COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

IN THE MATTER OF THE INQUIRY INTO VERIZON VIRGINIA INC.'S COMPLIANCE WITH THE CONDITIONS SET FORTH IN 47 U.S.C. § 271 (c)	**)**	**DOCKET NO. PUC02____**

CHECKLIST DECLARATION

ON BEHALF OF VERIZON VIRGINIA INC.

Donald E. Albert

Rosemarie Clayton

Timothy J. Coombs

Peter J. D'Amico

Maureen Davis

Margaret Detch

Susan Fox

Nancy M. Gilligan

Carleen Gray

William H. Green, III

Karen Maguire

Josephine Maher

Claire Beth Nogay

Richard L. Rousey

Steven Savino

Alice B. Shocket

Jonathan Smith

Harold E. West, III

John White

Alan T. Young

CHECKLIST DECLARATION

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BEFORE THE **VIRGINIA STATE CORPORATION COMMISSION**

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CHECKLIST DECLARATION

ON BEHALF OF VERIZON VIRGINIA INC.

THE DECLARANTS

1. My name is Donald E. Albert. My business address is 600 East Main Street, Richmond, Virginia. I am employed by Verizon Services Corp. as Director Network Engineering. In that position, I am directly involved in the negotiation of competitive local exchange carrier ("CLEC") interconnection agreements and the network implementation of CLEC unbundling, interconnection and collocation arrangements throughout the former Bell Atlantic footprint, including the service territory of Verizon Virginia Inc. ("Verizon VA"). I have more than twenty-four years of experience in the telecommunications industry as an employee of Verizon and its predecessor companies. During that time, I have held various positions of increasing responsibility in Network Operations, Sales, and Network Planning and Engineering. I have been in my present position for five years. I have testified before the commissions of all fourteen jurisdictions within the former Bell Atlantic footprint, in a variety of proceedings including interconnection agreement arbitrations, local competition proceedings, and proceedings involving statements of generally available terms and conditions for resale,

interconnection and access to unbundled network elements ("UNEs"). My testimony has concerned a range of subjects associated with the design, engineering and operation of telecommunications equipment and networks. I earned my Bachelor of Science degree in Civil Engineering from Virginia Tech in Blacksburg, Virginia, in 1977.

2. My name is Rosemarie Clayton. My business address is 2107 Wilson Boulevard, Arlington, Virginia. I have more than twenty years of experience as an employee of Verizon and its predecessor companies. Since 1998, I have been employed by Verizon Services Corp. as a Senior Product Manager with responsibilities for Line Sharing Digital Subscriber Line ("DSL") services. My responsibilities include the oversight of policy and pricing issues related to DSL and Line Sharing, negotiation of interconnection agreements with CLECs, and actively participating in the DSL and Line Sharing Collaborative in New York on product and provisioning issues. In addition, I conduct xDSL and Line Sharing workshops for CLECs. Prior to my current assignment, I was assigned to the Interconnection and Unbundled Services department, where I was responsible for the development and implementation of Unbundled Network Elements, specifically unbundled loops and switching.

3. My name is Timothy J. Coombs. My business address is 1 Davis Farm Road, Portland, Maine. I am employed by Verizon Services Group as Senior Staff Consultant – Regulatory Planning and Implementation. In this position, I am responsible for ensuring compliance with state and federal regulatory requirements for Operator Services and Directory Assistance. I have more than twenty years of experience in the telecommunications industry as an employee of Verizon and its predecessor companies. During that time, I have held various positions of increasing responsibility related to

operator services, network operations, regulatory matters and Retail markets. I received an Associate Degree in Liberal Arts from North Shore Community College in 1995.

4. My name is Peter J. D'Amico. My business address is 416 7th Avenue, Pittsburgh, Pennsylvania. I am employed by Verizon Services Corp. as a Senior Product Manager in the Interconnection Product Management Group. My responsibilities include development, implementation and management of interconnection services. I have more than eighteen years of experience in the telecommunications industry, as an employee of Verizon and its predecessor companies. I have held various positions of increasing responsibility during that period, including eleven years in product management involving interconnection arrangements. I received a Bachelor of Science Degree in Marketing from Indiana University of Pennsylvania in 1981.

5. My name is Maureen Davis. My business address is 13100 Columbia Pike, Silver Spring, Maryland. I am employed by Verizon Services Group as Executive Director - National CLEC Maintenance Centers. My responsibilities include maintenance for UNE loop and resold services, including DSL and line sharing products. I began my career with Verizon in 1985, and have over 15 years experience in installation and maintenance operations. I have a Bachelor of Science degree in Management and English from Saint Joseph's University and a Master of Business Administration degree from Drexel University.

6. My name is Margaret H. Detch. My office is located at 125 High Street, Boston, Massachusetts. I am a Senior Product Manager at Verizon with responsibility for Unbundled Dark Fiber. I have been employed by Verizon and its predecessor companies since 1993, when I was assigned to NYNEX Mobile to provide market analysis and

support for a number of pricing, product and service initiatives. I joined the Wholesale Marketing organization in May 1995. In my current position, I provide Unbundled Dark Fiber marketing support in state regulatory proceedings throughout the East Coast region of Verizon.

7. My name is Susan Fox. My business address is 2980 Fairview Park Drive, Falls Church, Virginia. I am employed by Verizon Services Corp. as a Product Manager in the Wholesale Marketing Organization of the Network Services Group. In this position I am responsible for product development and product management for Unbundled Dedicated Transport and Loop-Transport Combinations. Prior to assuming my current position in February 2000, I was the Product Manager for Interstate Switched Access from 1995 through 1999. I have more than eighteen years of experience in telecommunications, as an employee of Verizon and its predecessor companies, including AT&T and Bell Communications Research, Inc. ("Bellcore"). I joined Bell Atlantic Network Services in 1987. I graduated from Cornell University in Ithaca, New York with a Bachelor of Science degree in Agricultural Economics.

8. My name is Nancy M. Gilligan. My business address is 125 High Street, Boston, Massachusetts. I am employed by Verizon Services Group as Senior Product Manager - Wholesale Markets. In that capacity, I am responsible for the product management of the unbundled switching and unbundled platform offerings. I have more than twenty-three years experience in the telecommunications industry. During that time, I have held positions of increasing responsibility in Outside Plant Engineering, Network Planning and Access Services Product Management. I received a Bachelor of Arts degree in

Mathematics and Economics from Boston College in 1978, and a Master of Business Administration degree from Boston College in 1985.

9. My name is Carleen Gray. My office is located at 125 High Street, Boston, Massachusetts. I am a Senior Product Manager at Verizon with product management responsibility for Unbundled Analog loops, as well as, High Capacity Loops. I have been employed by Verizon and its predecessor companies since 1975, when I was assigned to be a Service Representative responsible for ordering and billing support for business accounts. I joined the Wholesale Marketing organization in October 1996. In my current position, I provide Unbundled Analog loop and High Capacity loop marketing support. I graduated from Providence College with a Bachelor of Science degree in Business Administration.

10. My name is William H. Green, III. My business address is 1095 Avenue of the Americas, New York, New York. I am employed by Verizon Services Group as Senior Product Manager – E 911 Wholesale. In this position, I am responsible for management of the 911/E 911 product throughout Verizon's service territory, including negotiation of interconnection agreement provisions and development of business rules and rates associated with the provisioning of 911/E 911 services for CLECs, resellers, and independent and wireless carriers. I have more than twenty years of experience in the telecommunications industry as an employee of Verizon and its predecessor companies. During that time, I have held various positions of increasing responsibility in the Marketing, Business Planning and Finance/Accounting areas. I received a Master of Business Administration degree with concentrations in Finance/Accounting from New

York University Graduate School of Business in 1979, and a Bachelor of Business Administration degree from Bernard Baruch College in 1974.

11. My name is Karen Maguire. My business address is 1095 Avenue of Americas, New York, New York. I am employed by Verizon Services Group as Executive Director - Customer Infrastructure Program Management. I am responsible for the implementation of infrastructure including collocation and entrance facilities for Wholesale Customers including CLECs. I have more than 12 years of service in Verizon and its predecessor companies. I joined the Company's Wholesale Markets Team in 1996 where I have held several positions of increasing responsibility. Previously, I was responsible for the implementation of new services for our largest retail business customers in the Manhattan Market Area. I received my Bachelor of Sciences Degree in Electrical Engineering from Manhattan College and a Master of Business Administration Degree from the Wharton School of the University of Pennsylvania.

12. My name is Josephine Maher. My business address is 125 High Street, Boston, Massachusetts. I am employed by Verizon Services Group as a Senior Product Manager - Local Services in the Network Services Group – Wholesale Markets. I have nationwide responsibility for the development, implementation and management of Verizon resale products. I am also responsible for resale tariff filings, and supporting other organizations within the Network Services Group in negotiations with CLECs concerning resale products. I have more than twenty-three years of experience with Verizon and its predecessor companies. Prior to assuming my present position in 2000, I held positions of increasing responsibility in Customer Service, Human Resources and Marketing.

13. My name is Claire Beth Nogay. My business address is 175 Park Avenue, Madison, New Jersey. I am employed by Verizon Services Corp. as Vice President, CLEC Operations. My responsibilities include the provisioning and maintenance of UNE loop and resold services, including DSL and line sharing products. Since joining Verizon in 1980, I have held a variety of managerial positions in network operations including outside plant engineering, installation and maintenance, assignment, and central office operations. Prior to my current assignment I was Director, Network Operations Center-NJ. I graduated from Princeton University in 1979 with a BSE in Civil Engineering.

14. My name is Richard L. Rousey. My business address is 600 Hidden Ridge Boulevard, Irving, Texas. I am employed by Verizon Services Corp. as the Senior Product Manager responsible for Verizon's unbundled sub-loop offerings. I have held a Senior Product Management position dealing with UNEs since 1996. Since joining Verizon in August 1975, I have also gained experience in Operator Services, Wholesale/Retail Ordering and Billing, Education and Training, Outside Plant Construction, and Special Services Engineering. I am currently working towards my Associate's degree at North Lake Community College in Irving, Texas.

15. My name is Stephen M. Savino. My business address is 1095 Avenue of the Americas, New York, New York. I am a Senior Product Manager - Wholesale Directory Listings for Verizon Network Services Group. In this position, I have product management responsibilities for ensuring compliance with state and federal regulatory requirements for Wholesale Directory Listings across the Verizon East region. Since joining the Company in 1984, I have held a variety of positions of increasing responsibility in General Business and Telecom Group Systems. Currently, I am enrolled

at the State University of NY 'Empire State College', based on Saratoga Springs, NY. I am completing a BA in Business and Technology Management in a program offered to Verizon management.

16. My name is Alice B. Shocket. My business address is 125 High Street, Boston, Massachusetts. I am employed by Verizon Services Group as Senior Product Manager – Interconnection Services. In that capacity, I am responsible for developing and implementing local number portability throughout the former Bell Atlantic footprint. I have more than thirty years of experience in the telecommunications industry, as an employee of Verizon and its predecessor companies. During that time, I have held various positions of increasing responsibility related to regulatory matters, marketing, access and, most recently, number portability. I received a Bachelor of Arts degree in Economics from Northeastern University in 1968.

17. My name is Jonathan B. Smith. My business address is 500 Summit Lake Drive, Valhalla, New York 10595. I am employed by Verizon Services Corp. as Executive Director - Local Interconnection Billing and Wholesale Billing Support. In that position, I am responsible for the review and payment of invoices received from CLECs for Local Interconnection Traffic and Facilities, as well as for support of the Wholesale Billing and Collections Organization. I have more than twenty years of experience in the telecommunications industry as an employee of Verizon and its predecessor companies. Prior to assuming my present position in August 2001, I have held positions of increasing responsibility in billing and collection services, resale services marketing, customer services, and outside plant engineering. I received a

Bachelor of Science degree in Engineering from Northeastern University in 1979 and a Masters of Business Administration from Babson College in 1992.

18. My name is Harold E. West, III. My business address is 540 Broad Street, Newark, New Jersey. I am employed by Verizon Services Corp. as Director - Regulatory Support. My responsibilities include presenting Verizon's pricing and policy positions in various state regulatory proceedings. I began working for Verizon NJ's predecessor, New Jersey Bell, in 1980 as a central office equipment engineer. Since then, I have held positions of increasing responsibility in Service Costs, Rates, Product Management and Sales. I assumed my current position in December 1994. I have provided testimony before public utility commissions in Delaware, Maryland, Massachusetts, New Jersey, New York, Pennsylvania, Virginia and Washington, D.C., on various marketing, policy and pricing issues associated with competitive entry into telecommunications markets. I have also participated in CLEC arbitration proceedings in Delaware, New Jersey, Pennsylvania and Virginia. I graduated from Princeton University in 1980 with a Bachelor of Sciences degree in Engineering. In 1991, I completed an Executive Masters program at the University of Pennsylvania and received a Master of Sciences degree in Engineering.

19. My name is John White. My business address is 1095 Avenue of the Americas, New York, New York. I have been employed by Verizon or by its affiliates and predecessor companies since 1966. Before joining Verizon I worked for a number of engineering and construction firms. During my first twelve years at Verizon, I was involved in every aspect of Outside Plant telephone engineering. From 1979 to 1994, I held managerial positions in Construction, Installation and Maintenance, and

Engineering, in both line and staff capacities. Before joining the Wholesale Services organization in June 2000, I worked in the Bell Atlantic Technology organization as the Executive Director, Transport Technology Planning. Currently, I am an Executive Director within the Verizon Wholesale Services organization, reporting to the Network Services Department. In this position, I am responsible for the introduction of wholesale digital services, with a focus on the technical support required for xDSL-compatible loops. I began my engineering studies at the University of Buffalo and went on to receive a Bachelors degree in Business Administration and a Masters in Business Administration from Pace University. I have also continued graduate work at Pace University in Finance and Economics as part of a Doctorate of Professional Studies program.

20. My name is Alan T. Young. My business address is 35 Haddon Avenue, Floor 2, Haddonfield, New Jersey. I am employed by Verizon Services Corp. as Manager – FCC Regulatory and Legal Support, Joint Use and Licensing. My responsibilities include the development, implementation and monitoring of policy and procedures for access to poles, ducts, conduits and rights-of-way owned or controlled by Verizon in the former Bell Atlantic South jurisdictions, including the service territory of Verizon VA. I have twenty-nine years of experience in the telecommunications industry, as an employee of Verizon and its predecessor companies. I began my employment with New Jersey Bell in 1972 in the Construction Department. Since that time, I have held various positions within the Construction and Outside Plan Engineering departments. I assumed my current position in 1992. I received a Bachelor of Science degree from Delaware Valley College of Science and Agriculture in 1972.

PURPOSE OF DECLARATION

21. The purpose of this declaration is to demonstrate that Verizon VA has met the 14-point checklist in Section 271(c)(2)(B) of the Telecommunications Act of 1996 (the "Act") in Virginia. All 14 items that make up the competitive checklist are available and being provided to local competitors in Virginia pursuant to interconnection agreements and, in some cases, tariffs filed with the Federal Communications Commission ("FCC"). Attachment 201 to this declaration is a list of CLECs operating in Virginia. Attachment 202 is a table showing where various checklist items are found in Verizon VA's tariffs and in illustrative interconnection agreements that are included in their entirety in Attachment 203.[1]

22. Verizon VA satisfies its checklist obligation by providing nondiscriminatory processes that are identical or substantially the same as the processes used in Verizon VA's retail operations. Moreover, the manner in which Verizon VA satisfies its obligations under the competitive checklist is essentially the same in Virginia as the manner in which these the checklist items have been satisfied by Verizon Pennsylvania

[1] As the Commission is aware, Verizon provides DSL-based data service to retail customers in Virginia through the same separate company ("Verizon Advanced Data Inc." or "VADI") that it uses to serve customers in Massachusetts, New York, Pennsylvania and Connecticut. Both the FCC and this Commission have granted Verizon's request to provide advanced services without using a separate data affiliate. *See GTE Corporation, Transferor, And Bell Atlantic Corporation, Transferee For Consent to Transfer Control of Domestic and International Section 214 and 310 Authorizations and Applications to Transfer Control of a Submarine Cable Landing License*, Order, 16 FCC Rcd 16915 (2001); *Order Granting Joint Application*, Virginia State Corporation Commission Case No. PUC010214, *Joint Application of Verizon Advanced Data – Virginia, Inc., Verizon Virginia Inc., and Verizon South Inc. for Approval For Verizon Advanced Data – Virginia, Inc. to Discontinue Local Exchange and IntraLATA Interexchange Telecommunications Services and for Authority for Verizon Virginia Inc. and Verizon South Inc. to Provide Advanced Data Services Under the Tariffs Filed by Verizon Advanced Data – Virginia, Inc. on an Interim Basis* (issued November 20, 2001). While Verizon is currently no longer obligated to provide its advanced services through a separate affiliate, during most of the time period covered by this application, Verizon provided advanced services in Virginia through VADI, which uses the same interfaces as CLECs. When Verizon has reintegrated VADI and no longer provides advanced services through a separate affiliate, the separate division within Verizon that provides DSL

("Verizon PA"), Verizon Massachusetts ("Verizon MA"), Verizon New York ("Verizon NY"), Verizon Connecticut ("Verizon CT"), and Verizon Rhode Island ("Verizon RI"). In each of these states, Verizon's compliance with the competitive checklist has been verified by the respective state commission and by the FCC.[2]

23. Nondiscriminatory access to UNEs through Verizon VA's Operating Support Systems ("OSS") is demonstrated in the accompanying OSS Declaration. The accompanying Measurements Declaration describes the comprehensive performance measurements, standards and reports voluntarily implemented by Verizon VA. The Measurements Declaration also provides performance reports that further confirm that Verizon VA is satisfying its nondiscrimination obligations. In addition, the Measurements Declaration proposes adoption by this Commission of measurements, standards and reports, and a performance incentive plan, which will ensure that Verizon VA will continue to meet its checklist obligations in the future.

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services will continue to use the same interfaces as CLECs for approximately 75 percent of its orders.

[2] *See* Memorandum and Opinion, Application *of Verizon Pennsylvania, Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization to Provide In-Region InterLATA Services in Pennsylvania*, FCC Docket No. 01-138, (Released September 19, 2001) ("Pennsylvania Order"); Memorandum Opinion and Order, *Application of Verizon New England Inc., Bell Atlantic Communications, Inc., (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) And Verizon Global Networks Inc., For Authorization to Provide In-Region, InterLATA Services in Massachusetts*, FCC Docket No. 01-9, (Released April 16, 2001) ("Massachusetts Order"); Memorandum Opinion and Order, *Application by Bell Atlantic New York for Authorizations Under Section 271 of the Communications Act to Provide In-Region InterLATA Service in the State of New York*, FCC Docket No. 99-295 (Released December 22, 1999) ("New York Order"); Memorandum Opinion and Order, *Application of Verizon New York, Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region InterLATA Services in Connecticut*, FCC Docket No. 01-100, (Released July 20, 2001) ("Connecticut Order"); Memorandum Opinion and Order, *Application by Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Rhode Island*, FCC Docket No. 01-324 (Released February 22, 2002).

CHECKLIST ITEM 1: INTERCONNECTION

A. Requirements for interconnection

24. Section 271(c)(2)(B)(i) of the Act requires that a 271 applicant provide interconnection arrangements in accordance with the requirements set forth in Sections 251(c)(2), 252 (d)(1), and 251(c)(6).

25. Section 251(c)(2) imposes upon Incumbent Local Exchange Carriers ("ILECs"),

> "The duty to provide, for the facilities and equipment of any requesting telecommunications carrier, interconnection with the local exchange carrier's network --
>
> (A) for the transmission and routing of telephone exchange service and exchange access;
>
> (B) at any technically feasible point within the carrier's network;
>
> (C) that is at least equal in quality to that provided by the local exchange carrier to itself or to any subsidiary, affiliate, or any other party to which the carrier provides interconnection; and
>
> (D) on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, in accordance with the terms and conditions of the agreement and the requirements of this section and section 252."

26. Section 251(c)(6) of the Act also requires ILECs, such as Verizon VA, to provide physical collocation of equipment necessary for interconnection unless the ILEC can demonstrate that physical collocation is not practical for technical reasons or because of space limitations. In that event, the ILEC is obligated to provide virtual collocation of interconnection equipment.

27. In its *Local Competition Order*,[3] the FCC identified a minimum number of technically feasible points within an ILEC's network where interconnection may occur. These points are: (1) the line-side of the local switch; (2) the trunk-side of a local switch; (3) the trunk interconnection points for a tandem switch; (4) central office cross-connect points; (5) out-of-band signaling transfer points necessary to exchange traffic at these points and to access call-related databases; and (6) the points of access to unbundled network elements.[4] Additionally, the FCC concluded that technically feasible methods of interconnection include, but are not limited to, physical and virtual collocation at the premises of an ILEC, and meet point interconnection arrangements.[5]

28. With respect to the quality of interconnection, the FCC concluded that the level of quality must be at least equal to that which the ILEC provides itself, a subsidiary, an affiliate, or any other party. As such, an ILEC must design and operate its interconnection facilities using the same technical criteria and operational practices, such as probability of blocking in the busy hour and transmission standards, that are used for designing interoffice trunks within its own network.[6]

B. Methods of Interconnection available to CLECs in Virginia

29. Verizon VA meets each of the requirements in the Act and the *Local Competition Order*. Specifically, Verizon VA makes available interconnection at: (1) the line-side of the local switch; (2) the trunk-side of a local switch; (3) the trunk interconnection points for a tandem switch; (4) central office cross-connect points; (5)

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3 *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996,* CC Docket No. 96-98, First Report and Order, 11 FCC Rcd 15499, 15509 (1996) ("*Local Competition Order").*

4 47 C.F.R. 51.305.

5 47 C.F.R. 51.321.

out-of-band signaling transfer points necessary to exchange traffic at these points and to access call-related databases; and (6) the points of access to unbundled network elements. *See* Attachment 202 ("Interconnection Agreement Matrix"). Verizon VA meets these requirements in the same manner that Verizon meets them in Pennsylvania, which the FCC found has met Verizon's responsibilities under the Act. *See, e.g., Pennsylvania Approval Order* ¶ 99

30. Interconnection at technically feasible points other than those identified above in the Verizon VA network, are available upon request through a Bona Fide Request ("BFR") process. The BFR process provides a CLEC the opportunity to request that Verizon VA deploy for the CLEC a capability not normally available in Verizon VA's network. The process also allows Verizon VA to determine whether the request is technically feasible, and if so, the price, terms, and conditions under which it can be offered. A BFR is provided for in interconnection agreements.

31. CLECs may interconnect with Verizon VA's network for the transport and termination of traffic in a variety of ways. Verizon VA provides interconnection to CLECs through collocation arrangements, through the use of dedicated transport facilities from the carrier's premises, and through other technically feasible forms of interconnection. In compliance with Section 251(c)(6) of the Act, Verizon VA supports the provision of both physical and virtual collocation. A detailed discussion of Verizon VA's collocation offerings begins in subsection D following.

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[6] 47 C.F.R.51.305 (a)(3).

32. Verizon VA provides interconnection to out-of-band Signaling Transfer Points ("STPs")[7] of the Signaling System 7 ("SS7") such that stand-alone access to the Verizon VA's STPs is available with or without Verizon VA-provided signaling link transport. In addition, Verizon VA exchanges Custom Local Area Signaling Services ("CLASS")-related Transactional Capabilities Application Part ("TCAP") messages with CLECs to facilitate the interoperability of out-of-band signaling features and services between the carriers' end users. This allows a CLEC to offer call feature options including call set-up and CLASS services, as well as access to databases. CLECs may interconnect their switches to Verizon VA's STPs via Access Link ("A-Link") connections or they can interconnect their STPs to Verizon VA's STPs via Diagonal Link ("D-Link") connections, depending on the option that best meets their network needs. The manner in which Verizon VA provides CLECs with nondiscriminatory access to databases, specifically the 800 Database, Line Information Database ("LIDB"), the Local Number Portability ("LNP") database, and the Advanced Intelligent Network ("AIN"), is discussed in Checklist Item 10 following.

33. Verizon VA also provides CLECs with trunking to access E-911, Directory Assistance, and Operator Services. As of the end of December 2001, Verizon VA has provided CLECs approximately 800 E-911 trunks. Additionally, Verizon VA has provided approximately 200 dedicated trunks to facilities-based CLECs for Directory Assistance and Operator Call Completion services. These arrangements are discussed in further detail in Checklist Item 7.

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[7] An STP is a switch in the separate SS7 signaling network that carries call management and network management signals outside of and parallel with the primary network, over which the user-to-user call itself is carried.

34. Verizon VA has also made available two-way measured-use trunking for CLECs that want this option in Virginia. These trunks are available pursuant to interconnection agreements. Through 2001, Verizon VA has about 24,080 direct two-way measured trunks in service with CLECs.

35. In addition to providing traditional 56 Kbps interconnection trunks, Verizon VA also provides CLECs with 64 Kbps Clear Channel interconnection trunks. These 64 Kbps Clear Channel trunks use a signaling format that makes available an additional 8 Kbps of bandwidth for Integrated Services Digital Network ("ISDN") transmission instead of using that bandwidth for communications between the switches at either end of the trunk. CLECs may use 64 Kbps Clear Channel trunk groups to connect to the Verizon VA tandem switch, as well as to connect directly to Verizon VA's end office switches.

36. In addition, Verizon VA provides interconnection to points of access to network elements. These arrangements are discussed below beginning in Subsection D (Collocation) and in Checklist Item 2.

C. Verizon VA meets CLEC interconnection trunking needs

1. General availability

37. Verizon VA provides interconnection trunking through interconnection agreements. Verizon VA's service offerings and operations processes are the same as those provided by Verizon PA that the FCC found has met Verizon's responsibilities under the Act. *See, e.g., Pennsylvania Approval Order* ¶ 99.

38. The widespread availability of local interconnection from Verizon VA is evident from the commercial volumes of trunking that Verizon VA is now handling for CLECs. At the end of December 2001, Verizon VA had more than 210,000 local

interconnection trunks in service with more than 30 CLECs. To put these numbers in perspective, over the last several decades, Verizon VA has built approximately 360,000 interoffice trunks in its network to carry all of its own local traffic among its switches. This means that the CLECs already have over half as many interconnection trunks in service as Verizon VA has in its entire local interoffice network.

