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

Dear Mr. Skirpan:

Re: PUC000035 – Request to Modify Project Leader Ruling Adopting Metrics

In your August 11, 2000 ruling adopting metrics for the KPMG OSS test, you adopted a new measure OR-10 Lost Order Trouble Tickets. Verizon has yet to report data for this metric, because to do so would require extensive manual intervention. By this letter, I am requesting elimination of this metric from the metric plan.

OR-10 relies on trouble tickets with a lost order status as the source of non-conformance. Unfortunately, this reliance makes the metric both unreliable and highly difficult to compute. Trouble tickets sent to Verizon typically include many different LSRs on the same ticket. These LSRs may have a myriad of reasons why they are being reported as a trouble, including being in a lost order status. CLECs also frequently mix both resale and UNE orders on the same ticket. Simply measuring the number of trouble tickets received with a lost order status (see attached definition) is not an accurate reflection of the number of orders that may have been lost. To discern an accurate count, a Verizon employee would have to manually inspect each trouble ticket and count the number of orders on that ticket that have been reported in a lost order status and then separate them by UNE and resale. This process is tedious and time consuming.

This metric also does not account for the fact that the notifier may have been returned by Verizon but was lost in the system of the CLEC. Similarly, this metric would not reflect notifiers that are late but reported as missing. We currently have no feedback mechanism to remove orders from the count in which the notifier was issued shortly after the submission of a trouble ticket.

OR-10 has been adopted in no other Verizon jurisdiction, despite numerous Commission proceedings and CLEC collaboratives. This seems to me to imply that the significant time, effort, and cost to Verizon to produce this metric for Virginia is not justified by the value of having the metric, particularly since other metrics demonstrate whether there are problems with order notifiers. OR-9 requires that 99% of LSRs be acknowledged the same day that they are received. OR-7 requires that 95% of LSRs be confirmed or rejected within three business days of receipt. With these stringent standards for order acknowledgement, confirmation, and rejection, it is simply

unnecessary to measure the number of lost LSR trouble tickets received. If Verizon meets the 99% standard for acknowledgements, the number of lost LSR trouble tickets will be very small, no more than 1% of orders. If Verizon is failing to acknowledge, confirm, or reject orders, this will be shown by Metrics OR-9 and OR-7 and does not need to be shown by OR-10, a tedious, time consuming measure.

I trust you will agree and eliminate this metric from our plan. Otherwise, we will have to enter into more detailed discussions with you about how to produce this metric.

Please don't hesitate to call if I can be of additional assistance.

Sincerely,

Attachment

Function:		
OR-10 Lost Order Trouble Tickets		
Definition:		
<i>Lost Order Trouble Tickets:</i> CLEC trouble tickets received by BA that indicate that an order submitted by the CLEC has never been acknowledged, confirmed, or rejected (missing EDI notifiers). Time period measured is based on the CLEC stated submission date.		
Exclusions:		
<u>Resale & UNE:</u>		
<ul style="list-style-type: none"> • BA Test Orders¹ 		
Performance Standard:		
Metric OR-10-01: No standard.		
Report Dimensions:		
Company: <ul style="list-style-type: none"> • CLEC Aggregate • CLEC Specific • BA Affiliate Aggregate • BA Affiliate Specific 		Geography: <ul style="list-style-type: none"> • State
Sub-Metrics		
OR-10-01	% Lost Order Trouble Tickets	
Products	Resale	UNE
Calculation	Numerator	Denominator
	Total number of trouble tickets received with a lost order status (no acknowledgement, confirmation, or rejection received by the CLEC) for specified product.	Sum of 1.) all orders acknowledged, confirmed or rejected by BA and 2.) trouble tickets received with a lost order status (no acknowledgement, confirmation, or rejection received by the CLEC) for specified product. Duplicates found in both categories are counted once.

¹ BA Test Orders – see Glossary.