.000
MR-1-03-2000	Average Response Time - Modify Trouble	5.79	2.79					-3.00	0	5	0.000
MR-1-04-2000	Average Response Time - Request Cancellation of Trouble	6.82	0.42					-6.40	0	5	0.000
MR-1-06-2000	Average Response Time - Test Touble (POTS only)	52.09	57.34					5.24	-1	5	-0.008
								Stat. Score			
MR-2-01-3200	Network Trouble Report Rate - Specials	0.49	1.35	93,379	3,856		0.12	-7.4048	-2	10	-0.033
MR-2-02-3112	Network Trouble Report Rate - Loop (POTS)	0.76	0.47	2,841,064	267,765		0.02	16.2813	0	10	0.000
MR-3-01-3112	% Missed Repair Appointments - Loop	11.32	6.30	21,597	1,270		0.91	5.4893	0	20	0.000
MR-3-02-3100	% Missed Repair Appointments - Central Office	6.24	4.94	2,149	81		2.74	0.4739	0	5	0.000
MR-4-01-3200	**Mean Time to Repair - Specials**	5.62	5.63	462	52	5.80	0.85	-0.0118	0	**20**	0.000
MR-4-02-3112	**Mean Time to Repair - Loop Trouble**	19.06	13.66	21,597	1,270	30.70	0.89	6.0804	0	**15**	0.000
MR-4-03-3100	**Mean Time to Repair - CO Trouble**	8.67	8.67	2,149	81	14.12	1.60	0.0000	0	**5**	0.000
MR-4-08-3100	**% Out of Service > 24 Hours - POTS**	18.71	11.74	12,505	971		1.30	5.3667	0	**20**	0.000
MR-4-08-3200	% Out of Service > 24 Hours - Specials	1.52	0.00	461	45		1.91	0.7955	0	10	0.000
MR-5-01-3100	**% Repeat Reports w/in 30 days - POTS**	12.71	14.05	23,746	1,359		0.93	-1.4467	-1	**15**	-0.025
MR-5-01-3200	**% Repeat Reports w/in 30 days - Specials**	15.15	13.46	462	52		5.24	0.3223	0	**15**	0.000
BI	**Billing**										
BI-1-02-2030	% DUF in 4 Business Days		99.75						0	10	0.000
								Totals	-10	599	-0.192

"NA" - no activity "UD" - under development

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

*** Performance Score determined through permutation testing**

Verizon VA **271 Backslide Report** **January-03**

RESALE

	Pre-Ordering	VZ	CLEC					Diff.	Perf. Score	Wgt.	Wgtd. Score
PO-1-01-6020	**Customer Service Record - EDI**	0.23	2.89					2.66	0	**15**	0.000
PO-1-01-6030	**Customer Service Record - CORBA**	0.23	1.15					0.92	0	**5**	0.000
PO-1-01-6050	**Customer Service Record - WEB GUI**	0.23	2.54					2.31	0	**5**	0.000
PO-1-02-6020	Due Date Availability - EDI	1.16	5.12					3.96	0	5	0.000
PO-1-02-6030	Due Date Availability - CORBA	1.16	2.38					1.22	0	2	0.000
PO-1-02-6050	Due Date Availability - WEB GUI	1.16	3.90					2.74	0	2	0.000
PO-1-03-6020	Address Validation -EDI	4.47	6.32					1.84	0	5	0.000
PO-1-03-6030	Address Validation - CORBA	4.47	4.91					0.44	0	2	0.000
PO-1-03-6050	Address Validation - WEB GUI	4.47	5.79					1.32	0	2	0.000
PO-1-04-6020	Product and Service Availability - EDI	9.53	NA						0	0	0.000
PO-1-04-6030	Product and Service Availability - CORBA	9.53	NA						0	0	0.000
PO-1-04-6050	Product and Service Availability - WEB GUI	9.53	12.64					3.11	0	2	0.000
PO-1-05-6020	Telephone Number Availability and Reservation - EDI	5.47	8.92					3.45	0	5	0.000
PO-1-05-6030	TN Availability and Reservation - CORBA	5.47	6.53					1.06	0	2	0.000
PO-1-05-6050	TN Availability and Reservation - WEB GUI	5.47	8.04					2.57	0	2	0.000
PO-2-02-6020	**OSS Interface Availability - Prime - EDI**		97.44						-2	**20**	-0.076
PO-2-02-6030	**OSS Interface Availability - Prime - CORBA**		98.65						-1	**10**	-0.019
PO-2-02-6080	**OSS Interface Availability - Prime - WEB GUI**		96.94						-2	**10**	-0.038
PO-3-02-2000	% Answered within 30 Seconds - Ordering		91.84						0	10	0.000
PO-3-04-2000	% Answered within 30 Seconds - Repair		87.44						0	10	0.000
OR	**Ordering**			Observations							
OR-1-02-2320	**% On Time LSRC - Flow Through - POTS - 2hrs**		97.47		9,050				0	**20**	0.000
OR-1-04-2100	**% OT LSRC/ASRC -No Facil Ck(Elec.-No Flow Thru)-POTS**		97.35		1,282				0	**5**	0.000
OR-1-04-2200	% OT LSRC/ASRC - No Facil Ck (Elec.-No Flow Through)-Specials		100.00		7				0	5	0.000
OR-1-06-2320	**% On Time LSRC/ASRC -Facil Ck(Electronic) - POTS**		100.00		73				0	**5**	0.000
OR-1-06-2200	% On Time LSRC /ASRC -Facil Check (Electronic) - Specials		100.00		6				0	5	0.000
OR-2-02-2320	**% On Time LSR Reject - Flow Through - POTS**		98.88		1,704				0	**15**	0.000
OR-2-04-2320	**% OT LSR/ASR Rej.-No Facil Ck (Elec.-No Flow Thru)-POTS**		99.81		521				0	**5**	0.000
OR-2-04-2200	% OT LSR/ASR Rej. -No Facil Ck (Elec.-No Flow Through)-Specials		50.00		6				-2	5	-0.019
OR-2-06-2320	**% On Time LSR/ASR Reject -Facil Ck (Electronic) - POTS**		100.00		50				0	**5**	0.000
OR-2-06-2200	% On Time LSR/ASR Reject -Facil Check (Electronic) - Specials		100.00		6				0	5	0.000
OR-4-09-2000	**% SOP to Bill Completion Sent w/in 3 Business Days**		99.66		5,363				0	**15**	0.000
OR-5-03-2000	% Flow Through - Achieved - POTS & Specials		97.31		9,304				0	20	0.000
PR	**Provisioning**	VZ	CLEC	VZ	CLEC	VZ Standard Deviation	Sampling Error	Stat. Score			
PR-3-08-2100	% Completed w/in 5 Days (1-5 lines - No Dispatch) - POTS	99.03	99.69	79,795	1,937		0.23	2.9431	0	10	0.000
PR-3-09-2100	% Completed w/n 5 Days (1-5 lines - Dispatch) - POTS	94.48	99.35	13,195	1,071		0.73	6.7103	0	5	0.000
PR-4-01-2200	**% Missed Appointment - VZ - Total - Specials**	11.01	0.00	981	11		9.49	1.1600	0	**10**	0.000
PR-4-02-2100	Average Delay Days - Total - POTS	4.29	1.66	2,497	47	13.23	1.95	1.3515	0	10	0.000
PR-4-02-2200	Average Delay Days - Total - Specials	8.59	NA	108		25.78		NA	0	0	0.000
PR-4-04-2100	**% Missed Appointment - VZ - Dispatch - POTS**	7.42	3.30	20,755	1,332		0.74	5.5563	0	**10**	0.000
PR-4-05-2100	**% Missed Appointment- VZ - No Dispatch - POTS**	0.76	0.10	125,391	2,924		0.16	4.0606	0	**20**	0.000
PR-5-01-2100	% Missed Appointment - Facilities - POTS	1.40	0.68	20,755	1,332		0.33	2.1764	0	10	0.000
PR-5-01-2200	% Missed Appointment - Facilities - Specials	2.04	0.00	489	2		10.03	0.2039	0	10	0.000
PR-5-02-2100	% Orders Held for Facilities > 15 days - POTS	0.15	0.00	20,755	1,332		0.11	1.3667	0	5	0.000
PR-5-02-2200	% Orders Held for Facilities > 15 days - Specials	0.20	0.00	489	2		3.20	0.0638	0	5	0.000
PR-6-01-2100	% Installation Troubles within 30 days - POTS	1.38	3.03	262,162	4,090		0.18	-8.9748	-2	15	-0.057
PR-6-01-2200	% Installation Troubles within 30 days - Specials	1.80	0.00	1,778	19		3.07	0.5870	0	15	0.000
MR	**Maintenance & Repair**							Diff.			
MR-1-01-2000	Average Response Time - Create Trouble	5.82	2.50					-3.32	0	5	0.000
MR-1-03-2000	Average Response Time - Modify Trouble	5.79	2.79					-3.00	0	5	0.000
MR-1-04-2000	Average Response Time - Request Cancellation of Trouble	6.82	0.42					-6.40	0	5	0.000
MR-1-06-2000	Average Response Time - Test Touble (POTS only)	52.09	57.34					5.24	-1	5	-0.010
								Stat. Score			
MR-2-01-2200	Network Trouble Report Rate - Specials	0.49	0.46	93,379	1,947		0.16	0.2023	0	10	0.000
MR-2-02-2100	Network Trouble Report Rate - Loop (POTS)	0.76	0.33	2,841,064	106,892		0.03	15.8526	0	10	0.000
MR-3-01-2100	% Missed Repair Appointments - Loop	11.32	9.89	21,597	354		1.70	0.8446	0	20	0.000
MR-3-02-2100	% Missed Repair Appointments - Central Office	6.24	0.00	2,149	12		7.00	0.8908	0	5	0.000
MR-4-01-2200	**Mean Time to Repair - Specials**	5.62	4.59	462	9	5.80	1.95	0.5276	0	**20**	0.000
MR-4-02-2100	**Mean Time to Repair - Loop Trouble**	19.06	14.35	21,597	354	30.70	1.65	2.8626	0	**15**	0.000
MR-4-03-2100	**Mean Time to Repair - CO Trouble**	8.67	5.60	2,149	12	14.12	4.09	0.7509	0	**5**	0.000
MR-4-08-2100	**% Out of Service > 24 Hours - POTS**	18.71	14.24	12,505	288		2.32	1.9260	0	**20**	0.000
MR-4-08-2200	% Out of Service > 24 Hours - Specials	1.52	0.00	461	7		4.66	0.3262	0	10	0.000
MR-5-01-2100	**% Repeat Reports w/in 30 days - POTS**	12.71	10.38	23,746	366		1.75	1.3264	0	**15**	0.000
MR-5-01-2200	**% Repeat Reports w/in 30 days - Specials**	15.15	22.22	462	9		12.07	-0.5859	0	**15**	0.000
BI	**Billing**										
BI-1-02-2030	% DUF in 4 Business Days		99.75						0	10	0.000
								Totals	-10	524	-0.219