39. During 2001, Verizon VA increased the number of interconnection trunks in service by more than 58% between Verizon VA's network and the networks of CLECs by adding approximately 78,000 interconnection trunks. To accomplish this, Verizon VA expanded the trunk capacity of its switches by approximately 179,000 tandem trunk terminations and about 116,000 end office trunk terminations. Verizon VA expects to further expand the trunk capacity of its switches by adding approximately 109,000 tandem trunk terminations and about 40,000 end office trunk terminations by the end of 2002. Of the approximately 210,000 interconnection trunks in service with CLECs in December 2001, about 58% are direct end-office trunks and the other 42% are trunks between Verizon VA tandems and CLECs.

40. The volume of interconnection traffic exchanged between Verizon VA and CLECs has also increased substantially. Through the end of December 2001, the average number of minutes exchanged has risen to 1.2 billion per month, which is more than a 40% increase over 2000.

2. Trunk provisioning intervals

41. Verizon VA uses standard intervals when provisioning interconnection trunks for CLECs identical to those used by Verizon for the same purpose in Pennsylvania. These intervals are comparable to those established for Access Service Requests ("ASRs")

that Verizon VA uses in provisioning network trunking arrangements for Interexchange Carriers ("IXCs").

42. Forecasts of CLEC demand for local interconnection trunking are an integral part of the interconnection process in Virginia. The process calls for CLECs to project trunk requirements six months in advance of the first forecasted trunk service date. This six-month lead-time allows Verizon VA to plan, engineer and construct trunk network switching infrastructure in anticipation of aggregated trunk demands.

43. In Virginia, as in Pennsylvania, Verizon tracks CLEC trunk order performance based on a grouping of trunk orders into six different categories. This categorization, which is based on whether the trunk request is associated with a forecast, as well as the size and complexity of the trunk request, is as follows:

Categories when a CLEC timely forecasts trunk requirements:

Category 1 – 18 business day interval:

> Forecasted by CLEC. Additions of 192 trunks or less to existing trunk groups.

Category 2 – 30 business day interval:

> Forecasted by CLEC. Additions of greater than 192 trunks and less than or equal to 384 trunks, to existing trunk groups.

Category 3 – negotiated interval:

> Forecasted by CLEC. New trunk groups. Additions greater than 384 trunks to existing trunk groups. Complex orders. Multiple trunk orders implemented as a Project.

Categories when a CLEC does not forecast trunk requirements:

Category 4 – 45 business day interval:

> Not forecasted by CLEC. Verizon facilities are currently available.

Category 5 – 198 business day interval:

Not forecasted by CLEC. Verizon facilities are not currently available.

Category 6 – negotiated interval:

Non-service affecting trunk projects initiated at Verizon's request, such as tandem rehoming projects, or at the CLEC's request, a DS-3 rollover project.

Under this approach, the provisioning performance for E-911 trunks and Operator Services and Directory Assistance trunks is included in Category 3 - Complex orders, if the orders were forecasted, and in either Category 4 or 5, if the orders were not forecasted.

44. Verizon VA's performance in providing timely Firm Order Confirmations ("FOCs") (which formally convey the Verizon VA due date) and installation intervals, in accordance with this six category measurement approach, for CLEC-ordered local interconnection trunks is shown in Checklist Declaration Attachment 204 ("Category 6 Exhibit") and is discussed below.

3. Trunk ordering

45. As in Pennsylvania, CLECs order interconnection trunks from Verizon VA using the industry standard ASR that IXCs have used for years. These requests can be transmitted to Verizon VA electronically using Connect: Direct (previously referred to as Network Data Mover ("NDM")) or by fax, if the CLEC has not yet implemented electronic systems. From November 2001 through January 2002, Verizon VA provided the FOC for Category 1 trunk orders in 10 days. For Category 2 through Category 6 trunk orders, Verizon VA provided the FOC sufficiently in advance of the date due to enable the CLEC to complete its trunk provisioning activities. *See* Attachment 204 ("Category 6 Exhibit").

4. Trunk provisioning

46. Verizon VA is consistently meeting or exceeding the Six Category provisioning interval targets for interconnection trunks. *See* Attachment 204 ("Category 6 Exhibit"). In addition, the Carrier-to-Carrier ("C2C") data provided with the Measurements Declaration, show that Verizon VA has consistently met the due dates for CLEC interconnection trunks. *See* Measurements Declaration Attachment 401. However, Verizon VA cannot complete the installation of interconnection trunks within a standard interval, or by a requested due date, if the CLEC is not ready to accept the trunks. CLECs in Virginia have not been ready to accept a number of the ordered interconnection trunks when Verizon VA has completed its provisioning activities. *See* Checklist Declaration Attachment 204 ("Category 6 Exhibit - Customer Not Ready Orders"). There are many reasons why a CLEC does not complete interconnection trunk orders when Verizon VA is ready, among them the unavailability of CLEC technicians for T1 transport turn-up, trunk testing and acceptance, and the lack of switching capacity on the CLEC's switch. Although these delays in Virginia have usually been short and do not indicate a significant CLEC operational problem, they do extend Verizon VA's overall (total time) provisioning interval. *Id*.

47. Further, CLECs sometimes make significant changes to their trunk orders after they are submitted to Verizon VA, but before the order is complete and final. For the period from November 2001 through January 2002, the average time consumed in CLEC order changes ranged from less than a day to 39 days after they were first submitted. *See* Checklist Declaration Attachment 204 ("Category 6 Exhibit - Average Days to Last Supp").

5. Trunk maintenance and repair

48. The interconnection Verizon VA provides to CLECs is technically the same as the interconnection Verizon VA provides between the switches in Verizon VA's local network. Verizon VA uses the same equipment, and in some cases shares exactly the same facilities, for CLEC and Verizon VA local traffic. Verizon VA also maintains and repairs interconnection trunks in a nondiscriminatory manner by using the same equipment and personnel for CLEC and Verizon VA trunks. This non-discriminatory treatment is confirmed by Verizon VA's Carrier-to-Carrier performance reports. In the period from November through January 2002, the Network Trouble Report Rate for interconnection trunks (MR-2-01) was virtually nonexistent. *See* Measurements Declaration Attachment 401. Other performance measures for interconnection trunking during this same period, such as Mean-Time-To-Repair Total (MR 4-01), also show the fine job Verizon VA is doing. (Id.)

6. Trunk call capacity

49. Verizon VA designs interconnection trunks to CLECs using the same technical criteria it uses to design its own facilities. Verizon VA installs direct end-office interconnection trunks to CLECs where traffic volumes justify it, based on evaluations of trunk utilization information ("trunks required" versus "trunks in service") reflecting actual calling data. In doing so, Verizon VA uses the same call-capacity criteria as it uses for its own network deployment, with overflow traffic routed through the tandem in the event that direct end-office trunks are all busy.

50. Dedicated final trunk groups from Verizon VA to CLECs, like Verizon VA's own final tandem trunks, are generally designed to a B.005 engineering standard. This

means that trunk groups are sized (designed) based on 1/2 percent blocking (one call blocked out of 200 calls) during the busiest hour of the day (using the same busy hour) over a four-week measurement period. This is a stringent design standard intended to alert network engineers when even a small incidence of blocking is observed. Accordingly, end-user customers do not normally observe degraded service when a trunk group is operating over the B.005 engineering design. Significantly more severe blocking levels must occur before customers are able to observe degradation in service. For example, final trunk groups between Verizon VA end-office switches are typically designed at B.01 (one percent) blocking. Activities to provide additional trunks to reduce actual call blocking for its own final trunk groups are generally not initiated by Verizon VA until 3% blocking occurs in the traffic study period.

51. In reviewing previous Verizon 271 applications, the FCC has examined the percent of Verizon's common final trunk groups exceeding their engineering design, and the percent of total CLEC dedicated final trunk groups (carrying traffic from Verizon to the CLECs) exceeding the same engineering design. *See, e.g.*, Pennsylvania Approval Order ¶ 99. Similar data for Virginia show that for the three months ending January 2002, the final trunk blocking for CLECs was 1.36% and 2.42% for Verizon VA. *See* Measurements Declaration, Attachment 401 ("NP-1- Percent Final Trunk Group Blockage").

52. However, a simple examination of trunk group quantities/percentages "over" or "under" the engineering design does not present a complete or accurate picture of the job Verizon VA is doing providing network trunk capacity to complete calls from Verizon VA's customers to CLEC customers. First, to achieve the acceptable blocking

level, Verizon VA depends critically on the cooperation of the CLECs. The Carrier-to-Carrier figures for "percent CLEC dedicated final trunk group" relate to trunks Verizon must order from the CLEC. See Measurements Declaration, Attachment 401 ("VA C2C Guidelines"). Verizon VA monitors dedicated final CLEC trunk groups (carrying traffic from Verizon to the CLEC) on a monthly basis. Based on the performance of the trunk group (utilization), the historical traffic trend, CLEC-specific input (when provided), and engineering judgment, Verizon may initiate a trunk addition. This trunk addition could be for the dedicated final group from the Verizon VA tandem to the CLEC, or for end-office trunking, direct from Verizon VA's end offices to the CLEC. Typically, Verizon VA issues a Demand Service Request ("DSR") to the CLEC to initiate trunk additions. Making a trunk addition is a joint process requiring the participation of the involved CLEC. Verizon cannot, on its own, install the additional trunking to the CLEC's switch.

53. Second, Verizon VA needs information from the CLEC to determine the timing and sizing of trunk additions because Verizon VA is not aware of new CLEC expansion plans. As a result, historical trend data alone does not allow Verizon VA to predict adequately the quantities of trunks that will be needed. The CLEC must provide Verizon VA with information about changes in its operations, so that trunk additions can be appropriately timed and sized.

54. Therefore, in order to evaluate properly the quality of interconnection Verizon VA provides CLECs, Verizon VA conducted "trunk utilization" traffic studies from November 2001 through January 2002. Overall trunk utilization data provides a more complete and accurate picture of the quality job that Verizon VA is doing to provide additional call capacity for dedicated final CLEC interconnection trunks. These studies,

which include all the dedicated final trunk groups from Verizon VA to CLECs, develop the utilization ratio of "trunks required" to "trunks in service." For a specific trunk group, "trunks required" is the calculation of the number of trunks needed to provide service at the engineering design level, based on the actual traffic loads carried by the trunk group during the study period. "Trunks in service" is the actual number of trunks in operation during that period. Verizon VA uses this utilization measurement to monitor and provide additional trunks for itself and for CLECs. Unlike the CLEC dedicated final trunk group data showing the percentage of trunk groups operating over the engineering design, trunk utilization data does reflect the proportional effects of small and large trunk groups, as well as variations in the amount of actual blockage experienced on individual trunk groups.

55. For the three months ending January 2002, the average utilization ratio ("trunks required" divided by "trunks in service") was 36.8% for CLEC-dedicated final trunk groups and 61.9% for Verizon's own common final trunk groups. The lower level of trunk utilization for CLEC dedicated final trunk groups shows that Verizon VA is providing a better grade of service in aggregate for CLEC dedicated final trunk groups than for its own common final trunk groups. That is, more CLEC interconnection trunks have been installed and are operational than are needed to operate at the same engineering design level of blocking as Verizon VA's own common final trunk groups.

56. Overall, Verizon VA has provided a substantial number of high quality interconnection trunks to CLECs in Virginia in reasonable and nondiscriminatory intervals in the same manner as it did in Pennsylvania to meet the requirements of Section 271. Verizon VA has also supported these trunks in the limited instances

necessary with satisfactory maintenance and repair service. These local interconnection trunks already support an average of 1.2 billion minutes of traffic per month. And, while there is already in place ample capacity to carry more traffic, Verizon VA has demonstrated the continuing ability to meet CLEC needs for additional local interconnection trunking.

D. Collocation requirements

57. Section 271(c)(2)(B)(i) of the Act requires that a 271 applicant provide interconnection arrangements in accordance with the requirements set forth in Section 251(c)(6). Though collocation is not explicitly included in the Act's Section 271 checklist, Section 251(c)(6) states that an ILEC, such as Verizon VA, has the "duty to provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier." Section 251(c)(6) requires ILECs to provide physical collocation unless it can be shown that this type of collocation is not practical for technical reasons or because of space limitations. In that event, ILECs must provide for virtual collocation of interconnection equipment.

58. This portion of the Declaration will demonstrate that Verizon VA is in compliance with the requirements of Section 271(c)(2)(B)(i) of the Act through the multiple collocation offerings and alternatives that Verizon VA makes available to CLECs in Virginia.

E. Collocation offerings

1. Verizon VA offers the same collocation offerings as Verizon Pennsylvania, Verizon Massachusetts, and Verizon New York.

59. In the *Pennsylvania Approval Order* at ¶ 103, the FCC found that "Verizon has

demonstrated compliance with this Checklist Item." In the FCC's *Massachusetts Approval Order*, the FCC determined that "Verizon demonstrates that its collocation offerings in Massachusetts satisfy the requirements of sections 251 and 271 of the Act." (*Massachusetts Approval Order* ¶ 194). Similarly, in the FCC's *New York Approval Order*, it determined that Verizon NY was "providing collocation in New York in accordance with the Commission's rules" and that Verizon NY's "collocation offering in New York satisfie[d] the requirements of sections 271 and 251 of the Act." (*New York Approval Order* ¶¶ 67, 73).

60. The multiple collocation options and alternatives offered by Verizon VA are essentially the same options offered by Verizon PA, Verizon MA, and Verizon NY.[8] The steps taken by Verizon VA to provide CLECs with quality collocation arrangements are essentially the same steps taken by Verizon in Pennsylvania, Massachusetts, and New York. The standard operating procedures used by Verizon VA to provide collocation are essentially the same operating procedures used by Verizon PA, Verizon MA, and Verizon NY.

61. The responsibilities of Verizon VA employees who provide collocation to CLECs in Virginia essentially are the same responsibilities of Verizon employees who provide collocation to CLECs in Pennsylvania, Massachusetts, and New York. In fact, some of the same organizations responsible for centralized functions, such as application

[8] Verizon NY's offerings also include assembly room and assembly point arrangements, which provide alternatives to physical and virtual collocation by enabling CLECs to combine unbundled loops and line ports. An assembly room is a non-conditioned secured room in a central office whereas an assembly point is a locked termination enclosure outside of a central office. The availability of cageless collocation and SCOPE collocation arrangements, as well as combinations of unbundled network elements, including UNE-P, has since made assembly room and assembly point arrangements unnecessary. No CLECs in New York have requested an assembly point arrangement and only one CLEC has requested an assembly room arrangement since the tariff for these offerings became effective Feb. 15, 1999. Neither assembly room or assembly point is

processing, cover the entire Verizon East region (former Bell Atlantic region), including Virginia, Pennsylvania, Massachusetts, and New York. Moreover, each CLEC is assigned an overall project manager who is responsible for its collocation arrangements across the Verizon East region. In addition, the CLEC Handbook used by Verizon VA to inform CLECs of their collocation rights and responsibilities is the same CLEC Handbook used by Verizon PA, Verizon MA, and Verizon NY.

F. Types of collocation

62. Verizon VA provides CLECs with several types of physical collocation, virtual collocation and other collocation alternatives, in compliance with its responsibilities under the Act and in accordance with the requirements of the FCC's Advanced Services Order.[9] These multiple collocation offerings are available to CLECs under interconnection agreements and the Verizon-VA Network Interconnection Services Tariff S.C.C. -Va. -No. 218 which is filed with and approved on an interim basis, subject to refund and/or modification by the Virginia SCC. On February 1, 2002, Verizon VA, WorldCom, Inc., AT&T Communications of Virginia, Inc., Sprint Communications Company of Virginia, Inc., Broadslate Networks of Virginia, Inc., NTELOS Network, Inc., and R&B Network, Inc. filed a Joint Petition for Settlement Approval ("Joint Petition") with the SCC to resolve, finally and equitably, disputed issues arising from the Network Interconnection Services Tariff S.C.C. –Va. -No. 218. On March 6, 2002, the SCC issued an order calling for interested parties to file comments on the Agreement no later than March 27, 2002.

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offered in Massachusetts, or Pennsylvania.

[9] *In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, FCC 98-48, First Report And Order (March 31, 1999) ("*Advanced Services Order*").

1. Physical collocation

63. Verizon VA offers different forms of physical collocation, including traditional physical collocation. This form of collocation is provided on a square footage basis and is located in a secured, environmentally conditioned area of a Verizon VA central office. For traditional physical collocation arrangements, the CLEC may chose to enclose its equipment in a cage. A standard size cage is 100 square feet. Additional space is available in 20 square foot increments for 100 square foot or larger cages. Under traditional physical collocation, CLECs provide and install their own equipment, and perform all maintenance-related activities up to their side of a Point of Termination ("POT") bay. Through January 2002, Verizon VA had provisioned 255 traditional physical collocation arrangements and 7 were progressing toward timely completion.

64. Verizon VA offers two other types of physical collocation arrangements. Secured Collocation Open Physical Environment ("SCOPE") enables a CLEC to place its physical collocation equipment in a Verizon VA central office in single-bay increments. SCOPE arrangements are located in the same secure, environmentally conditioned areas that are used for the traditional physical collocation offering, except that the space can be shared by a number of CLECs. Similar to traditional physical collocation, CLECs provide and install their own equipment, and perform all maintenance-related activities up to their side of a Shared Point of Termination ("SPOT") bay. Verizon VA also offers Cageless Collocation Open Environment ("CCOE"). This form of physical collocation permits a CLEC to place its physical collocation equipment in single-bay increments in a Verizon VA central office. Cages are not an option for either SCOPE or CCOE arrangements. Verizon VA offers these forms of cageless collocation in accordance with

the requirements of the FCC's Advanced Services Order ¶¶ 42-43. Through January 2002, Verizon VA had provisioned 647 cageless collocation arrangements (447 SCOPE and 200 CCOE) and 36 jobs were progressing toward timely completion.

2. Virtual collocation

65. Verizon VA offers virtual collocation, which is an alternative to physical collocation. Verizon VA offers virtual collocation in all of its central offices where space permits, even though Section 251(c)(6) of the Act requires that ILECs offer virtual collocation only in central offices where physical collocation space is not available. In a virtual collocation arrangement, a CLEC leases its equipment to Verizon VA, which installs, maintains, upgrades and repairs that equipment at the direction of the CLEC. The major difference between physical and virtual collocation is that a CLEC does not directly access the central office or the collocated equipment in a virtual collocation arrangement. However, a CLEC can establish remote access to the virtual collocation equipment for monitoring and testing purposes. Through January 2002, Verizon VA had provided 112 virtual collocation arrangements to unaffiliated CLECs and 12 were progressing toward timely completion.[10]

3. Collocation alternatives

66. Verizon VA offers shared (traditional physical) collocation, which permits a collocating CLEC to become the "host" to another collocating CLEC, and in effect, share collocation space and costs. In shared collocation arrangements, Verizon VA regards the host CLEC as its customer for all collocation matters, such as space and power requirements. The host CLEC establishes its own contractual arrangement with any

[10] On December 1, 2001, equipment owned by VADI in 73 VADI virtual collocation arrangements provisioned in 68 central offices in Virginia was transferred to Verizon Virginia and were no

"guest" CLEC, though the guest may, at its option, order unbundled network elements directly from Verizon VA. Verizon VA has set up a website that provides information on CLECs that offer or are interested in shared collocation. The website address is: http://128.11.40.241/east/wholesale/resources/master.htm. Through January 2002, Verizon VA had not received any requests for shared cage collocation arrangements.

67. Verizon VA offers adjacent structure collocation, which permits a CLEC to procure or construct a controlled environment vault or similar structure adjacent to a Verizon VA central office on Verizon VA's premises in the event physical collocation space is exhausted in a central office. Under adjacent structure collocation, CLECs are responsible for complying with municipal zoning requirements and obtaining associated permits. Through January 2002, Verizon VA had not received any formal requests for adjacent collocation in central offices that had no physical collocation space.

68. Verizon VA permits CLECs to bring their fiber facilities into a Verizon VA central office and terminate the facilities near a Verizon VA cable vault via Competitive Alternate Transport Terminal ("CATT") service. This service enables CLECs to provide interoffice transport facilities to other CLECs that are physically or virtually collocated in a Verizon VA central office, without establishing physical collocation arrangements of their own. Through January 2002, Verizon VA had provisioned 20 CATT arrangements.

69. Verizon VA offers Collocation at Remote Terminal Equipment Enclosures ("CRTEE"). CRTEE provides for the physical or virtual collocation of CLEC equipment in Verizon VA's remote terminal equipment enclosures where technically feasible and subject to the availability of space and conduit. Remote terminal equipment enclosures

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longer classified as collocation arrangements.

include controlled environmental vaults, huts, cabinets and leased space in buildings that Verizon VA does not own. Verizon VA offers CRTEE under amendments to interconnection agreements and the Verizon-VA Network Interconnection Services Tariff S.C.C. –Va. -No. 218. Through January 2002, Verizon VA had not received any requests for CRTEE arrangements.

70. Verizon VA enables CLECs to expand, upgrade and/or reconfigure their existing collocation arrangements. Such changes to existing arrangements are commonly referred to as augments. Through January 2002, Verizon VA had provisioned 651 collocation augments and an additional 92 were progressing toward timely completion.

G. Collocation provisioning

71. Verizon VA has demonstrated its ability to meet CLECs' requests for collocation. In 1996, Verizon VA provided 1 CLEC with 1 physical collocation arrangement. In 1997, Verizon VA provided 2 CLECs with 8 physical collocation arrangements. In 1998, Verizon VA provided 6 CLECs with 26 physical collocation arrangements. In 1999, Verizon VA provided 17 CLECs with 272 physical collocation arrangements. In 2000, Verizon VA provided 33 CLECs with 464 physical collocation arrangements. In 2001, Verizon VA provided 16 CLECs with 130 physical collocation arrangements. Cumulatively, as of January 2002, Verizon VA had provided 43 CLECs with 902 physical collocation arrangements.

72. Through December 2001, CLECs had access to 83.1% of Verizon VA's residential access lines and 92.2% of Verizon VA's business access lines through 637 collocation arrangements in 98 central offices.[11]

[11] These figures represent net collocation arrangements in place, and excludes arrangements provisioned that subsequently have been terminated at the request of a CLEC.

73. There are two standards by which Verizon VA's collocation provisioning performance is measured. The first standard requires Verizon VA to respond to completed collocation applications within 8 business days, as specified the Verizon-VA Network Interconnection Services Tariff S.C.C. –Va. -No. 218. The second standard requires Verizon VA to provide traditional physical collocation arrangements and SCOPE arrangements in a standard 76 business-day interval. In situations involving unique circumstances such as major construction obstacles or special CLEC requirements, upon notification to the CLEC, the interval may be extended for no greater than fifteen business days. The standard installation interval for CCOE is 76 business days where the equipment is already secured, and 105 days when equipment is not secured. Verizon VA is required to provide virtual collocation arrangements within a 60 business- day interval.

74. Verizon VA provides several written responses to CLECs upon receipt of their collocation applications. The initial response provided by Verizon VA is in the form of a standard E-mail "acknowledgment" letter. This letter is sent to CLECs within five business days of receiving a collocation application to inform them that their application has been received. This letter notifies CLECs that their application is complete and will be processed, or that it is incomplete and cannot be processed until the CLEC provides the information Verizon VA needs to process the application. Of the 67 acknowledgment letters that Verizon VA sent to CLECs from November 2001 through January 2002, 100% were sent to CLECs within five business days after receiving the applications.[12]

[12] This number does not correspond to the number of arrangements provisioned since some were cancelled by the CLEC or put in queue for other reasons.

75. The second response provided by Verizon VA is in the form of a standard E-mail "schedule" letter which, as noted above, is sent to CLECs by Verizon VA after receiving a completed collocation application. This letter formally notifies CLECs about the collocation arrangement that Verizon VA will provide based on the type of collocation the CLEC has requested, the date by which Verizon VA will complete the CLEC's collocation arrangement, and a cost estimate for the type of collocation the CLEC has requested and that can be provided by Verizon VA. The letter also contains the names and telephone numbers of the Verizon VA Collocation Manager responsible for preparing schedule letters and the Collocation Project Manager. Of the 61 schedule letters that Verizon VA sent to a CLECs from November 2001 through January 2002, 98.36% were sent within eight business days after Verizon VA received the application.

76. All of 4 physical collocation arrangements that Verizon VA provided from November 2001 through January 2002 were completed on time.

77. Verizon VA did not provide any virtual collocation arrangements to unaffiliated CLECs from November 2001 through January 2001.

H. Collocation space management

78. Verizon VA proactively optimizes the amount of central office space available for physical collocation. To achieve this objective, Verizon VA has completed 81 jobs to relocated administrative personnel and functions, remove obsolete unused equipment and/or reconfigure its own equipment space in 61 central offices that contain collocation arrangements to accommodate CLEC requests for collocation.

79. Verizon VA's collocation website provides CLECs with information on the availability of collocation space in its central offices. The website identifies central offices where all remaining physical collocation space has been exhausted. Verizon VA

updates the website with information on space limitations within 10 calendar days after determining that physical collocation space is not available in an office. These updates are made consistent with the requirements of the FCC's Advanced Services Order ¶ 58. The website address for collocation space availability is: http://128.11.40.241/east/wholesale/resources/pdf/space_exhaust_list.pdf.

80. Verizon VA will provide CLECs with opportunities to tour its central offices in accordance with FCC and SCC rules. These rules permit CLECs to tour central offices when Verizon VA "denies a request for physical collocation due to space limitations." Advanced Services Order ¶ 57. Central office tours enable Verizon VA to demonstrate to CLECs that physical collocation space has been exhausted in an office and the reason(s) why Verizon VA could not accommodate their physical collocation request. Through January 2002, Verizon VA has received 29 requests for central office tours from CLECs in Virginia.

