VERIZON RESPONSE TO
VA SCC KPMG EXCEPTION

Exception #:	7
Component:	**KPMG Consulting observed that data has been excluded in the calculations for metrics PO-1, Response Time OSS Pre-Ordering Interface, and PO-2, OSS Interface Availability, for EDI.**
Domain:	POP
Date Uncovered by KPMG:	11/28/01
Date VERIZON Received:	11/28/01
Date VERIZON Responded:	12/06/01
KPMG Summary Statement:	**Verizon's omission of data in the calculation of the PO-1 and PO-2 pre-ordering EDI metrics compromises the completeness and accuracy of the results reported on the Virginia Carrier-to-Carrier reports. Without complete and accurate reporting of metrics results, CLECs and the Virginia State Corporation Commission will be unable to determine whether or not Verizon is providing the levels of service required by the *Carrier-to-Carrier Guidelines Performance Standards and Reports*, dated August 11, 2000.**
Verizon Response:	**12/06/01 Response to Exception**

Verizon concurs with KPMG's statement that 2 of the 4 EDI Pre-order servers were being polled by EnView for the calculation of the stated metrics. Effective with the December data month, Verizon will poll and report on all 4 EDI servers within the 2 EDI complexes for the stated metrics.

Verizon has examined December 1st, 3rd, 4th, and 5th EnView data consisting of 19,672 Pre-order transactions completing within 330 seconds. The average Pre-order response time of these transactions was 6.75 seconds. The difference in response times of each EDI complex was 0.10 of a second. Verizon believes the changed configuration does not have any material impact on the accuracy of the PO-1 metric results reported on previous Virginia Carrier to Carrier reports. It should also be noted that the PO-1-10-6020 metric uses Production data and should be excluded from this exception. Furthermore, for the PO-2 metric, the calculation is based on interface outages captured by EnView and outages reported by the CLECs. CLEC reported outages associated with any of the 4 EDI servers were being included in the metric calculation.

Based upon this analysis, Verizon contends the metric results for the Pre-Ordering Interface (PO-1) and OSS Interface Availability (PO-2) metrics, as noted by KPMG, are not materially impacted.