"NA" - no activity "UD" - under development

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

Verizon VA — 271 Backslide Report

January-03

DSL

	Pre-Ordering	VZ	CLEC	Observations	CLEC	Diff.	Perf. Score	Wgt.	Wgtd. Score
PO-1-06-6020	**Facility Available/Loop Qualification - EDI**	15.61	5.55			-10.06	0	**5**	0.000
PO-1-06-6050	**Facility Available/Loop Qualification - WEBGUI**	15.61	4.65			-10.95	0	**5**	0.000
PO-8-01-2000	% On Time - Manual Loop Qualification		88.78				-2	5	-0.029
PO-8-02-2000	% On Time - Engineering Record Request		NA				0	0	0.000
OR	**Ordering**								
OR-1-04-3341	% On Time LSRC /ASRC- No Facil Ck (Elec. -No FT)-2 Wire Digital		100.00		23		0	2	0.000
OR-1-04-3342	**% On Time LSRC/ASRC- NoFacil Ck(E-No FT)-2Wire xDSL**		98.65		74		0	**10**	0.000
OR-1-04-3340	**% On Time LSRC/ASRC- NoFacil Ck(E-No FT)-Line Share**		100.00		54		0	**10**	0.000
OR-1-06-3341	% On Time LSRC /ASRC- Facility Check(Electronic) -2Wire Digital		NA				0	0	0.000
OR-1-06-3342	% On Time LSRC/ASRC- Facility Check(Electronic) -2Wire xDSL		NA				0	0	0.000
OR-1-06-3340	% On Time LSRC/ASRC- Facility Check(Electronic) -Line Share		NA				0	0	0.000
OR-2-04-3341	% On Time LSR/ASR Rej.- No Facil Ck(E. - No FT) -2Wire Digital		100.00		5		0	2	0.000
OR-2-04-3342	**% OT LSR/ASR Rej.- No Facil Ck(E- No FT)-2Wire xDSL**		100.00		23		0	**10**	0.000
OR-2-04-3340	**% OT LSR/ASR Rej.- No Facil Ck(E- No FT)- Line Share**		100.00		16		0	**10**	0.000
OR-2-06-3341	% On Time LSR/ASR Rej.- Facility Check(Electronic)-2Wire Digital		NA				0	0	0.000
OR-2-06-3342	% On Time LSR/ASR Rej.- Facility Check(Electronic)-2Wire xDSL		NA				0	0	0.000
OR-2-06-3340	% On Time LSR/ASR Rej.- Facility Check(Electronic)- Line Share		NA				0	0	0.000
PR	**Provisioning**					VZ Standard Deviation / Sampling Error / Stat. Score			
PR-3-03-3343	**% Comp. w/in 3 Days(1-5 lines No Disp.)- Ln. Share**		95.60		250				
PR-3-03-3343	**% Comp. w/in 3 Days(1-5 lines No Disp.)-Ln. Share**	79.58	95.60	6,494	250		2.60	6.1657	0 **10** 0.000
PR-3-10-3342	**% Comp. w/in 6 Days(1-5 lines) Tot.- 2Wire xDSL**		96.48		199				0 **10** 0.000
PR-4-02-3341	Average Delay Days - Total - 2Wire Digital	5.15	7.00	143	4	10.79	5.47	-0.3374	0 2 0.000
PR-4-02-3342	**Average Delay Days - Total - 2Wire xDSL**	10.01	1.50	75	14	30.66	8.93	0.9538	0 **10** 0.000
PR-4-02-3343	**Average Delay Days - Total - Line Share***	1.43	6.75	185	8	1.37	0.49	-2.7860	-2 **10** -0.058
PR-4-04-3341	% Missed Appointment - Dispatch - 2Wire Digital	16.84	2.90	671	69		4.73	2.9469	0 2 0.000
PR-4-04-3342	**% Missed Appointment- Dispatch - 2 Wire xDSL**		2.85		281				0 **20** 0.000
PR-4-04-3343	% Missed Appointment - Dispatch - DSL Line Share	3.45	1.32	1,448	76		2.15	0.9950	0 5 0.000
PR-4-05-3343	**% Missed Appt. - No Disp. - Line Share**	1.40	0.86	7,812	347		0.64	0.8252	0 **20** 0.000
PR-6-01-3341	% Installation Troubles w/in 30 Days - 2Wire Digital	5.21	3.80	25,431	79		2.50	0.5641	0 2 0.000
PR-6-01-3342	% Installation Troubles w/in 30 Days - 2Wire xDSL	5.21	4.19	25,431	334		1.22	0.8322	0 10 0.000
PR-6-01-3343	% Installation Troubles w/in 30 Days - Line Share	1.27	3.50	9,323	428		0.55	-4.0516	-2 10 -0.058
MR	**Maintenance & Repair**								
MR-2-02-3341	Network Trouble Report Rate - Loop - 2Wire Digital	0.75	0.32	2,888,984	5,248		0.12	3.5909	0 2 0.000
MR-2-02-3342	Network Trouble Report Rate - Loop - 2Wire xDSL	0.75	0.29	2,888,984	23,583		0.06	8.1428	0 5 0.000
MR-2-02-3343	Network Trouble Report Rate - Loop - Line Share	0.24	0.28	50,033	4,299		0.08	-0.4777	0 5 0.000
MR-2-03-3341	Network Trouble Report Rate - CO - 2Wire Digital	0.08	0.06	2,888,984	5,248		0.04	0.5539	0 2 0.000
MR-2-03-3342	Network Trouble Report Rate - CO - 2Wire xDSL	0.08	0.03	2,888,984	23,583		0.02	2.9016	0 5 0.000
MR-2-03-3343	Network Trouble Report Rate - CO - Line Share**	0.07	0.12	50,033	4,299		0.04	-1.2339	0 5 0.000
MR-3-01-3341	% Missed Repair Appt. - Loop - 2Wire Digital	11.46	5.88	21,747	17		7.73	0.7221	0 2 0.000
MR-3-01-3342	**% Missed Repair Appt. - Loop - 2Wire xDSL**	11.46	6.25	21,747	80		3.57	1.4611	0 **20** 0.000
MR-3-01-3343	**% Missed Repair Appt. - Loop - Line Share**	43.02	4.76	179	21		11.42	3.3498	0 **20** 0.000
MR-3-02-3341	% Missed Repair Appt. - CO - 2Wire Digital	7.13	0.00	2,271	3		14.87	0.4797	0 2 0.000
MR-3-02-3342	% Missed Repair Appt. - CO - 2Wire xDSL	7.13	11.11	2,271	9		8.60	-0.4628	0 10 0.000
MR-3-02-3343	% Missed Repair Appt. - CO - Line Share	26.88	36.36	93	11		14.14	-0.6708	0 10 0.000
MR-4-02-3341	Mean Time To Repair - Loop - 2Wire Digital	19.07	15.66	21,747	17	30.67	7.44	0.4580	0 2 0.000
MR-4-02-3342	**Mean Time To Repair - Loop - 2Wire xDSL**	19.07	11.50	21,747	80	30.67	3.44	2.2034	0 **20** 0.000
MR-4-02-3343	**Mean Time To Repair - Loop - Line Share**	28.28	19.02	179	21	23.33	5.38	1.7197	0 **20** 0.000
MR-4-03-3341	Mean Time To Repair - CO - 2Wire Digital	8.96	2.29	2,271	3	14.74	8.52	0.7831	0 2 0.000
MR-4-03-3342	Mean Time To Repair - CO - 2Wire xDSL	8.96	11.41	2,271	9	14.74	4.92	-0.4982	0 10 0.000
MR-4-03-3343	Mean Time To Repair - CO - Line Share	27.37	12.59	93	11	24.02	7.66	1.9304	0 10 0.000
MR-5-01-3341	% Repeat Reports w/in 30 Days - 2Wire Digital	12.74	15.00	24,018	20		7.46	-0.3030	0 2 0.000
MR-5-01-3342	**% Repeat Reports w/in 30 Days - 2Wire xDSL**	12.74	7.87	24,018	89		3.54	1.3768	0 **10** 0.000
MR-5-01-3343	**% Repeat Reports w/in 30 Days - Line Share**	39.71	31.25	272	32		9.14	0.9247	0 **10** 0.000
	"NA" - no activity "UD" - under development						Totals		-6 344 -0.145