81. Verizon VA files central office space exhaustion notifications with this Commission when space restrictions in a specific central office result in denying a CLEC's request for physical collocation. Verizon VA's space exhaustion notifications contain the information required by the SCC[13] and the FCC, as described in its Advanced Services Order ¶ 56 and Reconsideration Order ¶ 61. Consistent with SCC and FCC requirements, Verizon VA's space exhaustion notifications provide information on the types of physical collocation present or pending in the office and the reason(s) Verizon VA could not accommodate a CLEC's request for physical collocation. The notifications also include information on space that Verizon VA uses for administrative purposes, as

[13] The SCC set forth its requirements for space exhaustion notification requirements in its Order of January 7, 2000 in Case No. PUC960164. This order is can be obtained on the SCC's website at the following

well as any plans to expand the central office building or rearrange switching, transmission or power equipment in the office. The notifications include central office floor plans or diagrams that identify space Verizon VA has reserved for itself for future use and the location of CLEC equipment in the office.

I. Collocation methods and procedures

82. Verizon VA has developed and implemented comprehensive methods and procedures to ensure that it provides CLECs with quality collocation arrangements. Verizon VA's procedures include comprehensive internal quality inspections of collocation arrangements before they are turned over to CLECs and voluntary joint testing of facilities with CLECs after they have installed equipment in their physical collocation arrangements. The procedures also include coordination of Collocation Acceptance Meetings ("CAMs") with CLECs at the time Verizon VA turns over collocation arrangements to them for installation of their equipment.

83. Verizon VA conducts quality inspections of its collocation arrangements prior to turning over arrangements to CLECs for installation of their equipment. Verizon VA inspects collocation arrangements using an internal Pre-Acceptance Checklist to verify that each arrangement meets Verizon VA's installation specifications and to address those items that are not complete or correct at the time a collocation arrangement is inspected. This Pre-Acceptance Checklist covers areas such as power, fiber structure, cable racking, total number of circuits, and lighting.

84. Verizon VA performs comprehensive testing of its cross connects upon completion of a collocation arrangement to ensure continuity between Verizon VA's

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address: http://www.state.va.us/scc/caseinfo/puc/c960164.htm.

distribution frame(s) and POT/SPOT bays. Verizon VA's quality inspection process ensures that installation of Verizon VA provided cabling is accurate, that assignments are stenciled properly, and that Verizon VA's inventory systems correctly reflect the assignments upon completion of a physical collocation arrangement.

85. Verizon VA will perform voluntary cooperative testing of physical collocation arrangements with CLECs upon request. These tests include "head-to-head" testing of facilities by Verizon VA and CLEC technicians from CLEC equipment to Verizon VA's distribution frames to ensure proper continuity before or after CLECs have installed their equipment in a physical collocation arrangement. These cooperative tests also include testing of Verizon VA and CLEC facilities from a Verizon VA distribution frame through a POT/SPOT bay to a CLEC's equipment.

86. Verizon VA notifies CLECs about CAMs prior to the due date of an arrangement. These meetings are arranged and conducted by Verizon VA with CLECs to obtain their acceptance of a collocation arrangement. Under the CAM notification process, Verizon VA's Collocation Applications group sends a standard letter to CLECs prior to the time that their collocation arrangement is due to complete. The letter notifies CLECs that they must contact their Verizon VA Local Collocation Coordinator when they are ready to inspect their collocation arrangement and confirm that Verizon VA's work is complete.

87. Verizon VA provides CLECs with a standard collocation application form. The form enables CLECs to select one or more types of physical collocation, in order of preference, as well as virtual collocation. The application form allows CLECs to specify a minimum and maximum size for physical collocation cages and the number of bays for

SCOPE, as well as CCOE and virtual collocation. CLECs generally value this option because it enables Verizon VA to provide their first choice, when feasible, or provide the best available alternative should their first or other choices not be feasible. In doing so, Verizon VA is able to facilitate the processing of CLEC applications and eliminate any need to use its own judgment when deciding what alternatives would best satisfy a CLEC's collocation request. Most importantly, it saves time in the provisioning process when the first choice is not available.

88. A current version of the collocation application and instructions on how to complete it are available on Verizon's Wholesale Markets website. The website address is: http://128.11.40.241/east/wholesale/resources/master.htm.

89. Verizon VA also provides a copy of its CLEC Handbook on its Wholesale Markets website. The CLEC Handbook, which informs CLECs of their collocation rights and responsibilities, is published in three volumes. Volume One provides an overview of Verizon VA's CLEC program, including the steps CLECs should follow to establish a working relationship with Verizon VA. Volume Two provides information on how to interface with Verizon VA's Operations Support Systems Gateway Applications to transmit pre-order, order, order status and trouble administration transactions. Volume Three provides information on unbundled network elements and the business rules/procedures that guide CLECs' relationships with Verizon VA. The website address for the Handbook is: http://128.11.40.241/east/wholesale/customer_docs/master.htm.

J. Collocation rates and charges

90. The Verizon-VA Network Interconnection Services Tariff S.C.C. –Va. -No. 218 contains the rates and charges that apply to the multiple collocation offerings and alternatives available to CLECs in Virginia. The rates and charges contained in this

schedule include standard rates and charges for various collocation elements, including application fees, space conditioning, floor space and DC power. These rates and charges have been approved on an interim basis, subject to refund and modification. On February 1, 2002, Verizon VA, WorldCom, Inc., AT&T Communications of Virginia, Inc., Sprint Communications Company of Virginia, Inc., Broadslate Networks of Virginia, Inc., NTELOS Network, Inc. and R&B Network, Inc. filed a Joint Petition for Approval of Settlement Agreement Addressing Collocation Rates, Terms and Conditions which equitably settled all the rates pertaining to physical and virtual collocation as well as key terms and conditions. (See Checklist Declaration Attachment 205). On March 6, 2002, the SCC issued an order calling for interested parties to file comments on the Agreement no later than March 27, 2002.

CHECKLIST ITEM 2: NONDISCRIMINATORY ACCESS TO NETWORK ELEMENTS

A. Requirements for nondiscriminatory access to network elements

91. Section 271(c)(2)(B)(ii) of the Act requires a Section 271 applicant to offer "nondiscriminatory access to network elements in accordance with the requirements of sections 251(c)(3) and 252(d)(1)." Section 251(c)(3) of the Act requires the incumbent LEC to "provide to any requesting telecommunications carrier . . . nondiscriminatory access to network elements on an unbundled basis at any technically feasible point under rates, terms, and conditions that are just, reasonable, and nondiscriminatory . . .."

92. Section 251(c)(3) further provides that an incumbent LEC "shall provide such unbundled network elements in a manner that allows requesting carriers to combine such elements in order to provide such telecommunication service." Section 252(d)(1) of the

Act requires that state regulatory commission determinations of appropriate rates for network elements be based on the cost of providing the network elements and may include a reasonable profit.

93. Verizon VA's interconnection agreements include specific terms, conditions, and rates that enable it to provide nondiscriminatory access to network elements consistent with Section 251 requirements of the Act. See Attachment 202 ("Interconnection Agreement Matrix"). This section will address the technical access provided to Unbundled Network Elements (UNEs), including UNE combinations, and the applicable UNE rates. Other facilities-related issues involving access to individual network elements are discussed in the respective sections of this Declaration that address collocation and specific network elements. The access provided by Verizon VA via its Operations Support Systems is addressed in the accompanying OSS Declaration.

B. Methods of nondiscriminatory access to network elements

94. Verizon VA provides access to network elements, separately and in combined form in the same manner as provided by Verizon NY and Verizon MA. The FCC has validated this access in its 271 approval orders in the above jurisdictions. Verizon VA uses the same network facilities to provide and maintain unbundled network elements to CLECs that it uses to provide bundled services to its own end users. Verizon VA's facility assignment systems and processes do not discriminate between retail service requests and unbundled network element requests in the selection of facilities. Verizon VA inventories network facilities in various assignment systems based on their technical characteristics and specific physical location(s). If available facilities meet the requirements of the unbundled element(s) requested by a CLEC, those facilities are assigned without regard to the unbundled status of the request, or whether the customer is

a Verizon VA end user or a CLEC that is requesting a network facility from Verizon VA. For example, the same switching facilities are used whether or not Verizon VA provides the dial tone to a CLEC as unbundled switching, or as part of a Verizon VA retail service.

95. Verizon VA provides CLECs with access to UNEs including loops, dedicated local transport, and dedicated end office and tandem switching ports on a standalone basis. Access is provided at a CLEC's physical or virtual collocation arrangement in a Verizon VA central office. CLECs can obtain access to these elements through cross-connect jumper wires at their collocation arrangements. CLECs can combine these network elements at their physical collocation arrangements by simply connecting the jumper wires. CLECs do not need their own transmission equipment in every Verizon VA central office to access or combine network elements in order to provide telecommunications services. Further, CLECs do not need to establish collocation arrangements with Verizon VA to access or combine UNEs, unless collocation is technically necessary. CLECs may use the Bona Fide Request ("BFR") process to request alternative means of access.

96. In addition to standard physical and virtual collocation arrangements, Verizon VA, like Verizon NY, Verizon MA, and Verizon PA provides several alternative collocation arrangements through which CLECs can combine individual network elements. These alternative arrangements include smaller physical collocation cages, “cageless” collocation arrangements, and shared collocation cages. Verizon VA offers these collocation alternatives through interconnection agreements and the Verizon VA Network Interconnection Services Tariff S.C.C. -Va. -No. 218. These arrangements, which are the same as those offered by other Verizon companies that have received

approval from the FCC, enable CLECs to combine network elements in the same manner that standard collocation arrangements provide. Descriptions of these alternative arrangements are included in Checklist Item 1 of this Declaration.

C. Access to UNE combinations

97. Verizon VA offers UNEs in an already combined form and offers CLECs the means by which the CLECs themselves can combine individual network elements. One of the combinations provided by Verizon VA is Unbundled Network Element-Platform ("UNE-P"), which offers CLECs an unbundled loop element and unbundled local switching element. Verizon VA offers UNE-P in accordance with the requirements of the FCC. The various types and capabilities of the UNE switching element that is combined into the UNE-P arrangement is discussed in greater detail in Checklist Item 6 of this Declaration, while the provisioning and maintenance of UNE loops generally – including those combined in UNE-P arrangements - is discussed in Checklist Item 4 of this Declaration.

98. Verizon VA also provides combinations of unbundled loop and interoffice facility network elements known as Expanded Extended Loop ("EEL"). EEL arrangements enable a CLEC to use unbundled links and unbundled dedicated interoffice transport network elements to provide a significant amount of local exchange service to an end user. Verizon VA provides these elements in accordance with requirements of the FCC's *UNE Remand Order* and *Supplemental Orders*[14] via interconnection agreements.

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[14] *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, 15 FCC Rcd 3696 ("UNE Remand Order"), released November 5, 1999; *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Supplemental Order, 15 FCC Rcd 1761("Supplemental Order"), released November 24, 1999); *Supplemental Order Clarification*, 15 FCC Rcd 9587 ("Clarification Order"), released June 2, 2000.

Further discussion of EEL arrangements can be found in Checklist Item 4 of this Declaration.

D. UNE Rates

99. In April 1999, the Commission set TELRIC-compliant rates for the vast majority of unbundled network elements, including loops, ports, switching, and transport. Final Order, Case No. PUC970005 (April 15, 1999).[15] Those rates, which are currently effective and approved by this Commission, are contained in numerous interconnection agreements between Verizon VA and CLECs, as listed in Attachment 202. Verizon VA also makes available to CLECs a number of additional UNEs that did not exist at the time that Case No. PUC970005 was filed and decided.[16]

100. The recurring and non-recurring prices for these additional UNEs, as well as the original UNEs, are set out in Attachment 203(i). As indicated in Attachment 203(i), the source of the price for all original UNEs is the Final Order in Case No. PUC970005. Also, for additional UNE rate elements that have a comparable existing UNE rate element, the rate set by this Commission for the comparable existing UNE rate

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15 The order can be accessed from the Commission's website at http://www.state.va.us/scc/caseinfo/puc/c970005.htm. In the Final Order, the Commission found that "[t]he principles of total, forward-looking long-run incremental costs are appropriate for determining prices for UNEs. The application of these principles reflects BA-VA's existing wire center locations and the most efficient technology that can reasonably be employed in the immediate future." Final Order at 5. *See also*, Order, Case No. PUC970005 at 4-6 (May 22, 1998).

16 These additional UNEs include (1) those required by the FCC's UNE Remand Order, such as dark fiber and subloops, (2) xDSL loop conditioning required by the FCC's order approving the merger of Bell Atlantic and GTE, and (3) various other UNEs that Verizon makes available to CLECs. *See* Third Report and Order and Fourth Further Notice of Proposed Rulemaking, CC Docket No 96-98 (Released: November 5, 1999 ("*UNE Remand Order*"); *Deployment of Wireline Services Offering Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Third Report and Order, CC Docket No. 98-147, Fourth Report and Order in CC Docket No. 96-98, 14 FCC Rcd 20912 (1999) ("*Line Sharing Order*"); *In the Matter of GTE Corporation, Transferor, and Bell Atlantic Corporation, Transferee, For Consent to Transfer Control*, CC Docket No. 98-184, Memorandum Opinion and Order (Adopted and Released: June 16, 2000).

element is used, as long as that existing rate is lower than or equal to the rate any Virginia CLEC is currently paying. So, for example, because the Service Order rate element for the distribution two wire subloop UNE is comparable to the Service Order rate element for a basic loop, and there is no lower rate currently being paid by any CLEC, the Service Order price for the basic loop is used for this particular subloop. As Attachment 203(i) demonstrates, most of the additional UNE rate elements do have comparable, Commission-approved, existing rates.

101. For those additional UNEs that do not have an existing comparable UNE rate, the price is the lower of (1) any rate that a CLEC is currently paying Verizon VA or (2) the comparable New York rate adjusted as described below to reflect differences in costs between New York and Virginia. So, for example, because there is no existing VA comparable recurring rate for DS3 loops, the rate that CLECs are currently paying will be lowered to the adjusted comparable New York rate.

102. Verizon used the comparable New York rate as one of the three potential proxies for additional rates where no existing comparable rate existed because the FCC has held that, in making a determination about whether rates in a particular state comply with TELRIC, it "may, in appropriate circumstances, consider rates that we have found to be based on TELRIC principles" in the context of previous section 271 applications.[17] . If the rates in the state under review are comparable to those in a state that previously was approved, and have comparable cost structures, *See Kansas/Oklahoma Order ¶¶ 83-84*, the rates at issue are "entitled to a presumption of compliance with TELRIC." *See*

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[17] *See* Memorandum Opinion and Order, *Joint Application by SBC Communications Inc., Southwestern Bell Tel. Co.; and Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Log Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma*, FCC Docket 01-29 (Released January 22, 2001), ("Kansas/Oklahoma Order").

Kansas/Oklahoma Order ¶ 82 n.244. The FCC most recently used this type of "benchmark analysis" in its approval of Verizon Rhode Island's 271 application, comparing Verizon RI's rates to those recently approved in New York. *See Rhode Island Order ¶ 48.*

103. The FCC's benchmark analysis, which applies to certain loop, port, and switching elements, measures how the costs in two states, as calculated in the FCC's Universal Service Model, compare to the rates. *See Kansas/Oklahoma Order ¶ 84* (the USF cost model "accurately reflects the relative cost differences among states"); *See Pennsylvania Order ¶ 65* ("[O]ur USF cost model provides a reasonable basis for comparing cost differences between states."). So, for example, if the relevant costs of the state at issue are 50% higher than the relevant costs of a state that the FCC has already determined to have TELRIC-compliant rates, the rates for the state at issue should be no higher than 50% above the rates in the TELRIC-compliant state. As the FCC has held, where "the percentage difference between the applicant state's rates and the benchmark state's rates does not exceed the percentage difference between the applicant state's costs and the benchmark state's cost, as predicted by the USF model, then we will find that the applicant has met its burden to show that its rates are TELRIC-compliant." *See Pennsylvania Order ¶ 65* (emphasis added).

104. According to the Universal Service Model, relevant loop costs in Virginia are 35% higher than in New York, and relevant port costs are 1% less than New York. Therefore, in calculating the "comparable New York rate" for additional elements, the

current New York rates for loops were increased by 35%, and the current New York rates for ports were decreased by 1%.[18]

105. In addition to using the benchmark analysis to adjust the New York rates, in some cases a further adjustment was required to take into account rate structure differences that exist between New York and Virginia. For example, when CLECs purchase a DS-3 loop in New York the monthly rate includes not only a fixed component but a per quarter mile charge. In Virginia, the current rate structure does not include a per quarter mile charge. Consequently, the per quarter mile rate element has been incorporated into the fixed rate element. The details of this adjustment are described in the Notes Section of Attachment 203(i).

106. Verizon VA is making these UNEs available at these rates until this Commission, or some other forum with competent jurisdiction, establishes different rates for these and other UNEs.[19] These rates are posted on Verizon's website at http://www.bellatlantic.com/tariffs_info/intra/efftar/va/html/alpha.htm, and Verizon VA is sending an industry letter to all CLECs advising them of the availability of these rates. The rates will go into effect in May 2002.

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[18] The New York rates were approved on January 28, 2002. New York PSC, *Proceeding on Motion of the Commission to Examine New York Telephone Company's Rates for Unbundled Network Elements*, Case 98-1357, Order On Unbundled Network Element Rates (rel. Jan. 28, 2002).

[19] Verizon VA has already filed with the FCC TELRIC-compliant cost studies for all UNEs, including the additional UNEs established after the Commission's Final Order in Case No. PUC970005. *See* In the Matter of Petition of WorldCom, Inc. Pursuant to Section 252(e)(5) of the Communications Act for Expedited Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration (CC Docket No. 00-218); In the Matter of Petition of Cox Virginia Telecom, Inc., etc. (CC Docket No. 00-249); In the Matter of the Petition of AT&T Communications of Virginia Inc., etc. (CC Docket No. 00-251).

CHECKLIST ITEM 3: POLES, DUCTS, CONDUITS AND RIGHTS-OF-WAY

A. Requirements for Access to Poles, Ducts, Conduits and Rights-of-Way

107. Section 271(c)(2)(B)(iii) of the Act requires Verizon VA to offer "[n]ondiscriminatory access to the poles, ducts, conduits, and rights-of-way owned or controlled by [Verizon VA] at just and reasonable rates in accordance with the requirements of section 224." Section 224 gives the States the authority to preempt FCC jurisdiction, and to regulate rates, terms and conditions of access. Virginia has not preempted FCC jurisdiction.[20]

B. Verizon VA Provides Nondiscriminatory Access to Poles, Ducts, Conduits and Rights-of-Way

108. Verizon VA meets this checklist requirement by offering nondiscriminatory access to poles, ducts, conduits and rights-of-way that it owns or controls. As of December 31, 2001, Verizon VA was providing 158,504 pole attachments and access to 1,713,002 feet of conduit. Pole attachments are provided to 58 telecommunications carriers, 136 cable television companies, and 24 other parties. The story is similar for conduit access. No carrier has requested access to Verizon VA's private rights-of-way.

109. Verizon VA offers telecommunications carriers access to poles, ducts, conduits and rights-of-way at rates, terms and conditions stated in standard licensing agreements. A copy of the standard licensing agreement is attached to the Verizon Virginia Inc. Methods and Procedures for Access to Poles, Ducts, Conduits and Rights-of-Way ("Methods and Procedures"), which is Attachment 206 to this declaration.

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[20] See Public Notice – States that have Certified that they Regulate Pole Attachments, 7 FCC Rcd. 1498 (1992).

110. Verizon VA interconnection agreements also offer telecommunications carriers access to poles, ducts, conduits and rights-of-way owned or controlled by Verizon VA, on rates, terms and conditions stated in the standard licensing agreement. See Attachment 202 ("Interconnection Agreement Matrix").

111. Access to poles, ducts, conduits and rights-of-way is provided on a "first come, first served" basis. A detailed process is in place to ensure that each telecommunications carrier requesting access receives consistent and equitable treatment. The process is described in the Methods and Procedures. The process includes the following steps.

112. First, upon written request by a telecommunications carrier, Verizon VA provides access to information about the location of its facilities in the area where the carrier intends to request access. Verizon VA maintains records of the location and physical attributes of Verizon VA poles, ducts, conduits, rights-of-way, and associated facilities at eight centers throughout Virginia. Requests by telecommunications carriers for information typically involve records maintained at one center. After redacting any proprietary information, Verizon VA will permit requesting telecommunications carriers to examine the relevant records or, at a carrier's request, Verizon VA will conduct the necessary research and advise whether the records show that space is available.

113. From November 2001 through January 2002, Verizon VA received 5 requests from telecommunications carriers for access to Verizon VA records. Access to records was made available within ten business days of the request for 100% of requests received.

114. Second, Verizon VA processes applications by telecommunications carriers to attach to or occupy specific poles, ducts, conduits and rights-of-way. Applications are processed on a "first come, first served" basis. Applications must state the geographic location, type and quantity of facilities requested. Verizon VA reviews each application for compliance with the same widely-accepted standards regarding safety, reliability, capacity and engineering that Verizon VA applies to its own projects involving pole attachments and occupancy of ducts, conduits, and rights-of-way. The standards Verizon VA uses are the National Electrical Code, the National Electrical Safety Code, the Blue Book - Manual of Construction Procedures published in December 1998 by Telcordia Technologies, Inc.(formerly Bellcore), the rules and regulations of the Occupational Safety and Health Act, and standards stated in the standard licensing agreement.

115. For pole attachment applications, the applicant performs a survey to determine whether the requested facilities have space available for use. Verizon VA conducts a field review to verify the applicant's survey. If the applicant has asked to be present, Verizon VA notifies the applicant 24 hours prior to conducting its field review of the survey. For conduit occupancy applications that require physical verification of space availability, Verizon VA generally permits an applicant to conduct the survey, and may choose to have its inspector present. Alternatively, Verizon VA will conduct the survey after providing 24-hours notice to an applicant that has asked to be present. For applications for access to rights-of-way, Verizon VA will determine on a case-by-case basis whether physical verification of space availability is required, and the procedure for physical verification.

116. From November 2001 through January 2002, Verizon VA received 153 applications from telecommunications carriers for access to poles, and 4 applications from telecommunications carriers for access to ducts and conduits. During the same period, 100% of Verizon VA's responses to applications were provided within 45 days of receipt of the application.

117. Make-ready costs apply if a survey has shown that spare capacity is not available, but that a telecommunications carrier's request for access can be accommodated by performing make-ready work. Make-ready work may include the clearing of obstructions and the rearrangement, transfer, replacement, removal or modification of Verizon-VA owned facilities.

118. Make-ready work is scheduled on a non-discriminatory basis for Verizon VA and for telecommunications carriers. Work authorization details are evaluated, and work is scheduled based upon factors such as job type, size, and due date, without regard to the requesting carrier's identity. Verizon VA uses the same employees and independent contractors to perform make-ready work for itself and requesting carriers. Under the terms of Verizon VA's labor agreements, make-ready work on fiber optic plant must be performed by Verizon VA union employees. Otherwise, make-ready work can be performed by Verizon VA employees or Verizon VA approved contractors working for Verizon. The requesting carrier is charged only for work necessary to prepare facilities for its attachments and occupancy.

119. Before modifying poles, ducts, conduits or rights-of-way that contain facilities of existing licensees, Verizon VA provides sixty days prior notice to the existing licensees.

120. During the period from July 2001 through January 2002, Verizon VA was able to use existing spare capacity to satisfy approximately 22% of applications for access to poles and conduits for the placement of telecommunications facilities, without the need for any make-ready work

121. From July 2001 through January, 2002, Verizon VA completed make-ready work for 89 applications within an average of 94 days. During the same period, Verizon VA completed its own make-ready work within an average of 217 days. Thus, Verizon VA provided applicants with better than parity service.

122. The final step in the process of obtaining access to Verizon VA's poles, ducts, conduits and rights-of-way is the installation of the requesting telecommunications carrier's facilities. This work can be done by the requesting carrier or its independent contractor. Work can begin when Verizon VA notifies the carrier that facilities are available or make-ready work is completed, and provides an approved license, permit or authorization.

123. From July 2001 through January 2002, Verizon VA provided 143 licenses for 1,762 pole attachments. During the same period, Verizon VA provided 28 licenses for access to 32,791 feet of conduit. Verizon VA has the ability to meet increased demand for access to poles, ducts, conduits and rights-of-way. Contract engineers may be used by the engineering services organization responsible for processing applications, if that is necessary to continue to meet demand on a timely basis. As of February 2002, a construction workforce of approximately 74 Outside Plant Technicians are available in Virginia, and 475 Cable Splicing Technicians are also available to perform transfer work. Additional technicians can be hired and trained within 60 days to meet long-term

increases in demand. In the event of an immediate need or a short-term spike in demand, contract forces can be used to complete this work on a timely basis.

CHECKLIST ITEM 4: LOCAL LOOP TRANSMISSION FROM THE CENTRAL OFFICE TO THE CUSTOMER'S PREMISES, UNBUNDLED FROM LOCAL SWITCHING AND OTHER SERVICES

A. Requirements for Unbundled Local Loops

124. Section 271(c)(2)(B)(iv) of the Act requires a Section 271 applicant to provide or offer to provide local loop transmission from the central office to the customer's premises, unbundled from local switching or other services.

125. Verizon VA provides local loops unbundled from local switching or other network elements using the same processes and procedures in Virginia, as are used in Pennsylvania, Massachusetts and New York. An unbundled local loop is a transmission path between a distribution frame (or its equivalent) in Verizon VA's central office and the loop demarcation point at the customer's premises.

126. In Pennsylvania, as in New York and Massachusetts, the FCC found that "Verizon has demonstrated that it provides unbundled local loops in accordance with the requirements of section 271 and our rules." *Pennsylvania Order* ¶ 76; *see also Massachusetts Order* ¶ 124. The FCC recently came to the same conclusion in its review of the Rhode Island 271 Application.

B. Verizon VA's Unbundled Loop Offerings

127. Verizon VA provides a full set of unbundled loops (analog and digital, 2-wire and 4-wire), which CLECs can use to offer a full range of services, such as basic exchange telephone service, Integrated Services Digital Network ("ISDN"),

Asymmetrical Digital Subscriber Line ("ADSL"), High-bit-rate Digital Subscriber Line ("HDSL"), 1.544 Mbps digital ("DS-1") transmission, and 45 Mbps digital ("DS-3") transmission. Verizon VA also provides for the provisioning of Line Sharing in accordance with the FCC requirements in its Line Sharing Order.[21]

128. In addition, Verizon VA provides CLECs the ability to engage in Line Splitting.[22] Line Splitting is an arrangement where CLECs, either on their own or in partnership with another CLEC, offer integrated voice and data over a single unbundled xDSL compatible loop, purchased from Verizon VA, and combine that loop with unbundled local switching and transport at the CLEC's collocation cage or the collocation cage of a third party CLEC.

