

VERIZON RESPONSE TO VA SCC KPMG EXCEPTION

Exception #:	9
Component:	The average response time for Trouble Ticket Test transactions failed to meet the standard reported on the October 2001 Virginia Carrier-to-Carrier (C2C) report for metric MR-1-06,¹ Average Response Time – Test Trouble (POTS Only).
Domain:	M&R
Date Uncovered by KPMG:	12/05/01
Date VERIZON Received:	12/05/01
Date VERIZON Responded:	12/11/01
KPMG Summary Statement:	Failure to adhere to established metric standards could result in increased labor costs for CLECs due to longer transaction times. In addition, CLECs' customers may not receive timely repairs, resulting in decreased customer satisfaction.
Verizon Response:	<p><u>12/11/01 Response to Exception</u></p> <p>KPMG line tests were on lines that were not “in trouble”. This is not representative of how MLT tests are used in production. There is parity between response time results for KPMG and retail transactions which test lines that are not in trouble.</p> <p>CLEC customers are provided with the capability to perform MLT tests or line tests as a maintenance function, in the same manner that it is used by Verizon retail. In a normal operating environment, it is used when a customer calls to report a trouble on their POTS line. When an MLT test is requested, a series of tests are run on the customer’s line, and a “ver code” is returned. The ver code can be interpreted to determine what the problem might be on the line. If there is no problem detected, at completion of the full series of tests a zero ver code is returned. If a problem is detected, only a portion of the series of tests is run, and a non-zero ver code is returned. This results in significantly shorter transaction response times for tests on lines “in trouble”, compared to those with no trouble.</p> <p>The line tests run during KPMG’s volume test are on lines which are not in trouble. Therefore the line test requests result in a complete series of tests, a zero ver code, and significantly longer response times than those conducted when the line test is being used as part of an actual maintenance and repair process.</p>

¹ *Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports*, dated August 11, 2000.

Verizon performed an analysis of all retail line tests performed on lines in the same switches used during the two days of KPMG “normal day” testing, during the same day/time periods. There were a total of 734 retail line tests run in the selected switches during the selected time frames, averaging 44.63 seconds. This is consistent with the October parity response time, quoted by KPMG, of 44.09 seconds. However, the 105 retail line tests which returned a ver code of zero, averaged 69.84 seconds. This is well within seven seconds of the average response time of 73.8 seconds obtained by KPMG on the 2,667 line tests it ran. A table showing this analysis by NPA-NXX is included below.

		VerCode=0	VerCode NE 0	All Ver Codes
434525	Avg Response Time	70.0193	56.1239	58.3180
	Count of Retail MLTs	3	16	19
434534	Avg Response Time		60.2388	60.2388
	Count of Retail MLTs		4	4
540552	Avg Response Time	76.3284	49.9883	52.1833
	Count of Retail MLTs	1	11	12
540951	Avg Response Time		38.5930	38.5930
	Count of Retail MLTs		17	17
540953	Avg Response Time		42.7721	42.7721
	Count of Retail MLTs		9	9
540961	Avg Response Time	70.9947	43.2258	45.2828
	Count of Retail MLTs	2	25	27
540980	Avg Response Time	59.8021	34.8944	38.2603
	Count of Retail MLTs	5	32	37
703271	Avg Response Time	62.6707	31.2929	38.2658
	Count of Retail MLTs	2	7	9
703486	Avg Response Time	60.0143	36.4108	40.3447
	Count of Retail MLTs	3	15	18
703521	Avg Response Time	59.8693	54.2455	55.4506
	Count of Retail MLTs	6	22	28
703685	Avg Response Time	57.4888	33.7557	35.4509
	Count of Retail MLTs	1	13	14
703892	Avg Response Time	57.7507	43.7622	44.7614
	Count of Retail MLTs	1	13	14
703920	Avg Response Time	58.6105	50.9800	51.3616
	Count of Retail MLTs	1	19	20
703979	Avg Response Time	62.7430	45.5367	47.7810
	Count of Retail MLTs	3	20	23
757405	Avg Response Time		53.1554	53.1554
	Count of Retail MLTs		8	8
757441	Avg Response Time		17.1496	17.1496
	Count of Retail MLTs		2	2
757456	Avg Response Time	67.9600	31.3800	41.8314
	Count of Retail MLTs	4	10	14
757465	Avg Response Time	64.2491	22.9958	31.2464
	Count of Retail MLTs	6	24	30
757473	Avg Response Time	91.0960	58.3443	61.3217
	Count of Retail MLTs	1	10	11