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

*** Performance Score determined through permutation testing**

**** An absolute difference in performance of <0.1% results in a performance score of 0.**

Verizon Virginia
271 Backslide Report

January-03

INTERCONNECTION (TRUNKS)

	Ordering	CLEC	Obs.				Perf. Score	Wgt.	Wgtd. Score
OR-1-12-5020	% On Time Firm Order Confirmations	100.00	5				0	15	0.000
OR-1-13-5020	% On Time Design Layout Record	100.00	45				0	10	0.000
OR-2-12-5000	% On TimeTrunk ASR Reject	100.00	3				0	10	0.000

				Observations		VZ Standard	Sampling				
PR	Provisioning	VZ		VZ	CLEC	Deviation	Error	Stat. Score			
PR-4-01-5000	**% Missed Appointment - VZ - Total**	0.04	0.00	5,357	10,448		0.03	1.1449	0	**20**	0.000
PR-4-02-5000	Average Delay Days - Total		NA						0	0	0.000
PR-4-07-3540	**% On Time Performance - LNP only**		98.50		1,465				0	**20**	0.000
PR-5-01-5000	% Missed Appointment - Facilities	0.00	0.00	5,357	6,080		0.00	0.0000	0	10	0.000
PR-5-02-5000	% Orders Held for Facilities > 15 Days	0.00	0.00	5,357	6,080		0.00	0.0000	0	10	0.000
PR-6-01-5000	% Installation Troubles w/in 30 Days	0.02	0.00	5,357	10,448		0.02	0.8132	0	15	0.000
MR	**Maintenance & Repair**										
MR-4-01-5000	**Mean Time to Repair - Total**	1.85	1.02	17	27	2.71	0.84	0.9892	0	**20**	0.000
MR-5-01-5000	% Repeat Reports w/in 30 Days	5.88	3.70	17	27		7.28	0.2993	0	10	0.000
NP	**Network Performance**										
NP-1-03-5000	**# of Final Trunk Groups Blocked 2 months**		0						0	20	0.000
NP-1-04-5000	**# of Final Trunk Groups Blocked 3 months**		0								
								Totals	0	160	0.000

Collocation

Performance Report for Critical Measure # 12

NP	Network Performance	CLEC	Obs.	Wgt.
NP-2-01-6701	**% OT Response to Request for Physical Collocation - New**	NA		**0**
NP-2-01-6702	**% OT Response to Request for Physical Collocation - Augment**	100.00	3	**10**
NP-2-02-6701	**% OT Response to Request for Virtual Collocation - New**	NA		**0**
NP-2-02-6702	**% OT Response to Request for Virtual Collocation - Augment**	NA		**0**
NP-2-05-6701	**% On Time - Physical Location -New**	NA		**0**
NP-2-05-6702	**% On Time - Physical Location -Augment**	100.00	18	**20**
NP-2-06-6701	**% On Time - Virtual Location - New**	NA		**0**
NP-2-06-6702	**% On Time - Virtual Location - Augment**	NA		**0**
NP-2-07-6701	**Average Delay Days - Physical - New**	NA		**0**
NP-2-07-6702	**Average Delay Days - Physical -Augment**	NA		**20**
NP-2-08-6701	**Average Delay Days - Virtual - New**	NA		**0**
NP-2-08-6702	**Average Delay Days - Virtual - Augment**	NA		**0**
				50

"NA" - no activity "UD" - under development

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

		January-03 Verizon Virginia	Resale		UNE		Trunks		Collocation		DSL		Total
		CRITICAL MEASURES	%	$	%	$	%	$	%	$	%	$	$
		PRE-ORDERING											
1	metric	**OSS Interface**	**58%**	**67,593**	**58%**	**150,206**					**0%**	**0**	**217,798**
	PO-1-01	Customer Service Record - EDI	X	-	X	-							
	PO-1-01	Customer Service Record - CORBA	X	-	X	-							
	PO-1-01	Customer Service Record - WEB GUI	X	-	X	-							
	PO-1-06	Facility Availibility (Loop Qualification) - EDI									X	-	
	PO-1-06	Facility Availibility (Loop Qualification) - WEB GUI									X	-	
	PO-2-02	OSS Interface Availability - Prime - EDI	X	36,049	X	80,110							
	PO-2-02	OSS Interface Availability - Prime - CORBA	X	13,519	X	30,041							
	PO-2-02	OSS Interface Availability - Prime - WEB GUI	X	18,025	X	40,055							
		ORDERING											
2		**% On Time Ordering Notification**	**0%**	**0**	**0%**	**0**					**0%**	**0**	**0**
	OR-1-02	% On Time LSRC - Flow Through - POTS - 2hrs	X	-	X	-							
	OR-1-04	% OT LSRC/ASRC-No Facil Ck (E.-No FT)-POTS	X	-	X	-							
	OR-1-04	% OT LSRC/ASRC-No Facil Ck(E.-No FT)-2Wire xDSL									X	-	
	OR-1-04	% OT LSRC/ASRC-No Facil Ck(E.-No FT)-Line Share									X	-	
	OR-1-06	% OT LSRC /ASRC-Facil Ck (Electronic) - POTS	X	-	X	-							
	OR-2-02	% On Time LSR Reject - Flow Through - POTS	X	-	X	-							
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No Flow Through)-POTS	X	-	X	-							
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No FT)-2 Wire xDSL									X	-	
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No FT)-Line Share									X	-	
	OR-2-06	% OT LSR/ASR Reject -Facil Ck(Electronic) - POTS	X	-	X	-							
	OR-4-09	% SOP to Bill Completion Sent w/in 3 Bus. Days	X	-	X	-							
		PROVISIONING											
3		**% Completed**									**0%**	**0**	**0**
	PR-3-03	% Comp.w/in 3 Days(1-5 lines-No Disp).- Line Share									X	-	
	PR-3-10	% Comp. w/in 6 Days (1-5 lines) Tot.- 2Wire xDSL									X	-	
4a	PR-4-01	**% Missed Appointment - VZ - Total - EEL**			**0%**	**0**							**0**
4b		**% Missed Appointment**	**0%**	**0**	**0%**	**0**	**0%**	**0**			**17%**	**13,948**	**13,948**
	PR-4-01	% Missed Appointment - VZ - Total - Specials	X	-	X	-							
	PR-4-01	% Missed Appointment - VZ - Total - Trunks					X	-					
	PR-4-02	Average Delay Days - Total - 2Wire xDSL									X	-	
	PR-4-02	Average Delay Days - Total - DSL Line Share									X	13,948	
	PR-4-04	% Missed Appointment - VZ - Total - Dispatch - POTS	X	-									
	PR-4-04	% Missed Appt. - VZ - Total - Dispatch - New Loops			X	-							
	PR-4-04	% Missed Appointment- Dispatch - 2Wire xDSL									X	-	
	PR-4-05	% Missed Appt. - VZ - Total - No Dispatch - POTS	X	-									
	PR-4-05	% Missed Appt. - No Disp. - DSL Line Share									X	-	
5	PR-4-05	**% Missed Appt. - VZ - No Disp.- Platform**			**0%**	**0**							**0**
6		**Hot Cut Performance**			**0%**	**0**							**0**
	PR-9-01	% OT - Hot Cut (adj. for missed appts. due to late LSRC)			X								
	PR-6-02	% Troubles within 7 Days - Hot Cut			X								
7	PR-4-07	**% On Time Performance - UNE LNP**					**0%**	**0**					**0**
		MAINTENANCE											
8		**Missed Repair Appts.**									**0%**	**0**	**0**
	MR-3-01	% Missed Repair Appt. (Loop) - 2Wire xDSL									X	-	
	MR-3-01	% Missed Repair Appt. (Loop) - DSL Line Share									X	-	
9		**Mean Time To Repair**	**0%**	**0**	**0%**	**0**	**0%**	**0**			**0%**	**0**	**0**
	MR-4-01	Mean Time To Repair - Specials	X	-	X	-							
	MR-4-01	Mean Time To Repair - Trunks					X	-					
	MR-4-02	Mean Time To Repair - Loop - 2Wire xDSL									X	-	
	MR-4-02	Mean Time To Repair - Loop - Line Share									X	-	
	MR-4-02	Mean Time To Repair - Loop Trouble	X	-	X	-							
	MR-4-03	Mean Time To Repair - Central Office	X	-	X	-							
	MR-4-08	% Out Of Service > 24 Hours - POTS	X	-	X	-							
10		**% Repeat Reports within 30 Days**	**0%**	**0**	**43%**	**110,652**					**0%**	**0**	**110,652**
	MR-5-01	% Repeat Reports w/in 30 Days - POTS	X	-	X	110,652							
	MR-5-01	% Repeat Reports w/in 30 Days - Specials	X	-	X	-							
	MR-5-01	% Repeat Reports w/in 30 Days - Total - 2Wire xDSL									X	-	
	MR-5-01	% Repeat Reports w/in 30 Days - Tot. - Line Share									X	-	
		NETWORK PERFORMANCE											
11		**Final Trunk Groups Blocked**					**0%**	**0**					**0**
	NP-1-03	Blocked 2 months					X	-					
	NP-1-04	Blocked 3 months					X	-					
12		**Collocation**							**0%**	**0**			**0**
	NP-2-01/2	% On Time Response to Request for Collocation							X	-			
	NP-2-05/6	% On Time - Collocation							X	-			
	NP-2-07/8	Average Delay Days							X	-			
		# of full share measures in category **Total**	5	**67,593**	9	**260,857**	4	**0**	1	**0**	7	**13,948**	**342,398**