129. Access to UNE loops is provided by cross-connects that run from the Verizon VA distribution frame to the CLEC's collocation arrangement. Unbundled loops and cross-connects are available from Verizon VA under interconnection agreements. *See* Attachment 202 ("Interconnection Agreement Matrix").

130. Through December 2001, Verizon VA had over 155,000 stand-alone loops in service and over 8,200 loops provided as part of UNE-P combinations that include switching and transport elements. In the last half of 2001, the volume of UNE-P combinations and stand-alone loops combined increased by over 180%.

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21 *See Deployment of Wireline Services Offering Advanced Telecommunications Capabilities and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, "Third Report and Order in CC Docket 98-147, Fourth Report and Order in CC Docket 96-98," 14 FCC Rcd 20912 (1999) ("*Line Sharing Order*").

22 *See Deployment of Wireline Services Offering Advanced Telecommunications Capabilities and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, "Third Report and Order on Reconsideration in CC Docket No. 98-147, Fourth Report and Order on Reconsideration in CC Docket No. 96-98" (rel. Jan. 19, 2001) ("*Line Sharing Reconsideration Order*").

C. UNE POTS Loops Provisioning Performance

131. Verizon VA's overall UNE Loop performance has been good. A review of the key measures traditionally used to describe provisioning performance illustrates that Verizon VA is providing excellent service to CLECs on UNE Loops. For example, Verizon VA has consistently exceeded the parity standard for PR-4-04 - "Percent Missed Appointments - Verizon - Dispatch New Loop", the bellwether metric to measure timeliness for UNE POTS. Verizon VA's average performance for this metric for November through January was .58% (missed appointments) compared to 8.60% (missed appointments) for retail. Verizon VA also provided good service as measured by PR-4-05 (Percent Missed Appointments - No Dispatch - Platform). From November through January, the wholesale rate was .19% (missed appointments) in comparison to a rate of .71% (missed appointments) for retail. *See* Measurements Declaration, Attachment 401.

132. The PR-6-01 metric (Percent Installation Troubles within 30 Days - UNE Loops) appears to be out of parity. Verizon VA, however, continues to install POTS loops with a high degree of quality. In November 2001 through January 2002, the PR-6-01 installation quality measure for UNE POTS loops was 4.42% as compared to 3.60% for retail. The lower retail percentage is attributed to the fact that the retail measure includes a high percentage of highly automated installations such as number changes and feature additions on an existing account. Such orders largely flow through Verizon's provisioning systems without human intervention. Conversely, the majority of UNE POTS loops ordered by CLEC customers are for new service installations requiring physical provisioning work such as central office cross connections and or field dispatch provisioning of loop facilities at the customer's location. When feature changes are removed from the calculation (thereby making an “apples-to-apples” comparison)

Verizon VA's performance for CLEC customers exceeds that of retail. *See Attachment 207 - VA Loop I-Code Retail Study.*

133. Thus, the most significant provisioning data demonstrates that Verizon VA provides nondiscriminatory service to the CLECs. In fact, in November 2001, Verizon's provisioning process for POTS loops received ISO 9000 certification from the International Organization for Standardization. In order to receive this prestigious certification, Verizon VA had to establish that it had a quality structure in place. This structure must be overseen by an executive management team, which ensures adherence to a measurable quality policy. In order to retain certification, Verizon VA must participate in surveillance audits every six months to demonstrate that they are maintaining their quality structure.

134. Verizon VA also provides maintenance and repair for UNE loops on a nondiscriminatory basis, consistently meeting or exceeding the parity standard for the majority of maintenance and repair performance metrics. For example, Verizon VA's performance in November 2001 through January 2002, as measured by MR-2-02 "Network Trouble Report Rate – Loop" (*i.e.,* outside plant troubles) was better than retail: .65% loop and .21% UNE-P compared with .77% retail. *See* Measurements Declaration, Attachment 401. The "Network Trouble Rate – Central Office" metric (MR-2-03) was negligible for UNE loop (.08%) and UNE-P (.02%) as well as for retail (.08%). *See* Measurements Declaration, Attachment 401.

135. Although the Carrier-to-Carrier Performance Reports track repair appointments separately for loop troubles found in the field and loop troubles found in the central office, the customer is interested in whether Verizon met the repair

appointment regardless of where the trouble is located. Verizon VA's performance in fixing POTS troubles when promised, as measured by the "Percentage Missed Repair Appointment" measures (MR-3-01 and MR-3-02) on a weighted average basis surpassed the retail parity standard for the November 2001 through January 2002 period (3.67% UNE Loop vs. 12.76% Retail). There were only 26 UNE-P troubles cleared to Verizon's network for the November 2001 through the January 2002 time period of which 23 were completed when promised (11.54%). *See* Measurements Declaration, Attachment 401.

136. A review of other maintenance and repair measures for the November 2001 through January 2002 time period demonstrates that Verizon VA provided timely POTS repair service to the CLECs in parity with retail service. Verizon VA's UNE POTS performance, as measured by "Mean Time to Repair Total" (MR-4-01), and "Percentage Cleared (all troubles) within 24 Hours" (MR-4-04) was better than retail for both UNE POTS loops and UNE-P in the November 2001 through January 2002 time period. For example, CLECs enjoyed a much shorter Mean Time To Repair (14.80 hours UNE POTS Loop and 15.31 hours UNE-P) than did Verizon VA retail customers (19.19 hours). *See* Measurements Declaration, Attachment 401.

137. Results for "Percent Out of Service > 24 Hours" (MR 4-08) were equally strong for the November 2001 through January 2002 time period. Only 8.85% of UNE POTS loops and 14.28% of UNE-P troubles were out of service over 24 hours, as compared to 23.19% of Verizon retail troubles. See Measurements Declaration, Attachment 401.

138. It appears that Verizon VA's repair quality performance in fixing POTS troubles as measured by "% Repeat Reports within 30 Days" (MR 5-01) was not in parity for the November 2001 through January 2002 time period. This is due to a number of issues that have been addressed by the New York Carrier Working Group and incorporated into the consensus changes adopted by the New York Public Service Commission in October 2001. *See* Case 97-C-0139 "Order Modifying Existing and Establishing Additional Inter-Carrier Service Quality Guidelines (issued October 29, 2001) (the "New York C2C Order."). Verizon has worked with the CLECs to resolve process issues that cause repeated reports and to work cooperatively to determine whether a CLEC loop is working after the repair is complete. Specifically, Verizon VA's repeat trouble report rates can be skewed by CLEC behavior since some repeat trouble reports are due to the failure of CLECs to correctly isolate the location of the trouble in the loop. CLECs are responsible for determining the nature of the trouble on the line and directing Verizon VA to dispatch into the central office or out to the field. If a CLEC dispatches Verizon VA in the wrong direction (misdirects), another report is required to clear the trouble and is counted as a repeat report. In addition, a second factor impacting the MR 5-01 metric is the "No Access" situation. A "No Access" situation occurs when a Verizon technician is dispatched to repair a trouble, and the CLEC or end user is not available to give the technician access to the facility to test the loop. The New York Carrier Working Group agreed that repeat reports that result from misdirects or no access should not be counted in the Carrier-to-Carrier ("C2C") reported metric. When the current New York rules are applied to Verizon VA's performance, the repeated report rate for UNE POTS loops is 12.97%, compared to 14.66% for retail customers. See

Attachment 208 - UNE POTS Repeat Study. The FCC recently found that the "revised metric [MR-5-01] will more accurately reflect Verizon's performance." *See Rhode Island Approval Order*¶ *85.*

139. Overall, these data show that Verizon VA makes its UNE POTS repair services available on a nondiscriminatory basis. Moreover, the systems, processes and methods by which Verizon maintains and repairs loops in Virginia were thoroughly tested by KPMG who found that Verizon VA had satisfied all of the evaluation criteria with respect to maintenance and repair service. *See KPMG Draft Final Report Verizon 1.0 Section VI.* Finally, in November 2001, Verizon's maintenance processes for POTS services received ISO 9000 certification.

D. Hot Cuts Performance

140. A CLEC may request that Verizon VA convert an existing retail local exchange service from Verizon VA dial tone to CLEC dial tone. This entails disconnecting the customer's existing service and re-connecting the loop via a cross-connect to the CLEC's facilities. This conversion of a live circuit is known as a "hot cut." So that service disruption to the end user is minimal, Verizon VA coordinates the scheduled conversion time with the requesting carrier well in advance of the due date. Verizon VA uses the same methods and procedures to perform hot cuts as are used in Pennsylvania, Massachusetts and New York.

141. Verizon's hot cut methods and procedures have been reviewed in great detail and found to be satisfactory by the Massachusetts Department of Telecommunications and Energy, the New York Public Service Commission, The Pennsylvania Public Utility Commission and the FCC. Moreover, KPMG found that

Verizon VA had satisfied all the evaluation criteria with respect to the hot cut process. *See VA KPMG Draft Final Report Version 1.0 test points PPR-11-1 through PPR-11-7* In addition, in November 2000, Verizon's hot cut process received ISO 9000 certification. The process was recertified in May 2001 and again in November 2001.

142. Verizon's hot cut performance in Virginia is excellent. Verizon VA is delivering hot cut loops on time, as reflected in Verizon VA's performance in metric PR-9-01 - "% on time performance - hot cut". Verizon VA completed 97.94% of hot cut orders on time November 2001 through January 2002, which far exceeds the 95% "on time" benchmark. *See* Measurements Declaration, Attachment 401.

143. Likewise, Verizon VA is delivering quality hot cut loops. Although, the Virginia Carrier-to-Carrier report does not report installation troubles separately for hot cuts, Verizon VA has calculated its hot cut installation quality performance under the New York Guidelines, and those calculations show that Verizon's hot cut installation quality performance is excellent. During November through January, only .03% of CLEC hot cuts had reported troubles within 7 days of installation. *See Attachment 209* "VA Hot Cut I-Code Performance."

144. During the November 2001 through January 2002 period, the Hot Cut interval metrics, PR-1-01, and PR-2-01, appear to be out of parity. Verizon VA's performance on these measures is not, however, indicative of any discriminatory conduct. Rather, these performance scores highlight a current flaw in the metric definitions. Hot cuts are a manual process that requires physical work and coordination with the CLECs. The standard interval for hot cuts is 5 days for orders of 1-10 lines, 10 days for orders of 11-20 lines, and negotiated for orders of 21 lines or more. The retail parity standard used

in Virginia is completely inappropriate because it includes orders for services, such as feature changes, that do not require physical work and can be provisioned in much shorter intervals. For these reasons, the Carrier Working Group in New York has recognized that the PR-1-01 and PR-2-01 measures are not good measures of Verizon's hot cut performance. On October 29, 2001, the New York Commission adopted recommendations from the Carrier Working Group to make changes to these measures. Effective November 1, 2001, PR-1-01 for hot cuts was eliminated and the entire PR-2 family of submetrics was eliminated. *See* New York C2C Order. In order to capture more accurately Verizon's hot cut performance, the Commission added hot cuts to the products reported under the PR-3-08. This metric measures the percent of orders completed within 5 days, which is the standard interval for a hot cut. The standard for the PR-3-08 is 95%. Verizon VA is confident that it will be able to satisfy this measure once it is introduced in Virginia.

E. Digital Loops

145. Verizon VA provides the same digital loop offerings as its sister companies in Pennsylvania, Massachusetts, New York and Connecticut. The term "xDSL" describes an array of transmission technologies that use specialized electronics at the customer's premises and at a telephone company's central office (or other company facility) to transmit high-speed data signals over copper cables. Thus, xDSL does not refer to any particular *service*, but to a family of *technologies* that can be used to provision a wide variety of services. 2-wire xDSL generally requires a loop with a length of no more than 18,000 feet of copper without interferers, such as load coils, and minimal bridged taps. At the CLEC's request, Verizon VA will condition a loop (*e.g.*, eliminate interferers) in order to accommodate digital technology. Verizon VA provides CLECs

with a package of standardized pricing, terms and options for conditioning loops. These include the removal of bridged taps or load coils on copper loops and the addition of electronics that extend the effective range of ISDN/xDSL on longer loops.

146. Verizon's National Market Center ("NMC") has established a xDSL/Line Sharing center in Chesapeake, Virginia that is exclusively devoted to provisioning orders for line sharing and unbundled xDSL loops. This Center is responsible for processing all of the xDSL / Line Sharing orders from Virginia. *See* OSS Declaration.

147. Verizon VA provides nondiscriminatory access in provisioning unbundled digital loops. KPMG confirmed this fact in its draft report where it stated: "Verizon VA provisioned 100% of the 145 circuits on the agreed upon due date, where facilities were available." *See VA KPMG Draft Final Report Version 1.0 test point TVV-4-7*.

1. **Pre-Ordering**

148. Verizon provides CLECs that offer DSL services with access to the same pre-order loop information in Virginia as it does in New York, Massachusetts, and Pennsylvania, and which the FCC previously concluded satisfies the requirements of the competitive checklist. *See, e.g., New York 271 Order* ¶¶ 140-143; *Massachusetts 271 Order* ¶¶ 54-69; *Pennsylvania 271 Order* ¶¶ 45-47. Attachment 305 to the OSS Declaration describes the interfaces, underlying OSS, and loop information provided to CLECs offering DSL services in more detail. The same information is available to Verizon Advanced Data, Inc., the Verizon entity that provides xDSL service.[23] VADI pays the same prices for telecommunications services and facilities as other CLECs pay.

[23] In December 2001, VADI was integrated into the Core Company in Virginia. As discussed above, the reintegrated VADI continues to use the same external OSS that the CLECs use.

149. In addition, as part of the October 2001 OSS software release, Verizon implemented a new pre-order transaction, xDSL Loop Qualification – Extended (“LXE”), that enables CLECs to request a “manual” loop qualification using their existing pre-ordering interface (either the Web GUI, EDI, or CORBA). As a result, CLECs no longer need to submit a Local Service Request ("LSR") form to request a manual loop qualification, although they may do so if they choose. The specific details for this transaction were provided to the CLECs through the Change Management process. A copy of the initial description of the transaction is attached to the OSS Declaration. *See also Massachusetts Order* ¶¶ 58, 62. Through December 2001, Verizon has received approximately 250 LXE transactions across all former Bell Atlantic service areas, 36 of which were for Virginia.

150. As part of the October release, Verizon also implemented a long-term arrangement for obtaining access to the limited loop make-up information currently in the Loop Facilities Assignment and Control System (“LFACS”). This transaction is called Loop Make-Up (“LMU”). The specific details for this transaction were provided to the CLECs through the Change Management process. A copy of the initial description of the transaction is attached to the OSS Declaration. CLECs can obtain access to the loop make-up information in LFACS using any of the three pre-ordering interfaces – EDI, CORBA, or the Web GUI. CLECs can submit requests using either the working telephone number or the service address. As Verizon has explained to the CLECs in the New York DSL collaborative, the percentage of terminals for which LFACS contains at least one loop make-up (not the percentage of loops for which LFACS contains loop make-up information nor the percentage of serving terminals that contain a complete loop

make-up from the central office to the customer address) is less than 10% percent in Virginia. This is because the inventory of loops contained in LFACS are primarily expected to meet voice grade requirements, while loop make-ups were prepared only for those loops that were designed as special circuits, which are only a small portion of the base. Verizon has also explained that, at the terminal level, the loop make-up represents the make-up of a single loop and does not necessarily represent the characteristics of any other loops in that terminal. Through November, Verizon has received approximately 250 LMU transactions across all former Bell Atlantic service areas, with approximately 40 in Virginia.

151. The Carrier-to-Carrier Guidelines include three performance measures to track Verizon's performance in providing loop qualification information to CLECs. The first measures the time it takes to respond to electronic pre-order loop pre-qualification requests. This measure is referred to as PO-1-06. In November, December and January, Verizon has bettered the Carrier-to-Carrier standards in Virginia. The standard is parity plus four (4) seconds. For these three months, Verizon VA retail response time averaged, roughly 13 seconds compared to 4 seconds for CLECs. *See* Measurements Declaration, Attachment 401.

152. The second measure tracks the time it takes to respond to a request for manual loop qualification. The standard interval for providing such manual loop qualifications and returning the confirmation is 48 hours. This measure is referred to as PO-8-01. The measure is designed to track electronically received pre-ordering requests for manual loop qualification. As is the case in New York, Massachusetts, and Pennsylvania, however, Verizon did not have a pre-order transaction for manual loop

qualification until the LXE transaction described above was implemented in October 2001. Verizon VA began reporting this metric with the January 2002 Report month. In January 2002 there were two (2) transaction requests, both performed within standard.

153. The third measure (PO-8-02) tracks the time it takes to respond to Engineering Queries. Verizon received no Engineering Queries from CLECs in November, December, and January in Virginia. *See* Measurements Declaration, Attachment 401.

2. **Ordering**

154. As explained in Attachment 304 to the OSS Declaration, throughout the former Bell Atlantic footprint, Verizon provides two ordering interfaces – the EDI interface and the Web GUI. As with pre-order, CLECs and VADI use the same interfaces and underlying OSS to order line sharing (and unbundled DSL loops) in Virginia.

155. Both CLECs and VADI can submit their LSRs for line sharing either through the Web GUI or the EDI interface. VADI primarily uses EDI to submit its orders. Verizon receives service requests from CLECs and VADI over the same interfaces, and the systems and processes used for ordering line sharing by CLECs and VADI are the same. The ordering transactions for line sharing are processed first in, first out regardless of whether VADI or a CLEC submits the transaction, since the interfaces and systems are designed to handle all similar transactions in a similar manner regardless of the provider.

156. The C2C Guidelines include several separate measures of ordering timeliness. These measures include the timeliness of returning LSRCs and access service request confirmations ("ASRCs"), commonly referred to as Firm Order Confirmations ("FOCs"), and they also include timeliness of reject notices. In Virginia for the November through January period, Verizon VA's performance in returning order confirmations (OR-1-04) and reject notices (OR-2-04) on xDSL loops requiring loop qualification was excellent. The standard for each of these measurements is 95% within 72 hours. For OR-1-04, the results are 99.09% for November, 98.76% for December, and 99.59% for January. For OR-2-04, the results are 97.25%% for November, and 100% for December and January. *See* Measurements Declaration, Attachment 403.

3. **Provisioning and Maintenance Performance**

157. Verizon VA's sister company in New York is continuing to work collaboratively with the CLECs regarding the provisioning of xDSL loops. Verizon VA is already providing data competitors in Virginia with access to the same methods and system improvements that it has developed in the New York DSL Collaborative. *New York Approval Order* ¶ 317. These include the implementation of CLEC training programs, procedures for pair swaps, a "no access" management and coordination process, and a cooperative testing process. Verizon VA will implement any additional operational changes agreed to by the Verizon NY DSL Collaborative, subject to any changes by this Commission.

158. Verizon VA has proven that it can handle commercial volumes of xDSL loops. As of the end of December 2001, Verizon VA was providing 16,310 xDSL loops

to CLECs. Verizon VA completed 1779 orders over the period November through January.

159. Verizon uses the same methods and procedures to provision xDSL service in Virginia as it does in Massachusetts, New York, and Pennsylvania. When Verizon VA installs an xDSL loop, Verizon VA is prepared to cooperatively test that loop with the CLEC to verify continuity and ensure that the loop meets the requirements as communicated in Verizon's Technical Requirements documents for digital loops. Cooperative testing is a standard part of Verizon VA's provisioning process. In order to request cooperative testing, a CLEC enters a toll-free (*e.g.,* 800) number in the Remarks field of the xDSL loop order. Upon completion of the xDSL loop installation, Verizon VA will call the number listed on the order. If the loop tests appropriately, the CLEC will give Verizon VA a serial number to indicate acceptance of the working loop.

160. On average, Verizon VA's on time provisioning performance for xDSL loops has been excellent. For the November through January period, Verizon VA completed 98.62% of CLEC xDSL orders where facilities were available on time (PR-4-04 - % Missed Appointments - VZ Dispatch). *See* Measurements Declaration, Attachment 403**.**

161. The PR-4-14 measure - "% Completed on Time" - is an additional on-time performance measure for DSL Loops. If the CLEC ordering a loop participates in Cooperative Testing, Verizon VA must obtain a serial number from the CLEC, which indicates that the CLEC has received a good loop before the loop is considered on time for this metric. During November through January, Verizon VA completed 98.03% of xDSL Loop orders on time and with a serial number.

The bellwether measure to determine the quality of DSL provisioning is PR-6-01 - "Percent Installation Troubles Within 30 Days of Installation". When compared to the retail POTS dispatchable installation troubles, Verizon VA is provisioning DSL loops above parity. From November through January , the retail POTS dispatch Installation Code (I-Code) rate was 5.87%, while DSL loops experienced an I-Code rate of only 1.50%. *See* Measurements Declaration, Attachment 403**.**

162. As for maintenance and repair services, a review of Verizon VA's performance on these measures for the November 2001 through January 2002 time period indicates that Verizon VA has generally provided very good service for maintenance and repair for xDSL loops in virtually every category. *See* Measurements Declaration, Attachment 403. Missed Repair Appointments on a three-month weighted average basis (MR-3-01 and MR-3-02) were 8.22% for UNE xDSL and 21.15% for retail. On average, Verizon VA fixed CLEC loop troubles (MR-4-02) in 24.41 hours, while retail troubles were fixed in 31.41 hours. UNE xDSL troubles found in the Central Office (MR-4-03) also were fixed sooner than retail (13.42 hours UNE vs. 20.15 hours retail). Verizon VA fixes CLEC xDSL troubles when promised, and within a shorter time span than it does its own retail troubles, thus providing CLECs with excellent service.

163. Finally, the Trouble Report Rate on a weighted average basis (MR-2-02 and MR-2-03) for UNE xDSL loops was .43% and retail was .18% from November 2001 through January 2002. The fact that less than one half of one percent of all unbundled xDSL loops provisioned by Verizon VA experienced a trouble during this three month period indicates that Verizon VA is providing high quality xDSL loops. *See* Measurements Declaration, Attachment 403. The higher trouble rate for CLECs reflects

the fact that troubles included in the retail compare group for unbundled xDSL loops (*i.e.*, line sharing provided by VADI) do not include troubles that also affect Verizon VA's voice service because such "loop" troubles are reported and "scored" as retail POTS voice troubles rather than VADI line share troubles. In contrast, troubles reported on CLEC xDSL loops include all troubles. Moreover, the New York Carrier Working Group has agreed to change the retail standard for these measures to retail POTS and, against that standard, the trouble report rate for xDSL loops is in parity with retail (.43% for UNE xDSL compared to .85% for retail POTS). *See* Measurements Declaration, Attachment 403. The FCC has recently found that "retail POTS service appears to be a more probative comparison in this context." *See Rhode Island Approval Order* ¶ *79*.

4. **Line Sharing**

164. Verizon VA offers line sharing in Virginia in accordance with the FCC's requirements in its *Line Sharing Order*. Consistent with the FCC's Order, Verizon VA offers requesting carriers unbundled access to the high frequency portion of those loops on which Verizon VA provides the voice service to end users. Line sharing is available from Verizon VA under its interconnection agreements.

165. Verizon VA uses the same methods and procedures for provisioning line-sharing orders in Virginia as are used by Verizon PA. The FCC found that Verizon PA satisfied its line sharing obligations. *Pennsylvania Approval Order* ¶ 165.

166. The line sharing methods and procedures were developed with input from CLECs both in the general New York DSL Collaborative, discussed above, and in a New York line sharing pilot conducted jointly with several CLECs. Upon release of the FCC *Line Sharing Order*, the New York DSL Collaborative turned its attention to developing

methods and procedures for line sharing. Verizon agreed that any consensus decisions reached in the line-sharing portion of the collaborative would apply across the former Bell Atlantic footprint, subject to any state-specific requirements imposed by state commissions and OSS limitations. As a part of the collaborative, Verizon worked cooperatively with CLECs to identify and resolve technical and operational issues associated with line sharing.

167. Verizon VA has developed a working set of methods and procedures for ordering and provisioning line sharing. As with all methods and procedures, Verizon VA will continue to update these to reflect any modifications based on actual experience.

168. Like Verizon PA, Verizon VA offers CLECs a choice of two line sharing arrangements. One arrangement, known as Option A, provides CLECs with the ability to install, own and maintain the splitter in the CLEC's own collocation arrangement. (The splitter separates the data-carrying, high frequency portion of the loop, from the voice-carrying, low frequency portion of the loop.) The second arrangement, Option C, allows a CLEC-owned splitter to be installed and maintained by Verizon VA in Verizon VA's central office space.

169. Before submitting orders for line sharing, a CLEC must be collocated in a Verizon VA central office. A CLEC that does not have an existing collocation arrangement in the central office in which it wants to use line sharing must submit an initial collocation application. Even if the CLEC has an existing collocation arrangement, it still may need this arrangement modified or augmented to accommodate line sharing.

170. Verizon VA also has offered to provide CLECs with several options for testing of line sharing arrangements. Where the splitter is in the CLEC's collocation arrangement, a CLEC has full access to the splitter and the entire loop, and may conduct physical tests of the shared loop. Where the splitter is in Verizon VA's space, Verizon VA will install a CLEC-provided test head that will permit the CLEC to access the loop remotely for physical testing purposes. If the CLEC elects not to have a test head installed, the CLEC has access to the high frequency portion of the loop through a cross connect to the CLEC's collocation arrangement. In this situation, the CLEC will also have access to test the low frequency portion of the loop through metallic loop test ("MLT") access. In those situations where the CLEC has attempted to use the available testing options, but is still unable to resolve the error or trouble on the shared loop, Verizon VA will conduct a cooperative test on the circuit with the CLEC. If further action is necessary, Verizon VA and the CLEC will each dispatch a technician to an agreed-upon point to conduct a joint test to identify and resolve the trouble.