757488	Avg Response Time	64.4107	44.7802	50.0653
	Count of Retail MLTs	7	19	26
757490	Avg Response Time	60.5181	33.4506	38.5257
	Count of Retail MLTs	3	13	16
757493	Avg Response Time	85.3595	18.9935	27.8423
	Count of Retail MLTs	2	13	15
757494	Avg Response Time	115.8660	42.7605	56.0524
	Count of Retail MLTs	2	9	11
757497	Avg Response Time	71.8442	39.1655	43.5226
	Count of Retail MLTs	2	13	15
757499	Avg Response Time	75.0525	45.3342	51.2778
	Count of Retail MLTs	4	16	20
757518	Avg Response Time	73.4466	38.9113	44.2245
	Count of Retail MLTs	2	11	13
757543	Avg Response Time	88.6195	49.4939	59.9274
	Count of Retail MLTs	4	11	15
757545	Avg Response Time	69.7067	28.5340	39.1592
	Count of Retail MLTs	8	23	31
757552	Avg Response Time	50.6583	25.1411	33.6469
	Count of Retail MLTs	1	2	3
757591	Avg Response Time		29.3635	29.3635
	Count of Retail MLTs		8	8
757594	Avg Response Time		27.7465	27.7465
	Count of Retail MLTs		6	6
757595	Avg Response Time	56.0468	39.3687	40.6517
	Count of Retail MLTs	2	24	26
757596	Avg Response Time	70.2122	30.2265	36.8908
	Count of Retail MLTs	4	20	24
757599	Avg Response Time	60.3732	38.9326	41.4550
	Count of Retail MLTs	2	15	17
757671	Avg Response Time		16.3076	16.3076
	Count of Retail MLTs		5	5
757687	Avg Response Time		11.8111	11.8111
	Count of Retail MLTs		1	1
757873	Avg Response Time		33.8364	33.8364
	Count of Retail MLTs		3	3
804225	Avg Response Time		39.6347	39.6347
	Count of Retail MLTs		11	11
804343	Avg Response Time	85.7730		85.7730
	Count of Retail MLTs	1		1
804378	Avg Response Time	70.5301	48.9124	56.1183
	Count of Retail MLTs	4	8	12
804379	Avg Response Time	85.7958	33.1407	37.1911
	Count of Retail MLTs	1	12	13
804643	Avg Response Time	77.3050	31.8118	35.3112
	Count of Retail MLTs	1	12	13
804644	Avg Response Time	72.9183	49.7863	58.0477
	Count of Retail MLTs	5	9	14
804646	Avg Response Time		77.4064	77.4064
	Count of Retail MLTs		1	1

804648	Avg Response Time	82.7638	30.0908	40.6254
	Count of Retail MLTs	3	12	15
804649	Avg Response Time	86.0189	47.8988	55.5228
	Count of Retail MLTs	2	8	10
804771	Avg Response Time		66.0390	66.0390
	Count of Retail MLTs		3	3
804782	Avg Response Time		40.1648	40.1648
	Count of Retail MLTs		3	3
804783	Avg Response Time		64.1221	64.1221
	Count of Retail MLTs		6	6
804786	Avg Response Time		65.5587	65.5587
	Count of Retail MLTs		2	2
804794	Avg Response Time	62.5381	47.0835	47.6354
	Count of Retail MLTs	1	27	28
804897	Avg Response Time	64.9320	45.8171	49.1903
	Count of Retail MLTs	3	14	17
804788	Avg Response Time	88.3355	38.3344	50.8346
	Count of Retail MLTs	1	3	4
804780	Avg Response Time		31.6298	31.6298
	Count of Retail MLTs		2	2
540994	Avg Response Time		52.0176	52.0176
	Count of Retail MLTs		4	4
703769	Avg Response Time	66.4705	60.7308	63.6007
	Count of Retail MLTs	1	1	2
804594	Avg Response Time		19.5564	19.5564
	Count of Retail MLTs		1	1
757519	Avg Response Time		92.1283	92.1283
	Count of Retail MLTs		1	1
Tot Avg Txn Time		69.8352	40.4204	44.6283
Total Count		105	629	734