Special Provision - UNE Ordering

		% On Time	Observations	Market Adj.
OR-1-04-3100	% OT LSRC/ASRC -No Facil Ck(Elec.-No Flow Thru)-POTS	95.85	5,838	$ -
OR-1-06-3320	% On Time LSRC/ASRC -Facil Ck(Electronic) - POTS	98.17	438	$ -
OR-2-04-3320	% OT LSR/ASR Rej.-No Facil Ck (Elec.-No Flow Thru)-POTS	99.29	4,202	$ -
OR-2-06-3320	% On Time LSR/ASR Reject -Facil Ck (Electronic) - POTS	95.90	195	$ -
	Total Market Adj.*			$ -

* For allocation, any UNE Ordering market adjustment is combined with the MOE UNE market adjustment allocation.

Special Provision - UNE Flow Through

OR-5-01-3000 % Flow Through - Total - POTS & Specials

Month	%	Observations Gross #	Flow-thru
Jan 03	85.46	44,600	38,116
Overall	85.46	44,600	38,116

OR-5-03-3000 % Flow Through - Achieved - POTS & Specials

Month	%	Observations Gross #	Flow-thru
Jan 03	96.10	39,664	38,116
Overall	96.10	39,664	38,116

Market Adjustment * $ -

* For allocation, any Flow Though market adjustment is combined with the MOE UNE market adjustment allocation.

Special Provision - Hot Cut - Loop Performance

		% On Time Current Mo.	Observations	% On Time Prior Month	Observations
PR-9-01-3520	% On Time Performance - Hot Cut	95.81	477	97.44	390
		%Troubles		%Troubles Prior Month	
PR-6-02-3520	% Installation Troubles within 7 days - Hot Cut	1.19	927	0.36	1101

	Greater of - Tier I (2 mo)	or Tier II (1mo)	Total
Market Adjustment *	$ -	$ -	$ -

* For allocation purposes, any Hot Cut market adjustment is combined with the Critical measure market adjustment allocation.

Special Provision - Electronic Data Interface Measures

		% On Time	Observations
PO-9-01	% Missing Notifier Trouble Ticket PONS Cleared within 3 Bus. Days	100.00	211
		% Not Rejected	Observations
OR-3-02	% Resubmission Not Rejected	100.00	10
	Market Adjustment		$ -

		% On Time	Observations	Market Adj.
OR-4-09	% SOP to Bill Completion within 3 Business Days	99.42	24,125	$ -
	Total Market Adj.*			$ -

* For allocation, any EDI market adjustment is allocated to all CLEC's using the EDI interface based on the number of lines in service.

January-03

Change Control Assurance Plan

		% On Time	Observations	Mrkt Adj.
PO-4-01	% Change Management Notices sent on Time (type 3,4,5)	100.00	20	$ -

	* Cumlative number of delay days greater than 8 standard	Delay Days*	Observations	
PO-4-03	Change Management Notice Delay 8 plus Days (type 1-5)	NA	NA	$ -

		% Test Deck Wgt. Failure	Test Deck Wgt.	
PO-6-01	% Software Validation	R3	R3	$ -

	* Cumlative number of delay hours greater than 48 hour standard	Delay Hours*	Observations	
PO-7-04	Delay Hours - Failed/Rejected Test Deck Transactions Transactions failed, no workaround	R3		$ -

Total Market Adjustment			$ -
	Resale allocation	18%	$ -
	UNE allocation	82%	$ -

Verizon Virginia

PAP/CCAP Market Adjustment Summary

January-03

		Weighted Score	Market Adjustment	
	MODE OF ENTRY			
	Resale	-0.219	$ 141,820	
	Unbundled Network Elements	-0.192	527,200	
	Trunks	0.000	-	
	Digital Subscriber Lines	-0.145	-	
	Mode of Entry Total			669,020
#	**CRITICAL MEASURES**			
1	OSS Interface		$ 217,798	
2	% On Time Ordering Notification		-	
3	% Completed		-	
4a	% Missed Appointment - VZ - Total - EEL		-	
4b	% Missed Appointment		13,948	
5	% Missed Appt. - VZ - No Disp.- Platform		-	
6	Hot Cut Performance		-	
7	% On Time Performance - UNE LNP		-	
8	Missed Repair Appts.		-	
9	Mean Time To Repair		-	
10	% Repeat Reports within 30 Days		110,652	
11	Final Trunk Groups Blocked		-	
12	Collocation		-	
	Individual Rule Payment Total:		-	
	(Included in *Final* Monthly Report)			
	Critical Measure Total			342,398
	SPECIAL PROVISIONS			
	UNE Ordering		-	
	UNE Flow Through (Quarterly)		-	
	UNE Hot Cut Loop		-	
	EDI Measures		-	
	Special Provision Total			-
	CHANGE CONTROL			-
	Grand Total			$ 1,011,417

Under the Plan, -1 performance scores are subject to adjustment based on the next two month's performance.