171. Line sharing is also available to CLECs that seek to serve customers whose lines are partially fiber and are served by digital loop carrier ("DLC") systems. Loops equipped with DLC are fiber between the central office and the remote terminal, and copper from the remote terminal to the customer's premises. In order to provide DSL service, a copper-based technology, in a line sharing arrangement to customers served by DLC, the CLEC must obtain access to the copper distribution sub-loop portion (*i.e.*, the final leg) of the loop. CLECs seeking to serve customers with DLC on their lines have three provisioning options available to them.

172. First, as noted below, pursuant to Verizon's unbundled sub-loop offering, a CLEC may collocate either in or adjacent to the remote terminal and interconnect at the feeder distribution interface to obtain access to the copper distribution portion of the loop. At that point, the CLEC may place its data signal on top of Verizon's voice signal in a line sharing arrangement to serve the customer. To transport its data signal back to the central office from the remote terminal, the CLEC can purchase unbundled dark fiber, where available, between the remote terminal and the central office to equip that fiber with its own electronics. The second option is like the first one except that the CLEC can purchase, from Verizon, a high speed transmission path (*i.e.*, a DS-1 or DS-3 feeder facility) as either an unbundled network element or a service between the CLEC's remotely collocated DSLAM (Digital Subscriber Line Access Multiplexer) and the central office to transport its data signal between these two points.

173. Third, Verizon has agreed to provide CLECs with "line and station transfers" pursuant to which Verizon will move or switch a customer whose line is equipped with DLC to a full (*i.e.*, from the central office to the customer's premises) copper loop, provided that such a loop is available and that the length of the full copper loop would not result in a significant degradation of the voice service, thereby enabling the CLEC to provision its DSL service over the entire length of the loop.

174. A review of the November through January Virginia line sharing data indicates that Verizon VA continues to provide good line sharing service. The average completion interval - non-dispatch (PR-2-01) for CLECs was 2.87 days and the corresponding results for service provided to VADI was 2.56 days.

175. Verizon VA is completing over 99% of line sharing orders on time. The metric for "Percentage Missed Appointments – No Dispatch" (PR-4-05) was .52% for CLECs and .50% for VADI orders during November, December, and January.

176. Verizon VA provisions line-sharing orders with a high degree of quality. The Percentage of Installation Troubles within 30 days (PR-6-01) was negligible for both CLECs and VADI; 0.97%, and 0.51% for VADI.

177. A review of the Verizon VA Line Sharing maintenance results demonstrates that maintenance activities are conducted on a nondiscriminatory basis. The CLEC network trouble report rate (MR-2-02, 2-03) was 0.14% versus 0.18% for VADI. The mean time to repair on a weighted average (MR-4-02, 4-03) was 17.75 hours for CLECs compared to 26.44 hours for VADI. Percent Missed Repair Appointments on a weighted average basis (MR 3-01,MR 3-02) was 6.67% for CLECs and 21.15% for VADI. Verizon VA's quality performance in fixing CLEC Line Share troubles as measured by "% Repeat Reports within 30 Days" (MR 5-01) was in parity for the November 2001 through January 2002 time period. All these metrics meet the objective of "parity with VADI."

5. **Line Splitting**

178. Verizon is permitting CLECs to engage in line splitting in a manner consistent with the FCC's Orders, and the FCC has already found in Pennsylvania that Verizon makes it possible for CLECs to engage in line splitting. *Pennsylvania Approval Order* ¶ 76. CLECs in Virginia can offer voice and data over a single loop in a line splitting arrangement in the same manner that is available to CLECs in Pennsylvania. CLECs seeking to offer voice and data over a single loop may do so by purchasing an

unbundled xDSL-capable loop and unbundled switching combined with transport terminated to an appropriate collocation arrangement and connected to a CLEC-provided splitter and DSLAM equipment. With this line splitting arrangement, a CLEC can provide both the voice and data service itself or it can partner with another CLEC. The unbundled network elements that comprise this line splitting arrangement are currently available from Verizon VA.

179. Using these existing unbundled network element offerings, CLECs have several options available to them to provide integrated voice and data services in a line splitting arrangement. None of these options is specific to line splitting, and all of them are available today through Verizon VA's existing offerings. First, if a CLEC wants to engage in line splitting to serve a customer that does not have a pre-existing voice or data account with any carrier, the CLEC can order a new unbundled DSL-capable loop and a new unbundled local switching port, combined with transport, terminated to an appropriate collocation arrangement. Once these network elements are at the collocation arrangement, the CLEC can combine them with its splitter to provide an integrated voice and data service to its end user. If a CLEC wants to use its own switching capability, it does not need to order unbundled switching from Verizon VA.

180. Second, if CLECs want to engage in line splitting to serve an end user that already has voice service, the CLECs can again order a new unbundled xDSL-capable loop and unbundled switching element, and configure those elements in a line splitting arrangement as described above. Once that arrangement is in place, the CLECs can issue an order to disconnect the end user's pre-existing voice service.

181. Third, if a CLEC serving an end user through the UNE platform wants to engage in line splitting, the CLEC can enter into a line splitting arrangement that re-uses the unbundled loop and switch port elements that were a part of the pre-existing platform arrangement. To do so, the CLEC must initiate a local service request ("LSR") for a conversion from a loop, assuming it is xDSL capable, and port combination to an individual loop and port. On this LSR, the CLEC completes the service-specific forms for unbundled loop and switching facilities. Upon receipt of such a LSR, Verizon issues the necessary internal service orders to perform the following activities in the following order: (1) disconnect the existing UNE-P service; (2) connect the port to the appropriate collocation arrangement; and (3) connect the loop to the appropriate collocation arrangement. The "rearrangement" to move the loop and the port to the appropriate collocation arrangement is an entirely manual process, which will not result in a seamless migration and may cause some minimal service disruption. Verizon can coordinate the activities in the third scenario to enable a UNE-P CLEC to re-use the unbundled loop, assuming it is xDSL capable and unbundled switching in a line splitting arrangement today.

182. Verizon has sent CLECs an Industry Letter detailing its line splitting policy, which is consistent with the discussion outlined above. *See* http://www.bellatlantic.com/wholesale/html/clec_01/02_14.htm. In addition, Verizon has incorporated line splitting contract language in its Model Facilities Based Contract interconnection agreement. CLECs may contact their account manager to have contract language reflecting this policy incorporated into their existing interconnection agreements.

183. In addition, Verizon has developed line splitting-specific OSS capabilities that can be used to facilitate migrations from a UNE-P arrangement to a line splitting arrangement based on the business scenarios defined as part of the New York DSL Collaborative.

184. Verizon worked with CLECs in the New York DSL Collaborative to define the business relationships, rules and practices that provide the requirements for development of OSS capabilities for line splitting. Unlike line sharing, the line splitting arrangement allows Verizon to control neither the voice nor data portion of the loop. Therefore, issues concerning relationships and practices between the voice and data CLECs and Verizon needed to be defined in, and agreed to by, the New York DSL Collaborative before system requirements and subsequent development and implementation in Verizon's OSS could be accomplished. Under these new OSS capabilities, voice and data CLECs can submit newly developed line splitting orders that support the business scenarios defined by the DSL Collaborative.

185. These OSS capabilities allow data to be added to the loop associated with an existing UNE platform. Under this arrangement, the same network elements associated with the UNE-P would be reused, including the loop, if it is DSL-capable. These OSS capabilities also support transitions from line sharing to line splitting, consistent with the business processes defined in, and agreed to by, the DSL Collaborative.

186. Verizon VA is capable of handling commercial volumes of line splitting. The FCC has already concluded that Verizon can handle UNE combinations, and that line

splitting can be achieved today through the combination of UNEs. *See Pennsylvania Approval Order* ¶ 52.

F. Unbundled Sub-Loops

187. The FCC found that Verizon PA is providing CLECs with access to unbundled sub-loops. *Pennsylvania Approval Order* ¶ 76. The same is true for Virginia. Sub-loops are portions of the loop that runs between the Main Distributing Frame ("MDF") in Verizon's central office up to and including the Network Interface Device ("NID") and/or Rate Demarcation Point ("RDP") at the end user's premises. The portion of the loop that extends between Verizon VA's central office and a Verizon VA Remote Terminal / Feeder Distribution Interface ("FDI") is referred to as the feeder sub-loop. The portions of the loop that runs from Verizon VA's FDI, up to and including the NID/RDP at an end users premises, are referred to as distribution sub-loops. Verizon VA's unbundled feeder offering provides CLECs with access to feeder facilities at DS1 and DS3 levels. Verizon VA's unbundled distribution sub-loop product offering provides CLECs with access to the copper distribution sub-loop at Verizon VA's FDI, where the feeder sub-loop and the distribution sub-loop interconnect with each other. DSL service providers, including VADI, can use these sub-loop UNEs to reach end users served by loops that are equipped with fiber feeder.

188. Verizon's feeder and distribution sub-loop offerings are available in Virginia under interconnection agreements. In order to gain access to Verizon VA's distribution facilities a CLEC must establish a presence near the FDI through the creation of a Telecommunications Carrier Outside Plant Interconnection Cabinet ("TOPIC"). The TOPIC is provided by the CLEC on CLEC-secured right-of-way or easement, and the CLEC can tailor the TOPIC's design and size to meet its specific needs.

189. As of the end of December 2001, Verizon VA had entered into 57 interconnection agreements for its distribution sub-loop offering.

190. Verizon VA's standardized sub-loop offerings also include access to the house and riser cable ("HARC"), where Verizon VA owns and maintains the HARC. Verizon VA will provide HARC to CLECs on a Time and Material ("T&M") basis, for installation and for maintenance and repair. For CLECs that deploy their own loop facilities, Verizon VA also offers access to its stand-alone NID. Any NID deployed on an unbundled loop or distribution sub-loop is provided as part of the product.

191. Upon request, Verizon VA will provide access to other portions of the loop at other technically feasible points and, if demand materializes, will develop a standardized offering.

G. High Capacity Loops

192. Verizon VA offers access to unbundled high capacity loops, including DS-1s, DS-3s and other specially designed digital loops in the same manner as in Verizon NY, Verizon MA, and Verizon PA. These complex loops are available in Virginia under interconnection agreements. Verizon VA has provided over 1,000 Unbundled High Capacity Loops as of the end of 2001.

193. Verizon VA meets its unbundling obligations by providing high capacity loops where facilities are already available. Verizon VA also goes beyond its unbundling obligations to provide high capacity loops in certain situations where not all of the necessary facilities are available. See Attachment 210 - Industry Letter on High Capacity Loops.

194. Where there are already high capacity loop facilities in use servicing customer, Verizon VA will migrate those facilities to fill a CLEC order for an unbundled

high capacity loop. In these cases, Verizon VA will cross-connect the high capacity loop to the CLECs collocation arrangement in the central office where that high capacity loop terminates.

195. In addition, Verizon VA will fill a CLEC order for an unbundled high capacity loop where the central office equipment and the equipment at the end user's location necessary to create a high capacity loop can be accessed. This means that Verizon VA will install the appropriate high capacity card in the spare slots or ports of the equipment and perform cross connection work between the common equipment and the wire of fiber facility between the central office and the customer premises. Verizon VA will also correct conditions on an existing copper facility that could affect transmission characteristics. In addition, Verizon VA will terminate the high capacity loop in the appropriate network interface device at the customer premises, such as a Smart Jack or a Digital Cross Connect ("DSX").

196. Overall, Verizon's ordering performance results for High Capacity Loops in Virginia was good over the period November 2001 through January 2002. While volumes have been very low, Verizon VA's results for returning order confirmation notices within 72 hours of receiving an ASR that required a facilities check (OR-1-06) – "% On Time LSRC greater than or equal to six (6) Lines non-DS0, -DS1 and -DS3 - Electronic" was 100.0%. *See* Measurements Declaration, Attachment 401. These performance results are outstanding for designed circuits that require a facility check given that Verizon's experience in provisioning High Capacity Loops (and similar designed retail and wholesale special circuits) across the various state jurisdictions indicates that the current 72 hour standard for returning an order confirmation is

insufficient to complete a comprehensive facility check and issue an order confirmation. As a result, Verizon intends to propose a standard to the New York Carrier Working Group that more accurately reflects the volume of work required to complete a facility check and return an order confirmation.

197. Verizon VA's results for issuing reject notices to CLECs for Special Service UNEs appears out of parity. From November through January, Verizon VA, on average, returned rejections within standard (95% within 48 hours) 75% of the time. When Verizon receives an order, it must do a facilities check for these High Capacity Loops. Given this requirement, the ordering confirmation metric (discussed in the preceding paragraph) allows for 72 hours, however, the reject confirmation metric, where the same facilities check is required, mandates rejection in 48 hours. Given this unrealistic standard, Verizon's results have been excellent.

198. Verizon VA's on time performance results for high capacity loops was excellent. The metric to measure on time performance for Specials is Percent Missed Appointments - Total Specials (PR-4-01). Verizon VA averaged 5.75% missed appointments for the November through January period, while retail averaged 11.43%.

199. The PR 6-01 measure ("% Installation Troubles within 30 Days") appeared to be out of parity for UNE Specials in November and December. However, there are two reasons the retail comparison for this measure does not present an accurate assessment of parity performance. First, UNE Specials are comprised of DS1 and DS3 level products only. These complex services are compared to an aggregate of Retail Special Services which is comprised primarily (87%) of DS0 level products. *See*

Attachment 211 - "PR-6-01 Retail Specials Product Mix". These DS0 level products are far less complex to provision. This difference in the product mix of UNE Specials versus Retail Specials results in an unfair comparison on this measure. Second, a review of retail trouble tickets reveals that there were a significant number of tickets that were received within 30 days of a retail special circuit installation, but due to an old process were incorrectly coded as informational tickets. These troubles were excluded from the PR-6-01 metrics. When these tickets are correctly captured as installation troubles for retail DS1 and DS3 orders, the retail installation trouble report rate increases**.** Even with these flaws, the PR-6-01 metric was in parity for UNE Specials in January 2002

200. Maintenance and Repair results for high capacity loops are not disaggregated from other Special Services such as Interoffice Facilities ("IOF"). Overall, the results confirm that Verizon VA is providing CLECs with a high level of service. During November 2001 through January 2002, the trouble report rate on high capacity loops and interoffice facilities provided to CLECs was 1.93%. This means that over 98 percent of high capacity loops do not experience any troubles in a given month. Over the period November 2001 through January 2002, the "UNE Special Services Mean Time to Repair" (MR-4-01) on a weighted average basis was 9.31 hours versus 5.19 hours for retail. *See* Measurements Declaration, Attachments 401 and 404. While this appears to be out of parity, the UNE results are skewed by December results. In December, three (3) UNE circuits known to have a wiring problem between Verizon VA and a CLEC were accepted and closed before the problem could be investigated and cleared. The lengthy repair tickets required to resolve the problem added almost six (6) hours to the mean time to repair in December. Without this incident, the overall mean time to repair

for UNE high capacity loops would have been 6.74 hours, less than two hours longer than retail. *See* Measurements Declaration, Attachments 401 and 404.

H. Enhanced Extended Loops ("EELs")

201. An EEL is an arrangement that enables a CLEC to use combinations of unbundled loops and unbundled dedicated interoffice transport, including multiplexers, to provide local exchange service to an end user, in compliance with the FCC's orders. The loop unbundled network element component of an EEL includes two-wire analog and digital loop offerings, four-wire analog loops, four-wire digital 56 kbps loops, and high capacity DS1 and DS3 loops. In Pennsylvania, the FCC held that Verizon is in compliance with the FCC's EEL requirements. *See Pennsylvania Order* ¶ *381*. The same is true in Virginia.

202. The FCC's *UNE Remand Order*, as modified by the *Supplemental* and *Clarification Orders*, requires ILECs to provide CLECs with access to existing EEL combinations provided the carrier uses the combination "to provide a significant amount of local exchange service, in addition to exchange access, to a particular customer." *Supplemental Order* ¶ 2; *Clarification Order* ¶¶ 21-22. A CLEC is restricted from converting its special access services to EEL unless it meets those provisions.

203. The FCC identified three separate options for what constitutes "significant" amounts of local exchange service. The first option requires that the CLEC be the exclusive provider of the end user's local service. This option requires that the CLEC connect the EEL combination to collocation facilities in at least one ILEC central office. The second option requires that the CLEC be providing at least one-third of the end user's local traffic measured in dial tone lines delivered to the end user's premises. Further, for DS1 circuits and above, at least 50 percent of the activated channels on the

loop portion of the EEL combination have at least five percent local voice traffic individually, and the entire loop facility has at least ten percent local voice traffic. When the EEL includes multiplexing (*e.g.*, DS1 multiplexed to DS3 level), each of the individual DS1 circuits must meet these criteria. This test also requires that the CLEC connect the EEL combination to collocation facilities in at least one ILEC central office.

204. The third option requires: (1) that at least 50 percent of the activated channels on a circuit be used to provide originating and terminating local dial-tone service, (2) that at least 50 percent of the traffic on each of those local dial tone channels consists of local voice traffic, and (3) that the entire loop facility carries at least 33 percent local voice traffic. Collocation is not required for the third option.

205. Finally, even where there is a significant amount of local traffic, the FCC prohibits carriers from "commingling," *i.e.*, "combining loops or loop-transport combinations with tariffed special access services." (*Clarification Order* ¶ 22)

206. The FCC has stated that it will be addressing EELs issues as part of its Triennial Review. *See* CC Docket Nos. 01-339, 96-98, and 98-147, *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; and Deployment of Wireline Services Offering Advanced Telecommunications Capability* "Notice of Proposed Rulemaking" (rel. December 20, 2001) ("Triennial Review"), ¶¶70-71. Accordingly, existing service arrangements involving loop and dedicated transport combinations are not eligible for conversion to an EEL configuration unless they meet the significant use restrictions discussed above.

207. Verizon VA has published procedures on its web site for converting existing special access arrangements into EEL arrangements if a CLEC certifies that such arrangements provide significant local exchange service to an end user in accordance with the requirements of the FCC's *UNE Remand Order* and subsequent orders. These procedures may be found at the following web addresses.

Conversion Guidelines:

http://128.11.40.241/east/wholesale/html/pdfs/sa_conv_guide_final.pdf

CLEC Certification:

http://128.11.40.241/east/wholesale/customer_docs/master.htm

(must choose Supplementary Documentation, and then choose the bullet "Certification of Local Use Options -Form")

Data template for circuit information required to process conversion requests:

http://128.11.40.241/east/wholesale/customer_docs/master.htm

(must choose Supplementary Documentation, and then choose the bullet "Conversion Circuit Data Template").

CHECKLIST ITEM 5: LOCAL TRANSPORT FROM THE TRUNK SIDE OF A WIRELINE LOCAL EXCHANGE CARRIER SWITCH UNBUNDLED FROM SWITCHING OR OTHER SERVICES

A. Requirements For Access to Local Transport

208. Section 271(c)(2)(B)(v) of the Act requires a Section 271 applicant to provide or offer to provide local transport from the trunk side of a switch unbundled from switching or other services. The FCC's Local Competition Order further requires that an incumbent LEC:

a) provide unbundled access to dedicated transmission facilities between its central offices or between such offices and those of competing carriers, including at a minimum, interoffice facilities between end offices and

serving wire centers ("SWCs"), SWCs and interexchange carrier ("IXC") points of presence ("POP"), tandem switches and SWCs, end offices or tandems of the incumbent LEC, and the wire centers of incumbent LECs and requesting carriers. *Local Competition Order* ¶ 440.

b) provide all technically feasible transmission capabilities, such as DS1, DS3, and Optical Carrier levels that the competing provider could use to provide telecommunications services. *Id*.

c) not limit the facilities to which dedicated interoffice transport facilities are connected, provided such interconnection is technically feasible, or restrict the use of unbundled transport facilities. *Id.; See also* 47 C.F.R. §51.309.

d) provide shared transport in a way that enables the traffic of requesting carriers to be carried on the same transport facilities that an incumbent LEC uses for its own traffic. *Local Competition Third Reconsideration Order* ¶ 22.

209. In its UNE Remand Order, the FCC later modified the definition of dedicated transport to include unbundled dark fiber. UNE Remand Order ¶ 325.

1. Verizon VA Provides Nondiscriminatory Access to All Technically Feasible Transmission Capabilities, Including Dedicated and Shared Transport Facilities and Associated Functionalities

210. Verizon VA provides local transport unbundled from switching or other network elements using substantially the same processes and procedures in Virginia as are used in Pennsylvania, and New York. In Pennsylvania, as in New York, the FCC found that "Verizon demonstrates that it provides both shared and dedicated transport in compliance with the requirements of checklist item 5." *Pennsylvania Order* ¶ 109.

211. Verizon VA's interconnection agreements include specific rates, terms, and conditions that obligate Verizon VA to provide local transport unbundled from switching or other services. See Checklist Declaration Attachment 202. These agreements commit Verizon VA to provide access to both dedicated and shared transport facilities, consistent with FCC requirements. The terms and conditions of these

interconnection agreements commit Verizon VA to meet the Act's Section 271 requirements for providing nondiscriminatory access to local transport.

B. Dedicated Transport

212. Dedicated interoffice facility ("IOF") transport provides the CLECs exclusive use of the interoffice facility. Like its sister company Verizon PA, Verizon VA offers transmission capabilities, such as DS-1, DS-3, STS-1, and optical carrier levels OC-3 and OC-12. The physical interface for DS-1, DS-3 or STS-1 transport is a metallic-based electrical interface. The physical interface for all optical transport is optical fiber. Dedicated transport is available within the same LATA between CLEC central offices and Verizon VA central offices and among Verizon VA central offices. In the case of DS-1 or DS-3 transport, access to dedicated transport is provided from the CLEC's collocation arrangement in a Verizon VA central office through an appropriate cross-connection made on a Digital Signal Cross Connect ("DSX") bay; in the case of optical transport, it is provided on a Fiber Distribution Frame ("FDF").

213. DS-1 transport consists of a two-point digital channel that provides for simultaneous two-way transmission of digital electrical signals at a transmission rate of 1.544 Mbps. Dedicated DS-1 transport provides for the equivalent of 24 DS-0 channels, each of which provides the digital equivalent of an analog voice grade channel.

214. Dedicated DS-3 transport consists of a two-point digital channel that provides for simultaneous two-way transmission of digital electrical signals at a transmission rate of 44.736 Mbps. Dedicated DS-3 transport provides for the equivalent of 28 DS-1 channels. Each DS1 channel provides the digital equivalent of 24 analog voice grade channels. Therefore, dedicated DS-3 transport provides the digital equivalent capacity of 672 analog voice grade channels.

215. STS-1 provides a total bandwidth of 51.84 Mbps, including both overhead and payload.

216. Dedicated optical carrier transport is an optical point-to-point transmission path. Synchronous Optical Network ("SONET") is an optical interface standard that allows for the transport of different digital signals using a basic building block or base transmission rate of 51.84 Mbps. Higher rates are direct multiples of the base rate: the OC-3 rate is 155.52 Mbps and the OC-12 rate is 622.08 Mbps.

217. The provisioning interval for unbundled DS-1 and DS-3 interoffice transport facilities is based on Verizon VA's experience with private line and special access service. For quantities of 1 to 8 circuits, Verizon VA has established a standard provisioning interval of 15 business days where facilities are available. Intervals for larger quantities and for optical carrier transport facilities (e.g., SONET) are negotiated subject to the availability of facilities and equipment at the requested locations. Installation intervals for UNE IOF are provided in the CLEC Handbook Vol. 3, Section 2.8.1, which can be found on the Verizon website at www.bellatl.com/wholesale/html/handbooks/clec/volume_3/c3s2_8.htm.

218. An order for interoffice facilities is not accepted if suitable facilities are not available and there are no facility construction jobs planned to augment the existing interoffice infrastructure. However, in situations where interoffice facilities are not available, but Verizon VA has a construction job planned or underway, rather than reject an order, it is Verizon VA's practice to provide the CLEC a due date that includes the estimated construction interval, plus the standard provisioning interval. Because of the difficulty of accurately estimating completion times on complex construction jobs that

involve long lead times, this practice sometimes causes Verizon VA to miss a scheduled due date. However, this practice leads to orders being filled rather than rejected, and jobs being completed at the earliest possible date.

219. Orders for dedicated IOF can be placed on an automated basis using the industry-standard access service request ("ASR"). As of the end of December 2001, Verizon VA was providing approximately 10 non-affiliated CLECs with approximately 400 IOF transport arrangements. Verizon VA has the requisite processes, systems, and staff in place to continue provisioning unbundled transport to CLECs in commercial volumes as additional demand develops.

220. For the three-month period ending January 2001, Verizon VA had no missed appointments for UNE IOF orders (PR-4-01-3530), based on 22 IOF orders (1 in November, 13 in December and 8 in January). See Measurements Declaration Attachment 401. Maintenance results for unbundled IOF are not disaggregated from high capacity loops and, therefore, are discussed in aggregate in the high capacity loop section of this Declaration.

C. Shared Transport

221. Shared transport is the use of multiple interoffice transmission paths over non-dedicated facilities. Verizon VA provides shared transport for use with unbundled local switching using existing switch routing arrangements. Shared transport is available in interconnection agreements, which allow CLECs to use Verizon VA's shared transport at usage-sensitive rates in connection with their provision of telephone exchange and associated exchange access service. The transmission and routing of calls over the shared network is exactly the same as Verizon VA's routing for its own customers' calls from the originating to the terminating central office.

222. Verizon VA provides shared transport to CLECs in Virginia in a nondiscriminatory manner. Specifically, CLECs can use Verizon VA's shared transport network element to carry their customers' traffic between Verizon VA's end-office switches, and between Verizon VA's end office and tandem switches. In addition, CLECs can use Verizon VA's shared transport network element to reach other carriers' networks that are interconnected to Verizon VA's network.

223. Verizon VA provides shared transport in conjunction with unbundled local switching. Shared transport would be selected at the time the CLECs establish their Network Design Requests. Once shared transport is selected, a CLEC does not need to order transport separately when it orders individual local switching ports. CLECs purchasing UNE switching have thus far opted to use shared transport. Through December 2001, Verizon VA was providing shared transport in conjunction with routing traffic to and from the approximately 8,250 unbundled local switching ports it has provisioned to CLECs as part of the UNE-P combination.

