VERIZON RESPONSE TO
VA SCC KPMG EXCEPTION

Exception #:   12

Component: KPMG Consulting is unable to replicate certain Operator Services and
                         Databases[1] (OD) metrics results as reported by Verizon in the October 2001
                         Aggregate Carrier-to-Carrier (C2C) report.

Domain: Metrics

Date Uncovered by   12/11/01
KPMG:

Date VERIZON   12/11/01
Received:

Date VERIZON   12/20/01
Responded:

KPMG Summary   KPMG Consulting must be able to consistently replicate metrics results in
Statement: order to verify that the metrics results reported by Verizon in the Aggregate
                         C2C reports are accurate. Without accurate Aggregate C2C reports, CLECs
                         and the Virginia State Corporation Commission are unable to determine
                         whether or not they are receiving the levels of service required by the
                         Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports.

Verizon Response: <u>**12/20/01 Response to Exception**</u>

                         KPMG found two (2) instances where Verizon overstated the observation
                         count by approximately .5%. This overstatement in observation counts was
                         caused by the inadvertent inclusion of a test call queue. In fact, this test call
                         queue was specifically requested by KPMG in the Virginia test and therefore
                         would not even exist absent a test environment.

                         While Verizon agrees that this data should not have been included in the
                         observation count, this minimal overstatement had no impact on the reported
                         result. Verizon VA requests this exception be closed.

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[1] OD metrics are defined in the *Virginia Carrier-to-Carrier Guidelines Performance Standards and
Reports*, dated August 11, 2000.