Verizon VA 271 Backslide Report

January-03

UNE

	Pre-Ordering	VZ	CLEC	VZ	CLEC	VZ Standard Deviation	Sampling Error	Stat. Score	Diff.	Perf. Score	Wgt.	Wgtd. Score
PO-1-01-6020	**Customer Service Record - EDI**	0.23	2.89						2.66	0	**15**	0.000
PO-1-01-6030	**Customer Service Record - CORBA**	0.23	1.15						0.92	0	**5**	0.000
PO-1-01-6050	**Customer Service Record - WEB GUI**	0.23	2.54						2.31	0	**5**	0.000
PO-1-02-6020	Due Date Availability - EDI	1.16	5.12						3.96	0	5	0.000
PO-1-02-6030	Due Date Availability - CORBA	1.16	2.38						1.22	0	2	0.000
PO-1-02-6050	Due Date Availability - WEB GUI	1.16	3.90						2.74	0	2	0.000
PO-1-03-6020	Address Validation -EDI	4.47	6.32						1.84	0	5	0.000
PO-1-03-6030	Address Validation - CORBA	4.47	4.91						0.44	0	2	0.000
PO-1-03-6050	Address Validation - WEB GUI	4.47	5.79						1.32	0	2	0.000
PO-1-04-6020	Product and Service Availability - EDI	9.53	NA							0	0	0.000
PO-1-04-6030	Product and Service Availability - CORBA	9.53	NA							0	0	0.000
PO-1-04-6050	Product and Service Availability - WEB GUI	9.53	12.64						3.11	0	2	0.000
PO-1-05-6020	Telephone Number Availability and Reservation - EDI	5.47	8.92						3.45	0	5	0.000
PO-1-05-6030	TN Availability and Reservation - CORBA	5.47	6.53						1.06	0	2	0.000
PO-1-05-6050	TN Availability and Reservation - WEB GUI	5.47	8.04						2.57	0	2	0.000
PO-2-02-6020	**OSS Interface Availability - Prime - EDI**		100.00							0	**20**	0.000
PO-2-02-6030	**OSS Interface Availability - Prime - CORBA**		99.93							0	**10**	0.000
PO-2-02-6080	**OSS Interface Availability - Prime - WEB GUI**		100.00							0	**10**	0.000
PO-3-02-3000	% Answered within 30 Seconds - Ordering		91.84							0	10	0.000
PO-3-04-3000	% Answered within 30 Seconds - Repair		87.44							0	10	0.000
OR	**Ordering**			Observations								
OR-1-02-3320	**% On Time LSRC - Flow Through - POTS - 2hrs**		98.17		37,645					0	**20**	0.000
OR-1-04-3100	**% OT LSRC/ASRC -No Facil Ck(Elec.-No Flow Thru)-POTS**		95.85		5,838					0	**5**	0.000
OR-1-04-3200	% OT LSRC/ASRC - No Facil Ck (Elec.-No Flow Through)-Specials		100.00		38					0	5	0.000
OR-1-06-3320	**% On Time LSRC/ASRC -Facil Ck(Electronic) - POTS**		98.17		438					0	5	0.000
OR-1-06-3200	% On Time LSRC /ASRC -Facil Check (Electronic) - Specials		97.74		133					0	5	0.000
OR-2-02-3320	**% On Time LSR Reject - Flow Through - POTS**		99.10		8,074					0	**15**	0.000
OR-2-04-3320	**% OT LSR/ASR Rej.-No Facil Ck (Elec.-No Flow Thru)-POTS**		99.29		4,202					0	**5**	0.000
OR-2-04-3200	% OT LSR/ASR Rej. -No Facil Ck (Elec.-No Flow Through)-Specials		100.00		3					0	5	0.000
OR-2-06-3320	**% On Time LSR/ASR Reject -Facil Ck (Electronic) - POTS**		95.90		195					0	**5**	0.000
OR-2-06-3200	% On Time LSR/ASR Reject -Facil Check (Electronic) - Specials		96.88		32					0	5	0.000
OR-4-09-3000	**% SOP to Bill Completion Sent w/in 3 Business Days**		99.35		18,762					0	**15**	0.000
OR-5-03-3000	% Flow Through - Achieved - POTS & Specials		96.10		39,664					0	20	0.000
PR	**Provisioning**	VZ	CLEC	VZ	CLEC							
PR-3-08-3142	% Completed w/in 5 Days (1-5 lines-No Disp.)-UNE-P/Other	99.03	99.81	79,795	5,143		0.14	5.5178		0	10	0.000
PR-3-09-3142	% Completed w/in 5 Days (1-5 lines-Dispatch)-UNE-P/Other	94.48	99.35	13,195	155		1.85	2.6432		0	5	0.000
PR-4-01-3200	**% Missed Appointment - VZ - Total - Specials**	11.01	0.82	981	122		3.00	3.3910		0	**10**	0.000
PR-4-01-3510	**% Missed Appointment - VZ - Total - EEL**	28.09	7.69	235	13		12.80	1.5926		0	**10**	0.000
PR-4-01-3530	% Missed Appointment - VZ - Total - IOF	0.00	0.00	15	4		0.00	0.0000		0	10	0.000
PR-4-02-3100	Average Delay Days - Total - POTS	4.29	2.20	2,497	50	13.23	1.89	1.1071		0	10	0.000
PR-4-02-3200	Average Delay Days - Total - Specials	8.59	1.00	108	1	25.78	25.90	0.2932		0	10	0.000
PR-4-04-3140	% Missed Appointment - VZ - Dispatch - Platform	7.42	4.82	20,755	353		1.41	1.8511		0	10	0.000
PR-4-04-3113	**% Missed Appointment - VZ - Dispatch - New Loop**	7.42	3.74	20,755	749		0.97	3.7764		0	**10**	0.000
PR-4-05-3140	**% Missed Appointment- VZ - No Dispatch - Platform**	0.76	0.01	125,391	16,646		0.07	10.4623		0	**20**	0.000
PR-5-01-3100	% Missed Appointment - Facilities - POTS	1.40	0.09	20,755	1,110		0.36	3.6148		0	10	0.000
PR-5-01-3200	% Missed Appointment - Facilities - Specials	2.04	0.76	489	132		1.39	0.9269		0	10	0.000
PR-5-02-3100	% Orders Held for Facilities > 15 days - POTS *	0.15	0.36	20,755	1,110		0.12	-1.2831		-1	5	-0.008
PR-5-02-3200	% Orders Held for Facilities > 15 days - Specials	0.20	0.00	489	132		0.44	0.4610		0	5	0.000
PR-6-01-3121	% Installation Troubles within 30 days - POTS Other	1.38	0.85	262,162	19,886		0.09	6.1313		0	15	0.000
PR-6-01-3200	% Installation Troubles within 30 days - Specials	1.80	2.55	1,778	196		1.00	-0.7508		0	15	0.000
PR-6-02-3520	**% Installation Troubles within 7 days - Hot Cut**		1.19		927					0	**15**	0.000
PR-9-01-3520	**% On Time Performance - Hot Cut**		95.81		477					0	**20**	0.000
MR	**Maintenance & Repair**								Diff.			
MR-1-01-2000	Average Response Time - Create Trouble	5.82	2.50						-3.32	0	5	0.000
MR-1-03-2000	Average Response Time - Modify Trouble	5.79	2.79						-3.00	0	5	0.000
MR-1-04-2000	Average Response Time - Request Cancellation of Trouble	6.82	0.42						-6.40	0	5	0.000
MR-1-06-2000	Average Response Time - Test Touble (POTS only)	52.09	57.34						5.24	-1	5	-0.008
									Stat. Score			
MR-2-01-3200	Network Trouble Report Rate - Specials	0.49	1.35	93,379	3,856		0.12	-7.4048		-2	10	-0.033
MR-2-02-3112	Network Trouble Report Rate - Loop (POTS)	0.76	0.47	2,841,064	267,765		0.02	16.2813		0	10	0.000
MR-3-01-3112	% Missed Repair Appointments - Loop	11.32	6.30	21,597	1,270		0.91	5.4893		0	20	0.000
MR-3-02-3100	% Missed Repair Appointments - Central Office	6.24	4.94	2,149	81		2.74	0.4739		0	5	0.000
MR-4-01-3200	**Mean Time to Repair - Specials**	5.62	5.63	462	52	5.80	0.85	-0.0118		0	**20**	0.000
MR-4-02-3112	**Mean Time to Repair - Loop Trouble**	19.06	13.66	21,597	1,270	30.70	0.89	6.0804		0	**15**	0.000
MR-4-03-3100	**Mean Time to Repair - CO Trouble**	8.67	8.67	2,149	81	14.12	1.60	0.0000		0	**5**	0.000
MR-4-08-3100	**% Out of Service > 24 Hours - POTS**	18.71	11.74	12,505	971		1.30	5.3667		0	**20**	0.000
MR-4-08-3200	% Out of Service > 24 Hours - Specials	1.52	0.00	461	45		1.91	0.7955		0	10	0.000
MR-5-01-3100	**% Repeat Reports w/in 30 days - POTS**	12.71	14.05	23,746	1,359		0.93	-1.4467		-1	**15**	-0.025
MR-5-01-3200	**% Repeat Reports w/in 30 days - Specials**	15.15	13.46	462	52		5.24	0.3223		0	**15**	0.000
BI	**Billing**											
BI-1-02-2030	% DUF in 4 Business Days		99.75							0	10	0.000
									Totals	-5	599	-0.075

"NA" - no activity "UD" - under development

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

*** Performance Score determined through permutation testing**

Verizon VA 271 Backslide Report

January-03

RESALE

	Pre-Ordering	VZ	CLEC	Diff.	Perf. Score	Wgt.	Wgtd. Score
PO-1-01-6020	**Customer Service Record - EDI**	0.23	2.89	2.66	0	**15**	0.000
PO-1-01-6030	**Customer Service Record - CORBA**	0.23	1.15	0.92	0	**5**	0.000
PO-1-01-6050	**Customer Service Record - WEB GUI**	0.23	2.54	2.31	0	**5**	0.000
PO-1-02-6020	Due Date Availability - EDI	1.16	5.12	3.96	0	5	0.000
PO-1-02-6030	Due Date Availability - CORBA	1.16	2.38	1.22	0	2	0.000
PO-1-02-6050	Due Date Availability - WEB GUI	1.16	3.90	2.74	0	2	0.000
PO-1-03-6020	Address Validation -EDI	4.47	6.32	1.84	0	5	0.000
PO-1-03-6030	Address Validation - CORBA	4.47	4.91	0.44	0	2	0.000
PO-1-03-6050	Address Validation - WEB GUI	4.47	5.79	1.32	0	2	0.000
PO-1-04-6020	Product and Service Availability - EDI	9.53	NA		0	0	0.000
PO-1-04-6030	Product and Service Availability - CORBA	9.53	NA		0	0	0.000
PO-1-04-6050	Product and Service Availability - WEB GUI	9.53	12.64	3.11	0	2	0.000
PO-1-05-6020	Telephone Number Availability and Reservation - EDI	5.47	8.92	3.45	0	5	0.000
PO-1-05-6030	TN Availability and Reservation - CORBA	5.47	6.53	1.06	0	2	0.000
PO-1-05-6050	TN Availability and Reservation - WEB GUI	5.47	8.04	2.57	0	2	0.000
PO-2-02-6020	**OSS Interface Availability - Prime - EDI**		100.00		0	**20**	0.000
PO-2-02-6030	**OSS Interface Availability - Prime - CORBA**		99.93		0	**10**	0.000
PO-2-02-6080	**OSS Interface Availability - Prime - WEB GUI**		100.00		0	**10**	0.000
PO-3-02-2000	% Answered within 30 Seconds - Ordering		91.84		0	10	0.000
PO-3-04-2000	% Answered within 30 Seconds - Repair		87.44		0	10	0.000

OR	Ordering		Observations						
OR-1-02-2320	**% On Time LSRC - Flow Through - POTS - 2hrs**	97.47	9,050			0	**20**	0.000
OR-1-04-2100	**% OT LSRC/ASRC -No Facil Ck(Elec.-No Flow Thru)-POTS**	97.35	1,282			0	**5**	0.000
OR-1-04-2200	% OT LSRC/ASRC - No Facil Ck (Elec.-No Flow Through)-Specials	100.00	7			0	5	0.000
OR-1-06-2320	**% On Time LSRC/ASRC -Facil Ck(Electronic) - POTS**	100.00	73			0	**5**	0.000
OR-1-06-2200	% On Time LSRC /ASRC -Facil Check (Electronic) - Specials	100.00	6			0	5	0.000
OR-2-02-2320	**% On Time LSR Reject - Flow Through - POTS**	98.88	1,704			0	**15**	0.000
OR-2-04-2320	**% OT LSR/ASR Rej.-No Facil Ck (Elec.-No Flow Thru)-POTS**	99.81	521			0	**5**	0.000
OR-2-04-2200	% OT LSR/ASR Rej. -No Facil Ck (Elec.-No Flow Through)-Specials	50.00	6			-2	5	-0.019
OR-2-06-2320	**% On Time LSR/ASR Reject -Facil Ck (Electronic) - POTS**	100.00	50			0	**5**	0.000
OR-2-06-2200	% On Time LSR/ASR Reject -Facil Check (Electronic) - Specials	100.00	6			0	5	0.000
OR-4-09-2000	**% SOP to Bill Completion Sent w/in 3 Business Days**	99.66	5,363			0	**15**	0.000
OR-5-03-2000	% Flow Through - Achieved - POTS & Specials	97.31	9,304			0	20	0.000

