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Mr. Alexander F. Skirpan, Jr.
Project Leader
Virginia State Corporation Commission
11th Floor, Tyler Building
1300 E. Main Street
Richmond, Virginia 23219

Dear Mr. Skirpan:

Re: PUC000035 – Modification to the OSS Test Schedule

As you requested, this letter is to explain the reasons Verizon Virginia feels it is critical to modify the schedule of the Virginia OSS test by approximately eight weeks. These reasons are outlined below.

First, Verizon has a finite amount of resources for supporting OSS testing and 271 attestations. This process is taking longer in every jurisdiction than originally imagined and is consuming enormous amounts of management time, separate and distinct from the management time needed to provide service to CLECs. Many of the resources we had planned to have working in Virginia by this time continue to be consumed in other Verizon jurisdictions as the result of delays.

Second, Verizon will release a major, new version of our expressTRAK software on February 19th. We did not want our preparation and implementation of this release to be jeopardized by the conduct of the OSS test. We do not want management supporting that release to be distracted by the added burden associated with the OSS test process.

Third, Verizon is continuing to devote significant resources towards improving the processes and performance of the TISOCs in Virginia. We feel that at this time, the TISOC management team should make improving CLEC service its first priority, ahead of their work to prepare for an OSS test.

I hope these reasons answer your questions. Please don't hesitate to call me if I can be of further help.

Sincerely,