D. Unbundled Dark Fiber

224. Verizon VA has also made unbundled dark fiber available to CLECs pursuant to the FCC's *UNE Remand Order* (*UNE Remand Order* ¶¶ 325-330). Unbundled dark fiber is available where in-place, spare facilities exist and is provided in pairs (two strands). The electronics to "light" dark fiber are owned and provided by the CLEC. Verizon VA provides unbundled dark fiber where available for local transport in accordance with the terms and conditions of its interconnection agreements. See Checklist Declaration Attachment 202. Verizon VA has established the methods and procedures to provide CLECs with unbundled dark fiber consistent with the requirements prescribed by the FCC in its UNE Remand Order. These are similar to those in effect for

the provision of unbundled dark fiber by Verizon in Pennsylvania and New York. Verizon VA has provisioned 6 unbundled dark fiber orders for the three months ending January 2002. Verizon VA completed all of these orders on time.

CHECKLIST ITEM 6: LOCAL SWITCHING UNBUNDLED FROM TRANSPORT, LOCAL LOOP TRANSMISSION, OR OTHER SERVICES

A. Requirements for Access to Local Switching

225. Section 271(c)(2)(B)(vi) of the Act requires a Section 271 applicant to provide or offer to provide local switching unbundled from transport, local loop transmission, or other services.

226. The FCC's *Local Competition Order* further requires that, pursuant to Section 251 of the Act, an incumbent LEC:

a) provide nondiscriminatory access to line-side and trunk-side facilities plus the features, functions, and capabilities of the switch. 47 C.F.R. §51.319(c)(1)(i); *Local Competition Order* ¶ 412.

b) provide nondiscriminatory access to trunk ports on a shared basis, and routing tables resident in the BOC's switch, as necessary to provide nondiscriminatory access to shared transport facilities. *Local Competition Third Reconsideration Order* ¶ 25-29

c) provide nondiscriminatory access to unbundled tandem switching, which includes the facilities connecting trunk distribution frames to the tandem switch and all functions of the switch itself, including those that establish a temporary transmission path between two other switches. 47 C.F.R. §51.319(c)(2); *Local Competition Order* ¶ 425, 426.

227. Subsequently, the FCC revisited the required provision of unbundled switching in its *UNE Remand Order*, issued November 5, 1999, and identified specific circumstances where the incumbent LEC is not required by Section 251 to provide UNE

switching to competing carriers. 47 C.F.R. §51.319(c)(1)(B); *UNE Remand Order* ¶¶ 276-299.

B. Verizon VA provides Nondiscriminatory Access to UNE Local Switching, including Features, Functions and Capabilities of the Switch

228. Verizon VA provides local switching unbundled from transport, local loop transmission, or other network elements using the same processes and procedures in Virginia as are used in Pennsylvania. In Pennsylvania, as in New York, and Massachusetts the FCC found that Verizon was in compliance with this checklist item. *Pennsylvania Order* ¶ 120; *New York Order* ¶¶ 346-348; and *Massachusetts Order* ¶ 222.

229. Verizon VA's interconnection agreements include specific terms and conditions that require it to provide local switching consistent with the requirements of Section 251 of the Act. These agreements require Verizon VA to provide access to line-side and trunk-side facilities of the local (end office) switch, basic switching functions, trunk ports on a shared basis, tandem switching, vertical switch features, customized routing, and usage information to bill for inter/intraLATA exchange access. *See* Attachment 202 ("Interconnection Agreement Matrix").

230. Local switching provides CLECs with the functionality they need to connect their loops to line-side switch ports, and their loops or trunks to trunk-side switch ports via a collocation arrangement. A line port is the physical and electrical interface that terminates on the line-side of a Verizon VA end office switch. A trunk port is the physical and electrical interface that terminates on the trunk-side of a Verizon VA end office or tandem switch. Local switching also provides access to the functions and capabilities resident in a Verizon VA end office or tandem switch. Verizon VA offers access to local switching at each of its central offices, and provides a cross-connect

between a line port or trunk port and a CLEC's collocation arrangement. Verizon VA also offers access to tandem switching and provides a cross-connect between a trunk port and a CLEC's collocation arrangement.

231. Verizon VA offers 8 types of local switch ports through interconnection agreements. They are: analog line (for the provision of POTS-type service, PBX or Centrex capabilities); basic rate ISDN ("ISDN-BRI"); Integrated Digital Loop Carrier ("IDLC"); Coin Telephone; Public Access Line; and SMDI. The following trunk ports with line treatment are also available: DS1 DID/DOD/PBX; and Primary Rate ISDN ("ISDN-PRI"). Trunk port connections are required to provide certain network services that transmit higher bandwidth or feature functionality that cannot be provided with a line side interface. Digital PBX service is an example of a service that requires customer premises equipment to be connected to a trunk port with line treatment rather than to a line port. Descriptions of the major available local switch port offerings are contained in Sections 2.4, 2.5 and 2.7 of Volume III of the CLEC Handbook.

232. The local switch functions and capabilities resident in a Verizon VA switch are made available with local switching, including those capabilities that Verizon VA uses to provide retail services. Verizon VA will provide CLECs with access to the capabilities available in a switch, for the port type requested, on a line-by-line basis. Some features are optional, which CLECs can activate at the time Verizon VA provisions the line port or after initial provisioning. A CLEC may differentiate its service offering(s) by packaging individual switch features differently or by offering a variety of pricing packages; for example, providing Caller ID free-of-charge to all of its end users.

Descriptions of major switch features available on individual line port types are contained in Sections 2.4 and 2.5 of Volume III of the CLEC Handbook.

233. Tandem switching consists of dedicated tandem trunk ports, shared tandem trunk ports, and tandem usage. Dedicated tandem trunk ports consist of DS1 bandwidth capable of supporting 24 voice grade equivalent trunks. These trunk ports include associated signaling and transmission options. Shared tandem trunk ports will be used upon a carrier's request when the traffic is routed through the Verizon tandem using Verizon's existing trunk groups and switch routing.

234. Local switching may be combined with shared transport, which enables CLECs to route their traffic over Verizon VA's network in the same way that Verizon VA routes traffic for its own end users. In addition, Verizon VA will provide local switching, upon request, using customized routing based on class-of-call (*e.g.*, operator services or directory assistance).

235. Verizon VA also provides CLECs with a combination of unbundled network elements known as Unbundled Network Element – Platform ("UNE-P"). As previously noted in Checklist Item 2 of this Declaration, Verizon VA offers UNE-P in accordance with the FCC's *UNE Remand Order*.

236. UNE-P enables CLECs to provide residential and business local exchange services, and exchange access service, to their end-users. In a UNE-P combination, Verizon VA provides CLECs with a combination of an unbundled local loop network element and an unbundled local switching network element. The unbundled local switching element provided within the UNE-P combination offers CLECs access -- as requested by a CLEC via the Network Design Request ("NDR") process described below

-- to other unbundled network elements. These elements include Common Transport or Dedicated Transport, Shared Tandem Switching, Signaling Systems and Call-related Databases, and E911. Collocation is not required to access local loop and local switch port UNE-P combinations.

237. Verizon VA also will combine unbundled local switching with other UNEs or with Verizon VA services, subject to technical feasibility. These include shared or dedicated interoffice transport, shared tandem switching, SS7 signaling and access to E911. Operator Services and Directory Assistance service are available on an optional basis. All UNE-P lines currently in service combine these types of UNEs. Collocation is not required, provided that the terminating location is normally accessed in the Verizon VA central office from which CLECs have purchased an unbundled switch line port. Verizon VA also will provide dedicated interoffice transport in conjunction with a dedicated trunk port to CLECs that purchase dedicated interoffice transport.

C. Establishment of Unbundled Local Switching

238. Verizon VA has taken the necessary steps to ensure the commercial availability of local switching to CLECs. Provisioning of local switching is a two-step process. For new lines, the first step involves establishing the proper class of service, while the second step involves establishment of the cross-connection between the local switch port and the CLEC's collocation arrangement. For existing lines, the first step involves implementation of the translations needed to change the class of service to that associated with the CLEC's local unbundled switching, while the second step involves moving the existing cross-connection from the local switching port to the CLEC's collocation arrangement. The CLEC may order services on behalf of its subscribers through industry standard ordering guidelines using the Local Service Request ("LSR").

239. Verizon VA's interconnection agreements properly indicate that the Network Design Request ("NDR") process is used to set up the CLEC's network unbundled switching arrangements in Verizon VA's switches to enable the CLEC to provide service to its customers. *See* Attachment 202 ("Interconnection Agreement Matrix"). The NDR process is a joint CLEC/Verizon VA responsibility. The terms and conditions applicable to the NDR process are included in the CLEC Handbook (Vol. I, Section 6.4.2). The NDR process was reviewed by KPMG in its Virginia OSS Evaluation and passed every test criterion. *See* KPMG Draft Final Report Version 1.0 Test Points PPR7-1-1 through PPR7-1-7.

240. In the more simple case, the CLEC may ask for calls to be routed exactly the same way Verizon VA routes its own calls, including the use of the Verizon VA Operator and Directory Assistance platform with or without branding. In such a case, the NDR process is relatively straightforward to implement when the CLEC's billing and Operator Services/Directory Assistance arrangements are established. NDR completion intervals are typically 45 business days, including the loading of OS/DA branding tapes and loading CLEC-specific rates – an essential NDR component that enables Verizon VA operators to quote rates to a CLEC's end-users.

241. Alternatively, if a CLEC wants Verizon VA to provide customized routing services using additional Advanced Intelligent Network ("AIN") capabilities of Verizon VA's switches and network, more complex NDR work is required. Depending on the specifics of the CLEC's customized routing request, building new trunk groups, adding more interoffice trunks, and loading new data into Verizon's AIN routing database may be required. NDR completion intervals for arrangements including customized routing

are negotiated depending on the complexity and scope of the request. In both cases, CLECs order UNEs on a per-line basis after Verizon VA completes the NDR process.

242. Through December 2001, there were 19 CLECs that have set up the capacity to use Verizon VA's UNE switching arrangements. CLECs that purchase Verizon VA's OS/DA platform in connection with unbundled switching may chose from three branding (announcement) options: (1) Verizon branding; (2) no branding; or (3) a CLEC's own branding. Regardless of the branding option chosen, CLECs can establish their own rates for these services, or they can adopt Verizon VA's retail rate schedule. To date, 8 of the 19 CLECs have chosen to use Verizon VA's OS/DA branding, 5 have chosen to be unbranded, and the remaining 6 CLECs have chosen to use their own branding.

D. Access to UNE Switching

243. Verizon VA provisions CLEC orders for local and tandem switching using the same personnel, facilities and equipment as Verizon VA's retail orders. The only differences between the CLEC and retail provisioning processes are those inherent in the unique characteristics of unbundled switching elements (e.g., recording of access usage for CLEC, suppression of Verizon VA access bills, and customized routing, if requested). CLECs purchasing unbundled local and tandem switching elements are provided with usage recording suitable for billing exchange access charges to IXCs in the same manner that Verizon VA bills IXCs for exchange access service. Verizon VA suppresses its exchange access billing on the switching elements Verizon VA provides to CLECs. This is the same approach used by Verizon PA, which received 271 approval from the FCC.

244. Through the end of December 2001, Verizon VA had provided more than 8,200 line side local switching ports as part of UNE-P combinations that include a UNE

loop. Of these, approximately 2,400 were for business service, while over 5,800 were for residence customers. Verizon VA's service performance record on these orders is discussed above in the UNE Loop Section of this Declaration (Checklist Item 4). Although these UNE-P orders were for POTS service, Verizon VA will provision other line ports and switch features in accordance with its interconnection agreements.

245. Verizon VA provides CLECs using UNE Switching with access to tandem switching. CLECs do not need to request unbundled tandem switching separately if they are using Verizon VA's UNE Switching because it is part of unbundled shared transport and can be accessed through all unbundled local switching elements.

246. As of December 2001, Verizon VA had received zero requests for unbundled tandem switching on a stand-alone basis. Verizon VA will provide this UNE upon request. This UNE is available pursuant to interconnection agreements, using the NDR process. *See* Attachment 202 ("Interconnection Agreement Matrix").

247. The rates for Verizon VA's UNE switching and UNE-P combinations are addressed above in the Access to UNEs Section of this Declaration (Checklist Item 2).

CHECKLIST ITEM 7: 911/E911, DIRECTORY ASSISTANCE, OPERATOR CALL COMPLETION SERVICES

A. Requirements for Access to 911 and E911, Directory Assistance, and Operator Call Completion Services

248. Section 271(c)(2)(B)(vii) of the Act requires Verizon VA to offer nondiscriminatory access to (1) E911 services; (2) directory assistance ("DA") services to allow other carriers' customers to obtain telephone number information; and (3) operator call completion ("OCC") services. With regard to DA services access, the competitive checklist requires (1) that customers of all carriers are able to access Verizon VA's DA

service and obtain a directory listing, notwithstanding the identity of the requesting customer's local service provider or the identity of the carrier for the customer whose listing is requested; and (2) that Verizon VA provide nondiscriminatory access "to the directory assistance service provider selected by the customer's local service provider, regardless of whether the competitor provides such services itself; selects [Verizon VA] to provide such services; or chooses a third party to provide such services." OCC services referred to in this checklist item include "any automatic or live assistance to a consumer to arrange for the billing or completion, or both, of a telephone call," including busy line verification, emergency interrupt, and operator-assisted directory assistance.[24]

B. Verizon VA Provides Nondiscriminatory Access to E911, Directory Assistance, and Operator Call Completion Services

249. Verizon VA meets these checklist requirements by offering CLECs nondiscriminatory access to E911 services pursuant to interconnection agreements. Verizon VA meets DA and OCC services requirements by providing nondiscriminatory access to CLECs pursuant to interconnection agreements. See Attachment 202 ("Interconnection Agreement Matrix").

1. 911/E911

250. Verizon VA provides Enhanced 911 ("E911") services to counties, cities and towns pursuant to the Miscellaneous Service Arrangements Tariff, S.C.C. – Va. – No. 211, Section 14. The services provided by Verizon VA include trunking, routing and features that enable these local governmental authorities to provide E911 service. Local

[24] *See* In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance, Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, Inter-LATA Services in Texas, CC Docket No. 00-65, Memorandum Opinion and Order, June 30, 2000, ¶346.

governmental authorities and Langley Air Force Base maintain and operate 66 Public Safety Answering Points ("PSAPs") in Verizon VA's service territory, where 911 calls are received and aid is dispatched. E911 has been implemented throughout Verizon VA's service territory, except in Dickinson, Lee and Madison counties, where E911 will be implemented by July 2003.

251. There are three ways that resellers and facilities-based CLECs can use the E911 network to provide E911 service to their customers. First, a reseller may resell Verizon VA's retail exchange service. Second, a CLEC purchasing Verizon VA's unbundled local switching may use Verizon VA-furnished dialtone to provide E911. Third, a CLEC that uses its own switch may interconnect with Verizon VA's network. With these arrangements, CLEC customers are able to dial 911 to reach an emergency services provider in the same manner as Verizon VA's end user customers.

252. The 911 calls by customers of resellers and CLECs using Verizon VA's local switching are treated in the same manner as 911 calls by Verizon VA's end users.

253. CLECs using their own switching may interconnect at Verizon VA's E911 tandems using their own trunks or trunks provided by Verizon VA or another carrier. These E911 trunks must conform to industry standards and be capable of carrying Automatic Number Identification.

254. The E911 trunks provided to CLECs by Verizon VA are provisioned, maintained and repaired on a first-come, first-served basis, using the same facilities, equipment and personnel that Verizon VA uses for the trunks serving its retail customers. At the request of a CLEC, Verizon VA provisions E911 trunks coincident with initial

activation of a CLEC's switch. Additional E911 trunks are provisioned within the intervals applicable to interconnection trunks.

255. Verizon VA is providing interconnection to CLECs at each of its 14 E911 tandems. As of December, 2001, 35 CLECs had interconnected to the E911 tandems, and Verizon VA provided over 800 E911 trunks to those CLECs. Calls received at Verizon VA's E911 tandems are routed to the appropriate PSAP on a first-come, first-served basis, without regard to service provider. The same dedicated trunks are used to carry 911 calls by both Verizon VA and CLEC end users from the E911 tandem to the PSAP.

256. Verizon VA offers CLECs the ability to input their customer information into the E911 databases. These databases correlate the caller's address with the emergency service provider's location so that the call can be routed to the appropriate PSAP, and correlate the caller's telephone number with the caller's name, address and other emergency information.

257. Customer information for resellers and CLECs using Verizon VA's local switching is input into the E911 databases every business day, on a first-come, first-served basis, in the same manner as information for Verizon VA end users. Each evening, Verizon VA's service order system creates E911 database records by replicating the name, address and telephone number for each Verizon VA retail, resale and unbundled local switching order processed that day. The Verizon VA, reseller and CLEC records for the entire day are commingled, batched and then electronically submitted to the Fault Resistant/Database Management System ("FR/DBMS"). Where the local

governmental authority has provided a Master Street Address Guide ("MSAG"), records are compared to the MSAG before they are posted to the E911 databases.

258. Discrepancies identified by comparison of the service order to the MSAG -- e.g., a street address not included in the MSAG street names or house number ranges -- create an error code in the submitted record. When a discrepancy is identified, the Verizon VA E911 database clerk reviews it and investigates as necessary. This investigation may include interaction with the PSAP or the local governmental authority regarding such matters as verification of address range changes, additions for new housing developments, etc. The clerk corrects the discrepancy either by correcting the record, or updating the MSAG at the direction of the local governmental authority. The record will continue to cycle through this process until the record is consistent with the MSAG. When a record is consistent, the FR/DBMS will insert the correct information into the E911 databases.

259. Because this error correction process commingles Verizon VA, reseller and CLEC records without separately identifying them, there is no practical way to measure and compare the number of errors related to Verizon VA retail orders to the number of errors related to resale and unbundled local switching orders. However, Verizon VA does receive error reports for the entire batch process and monitors the performance on a total basis.

260. CLECs using their own switches are responsible for their customers' entries in the E911 databases. These CLECs submit customer information to the E911 databases using the Private Switched/Automatic Location Identification ("PS/ALI") interface, which uses an industry-standard format. This interface allows CLECs to enter

and maintain their customers' 911 database entries, and to submit up to ten files containing multiple entries each business day. (By contrast, Verizon VA can submit and update only once a day.) Where the local governmental authority has provided a Master Street Address Guide ("MSAG"), customer information is compared to the MSAG before it is posted to the E911 databases.

261. A confirmation or an error report is available to the CLEC after file processing is completed, and a statistic and error file is available to the carrier at its next login. (The statistic file provides feedback regarding number of records submitted, number of records containing errors, and number of records that are error-free. The error file contains the telephone numbers for which errors are found.) Inconsistencies with the MSAG create an error in the submitted record.

262. The CLEC is responsible for correcting errors associated with its records and resending the corrections. Verizon VA provides CLECs the same information for investigating and correcting errors that is available to its own retail representatives. Orientation information provided to CLECs includes instructions on correcting errors in the E911 database, and a contact list for comprehensive technical support. Additional information is available on the Verizon Wholesale Operations Support web site in the Pre-Order, Order and Trouble Administration Supplementary Documentation: http://128.11.40.241/east/wholesale/customer_docs/master.htm. With this information, CLECs can correct errors in the 911 database, contact the Verizon 911 database management center to correct errors in the MSAG, or contact the local governmental authorities directly. Where an MSAG has been provided by the local governmental

authority, customer information is inserted into the 911 databases when it is consistent with the MSAG.

263. As of December 31, 2001, more than 25 CLECs were using the electronic interface for entry of information into the E911 databases. As of December 31, 2001, CLECs using their own switches had approximately 570,000 E911 listings in Virginia.

2. Directory Assistance Services

264. Virginia CLECs have three options for providing DA service to their customers using products provided by Verizon VA. First, resellers may resell Verizon VA's retail service. Second, CLECs can purchase Verizon VA's DA service pursuant to interconnection agreement, and Verizon VA will provide DA service directly to CLEC customers. Third, CLECs can establish their own centers to provide DA service to their customers, and use Verizon VA's DA database pursuant to interconnection agreement. These options are described below.

265. When purchasing Verizon VA's DA service, CLECs that use their own switches or Verizon VA's unbundled local switching may interconnect directly with Verizon VA's DA platform using their own facilities or dedicated transport facilities purchased from Verizon VA or another carrier. CLECs that use Verizon VA's unbundled local switching may also interconnect directly with Verizon VA's DA platform using shared transport facilities purchased from Verizon VA.

266. As of December 31, 2001, approximately 5 CLECs were purchasing Verizon VA's DA service and interconnecting using over 200 dedicated DA and OCC trunk ports and transmission facilities provided by Verizon VA. An additional 84 CLECs

and resellers were purchasing Verizon VA's DA service and interconnecting using Verizon VA's shared transport.

267. CLECs that resell Verizon VA's retail services or use Verizon VA's unbundled local switching have the option of purchasing Verizon VA's DA service, or using their own or another carrier's DA centers. If a CLEC chooses to use its own or another carrier's DA center, the CLEC must establish customized routing between Verizon VA's switches and the DA provider's platform. CLECs may install their own transmission facilities, or obtain them from Verizon VA or another carrier. See Attachment 202 ("Interconnection Agreement Matrix"). As of December 31, 2001, no CLECs were purchasing customized routing from Verizon VA.

268. Verizon VA's DA service is available with the CLEC's own brand, unbranded, or with Verizon VA's brand. For CLECs that provide their own trunks or purchase dedicated trunks from Verizon VA to interconnect to Verizon VA's DA platform, branding is done based upon the trunk group used to deliver traffic. For CLECs that use Verizon VA's shared transport network to interconnect to Verizon VA's DA platform, branding is based on the line number of the calling party. As of December 31, 2001, Verizon VA provided carrier-specific branding to 15 CLECs, unbranded service to 6 CLECs, and Verizon VA-branded service to 71 CLECs.

269. Verizon VA also offers Connect ReQuest to CLECs purchasing Verizon VA's DA service. Connect ReQuest allows CLEC customers to complete calls automatically to numbers obtained from DA. A facilities-based CLEC may choose to have these calls completed over its own or Verizon VA's network. As of December 31, 2001, Verizon VA was providing Connect ReQuest to 91 CLECs.

270. For CLECs that establish their own DA centers, Verizon VA offers nondiscriminatory access to its DA listings. Verizon VA offers Direct Access to Directory Assistance ("DADA"), a service that provides "read only" access to the listings in Verizon VA's DA database. DADA gives CLECs the same access capabilities that Verizon VA's retail operators have to respond to customers' listing requests. CLECs using DADA have access to all public listings in Verizon VA's DA database, including listings for other carriers' customers. DADA is offered pursuant to interconnection agreement. See Attachment 202 ("Interconnection Agreement Matrix"). As of December 31, 2001, no CLECs were purchasing Verizon VA's DADA service.

271. Verizon VA also offers a Directory Assistance License Agreement, which makes the contents of Verizon's DA database for Verizon VA or all of Verizon available to CLECs in an electronic format for their use in providing local DA services. The database includes all public listings for Verizon and other carriers' customers. Verizon VA provides daily updates to this database, transmitted electronically with the same frequency and basic listing content as Verizon's own database updates. As of December 31, 2001, Verizon VA was providing access to listings to one CLEC pursuant to the Directory Assistance License Agreement.

272. Verizon VA provides nondiscriminatory access to its DA services. Verizon VA provisions, maintains and repairs DA trunks for CLECs using the same facilities, equipment and personnel that Verizon VA uses for its own DA trunks. CLEC DA trunks are provisioned in the same manner that Verizon VA provisions all other CLEC trunks.

273. DA calls from customers of CLECs that use Verizon VA's DA service are handled on a nondiscriminatory basis. Service performance results show an average speed of answer of, 5.28 seconds in November, 5.68 seconds in December, and 6.27 seconds in January for Verizon VA retail and resellers' customers; and 3.49 seconds in November, 3.70 seconds in December, and 3.31 seconds in January for customers of facilities-based CLECs and CLECs purchasing UNE Platform. In each of the months of November, December and January, Verizon VA met the performance standard of 95 percent of calls answered within 30 seconds for customers of facilities-based CLECs and CLECs purchasing UNE Platform, and provided service at parity with Verizon retail for resellers' customers.

274. Verizon VA performs updates to the DA database for CLEC customers with a high degree of accuracy. Verizon VA accurately completed 99.5 percent of DA database updates for CLECs in November, 98.5 percent in December, and 99.5 percent in January. Verizon VA accurately completed 99.5 percent of DA database updates for its retail customers in November, 100 percent in December, and 99.5 percent in January. Excluding service order errors, the rate of accuracy for CLEC customer updates was 99.5 percent in November, 98.5 percent in December, and 99.5 percent in January.

3. Operator Call Completion Services

275. Virginia CLECs also have three options for providing OCC service to their customers using products provided by Verizon VA. First, resellers may resell Verizon VA's retail service. Second, CLECs can purchase Verizon VA's OCC service pursuant to interconnection agreement, and Verizon VA will provide OCC service directly to CLEC customers. Third, CLECs can establish their own centers to provide

OCC service. If a CLEC elects to establish its own OCC center, the CLEC may interconnect with Verizon VA's OCC platform so that the CLEC and Verizon VA can provide line status verification and line status verification with interrupt services to their respective customers. In addition, CLECs providing their own OCC centers can interconnect with Verizon VA's Line Information Data Base to verify telephone number and other billing information, as described in the section of this declaration concerning access to databases and signaling pursuant to Checklist Item 10.

276. Verizon VA provides the same OCC service to CLECs that it provides to itself. Verizon VA's OCC service allows end users to dial "0" ("0 Minus Dialing") or "0" plus 10 digits ("0 Plus Dialing") to place collect, calling card, and bill to third number calls, with or without live operator assistance.

277. When purchasing Verizon VA's OCC service, CLECs that use their own switches or Verizon VA's unbundled local switching may interconnect directly with Verizon VA's OCC platform using their own facilities or dedicated transport facilities purchased from Verizon VA or another carrier. CLECs that use Verizon VA's unbundled local switching may also interconnect directly with Verizon VA's OCC platform using shared transport facilities purchased from Verizon VA. As of December 31, 2001, approximately 5 CLECs were purchasing Verizon VA's OCC service and interconnecting using over 200 dedicated OCC and DA trunk ports and transmission facilities provided by Verizon VA. An additional 84 CLECs and resellers were purchasing Verizon VA's OCC service and interconnecting using Verizon VA's shared transport.