PR	Provisioning	VZ	CLEC	VZ	CLEC	VZ Standard Deviation	Sampling Error	Stat. Score			
PR-3-08-2100	% Completed w/in 5 Days (1-5 lines - No Dispatch) - POTS	99.03	99.69	79,795	1,937		0.23	2.9431	0	10	0.000
PR-3-09-2100	% Completed w/n 5 Days (1-5 lines - Dispatch) - POTS	94.48	99.35	13,195	1,071		0.73	6.7103	0	5	0.000
PR-4-01-2200	**% Missed Appointment - VZ - Total - Specials**	11.01	0.00	981	11		9.49	1.1600	0	**10**	0.000
PR-4-02-2100	Average Delay Days - Total - POTS	4.29	1.66	2,497	47	13.23	1.95	1.3515	0	10	0.000
PR-4-02-2200	Average Delay Days - Total - Specials	8.59	NA	108		25.78		NA	0	0	0.000
PR-4-04-2100	**% Missed Appointment - VZ - Dispatch - POTS**	7.42	3.30	20,755	1,332		0.74	5.5563	0	**10**	0.000
PR-4-05-2100	**% Missed Appointment- VZ - No Dispatch - POTS**	0.76	0.10	125,391	2,924		0.16	4.0606	0	**20**	0.000
PR-5-01-2100	% Missed Appointment - Facilities - POTS	1.40	0.68	20,755	1,332		0.33	2.1764	0	10	0.000
PR-5-01-2200	% Missed Appointment - Facilities - Specials	2.04	0.00	489	2		10.03	0.2039	0	10	0.000
PR-5-02-2100	% Orders Held for Facilities > 15 days - POTS	0.15	0.00	20,755	1,332		0.11	1.3667	0	5	0.000
PR-5-02-2200	% Orders Held for Facilities > 15 days - Specials	0.20	0.00	489	2		3.20	0.0638	0	5	0.000
PR-6-01-2100	% Installation Troubles within 30 days - POTS	1.38	3.03	262,162	4,090		0.18	-8.9748	-2	15	-0.057
PR-6-01-2200	% Installation Troubles within 30 days - Specials	1.80	0.00	1,778	19		3.07	0.5870	0	15	0.000

MR	Maintenance & Repair							Diff.			
MR-1-01-2000	Average Response Time - Create Trouble	5.82	2.50					-3.32	0	5	0.000
MR-1-03-2000	Average Response Time - Modify Trouble	5.79	2.79					-3.00	0	5	0.000
MR-1-04-2000	Average Response Time - Request Cancellation of Trouble	6.82	0.42					-6.40	0	5	0.000
MR-1-06-2000	Average Response Time - Test Touble (POTS only)	52.09	57.34					5.24	-1	5	-0.010
								Stat. Score			
MR-2-01-2200	Network Trouble Report Rate - Specials	0.49	0.46	93,379	1,947		0.16	0.2023	0	10	0.000
MR-2-02-2100	Network Trouble Report Rate - Loop (POTS)	0.76	0.33	2,841,064	106,892		0.03	15.8526	0	10	0.000
MR-3-01-2100	% Missed Repair Appointments - Loop	11.32	9.89	21,597	354		1.70	0.8446	0	20	0.000
MR-3-02-2100	% Missed Repair Appointments - Central Office	6.24	0.00	2,149	12		7.00	0.8908	0	5	0.000
MR-4-01-2200	**Mean Time to Repair - Specials**	5.62	4.59	462	9	5.80	1.95	0.5276	0	**20**	0.000
MR-4-02-2100	**Mean Time to Repair - Loop Trouble**	19.06	14.35	21,597	354	30.70	1.65	2.8626	0	**15**	0.000
MR-4-03-2100	**Mean Time to Repair - CO Trouble**	8.67	5.60	2,149	12	14.12	4.09	0.7509	0	**5**	0.000
MR-4-08-2100	**% Out of Service > 24 Hours - POTS**	18.71	14.24	12,505	288		2.32	1.9260	0	**20**	0.000
MR-4-08-2200	% Out of Service > 24 Hours - Specials	1.52	0.00	461	7		4.66	0.3262	0	10	0.000
MR-5-01-2100	**% Repeat Reports w/in 30 days - POTS**	12.71	10.38	23,746	366		1.75	1.3264	0	**15**	0.000
MR-5-01-2200	**% Repeat Reports w/in 30 days - Specials**	15.15	22.22	462	9		12.07	-0.5859	0	**15**	0.000

BI	Billing					
BI-1-02-2030	% DUF in 4 Business Days	99.75		0	10	0.000
	"NA" - no activity "UD" - under development		Totals	-5	524	-0.086