278. CLECs that resell Verizon VA's retail services or use Verizon VA's unbundled local switching have the option of purchasing Verizon VA's OCC service, or

using their own or another carrier's OCC centers. If a CLEC chooses to use its own or another carrier's OCC center, the CLEC must establish customized routing between Verizon VA's switches and the OCC provider's platform. CLECs may install their own transmission facilities, or obtain them from Verizon VA or another carrier. See Attachment 202 ("Interconnection Agreement Matrix"). As of December 31, 2001, no CLECs were taking advantage of Verizon VA's offer of customized routing.

279. Verizon VA's OCC service is available with the CLEC's own brand, unbranded, or with Verizon VA's brand. For CLECs that provide their own trunks or purchase dedicated trunks from Verizon VA to interconnect to Verizon VA's OCC platform, branding is done based upon the trunk group used to deliver traffic. For CLECs that use Verizon VA's shared transport network to interconnect to Verizon VA's OCC platform, branding is based on the line number of the calling party. As of December 31, 2001, Verizon VA provided carrier-specific branding to 15 CLECs, unbranded service to 6 CLECs, and Verizon VA-branded service to 71 CLECs.

280. As referenced above, Verizon VA also offers Line Status Verification ("LSV") and LSV with Interrupt ("LSVI") to CLECs that purchase Verizon VA's OCC service. LSV is provided by the Verizon VA operator in response to a calling party's request to determine if a line is in use; LSVI is provided when a calling party requests the operator to interrupt a call in progress after LSV has been provided. Verizon VA is only able to provide this information for calls placed to its own end users, or end users of CLECs that purchase OCC service from Verizon VA or have interconnected with Verizon VA for the purpose of enabling Verizon VA to provide LSV and LSVI. LSV and LSVI are offered pursuant to interconnection agreement. *See* Attachment 202 ("Interconnection

Agreement Matrix"). As of December 31, 2001, Verizon VA provided LSV and LSVI to 92 CLECs.

281. Verizon VA provides nondiscriminatory access to its OCC services. Verizon VA provisions, maintains and repairs OCC trunks for CLECs using the same facilities, equipment and personnel that Verizon VA uses for its own OCC trunks. CLEC OCC trunks are provisioned in the same manner that Verizon VA provisions all other CLEC trunks.

282. OCC calls from customers of CLECs that use Verizon VA's OCC service are handled on a nondiscriminatory basis. Service performance results show an average speed of answer for Verizon VA retail and resellers' customers of 1.92 seconds in November, 2.66 seconds in December, and 1.96 seconds in January; and 0.31 seconds in November, 0.31 seconds in December, and .23 seconds in January for customers of facilities-based CLECs and CLECs purchasing UNE Platform. In each of the months of November, December and January, the percentage of OCC calls answered within 30 seconds was greater than 99 percent for Verizon VA retail and resellers' customers, and was 100% for customers of facilities-based CLECs and CLECs purchasing UNE Platform.

CHECKLIST ITEM 8: WHITE PAGE DIRECTORY LISTINGS

A. Requirements for Directory Listings

283. Section 271(c)(2)(B)(viii) of the Act requires Verizon VA to provide White Page directory listings for customers of other carriers' telephone exchange service on a non-discriminatory basis. Section 251(b)(3) further obligates Verizon VA to permit CLECs and Resellers non-discriminatory access to directory listings.

B. Verizon VA Provides Nondiscriminatory Access

284. Verizon VA is providing White Page directory listings in accordance with Section 271(c)(2)(B)(viii) of the Act. Verizon has procedures in place to ensure that the directory listings of CLEC customers are included in Verizon VA's database on an accurate, reliable, and non-discriminatory basis. As of December 31, 2001, Verizon's Virginia White Page database contained over 300,000 CLEC and Reseller listings.

285. The terms and conditions of the White Page Directory listings services that Verizon VA provides its retail customers are contained in Verizon VA's Tariff S.C.C.-Va.-No.203, Section 4. The terms and conditions of the White Page Directory listings services Verizon VA makes available to other telephone companies and their end users are contained in numerous Commission-approved interconnection agreements.

286. All parties are required to use commercially reasonable efforts to maintain an accurate listings database to ensure the accurate publication of CLEC end user White Pages listings. The responsibilities of CLECs and Verizon VA in this regard are contained in individual Interconnection Agreements.

287. Verizon VA provides non-discriminatory appearance of White Page directory listings in the appropriate White Page directory for customers served by CLECs. Specifically, residential and business customers are entitled to one free White Page listing for each telephone service. In addition, Verizon VA provides CLECs' business customers with a "basic" Yellow Page Directory listing at no charge. These listings, which consist of the CLEC's customer's name, address, and telephone number, are identical in appearance, placement, and font to those provided for Verizon VA's retail residence and business customers, and are intermixed alphabetically with Verizon's

listings. Thus, Verizon VA provides non-discriminatory treatment of CLECs' customers' listings.

288. White Page and Yellow Page Directories are published by Verizon Directory Services Virginia Inc., an indirect wholly-owned subsidiary of Verizon Communications Inc., and one of a number of Verizon Information Services ("VIS") companies. VIS receives service orders from Verizon VA to process residential, business, and government listings in the White Page database. VIS publishes 20 'white page listings' directories for Verizon VA.

289. Interconnection Agreements between Verizon VA and CLECs allow CLECs to list, at no charge, their company name (in logo format, if desired) and customer contact numbers in the introductory pages of each White Page directory under the heading "Other Local Telephone Service Providers," as part of the Verizon VA White Page Directory "Customer Guide" Pages. An example of several pages under the heading "Other Local Telephone Service Providers" from the Richmond Directory, is attached. *See* Attachment 212 ("Customer Guide Pages – Other Local Telephone Service Providers").

290. VIS processes listing service order data for CLEC customers and Verizon VA's retail customers in the same manner. The VIS directory listing system has built-in, automated features to detect and edit listing errors. These features are applicable to all customer accounts, CLEC and Reseller, as well as Verizon VA. The VIS directory listing system automatically identifies and "flags" a customer account if certain listing information is not correct. For example, the VIS directory listing system could flag a

customer account if information on the service order does not match information already in the system.

291. If a problem is detected, VIS attempts to resolve it itself (e.g, by correcting spelling errors). If VIS cannot resolve the problem itself, VIS queries back the request to Verizon VA. If Verizon VA cannot resolve the problem, it asks the appropriate carrier for clarification or correction of the account listing information. In general, it is VIS's policy not to remove a listing from the published directory without the receipt of a disconnect listing service order or a listing service order changing the account to non-published or non-listed service.

292. Verizon VA has several procedures that provide CLECs and Resellers with tools to validate their customers' listings. First, thirty business days prior to the "service order close" date for a particular White Page directory, VIS gives each carrier a Listings Verification Report ("LVR") containing all listings for the carrier that are in the VIS database for publication in the upcoming directory. The LVR includes name, address, listed telephone number, class of service, customer directory name, directory appearance, and type of listing (e.g., additional list). Unless the carrier elects a different interval, LVRs are extracted from VIS's database 31 business days prior to the scheduled directory service order close date and then mailed within one business day of extraction.

293. Second, CLECs are able to view all published listings through a "real-time" electronic graphical user interface (or "Web GUI"). This gives CLECs access to an up-to-date display of White Page directory listings database for Virginia.

294. Third, CLECs are now able to search and sort their directory listings in an electronic format. Specifically, at a CLEC's request, Verizon VA will provide the LVR

in electronic text format (compatible with Excel spreadsheet format), which allows the CLEC to search and sort these listings.

295. Fourth, as yet another mechanism for verifying the accuracy of listing information, CLECs receive an electronic confirmation order from Verizon VA indicating Verizon VA's receipt and processing of listing service orders. This confirmation order includes the listing data processed. By comparing its LSRs to the confirmation message, CLECs and Resellers can determine whether their listing information was accurately processed by Verizon VA. Details of the composition of the confirmation message, including directory listing information, is documented at the Verizon Wholesale Web site, in the 'Local Response' and 'Local Service Billing Completion' section of the 'Order Business Rules': Http://128.11.40.241/east/wholesale/html/pdfs/business_rules/BA_LSOG4_ORD_BR_4.6.1.pdf

296. Verizon VA identifies the last day on which any carrier (including Verizon VA) may send listings for an upcoming directory -- known as the "service order close date" -- on Verizon's wholesale web site. If the "service order close date" for a directory is before the customer's "service order completion date", VIS accepts "advanced listings" from both Verizon VA and CLECs so that their customer's listing can nevertheless be included in a directory.

297. VIS distributes directories to Verizon VA and CLEC customers at exactly the same time and in exactly the same manner. Within Virginia, "out-of-area" White Page directories are available to CLEC and Verizon VA customers on the same terms.

Additional directories and out-of-area directories that are provided to Verizon VA customers at no charge are also provided to CLEC customers at no charge.

298. Verizon provides CLECs with extensive documentation regarding the procedures for listing their customers in directories by "posting" this information on the Verizon "Wholesale Markets" web site. This information is contained in the Resale Handbook, Volume III, Section 8, and the CLEC Handbook, Volume III, Section 6 and can be found at the following web site: http://www22.verizon.com/wholesale/lsp/bridge/0,2631,4-lib,FF.html#handbooks. The handbooks are updated periodically to incorporate improvements in technology and procedures.

299. The Wholesale Markets group also offers CLECs workshops on directory listings. Information regarding scheduling and registration for the workshops is available on the Verizon Wholesale Markets web site at http://www22.verizon.com/wholesale/lsp/bridge/0,2631,4-te,FF.html.

300. Verizon VA monitors and reports the timeliness with which it provides CLECs with Directory LVRs, which contain all listings for the CLEC that are in the VIS database for publication in the upcoming directory. The results of this performance measurement, GE-1-01, show that Verizon VA provides CLECs with excellent directory services. From November 2001 through January 2002, Verizon VA provided 100% of directory LVRs at least 30 business days prior to the "service order close" date for the particular White Page directory.

301. KPMG's testing in Virginia found that Verizon VA accurately provisioned 94.7 % of its test orders in its Directory Listings database. KPMG determined that the

difference between 94.7% and the benchmark of 95% is not statistically significant (see TVV4-1; VA KPMG Draft Final Report Version 1.0 released March 4, 2002.

CHECKLIST ITEM 9: ACCESS TO TELEPHONE NUMBERS

A. Requirements for Access to Telephone Numbers

302. Section 271(c)(2)(B)(ix) of the Act requires Verizon VA to provide nondiscriminatory access to telephone numbers for assignment to other carriers' customers until the date that numbering administration guidelines, plan or rules are established, and to comply with such guidelines, plan or rules after that date. Checklist Item 9 states: "Until the date by which telecommunications numbering administration guidelines, plan or rules are established, nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers. After that date, compliance with such guidelines, plan or rules."

B. Verizon VA Complies with Industry Guidelines and Procedures for Access to Telephone Numbers

303. Responsibility for assignment of telephone numbers has been transferred from Verizon VA to an independent third-party numbering administrator. Verizon VA therefore meets this checklist item by complying with the industry guidelines and procedures for access to telephone numbers that apply to all carriers.

304. Verizon VA no longer assigns telephone numbers to itself or CLECs. That function is now handled by NeuStar (formerly Lockheed Martin Information Management Services), the entity designated by the FCC as the North American Numbering Plan Administrator ("NANPA"). As the NANPA, NeuStar is responsible for area code relief planning and for assigning central office codes ("NXX codes"), which are blocks of 10,000 telephone numbers used by carriers to assign specific telephone

numbers to their end user customers. Neustar has also been named as the national Pooling Administrator, responsible for assigning thousand-number blocks for number pooling. In Virginia, number pooling is in place for the 804, 434, 540, 276 and 757 area codes, and is scheduled to begin in the 703 and 571 area codes in April 2002.

305. As of December 2001, approximately 220 NXX codes and 3,400 thousand-number blocks have been assigned to CLECs in Virginia. As a result of these assignments, more than 5,600,000 individual telephone numbers are available to CLECs in Virginia.

306. Verizon VA adheres in a timely and accurate manner to all industry numbering administration guidelines and FCC rules, including provisions requiring the accurate reporting of data to the code administrator NeuStar.

307. When an NXX code is assigned, all carriers must program their switches to recognize the code and route calls to telephone numbers within the code. Newly assigned NXX codes are installed in Verizon VA switches and systems in accordance with the timeframes and guidelines established in the industry's Central Office Code Assignment Guidelines. During the fourth quarter of 2001, Verizon VA completed 100% of the switch installations required for implementation of 39 new CLEC NXX codes by the effective date stated in the Local Exchange Routing Guide ("LERG"), which is the master industry NXX listing issued and updated by NeuStar.

308. In addition, Verizon VA conducts a monthly comparison of records in the Verizon Code Administration System with information in the LERG. This database comparison ensures that accurate and consistent information relating to code activations is contained in Verizon's Code Administration System and the LERG.

CHECKLIST ITEM 10: ACCESS TO DATABASES AND SIGNALING

A. Verizon VA Provides Access to Databases And Signaling In Accordance With The Act

309. Section 271(c)(2)(B)(x) of the Act requires Verizon VA to provide nondiscriminatory access to databases and associated signaling necessary for call routing and completion.

310. Verizon VA provides competing carriers with nondiscriminatory access to its (a) signaling networks, including signaling links and signaling transfer points, (b) call-related databases, and (c) service management systems. Verizon VA's service offerings for access to its signaling systems and call-related databases are contained in interconnection agreements.

311. Verizon VA also allows requesting carriers to design, create, test, and deploy advanced Intelligent Network ("AIN") based services by accessing the AIN Service Creation ("ASC") Service. Verizon VA offers access to its AIN-based services per the Commission's Final Order in Case No. PUC970005, dated April 15, 1999.

312. Verizon VA has a proven track record of providing nondiscriminatory access to its call-related databases and the associated signaling necessary for call routing and completion. For many decades, Verizon VA's databases have processed large volumes of queries for long distance companies and other local exchange carriers, including wireless providers. There are no technical differences between processing queries and exchanging messages with those carriers and processing queries and exchanging messages for CLECs.

1. Signaling

313. Verizon VA provides CLECs access to its signaling links and signaling transfer points ("STPs") on an unbundled basis. These access arrangements permit a CLEC to use Verizon VA's Common Channel Signaling System No. 7 ("SS7") network for signaling between its own switches, between its own switches and Verizon VA's switches, and between its own switches and the networks of parties connected to Verizon VA's SS7 network. In all cases, access to Verizon VA's SS7 network is provided through a signaling link between the carrier's switches and a Verizon VA STP, or between the carrier's STP and Verizon VA's STP.

314. Verizon VA provides access to its signaling network on a non-discriminatory basis. It uses the same facilities, equipment, and personnel to provision signaling links for CLECs and itself. All signaling traffic on Verizon VA's network is commingled and is queued and routed on a nondiscriminatory basis.

315. Verizon VA uses an SS7 network to separate signaling information from voice traffic. The SS7 network carries two kinds of signaling traffic: (1) Integrated Services Digital Network User Part ("ISUP"), which is used to set up or establish calls (e.g., dial tone, routing); and (2) Transactional Capabilities Application Part ("TCAP"), which is used for the exchange of information between two application processes (e.g., queries and responses between switches and databases).

316. A CLEC can order an unbundled signaling link between its switch and the Verizon VA STP by completing a signaling questionnaire and then participating in the pre-Access Service Request process with Verizon VA. For CLECs purchasing unbundled switching, Verizon VA provides access to its signaling network in the same manner that it provides access to itself; there is no operational distinction between a call

originated from a Verizon VA customer and a call originated from a customer of a CLEC that has purchased unbundled local switching. All signaling functions are identical because Verizon VA uses the same facilities, equipment, and personnel to provide signaling links for CLECs and for itself.

317. As of December 31, 2001, Verizon VA provides 8 CLECs in Virginia with access to its signaling network. No CLEC has requested or is using unbundled access to Verizon VA's signaling network. The rates associated with access to unbundled signaling and signaling links were approved in the Commission's Final Order in Case No. PUC970005, dated April 15, 1999. *See* Attachment 202 ("Interconnection Agreement Matrix").

2. Call-Related Databases

318. Verizon VA also provides competing carriers with access to call-related databases. Call-related databases, also known as Service Control Points ("SCP"), are used in the signaling networks for transmission, routing, billing, and collection, but are distinct from Verizon VA's Operations Support Systems. These databases also provide the translation and routing data needed to deliver advanced network services. Verizon VA currently has four call-related databases: (1) Line Information Database ("LIDB"), which provides access to Calling Name; (2) Toll Free Database (e.g., 800/888/877/866); (3) Local Number Portability Database ("LNP"), and (4) AIN. Each of these four call-related databases is available to CLECs on an unbundled basis. Rates for (1) Line Information Database ("LIDB"), which provides access to Calling Name; (2) Toll Free Database (e.g., 800/888/877/866); and (3) Advanced Intelligent Network Database ("AIN") elements are contained in the Commission's Final Order in Case No.

PUC970005, dated April 15, 1999. Rates for access to Verizon VA's LNP database are contained in interconnection agreements and in FCC Tariff No. 1, Section 13.3.16.

319. A CLEC purchasing unbundled local switching can use Verizon VA's call-related databases in the same manner, and through the same type of signaling links, as Verizon VA. A requesting carrier that has deployed its own switch and linked that switch to Verizon VA's signaling system, gains access to Verizon VA's SCPs through a STP. This arrangement allows the CLEC to provide call-related, database-supported services to its end user customers.

320. When a CLEC accesses a call-related database, a "trigger" tells the tandem or end office switch to suspend processing of a call and then sends a TCAP message to query the SCP for additional call processing and routing instruction. Once the SCP responds, call processing resumes in accordance with the instruction. For example, when an end user dials an 800 number, the switch suspends call processing and queries the 800 database for a "translation" of the 800 number into an area code plus seven digit number or a carrier code identification, which the switch then uses to route the call. Similarly, for other call-related database services such as AIN services, the switch suspends call processing and then sends a TCAP message to query the database for call processing instructions. The switch handles the call in accordance with the instructions in the TCAP message.

321. Verizon VA currently exchanges TCAP messages and ISUP messages with other carriers, and has done so for many years. In addition, Verizon VA is operationally ready to exchange TCAP messages between facilities-based CLECs and the Verizon VA AIN SCPs for the purpose of providing CLEC-designed and -developed

AIN-based services to CLEC end-users served by CLEC switches in Virginia. Verizon VA is able to do so for any reasonably foreseeable commercial volume. As of December 31, 2001 no CLEC in Virginia had requested this service.

a) Line Information Database

322. Verizon VA offers CLECs access to its Line Information Database ("LIDB") through access to its signaling network. With these access arrangements, CLECs that offer their own operator services can query Verizon VA's LIDB to obtain call restriction information associated with individual telephone numbers. CLECs have access to the same features and functions of Verizon VA's LIDB as Verizon VA. Verizon VA makes access to its LIDB available under interconnection agreements and under the provisions established in the Commission's Final Order in Case No. PUC970005, dated April 15, 1999.

323. Verizon VA offers access to its LIDB on a non-discriminatory basis. CLEC queries to the LIDB are handled in the same manner as Verizon VA's queries. Verizon VA's SS7 signaling network commingles CLEC queries with Verizon VA queries and processes them on a first-come, first-served basis.

324. As of December 31, 2001, no facility-based CLEC in Virginia stored its end users' records in Verizon VA's LIDB. From January 2001 to December 2001, Verizon processed over 153 million billing verification queries of its LIDB for scores of CLECs and other companies in its former Bell Atlantic South territories.

325. For CLECs that use Verizon VA's unbundled local switching element or resell Verizon VA's retail service, Verizon VA will maintain all the working telephone numbers in Verizon VA's LIDB, including those with call restriction information associated with their customer's telephone numbers. For CLECs with their own

switches, Verizon VA offers database storage services that allow CLECs to enter and store the call restriction information associated with their customers' individual telephone numbers in Verizon VA's LIDB. These database services are available under interconnection agreements and under the provisions established in the Commission's Final Order in Case No. PUC970005, dated April 15, 1999.

326. Verizon VA maintains information in its LIDB about CLECs' customers on a non-discriminatory basis by using the same processes as it uses for its own retail customers. For resale and UNE-P lines, Verizon VA's LIDB is maintained through Verizon VA's service order system. Whenever a customer initiates service or makes a change to current service that requires an addition, deletion, or modification of information in the LIDB, Verizon VA's service order system pulls the relevant information from the service order and sends that information to the LIDB for updating. This same process is used for orders submitted by CLECs and Verizon VA's retail service representatives. Verizon VA is not aware of any complaints from CLECs in Virginia about errors in Verizon VA's LIDB.

b) Calling Name Information Database

327. Verizon VA's Calling Name Information Database ("CNAM") is part of its LIDB. Verizon VA provides CLECs with access to its CNAM through access to its signaling network. With these access arrangements, CLECs can use Verizon VA's CNAM to offer telecommunications services to their customers that provide the caller's name on a display unit when the customer receives a call. CLECs have access to the same features and functions of the CNAM as Verizon VA. Verizon VA makes access available under interconnection agreements and under the provisions established in the Commission's Final Order in Case No. PUC970005, dated April 15, 1999.

328. The same CLECs that have had the ability to access LIDB also have had the ability to access Verizon VA's CNAM either through direct STP connections or through hub providers. As of December 31, 2001, 8 CLECs were accessing Verizon VA's CNAM directly. Additional CLECs may be accessing the database through hub providers.

329. The access Verizon VA provides to its CNAM is nondiscriminatory. CLEC queries to the CNAM are handled in the same manner as Verizon VA's queries. Verizon VA's SS7 signaling network commingles CLEC queries with Verizon VA queries and processes them on a first-come, first-served basis. From January 2000 to December 2001, Verizon processed over 794 million CNAM queries of its LIDB for scores of CLECs and other companies in its former BA-South territories. Verizon VA also maintains information on its CNAM about CLECs' customers on a non-discriminatory basis by using the same processes as it uses for its own customers. As of December 31, 2001, Verizon VA had not received any complaints from CLECS in Virginia about errors in Verizon VA's CNAM.

c) Toll Free Database

330. Verizon VA provides CLECs with access to its Toll Free Database through its signaling network. CLECs are able to query Verizon's Toll Free Database to determine how a particular toll free call (e.g, 800/888/877/866) should be routed and completed. Instructions received from the Toll Free Database may include items such as POTS "translations" and time-of-day or day-of-week specific routing instructions (e.g, routing calls from one ordering center to another after 5:00 p.m.). Translations are changes made by the network to dialed telephone numbers to allow the call to be routed correctly through the network. The Verizon Toll Free SCP contains call processing

instructions for toll free numbers that have an area of service coverage within the Verizon footprint. Verizon VA makes access to its Toll Free Database available under interconnection agreements. *See* Attachment 202 ("Interconnection Agreement Matrix"). The rates associated with unbundled Toll Free Database queries were approved in the Commission's Final Order in Case No. PUC970005, dated April 15, 1999.

331. Verizon VA processed approximately 1.3 billion Toll Free Database queries in 2001 associated with its Federal Access Tariff offering, FCC Tariff No. 1, Section 6 and state access offering, Verizon VA's Access Services Tariff, S.C.C. - Va. - No. 217.

332. Verizon VA has two service options for queries to the Verizon Toll Free SCP. First, a CLEC switch can be connected to the Verizon VA 800 SCP through the STP port using SS7 interconnection. In this case, the CLEC's switch records the call information that can be used by the CLEC to bill the identified carrier. Second, the CLEC can have Verizon VA perform toll free database queries on its behalf from the access tandem. With the CLEC dialing plan (e.g., flat rate per month), the CLEC routes all toll free dialed numbers from its switch to the Verizon VA access tandem, which launches a query to the Toll Free SCP. The call record is made at the Verizon VA access tandem. Verizon VA and the CLEC then exchange the records that allow each of them to make appropriate billing.

333. In addition, carriers including Verizon VA can provide updates to the Toll Free database by contracting with a Responsible Organization, i.e., an independent third Party responsible for managing and administering the 800 subscriber records (e.g., data entry, changes, trouble reports).

334. Verizon VA is providing access to its Toll Free Database on a non-discriminatory basis. CLEC queries to the Toll Free Database are automatically handled in the same manner as Verizon VA queries. Verizon VA's SS7 signaling network commingles CLEC queries with Verizon VA queries and processes them on a first-come, first-served basis.

d) Local Number Portability Database

335. Local Number Portability ("LNP") is an arrangement by which an end user can select any carrier to provide local exchange service while retaining its existing telephone number. End users can "port" or transfer their telephone numbers to any local exchange provider that has facilities within their service areas. The LNP SCP contains identification records on "ported" numbers and the location routing number ("LRN"). The LRN is a 10-digit telephone number that identifies the switch to which the number has been ported. When the SCP receives a query for a ported telephone number, the SCP response includes the LRN, which provides call routing instructions. (By contrast, when the SCP receives a query for a telephone number that has not been ported, the SCP response indicates that the normal NPA-NXX routing applies.)[25] LNP queries from the Verizon VA area are handled by the Verizon LNP SCP in the Washington, DC LATA 236.

336. A CLEC connects to Verizon VA's LNP query service through SS7 interconnection. To access the Verizon VA LNP SCP, the carrier's network must have SS7 and LNP Capabilities because the CLEC switch launches an LNP query to the Verizon VA LNP SCP through the SS7 interconnection facilities. The source of the

information contained in the LNP database is the Number Portability Administration Center ("NPAC"). The NPAC is a neutral third Party that coordinates porting activity and downloads information about ported telephone numbers to all service providers with LNP SCPs serving the NPAC region. Verizon VA is in the Mid-Atlantic NPAC region.