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

Verizon VA 271 Backslide Report

January-03

DSL

	Pre-Ordering	VZ	CLEC	Observations	CLEC	VZ Standard Deviation	Sampling Error	Stat. Score	Diff.	Perf. Score	Wgt.	Wgtd. Score
PO-1-06-6020	**Facility Available/Loop Qualification - EDI**	15.61	5.55						-10.06	0	**5**	0.000
PO-1-06-6050	**Facility Available/Loop Qualification - WEBGUI**	15.61	4.65						-10.95	0	**5**	0.000
PO-8-01-2000	% On Time - Manual Loop Qualification		88.78							-2	5	-0.029
PO-8-02-2000	% On Time - Engineering Record Request		NA							0	0	0.000
OR	**Ordering**											
OR-1-04-3341	% On Time LSRC /ASRC- No Facil Ck (Elec. -No FT)-2 Wire Digital		100.00		23					0	2	0.000
OR-1-04-3342	**% On Time LSRC/ASRC- NoFacil Ck(E-No FT)-2Wire xDSL**		98.65		74					0	**10**	0.000
OR-1-04-3340	**% On Time LSRC/ASRC- NoFacil Ck(E-No FT)-Line Share**		100.00		54					0	**10**	0.000
OR-1-06-3341	% On Time LSRC /ASRC- Facility Check(Electronic) -2Wire Digital		NA							0	0	0.000
OR-1-06-3342	% On Time LSRC/ASRC- Facility Check(Electronic) -2Wire xDSL		NA							0	0	0.000
OR-1-06-3340	% On Time LSRC/ASRC- Facility Check(Electronic) -Line Share		NA							0	0	0.000
OR-2-04-3341	% On Time LSR/ASR Rej.- No Facil Ck(E. - No FT) -2Wire Digital		100.00		5					0	2	0.000
OR-2-04-3342	**% OT LSR/ASR Rej.- No Facil Ck(E- No FT)-2Wire xDSL**		100.00		23					0	**10**	0.000
OR-2-04-3340	**% OT LSR/ASR Rej.- No Facil Ck(E- No FT)- Line Share**		100.00		16					0	**10**	0.000
OR-2-06-3341	% On Time LSR/ASR Rej.- Facility Check(Electronic)-2Wire Digital		NA							0	0	0.000
OR-2-06-3342	% On Time LSR/ASR Rej.- Facility Check(Electronic)-2Wire xDSL		NA							0	0	0.000
OR-2-06-3340	% On Time LSR/ASR Rej.- Facility Check(Electronic)- Line Share		NA							0	0	0.000
PR	**Provisioning**											
PR-3-03-3343	**% Comp. w/in 3 Days(1-5 lines No Disp.)- Ln. Share**		95.60		250					0	**10**	0.000
PR-3-03-3343	**% Comp. w/in 3 Days(1-5 lines No Disp.)-Ln. Share**	79.58	95.60	6,494	250		2.60	6.1657				
PR-3-10-3342	**% Comp. w/in 6 Days(1-5 lines) Tot.- 2Wire xDSL**		96.48		199					0	**10**	0.000
PR-4-02-3341	Average Delay Days - Total - 2Wire Digital	5.15	7.00	143	4	10.79	5.47	-0.3374		0	2	0.000
PR-4-02-3342	**Average Delay Days - Total - 2Wire xDSL**	10.01	1.50	75	14	30.66	8.93	0.9538		0	**10**	0.000
PR-4-02-3343	**Average Delay Days - Total - Line Share***	1.43	6.75	185	8	1.37	0.49	-2.7860		-2	**10**	-0.058
PR-4-04-3341	% Missed Appointment - Dispatch - 2Wire Digital	16.84	2.90	671	69		4.73	2.9469		0	2	0.000
PR-4-04-3342	**% Missed Appointment- Dispatch - 2 Wire xDSL**		2.85		281					0	**20**	0.000
PR-4-04-3343	% Missed Appointment - Dispatch - DSL Line Share	3.45	1.32	1,448	76		2.15	0.9950		0	5	0.000
PR-4-05-3343	**% Missed Appt. - No Disp. - Line Share**	1.40	0.86	7,812	347		0.64	0.8252		0	**20**	0.000
PR-6-01-3341	% Installation Troubles w/in 30 Days - 2Wire Digital	5.21	3.80	25,431	79		2.50	0.5641		0	2	0.000
PR-6-01-3342	% Installation Troubles w/in 30 Days - 2Wire xDSL	5.21	4.19	25,431	334		1.22	0.8322		0	10	0.000
PR-6-01-3343	% Installation Troubles w/in 30 Days - Line Share	1.27	3.50	9,323	428		0.55	-4.0516		-2	10	-0.058
MR	**Maintenance & Repair**											
MR-2-02-3341	Network Trouble Report Rate - Loop - 2Wire Digital	0.75	0.32	#######	5,248		0.12	3.5909		0	2	0.000
MR-2-02-3342	Network Trouble Report Rate - Loop - 2Wire xDSL	0.75	0.29	#######	23,583		0.06	8.1428		0	5	0.000
MR-2-02-3343	Network Trouble Report Rate - Loop - Line Share	0.24	0.28	50,033	4,299		0.08	-0.4777		0	5	0.000
MR-2-03-3341	Network Trouble Report Rate - CO - 2Wire Digital	0.08	0.06	#######	5,248		0.04	0.5539		0	2	0.000
MR-2-03-3342	Network Trouble Report Rate - CO - 2Wire xDSL	0.08	0.03	#######	23,583		0.02	2.9016		0	5	0.000
MR-2-03-3343	Network Trouble Report Rate - CO - Line Share**	0.07	0.12	50,033	4,299		0.04	-1.2339		0	5	0.000
MR-3-01-3341	% Missed Repair Appt. - Loop - 2Wire Digital	11.46	5.88	21,747	17		7.73	0.7221		0	2	0.000
MR-3-01-3342	**% Missed Repair Appt. - Loop - 2Wire xDSL**	11.46	6.25	21,747	80		3.57	1.4611		0	**20**	0.000
MR-3-01-3343	**% Missed Repair Appt. - Loop - Line Share**	43.02	4.76	179	21		11.42	3.3498		0	**20**	0.000
MR-3-02-3341	% Missed Repair Appt. - CO - 2Wire Digital	7.13	0.00	2,271	3		14.87	0.4797		0	2	0.000
MR-3-02-3342	% Missed Repair Appt. - CO - 2Wire xDSL	7.13	11.11	2,271	9		8.60	-0.4628		0	10	0.000
MR-3-02-3343	% Missed Repair Appt. - CO - Line Share	26.88	36.36	93	11		14.14	-0.6708		0	10	0.000
MR-4-02-3341	Mean Time To Repair - Loop - 2Wire Digital	19.07	15.66	21,747	17	30.67	7.44	0.4580		0	2	0.000
MR-4-02-3342	**Mean Time To Repair - Loop - 2Wire xDSL**	19.07	11.50	21,747	80	30.67	3.44	2.2034		0	**20**	0.000
MR-4-02-3343	**Mean Time To Repair - Loop - Line Share**	28.28	19.02	179	21	23.33	5.38	1.7197		0	**20**	0.000
MR-4-03-3341	Mean Time To Repair - CO - 2Wire Digital	8.96	2.29	2,271	3	14.74	8.52	0.7831		0	2	0.000
MR-4-03-3342	Mean Time To Repair - CO - 2Wire xDSL	8.96	11.41	2,271	9	14.74	4.92	-0.4982		0	10	0.000
MR-4-03-3343	Mean Time To Repair - CO - Line Share	27.37	12.59	93	11	24.02	7.66	1.9304		0	10	0.000
MR-5-01-3341	% Repeat Reports w/in 30 Days - 2Wire Digital	12.74	15.00	24,018	20		7.46	-0.3030		0	2	0.000
MR-5-01-3342	**% Repeat Reports w/in 30 Days - 2Wire xDSL**	12.74	7.87	24,018	89		3.54	1.3768		0	**10**	0.000
MR-5-01-3343	**% Repeat Reports w/in 30 Days - Line Share**	39.71	31.25	272	32		9.14	0.9247		0	**10**	0.000
	"NA" - no activity "UD" - under development							Totals		-6	344	-0.145

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

*** Performance Score determined through permutation testing**

**** An absolute difference in performance of <0.1% results in a performance score of 0.**

Verizon Virginia

271 Backslide Report

January-03

INTERCONNECTION (TRUNKS)

OR	Ordering	CLEC	Obs.					Perf. Score	Wgt.	Wgtd. Score
OR-1-12-5020	% On Time Firm Order Confirmations	#####	5					0	15	0.000
OR-1-13-5020	% On Time Design Layout Record	#####	45					0	10	0.000
OR-2-12-5000	% On TimeTrunk ASR Reject	#####	3					0	10	0.000

PR	Provisioning	VZ	CLEC	Observations VZ	Observations CLEC	VZ Standard Deviation	Sampling Error	Stat. Score	Perf. Score	Wgt.	Wgtd. Score
PR-4-01-5000	**% Missed Appointment - VZ - Total**	0.04	0.00	5,357	#####		0.03	1.1449	0	**20**	0.000
PR-4-02-5000	Average Delay Days - Total		NA						0	0	0.000
PR-4-07-3540	**% On Time Performance - LNP only**		98.50		1,465				0	**20**	0.000
PR-5-01-5000	% Missed Appointment - Facilities	0.00	0.00	5,357	6,080		0.00	0.0000	0	10	0.000
PR-5-02-5000	% Orders Held for Facilities > 15 Days	0.00	0.00	5,357	6,080		0.00	0.0000	0	10	0.000
PR-6-01-5000	% Installation Troubles w/in 30 Days	0.02	0.00	5,357	#####		0.02	0.8132	0	15	0.000
MR	**Maintenance & Repair**										
MR-4-01-5000	**Mean Time to Repair - Total**	1.85	1.02	17	27	2.71	0.84	0.9892	0	**20**	0.000
MR-5-01-5000	% Repeat Reports w/in 30 Days	5.88	3.70	17	27		7.28	0.2993	0	10	0.000
NP	**Network Performance**										
NP-1-03-5000	**# of Final Trunk Groups Blocked 2 months**		0						0	20	0.000
NP-1-04-5000	**# of Final Trunk Groups Blocked 3 months**		0								
								Totals	0	160	0.000

Collocation

Performance Report for Critical Measure # 12

NP	Network Performance	CLEC	Obs.	Wgt.
NP-2-01-6701	**% OT Response to Request for Physical Collocation - New**	NA		**0**
NP-2-01-6702	**% OT Response to Request for Physical Collocation - Augment**	#####	3	**10**
NP-2-02-6701	**% OT Response to Request for Virtual Collocation - New**	NA		**0**
NP-2-02-6702	**% OT Response to Request for Virtual Collocation - Augment**	NA		**0**
NP-2-05-6701	**% On Time - Physical Location -New**	NA		**0**
NP-2-05-6702	**% On Time - Physical Location -Augment**	#####	18	**20**
NP-2-06-6701	**% On Time - Virtual Location - New**	NA		**0**
NP-2-06-6702	**% On Time - Virtual Location - Augment**	NA		**0**
NP-2-07-6701	**Average Delay Days - Physical - New**	NA		**0**
NP-2-07-6702	**Average Delay Days - Physical -Augment**	NA		**20**
NP-2-08-6701	**Average Delay Days - Virtual - New**	NA		**0**
NP-2-08-6702	**Average Delay Days - Virtual - Augment**	NA		**0**
				50

"NA" - no activity "UD" - under development

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

		January-03 Verizon Virginia	Resale		UNE		Trunks		Collocation		DSL		Total
		CRITICAL MEASURES	%	$	%	$	%	$	%	$	%	$	$
		PRE-ORDERING											
1	metric	**OSS Interface**	**0%**	**0**	**0%**	**0**					**0%**	**0**	**0**
	PO-1-01	Customer Service Record - EDI	X	-	X	-							
	PO-1-01	Customer Service Record - CORBA	X	-	X	-							
	PO-1-01	Customer Service Record - WEB GUI	X	-	X	-							
	PO-1-06	Facility Availibility (Loop Qualification) - EDI									X	-	
	PO-1-06	Facility Availibility (Loop Qualification) - WEB GUI									X	-	
	PO-2-02	OSS Interface Availability - Prime - EDI	X	-	X	-							
	PO-2-02	OSS Interface Availability - Prime - CORBA	X	-	X	-							
	PO-2-02	OSS Interface Availability - Prime - WEB GUI	X	-	X	-							
		ORDERING											
2		**% On Time Ordering Notification**	**0%**	**0**	**0%**	**0**					**0%**	**0**	**0**
	OR-1-02	% On Time LSRC - Flow Through - POTS - 2hrs	X	-	X	-							
	OR-1-04	% OT LSRC/ASRC-No Facil Ck (E.-No FT)-POTS	X	-	X	-							
	OR-1-04	% OT LSRC/ASRC-No Facil Ck(E.-No FT)-2Wire xDSL									X	-	
	OR-1-04	% OT LSRC/ASRC-No Facil Ck(E.-No FT)-Line Share									X	-	
	OR-1-06	% OT LSRC /ASRC-Facil Ck (Electronic) - POTS	X	-	X	-							
	OR-2-02	% On Time LSR Reject - Flow Through - POTS	X	-	X	-							
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No Flow Through)-POTS	X	-	X	-							
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No FT)-2 Wire xDSL									X	-	
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No FT)-Line Share									X	-	
	OR-2-06	% OT LSR/ASR Reject -Facil Ck(Electronic) - POTS	X	-	X	-							
	OR-4-09	% SOP to Bill Completion Sent w/in 3 Bus. Days	X	-	X	-							
		PROVISIONING											
3		**% Completed**									**0%**	**0**	**0**
	PR-3-03	% Comp.w/in 3 Days(1-5 lines-No Disp).- Line Share									X	-	
	PR-3-10	% Comp. w/in 6 Days (1-5 lines) Tot.- 2Wire xDSL									X	-	
4a	PR-4-01	**% Missed Appointment - VZ - Total - EEL**			**0%**	**0**							**0**
4b		**% Missed Appointment**	**0%**	**0**	**0%**	**0**	**0%**	**0**			**17%**	**13,948**	**13,948**
	PR-4-01	% Missed Appointment - VZ - Total - Specials	X	-	X	-							
	PR-4-01	% Missed Appointment - VZ - Total - Trunks					X	-					
	PR-4-02	Average Delay Days - Total - 2Wire xDSL									X	-	
	PR-4-02	Average Delay Days - Total - DSL Line Share									X	13,948	
	PR-4-04	% Missed Appointment - VZ - Total - Dispatch - POTS	X	-									
	PR-4-04	% Missed Appt. - VZ - Total - Dispatch - New Loops			X	-							
	PR-4-04	% Missed Appointment- Dispatch - 2Wire xDSL									X	-	
	PR-4-05	% Missed Appt. - VZ - Total - No Dispatch - POTS	X	-									
	PR-4-05	% Missed Appt. - No Disp. - DSL Line Share									X	-	
5	PR-4-05	**% Missed Appt. - VZ - No Disp.- Platform**			**0%**	**0**							**0**
6		**Hot Cut Performance**			**0%**	**0**							**0**
	PR-9-01	% OT - Hot Cut (adj. for missed appts. due to late LSRC)			X								
	PR-6-02	% Troubles within 7 Days - Hot Cut			X								
7	PR-4-07	**% On Time Performance - UNE LNP**					**0%**	**0**					**0**
		MAINTENANCE											
8		**Missed Repair Appts.**									**0%**	**0**	**0**
	MR-3-01	% Missed Repair Appt. (Loop) - 2Wire xDSL									X	-	
	MR-3-01	% Missed Repair Appt. (Loop) - DSL Line Share									X	-	
9		**Mean Time To Repair**	**0%**	**0**	**0%**	**0**	**0%**	**0**			**0%**	**0**	**0**
	MR-4-01	Mean Time To Repair - Specials	X	-	X	-							
	MR-4-01	Mean Time To Repair - Trunks					X	-					
	MR-4-02	Mean Time To Repair - Loop - 2Wire xDSL									X	-	
	MR-4-02	Mean Time To Repair - Loop - Line Share									X	-	
	MR-4-02	Mean Time To Repair - Loop Trouble	X	-	X	-							
	MR-4-03	Mean Time To Repair - Central Office	X	-	X	-							
	MR-4-08	% Out Of Service > 24 Hours - POTS	X	-	X	-							
10		**% Repeat Reports within 30 Days**	**0%**	**0**	**43%**	**110,652**					**0%**	**0**	**110,652**
	MR-5-01	% Repeat Reports w/in 30 Days - POTS	X	-	X	110,652							
	MR-5-01	% Repeat Reports w/in 30 Days - Specials	X	-	X	-							
	MR-5-01	% Repeat Reports w/in 30 Days - Total - 2Wire xDSL									X	-	
	MR-5-01	% Repeat Reports w/in 30 Days - Tot. - Line Share									X	-	
		NETWORK PERFORMANCE											
11		**Final Trunk Groups Blocked**					**0%**	**0**					**0**
	NP-1-03	Blocked 2 months					X	-					
	NP-1-04	Blocked 3 months					X	-					
12		**Collocation**							**0%**	**0**			**0**
	NP-2-01/2	% On Time Response to Request for Collocation							X	-			
	NP-2-05/6	% On Time - Collocation							X	-			
	NP-2-07/8	Average Delay Days							X	-			
		# of full share measures in category **Total**	5	**0**	9	**110,652**	4	**0**	1	**0**	7	**13,948**	**124,599**

Special Provision - UNE Ordering

		% On Time	Observations	Market Adj.
OR-1-04-3100	% OT LSRC/ASRC -No Facil Ck(Elec.-No Flow Thru)-POTS	95.85	5,838	$ -
OR-1-06-3320	% On Time LSRC/ASRC -Facil Ck(Electronic) - POTS	98.17	438	$ -
OR-2-04-3320	% OT LSR/ASR Rej.-No Facil Ck (Elec.-No Flow Thru)-POTS	99.29	4,202	$ -
OR-2-06-3320	% On Time LSR/ASR Reject -Facil Ck (Electronic) - POTS	95.90	195	$ -
	Total Market Adj.*			$ -

* For allocation, any UNE Ordering market adjustment is combined with the MOE UNE market adjustment allocation.

Special Provision - UNE Flow Through

OR-5-01-3000 % Flow Through - Total - POTS & Specials

Month	%	Observations Gross #	Flow-thru
Jan 03	85.46	44,600	38,116
Overall	85.46	44,600	38,116

OR-5-03-3000 % Flow Through - Achieved - POTS & Specials

Month	%	Observations Gross #	Flow-thru
Jan 03	96.10	39,664	38,116
Overall	96.10	39,664	38,116

Market Adjustment * $ -

* For allocation, any Flow Though market adjustment is combined with the MOE UNE market adjustment allocation.

Special Provision - Hot Cut - Loop Performance

		% On Time Current Mo.	Observations	% On Time Prior Month	Observations
PR-9-01-3520	% On Time Performance - Hot Cut	95.81	477	97.44	390
		%Troubles		%Troubles Prior Month	
PR-6-02-3520	% Installation Troubles within 7 days - Hot Cut	1.19	927	0.36	1101

	Greater of - Tier I (2 mo)	or Tier II (1mo)	Total
Market Adjustment *	$ -	$ -	$ -

* For allocation purposes, any Hot Cut market adjustment is combined with the Critical measure market adjustment allocation.

Special Provision - Electronic Data Interface Measures

		% On Time	Observations
PO-9-01	% Missing Notifier Trouble Ticket PONS Cleared within 3 Bus. Days	100.00	211
		% Not Rejected	Observations
OR-3-02	% Resubmission Not Rejected	100.00	10
	Market Adjustment		$ -

		% On Time	Observations	Market Adj.
OR-4-09	% SOP to Bill Completion within 3 Business Days	99.42	24,125	$ -
	Total Market Adj.*			$ -

* For allocation, any EDI market adjustment is allocated to all CLEC's using the EDI interface based on the number of lines in service.

January-03

Change Control Assurance Plan

		% On Time	Observations	Mrkt Adj.
PO-4-01	% Change Management Notices sent on Time (type 3,4,5)	100.00	20	$ -

	* Cumlative number of delay days greater than 8 standard	Delay Days*	Observations	
PO-4-03	Change Management Notice Delay 8 plus Days (type 1-5)	NA	NA	$ -

		% Test Deck Wgt. Failure	Test Deck Wgt.	
PO-6-01	% Software Validation	R3	R3	$ -

	* Cumlative number of delay hours greater than 48 hour standard	Delay Hours*	Observations	
PO-7-04	Delay Hours - Failed/Rejected Test Deck Transactions Transactions failed, no workaround	R3		$ -

Total Market Adjustment			$ -
	Resale allocation	18%	$ -
	UNE allocation	82%	$ -

Verizon Virginia

PAP/CCAP Market Adjustment Summary

January-03

		Weighted Score	Market Adjustment	
	MODE OF ENTRY			
	Resale	-0.075	$ -	
	Unbundled Network Elements	-0.086	-	
	Trunks	0.000	-	
	Digital Subscriber Lines	-0.145	-	
	Mode of Entry Total			-
#	**CRITICAL MEASURES**			
1	OSS Interface		$ -	
2	% On Time Ordering Notification		-	
3	% Completed		-	
4a	% Missed Appointment - VZ - Total - EEL		-	
4b	% Missed Appointment		13,948	
5	% Missed Appt. - VZ - No Disp.- Platform		-	
6	Hot Cut Performance		-	
7	% On Time Performance - UNE LNP		-	
8	Missed Repair Appts.		-	
9	Mean Time To Repair		-	
10	% Repeat Reports within 30 Days		110,652	
11	Final Trunk Groups Blocked		-	
12	Collocation		-	
	Individual Rule Payment Total:		-	
	(Included in *Final* Monthly Report)			
	Critical Measure Total			124,599
	SPECIAL PROVISIONS			
	UNE Ordering		-	
	UNE Flow Through (Quarterly)		-	
	UNE Hot Cut Loop		-	
	EDI Measures		-	
	Special Provision Total			-
	CHANGE CONTROL			-
	Grand Total			$ 124,599

Under the Plan, -1 performance scores are subject to adjustment based on the next two month's performance.