337. Verizon VA provides CLECs nondiscriminatory access to its LNP Database. CLEC queries to Verizon VA's LNP Database are handled in the same manner as Verizon VA's queries. Verizon VA's SS7 signaling network commingles CLEC queries with Verizon VA queries and processes them on a first come, first serve basis. In addition, CLECs have exactly the same access to ported telephone number information as Verizon VA. Verizon VA ensures that call routing instructions are available to CLECs at the same time they are available to itself. As of December 31, 2001, 2 CLECs or IXCs use Verizon VA's LNP databases.

e) Advanced Intelligent Network Databases

338. Verizon VA also provides competing carriers with the ability to design, create, test, and deploy AIN-based services at the Service Management Systems ("SMS") through a Service Creation Environment ("SCE"). AIN is a service-independent, multi-vendor network architecture that provides CLECs and Verizon VA with the capability to create custom telecommunications services that are elicited by SS7 (TCAP) messages and central office switch "triggers" communicating with an AIN database (SCP). Basically, AIN allows service-specific call processing logic to reside in a database that is geographically remote from the switch that may process the call. The AIN database

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[25] The first six digits of a ten digit telephone number are the NPA-NXX. For example, if an end user has a telephone number of 804-772-1234, the NPA-NXX code is 804-772, and it is assigned to the Richmond Exchange Area rate center in Richmond, Virginia.

contains the call processing programs that instruct the network how to route or handle calls based on a specific criteria (e.g., who should be charged for the call; how to handle a call if the dialed number is not available). The nature of the response to an AIN query depends on the service logic being accessed at the SCP. Based on the call conditions encountered in the switch (such as an off-hook condition or terminating call attempt), the "trigger" halts call processing in the central office and launches a query over the SS7 network to the appropriate database for call processing instructions. The AIN trigger used to generate the query and the information in the query governs the database response when it is processed at the SCP.

339. Access to the Verizon VA AIN SCP is provided through the SMS/SCE. The SMS is a system that allows the creation, modification, and updating of information in the AIN databases. The SCE is an interface to an SMS that provides an AIN service creator with the ability to design, create, and test AIN call processing logic using software specific to a vendor's AIN platform implementation. In the Verizon VA network, the SCE used by service creators is not directly linked to either the AIN database or the Verizon VA switches. The rates associated with AIN were approved in the Commission's Final Order in Case No. PUC970005, dated April 15, 1999.

340. Information on ordering and deploying AIN is contained in the CLEC Handbook, Volume III, Tab 3.0. Verizon VA also provides CLECs with an AIN Service Creation User Guide upon completion of AIN Service Creation training.

341. For CLECs with their own switches, Verizon VA provides unbundled access to its AIN SCP through the SS7 network using interconnecting links to Verizon VA's STP. A CLEC deploying its own switch must provision its own switch trigger.

342. If the CLEC is serving end users through Verizon VA's unbundled local switching elements, access to the STP is provided over the same SS7 links used by Verizon VA. CLECs using Verizon VA's unbundled switching elements have access to exactly the same AIN functions as Verizon VA.

343. Verizon VA provisions competitor-designed AIN-based services on unbundled ports/loops or on their own switch using the same process flows as those designed for Verizon VA. Verizon VA's mechanized ordering and provisioning system for AIN-based services is used by both Verizon VA and CLECs. CLECs using the mechanized provisioning process submit a Local Service Request.

344. The AIN provisioning system used for both Verizon VA and CLECs is called the Advanced Provisioning System ("APS"). The APS does not distinguish between a properly formatted order issued by Verizon VA and one issued by CLECs. The system inherently provides CLECs with parity of services.

3. Service Management Systems

345. Verizon VA provides competing carriers with access to its Service Management Systems ("SMS"), which enables competitors to enter, modify, or delete entries for their own customers in Verizon VA's other databases. Verizon VA provides CLECs with access to the SMS associated with three of the call-related databases described above –Toll Free, LNP, and AIN. Verizon VA gives carriers the information necessary to enter information into Verizon VA's SMS. CLECs update LIDB entries via an LSR.

346. The SMS for the Toll Free Databases is administered by a neutral third Party, and all carriers, including Verizon VA and CLECs, obtain access by contracting

with that administrator. Like the Toll Free Database, the SMS for the LNP database is administered by a neutral third Party, and all carriers, including Verizon VA and CLECs, obtain access to the NPAC by contracting with that administrator. Detailed information regarding access to databases and the signaling network is contained in the CLEC Handbook Volume III, Sections 2.9 and 3.1.

347. Verizon VA provides access to the SMS associated with the AIN database through the service creation environment. Access is scheduled on a case-by-case basis. The SS7 interconnection intervals, as well as the intervals for access to LIDB, Toll Free Database, LNP database, and AIN, are negotiated.

CHECKLIST ITEM 11: LOCAL NUMBER PORTABILITY

A. Requirements for Local Number Portability

348. Section 271 (c)(2)(B)(xi) of the Act requires "[u]ntil the date by which the [FCC] issues regulations pursuant to section 251 to require number portability, interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations." Number portability is defined in Section 3(30) of the Act as "the ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another."

B. Verizon VA Provides Local Number Portability

349. Verizon VA meets this checklist item by offering local number portability ("LNP") throughout its service area. LNP arrangements allow CLECs to serve end users

formerly served by Verizon VA, without requiring those end users to change their existing telephone numbers. Verizon VA provides LNP pursuant to interconnection agreements. *See* Attachment 202 ("Interconnection Agreement Matrix").

350. As of December 31, 2001, Verizon VA was porting approximately 436,800 telephone numbers using LNP arrangements for more than 25 CLECs. Verizon VA is provisioning LNP on a timely basis. From November 2001 through January 2002, Verizon VA met the due date on approximately 99% of "LNP Only" orders. LNP Only orders are orders for number portability that are not associated with the purchase of UNE loops. An LNP Only order would be used by a CLEC that provides not only its own switching, but also its own loop to the end user premises -- such as a cable company or other full facilities-based CLEC -- to move the end user's service to the CLEC's switch without requiring the end user to change its number. The provision of LNP in connection with the "hot cut" of an existing Verizon VA end user's loop from Verizon VA service to CLEC service as a UNE loop is discussed with UNE loops in Checklist Item 4.

351. Verizon VA continues to provide interim number portability where the arrangement is already in place. However, because Verizon VA has deployed LNP in all of its switches, Verizon VA is no longer accepting new orders for interim number portability arrangements. CLECs with existing interim arrangements are being transitioned to LNP on a mutually agreed-upon schedule. Verizon VA has not yet received commitments from all of the CLECs regarding timeframes to complete the transition.

352. As of December 31, 2001, Verizon VA was providing interim number portability arrangements on approximately 300 telephone numbers for 6 CLECs. These

remaining interim arrangements are being provided pursuant to interconnection agreements. See Attachment 202 ("Interconnection Agreement Matrix").

CHECKLIST ITEM 12: LOCAL DIALING PARITY

A. Requirements for Local Dialing Parity

353. Section 271(c)(2)(B)(xii) of the Act requires Verizon VA to provide nondiscriminatory access to the services and information necessary to allow competing providers to implement local dialing parity in accordance with the requirements of Section 251(b)(3) of the Act. "Dialing parity" is defined by the Act to mean that a CLEC "that is not an affiliate of a local exchange carrier is able to provide telecommunications services in such a manner that customers have the ability to route automatically, without the use of any access code, their telecommunications to the telecommunications services provider of the customer's designation from among 2 or more telecommunications services providers (including such local exchange carrier)."[26] With regard to local dialing parity, Section 251(b)(3) requires Verizon VA "to provide dialing parity to competing providers of telephone exchange service and . . . to permit all such providers to have nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listing, with no unreasonable dialing delays."

B. Verizon VA Provides Local Dialing Parity

354. Verizon VA meets this checklist item by providing local dialing parity to CLECs that purchase unbundled local switching from Verizon VA or resell Verizon VA's retail service, and by providing the information necessary for CLECs with their own switches to implement local dialing parity.

355. Local dialing parity provided by Verizon VA ensures that a CLEC's local service customers are not required to dial more digits than a Verizon VA end user to complete a similar call, unless such a requirement is imposed by the CLEC. In addition, Verizon VA does not cause a CLEC's local service customers to experience post-dialing delay, call completion rate or transmission quality that is inferior to that experienced by end users of Verizon VA. Verizon VA's network does not distinguish between comparable calls by end users of Verizon VA and resellers, or between comparable calls that originate on Verizon VA's network and the network of a CLEC. Once a local call passes from a CLEC's network to Verizon VA's network, it is from that point on treated the same as a similarly-routed call originating from any other service provider's network, including Verizon VA's.

356. Local dialing parity allows CLEC customers to make local calls to the following, without dialing any extra digits or access codes, and without any unreasonable dialing delays: (1) a Verizon VA customer; (2) another customer served by the same CLEC or by another CLEC interconnected with Verizon VA; (3) directory assistance services; and (4) operator call completion services. Local dialing parity also allows Verizon VA customers to make local calls to CLEC customers without dialing extra digits or access codes, and without any unreasonable dialing delays.

357. Verizon VA provides local dialing parity at no additional charge, as an inherent component of its network interconnection arrangements with competitive carriers pursuant to interconnection agreements. Local dialing parity is also provided at no additional charge to CLECs that resell Verizon VA's retail service or purchase Verizon

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[26] 47 U.S.C. § 3(15).

VA's unbundled local switching pursuant to interconnection agreements. *See* Attachment 202 ("Interconnection Agreement Matrix").

358. From January through December 2001, Verizon VA exchanged over 14.2 billion minutes of traffic with CLECs over local interconnection trunks. All of the local calls handled under these arrangements were completed with local dialing parity.

359. While not a checklist requirement, Verizon VA also provides intraLATA toll dialing parity for all of its customers in Virginia. Verizon VA implemented intraLATA toll dialing parity on May 7, 1999, in accordance with the requirements of the Commission. See Implementation of IntraLATA Toll Dialing Parity pursuant to the provisions of 47 U.S.C. § 251 (b) (3), Case No. PUC970009, Final Order, dated April 14, 1999.

CHECKLIST ITEM 13: RECIPROCAL COMPENSATION

A. Requirements for Reciprocal Compensation

360. Section 271 (c)(2)(B)(xiii) of the Act requires Verizon VA to offer access and interconnection that includes reciprocal compensation arrangements in accordance with Section 252(d)(2). Reciprocal compensation arrangements are agreements between interconnecting carriers regarding the charges that each carrier will apply for the transport and termination of certain telecommunications traffic of the other carrier.[27] The FCC has held that traffic bound for the Internet, and other types of traffic excluded by Section 251(g), are not subject to reciprocal compensation provisions of the Act.[28] Section 252(d)(2)

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[27] See CC Docket Nos. 96-98 and 95-185, First Report and Order, FCC 96-325, released August 6, 1996, paras. 1033-1045.

[28] See CC Docket Nos. 96-98 and 99-68, Order on Remand and Report and Order, FCC 01-131, released April 7, 2001, paras. 45-46 ("Order on Remand"). With the exception of provisions limiting the ability of CLECs to invoke opt-in provisions of Section 252(i), provisions of the Order on Remand became effective on June 14, 2001. Order on Remand, para. 112.

requires reciprocal compensation arrangements that provide for mutual and reciprocal recovery of costs associated with the transport and termination on one carrier's network of calls that originate on the network of the other carrier.

B. Verizon VA Provides Reciprocal Compensation in Accordance with the Requirements of the Act and this Commission

361. Verizon VA offers reciprocal compensation to CLECs for the termination of traffic from Verizon VA customers that is subject to reciprocal compensation under the Act. These compensation arrangements provide compensation to CLECs for their costs of transporting and terminating this traffic from Verizon VA customers. The arrangements also obligate CLECs to compensate Verizon VA for completing traffic from CLEC customers that is subject to the Act's reciprocal compensation requirements. Verizon VA offers reciprocal compensation arrangements to CLECs pursuant to interconnection agreement in accordance with applicable law. See Attachment 202 ("Interconnection Agreement Matrix"). Verizon VA has complied with all rulings of this Commission that have addressed the reciprocal compensation terms of interconnection agreements. In addition, Verizon VA has implemented provisions of the FCC's Order on Remand. To the extent that Verizon VA is exchanging Internet-bound traffic and traffic properly subject to reciprocal compensation under the Act, unless otherwise provided in the parties interconnection agreement**.** Verizon VA will apply the presumption that any such traffic that exceeds a 3:1 ratio of terminating to originating is Internet-bound traffic. A detailed description of how Verizon VA will implement rate caps and payment limits of the FCC's Order on Remand is given in industry letters mailed to Virginia CLECs, which are

included in Attachment 213 (May 14 letter and October 23 letter transmitting interconnection agreement amendment) to this declaration.

362. As of December 31, 2001, Verizon VA was paying reciprocal compensation to 17 CLECs, 15 broadband Commercial Mobile Radio Service providers, and 5 paging companies.

CHECKLIST ITEM 14: RESALE

A. Requirements for resale

363. Section 271(c)(2)(B)(xiv) of the Act requires Verizon VA to make telecommunications services available for resale in accordance with the requirements of Section 251(c)(4) and 252(d)(3). Section 251(c)(4)(A) requires Verizon VA "to offer for resale at wholesale rates any telecommunications services that the carrier provides at retail to subscribers who are not telecommunications carriers." Section 251(c)(4)(B) prohibits "unreasonable or discriminatory conditions or limitations" on resale. Section 252(d)(3) sets forth the methodology for determining "wholesale rates."

B. Verizon VA provides resale services that conform to the Act

364. Verizon VA complies fully with all of the provisions of the Act governing Resale. Verizon VA offers to CLECs for resale, at the wholesale rates established by this Commission, all of the telecommunications services it provides at retail to subscribers who are not telecommunications carriers. Other carriers can and do purchase these services to compete directly with Verizon VA.

365. Verizon VA makes its resale telecommunications services available pursuant to interconnection agreements. The retail telecommunications services available for resale are contained in the Company's retail tariffs, S.C.C.-Va. -No.; 202-Local

Exchange Services, 202A- Extended Area Calling, 202B-Community Choice Plan, 203-General Services, 204-Channel Services, 209-Long Distance Services, 211-Miscellaneous Services, 251-Optional Calling Plans. In addition, CLECs can resell Verizon's retail DSL offerings on resold voice lines in Virginia, as in Pennsylvania. *See* FCC Tariff No. 1 Section 5.2, Part 3.

366. As of December 1, 2001, the Commission has approved or is reviewing for approval approximately 70 resale-only interconnection agreements and approximately 130 facilities-based interconnection agreements, many of which include resale provisions, between Verizon VA and CLECs.

367. Verizon VA is providing resale services in commercial volumes. As of the end of December 2001, there were more than 94,000 resold lines in service in Virginia, of which over 64,500 were business lines and over 29,600 were residence lines.

368. CLECs have the option of reselling Verizon VA's retail telecommunications services with Verizon VA's "branded" directory assistance and operator call completion services, with their own brands, or with no brand at all. When CLECs use Verizon VA's "branded" services, their subscribers hear Verizon's name or other identifying information. As of the end of December 2001, 51 CLECs were reselling Verizon VA's retail telecommunications services with Verizon-branded directory assistance and operator call completion services. To date, no resellers have requested rebranded or unbranded directory assistance and operator call completion services.

369. CLECs also have the option of having their customers' operator services and directory assistance calls routed to their own platforms. For these CLECs, Verizon

VA uses the same processes to route operator services and directory assistance calls from resold lines and unbundled local switch ports. As of the date of this filing, no resellers have requested that Verizon VA custom route their directory assistance and operator call completion services traffic to their own or a third-party provider.

370. Verizon VA provides its retail telecommunications services for resale in a nondiscriminatory fashion. There are no differences in the way CLEC subscribers are provided service and the way Verizon VA retail customers are provided service. Retail services sold to CLECs for their subscribers are provisioned, maintained, and repaired in the same time and manner as retail services sold to Verizon VA subscribers. Verizon VA uses the same resources and personnel to provision, maintain, and repair retail and resale services.

C. Resale discounts and merger conditions

371. The wholesale rates Verizon VA charges CLECs are Verizon VA's retail rates minus the Commission-determined discount. The Commission has determined a wholesale discount off of retail rates of 18.50% if Verizon VA provides operator and directory assistance services. If the reseller elects to provide its own operator and directory assistance services, the wholesale discount off of retail rates is 21.30%. Wholesale discounts can be found in interconnection agreements and the following orders: *Order Resolving Wholesale Discount for Resold Services*, issued November 8, 1996, and *Amending Order*, issued November 13, 1996,in Case No. PUC960100, Application of AT&T Communications of Virginia, Inc. for arbitration of unresolved issues from interconnection negotiations with Bell Atlantic - Virginia, Inc. pursuant to § 252 of the Telecommunications Act of 1996, and PUC960104, Application of Cox Fibernet Commercial Services, Inc. for arbitration of unresolved issues from

interconnection negotiations with Bell Atlantic - Virginia, Inc. pursuant to § 252 of the Telecommunications Act of 1996, and PUC960113, Application of MCI Telecommunications and MCImetro Access Transmission Services of Virginia, Inc. for arbitration of unresolved issues from interconnection negotiations with Bell Atlantic - Virginia, Inc. pursuant to § 252 of the Telecommunications Act of 1996.

372. As a condition of the FCC's approval of the merger between Bell Atlantic and GTE, Verizon VA currently offers a special, greater promotional discount of 32%, rather than the Commission-ordered discount rate, on resold residence lines ordered after the Merger Close Date and during the Offering Window, as those terms are defined in the FCC's order approving the merger. *See generally* Memorandum Opinion and Order, *In Re Application of GTE Corporation, Transferor, and Bell Atlantic Corporation, Transferee for Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License*, CC Docket No. 98-184 (released June 16, 2000). The Offering Window opened on July 30, 2000, and closes on the earlier of (a) 36 months later or (b) the first day of the month following the date on which the number of resold lines in service being billed at the promotional amount reaches the maximum allowable quantity for the relevant serving territory. The promotional period is 36 months from either the date the resold service is installed and operational or the period during which the resold service remains at the same location and for the same reseller, whichever is shorter. The 32% discount rate will be in effect for 24 months from the commencement of the offering window period but may be shortened if Verizon VA meets certain conditions, such as obtaining long distance relief in Virginia or meeting 50% of its out-of-region

commitment. Once Verizon VA meets one of these conditions, the 32% discount becomes 1.1 times the applicable Commission-set wholesale discount.

D. Reseller support

373. As indicated in the OSS Declaration, Verizon VA provides extensive support resources for CLECs that wish to resell Verizon VA's applicable telecommunications services. For example, there are automated interfaces to give resellers access to its OSS for pre-ordering and ordering activities for resold services. Verizon VA's Repair Trouble Administration System ("RETAS") provides resellers with the ability to test resold lines for troubles, submit trouble reports to Verizon VA, check status, check trouble history, and close out trouble reports. Verizon VA's Wholesale Customer Care Center ("WCCC") provides resellers with OSS technical assistance that is available 24 hours a day, 7 days a week. Verizon also provides resellers with formal training and detailed documentation, including the Resale Handbook, to help them understand and resell Verizon VA's services. A detailed discussion of these topics is provided in the accompanying OSS Declaration.

374. Verizon VA's Wholesale Markets-Resale Services organization supports resellers in their day-to-day dealings with Verizon VA. Indeed, the sole mission of Wholesale Markets-Resale Services is to support competitive facilities-based carriers, wireless carriers, payphone providers, independent telephone companies, and resellers. Within Wholesale Markets-Resale Services, the Resale Product Development and Management Group is responsible for developing new products for the resale market, "retro-fitting" retail products for resale, and defining resale policies and procedures.

375. The Account Management group is responsible for coordinating all aspects of a reseller's business dealings with Verizon VA. Each reseller has at least one

account manager who interfaces with the rest of the Verizon VA support network on behalf of the reseller. The account manager is supported by many Verizon employees dedicated to serving resellers. In addition, Verizon VA has established a number of contact centers to support resellers. The contact names and telephone numbers of those centers, as well as their hours of operation, are provided on the Verizon Wholesale Markets-Resale Services web site: www.verizon.com/wholesale. These include:

- A specialized and dedicated Regional Resold Services Center, located at 1300 White Horse-Hamilton Square Road in Hamilton Square, New Jersey began operations for Virginia on April 6, 2001. This center provides provisioning and maintenance functions for Resold Special Services and also provides a support function for Resold POTS. The center is available for POTS services 8:00 a.m. to 5:00 p.m. EST, Monday through Friday excluding holidays and 8 a.m. to midnight, 7 days a week, including holidays for Special Services. The Regional CLEC Maintenance Centers ("RCMC"), located in Virginia and New Jersey, provide maintenance and repair services for Virginia resellers (as well as carriers purchasing unbundled network elements) 7 days a week, 24 hours a day.
- The National Market Center ("NMC"), located at 13100 Columbia Pike, Silver Spring, Maryland supports the ordering functions described in the OSS Declaration. The NMC is open from 8:00 a.m. to 6:00 p.m. EST, Monday through Friday.
- The Billing and Collection Operations Center, also located at 1 Washington Park, Newark, New Jersey, is responsible for account inquiry and billing and collection

for resold accounts. This center is open from 8:00 a.m. to 5:00 p.m. EST, Monday through Friday.

E. Reasonable resale restrictions

376. Section 251(c)(4)(B) of the Act prohibits "unreasonable or discriminatory conditions or limitations" on resale, with the exception that a state commission may, consistent with regulations prescribed by the FCC, "prohibit a reseller that obtains at wholesale rates a telecommunications service that is available at retail only to a category of subscribers from offering such service to a different category of subscribers." Verizon VA does not impose any "unreasonable or discriminatory conditions or limitations" on the resale of its retail telecommunications services. The only restrictions Verizon VA places on the resale of its services are expressly authorized by applicable rules of the FCC and this Commission.

377. If Verizon VA makes a service available only to a limited category or class of customers (*e.g.*, subscribers to business exchange service), it does not allow a reseller to offer those services to classes of customers not eligible to subscribe to such services from Verizon VA (*e.g*., subscribers with residence exchange service). A general Class-of-Customer restriction is contained in interconnection agreements and in tariff S.C.C.-Va.-No.202 - Local Exchange Services.

378. If a Verizon VA service in Tariff S.C.C.-Va. -No.; 202-Local Exchange Services, 202A- Extended Area Calling, 202B-Community Choice Plan, 203-General Services, 204-Channel Services, 209-LongDistance Services, 211-Miscellaneous Services, 251-Optional Calling Plans has been grandfathered, *i.e.*, designated as no longer offered for new installations and available only to Verizon VA's existing subscribers to that service at their present locations, then the service is available for resale only to

customers who already subscribe to the service. Verizon VA's policy on resale of grandfathered services is contained in interconnection agreements.

379. If Verizon VA makes a promotional offering available for a period of more than 90 days, it makes that offering available for resale at wholesale rates. If the Verizon VA offering is available for 90 or fewer days, however, Verizon VA applies the wholesale discount to the retail price of the service, not to the short-term promotional price. Verizon VA's policy on promotional offerings is contained in interconnection agreements.

380. On request, Verizon VA will make existing contracts it has with customers available for resale at the wholesale discount. A contract Verizon VA has with a customer was tailored to meet the specific needs of that customer. As such, a reseller may sell any of Verizon VA's customer-specific arrangements to any customer that meets the terms and conditions of the particular arrangement.

F. Resale performance results

381. Verizon VA's C2C reports for November, and December 2001, and January 2002 show that the Company is providing resold services at parity with Verizon VA's retail operations. The resale measurements are divided into four major categories: (1) Pre-Ordering, (2) Ordering, (3) Provisioning, and (4) Maintenance.

382. Verizon VA generally provides resellers with excellent Pre-ordering and Ordering services. The Company exceeded the vast majority of all Pre-ordering and Ordering performance standards for November through January. Verizon VA's performance in these areas is discussed in detail in the OSS Declaration.

383. Likewise, Verizon VA's performance in provisioning Resold POTS has also been good. During November and December 2001 and January 2002 Verizon VA

provisioned 12,927 Resale POTS orders, and during this period, Verizon VA provided better provisioning service to CLECs than it did to its own customers. The average percent missed appointment for resale dispatch orders, as measured by PR 4-04, was only 1.56% during this time frame, compared to 8.60% for Verizon VA's retail orders. In addition, Verizon VA missed only 0.31% resale non-dispatch orders, as measured by PR 4-05, during November through January, compared to 0.71% of retail orders.

384. The PR 1-01 "Average Interval Offered – Non-Dispatch" and 2-01 "Average Interval Completed – Non –Dispatch" appear out of parity for Resale customers, but upon closer examination, it is clear that Verizon VA provided nondiscriminatory service. First, the difference between Resale and Retail intervals is less than a day, which is not competitively significant. Second, the order mix accounts for this difference: the majority of the Resold POTS orders (75%) are migration orders that change a Verizon VA customer to a reseller customer. The interval on these migration orders is one to two days, while retail orders are predominantly feature changes that receive a zero or one day interval. Thus, the fact that a majority of resold POTS orders involve migration (with a longer interval) accounts for the competitively insignificant difference in the measurement.

385. Verizon VA was also out of parity for PR 6-01 "% Installation troubles reported within 30 days" and PR 6-02 "% Installation troubles reported within 7 days" during the November through January time period. However, Verizon's Regional Resale Service Center performed root cause analysis and engaged the appropriate organizations for corrective actions. These actions resulted in new processes for handling certain

types of Resale orders. As a result of these initiatives, Verizon VA's installation quality performance has improved each month.

386. Verizon VA's repair and maintenance performance for resold services is also generally at parity with or better than its retail performance, as demonstrated by the C2C results for the period. Attachment 401 of the Measurements Declaration shows that Verizon VA met or exceeded the parity performance standard for every POTS PAP metric from November through January. In fact, Verizon VA provided *better* service to resellers than to its own retail customers in such important areas as Network Trouble Report Rate (MR-2-02 and MR 2-03), Missed Repair Appointments (MR-3-01 and MR-3-02), Mean Time to Repair (MR 4-01, MR4-02 and MR-4-03), % Out of Service > 24 Hours (MR-4-08), and % Repeat Reports within 30 Days (MR-5-01). In fact, 85.04% of all CLEC troubles were cleared within 24 hours (MR-4-04), compared to 76.36% of Verizon VA's retail troubles. In addition, Mean Time to Repair (MR-4-01) is significantly better for CLECs than for Verizon's retail customers, with a three-month weighted average of 14.80 hours for CLECs versus 19.19 hours for Verizon's retail customers. Resold services are also repaired with a higher degree of quality than retail; repeated reports for resale averaged just 10.66% for CLECs as compared to 14.66% for retail customers. Finally, average times to restore Special Services were also better for resale than for retail. Mean Time to Repair (MR 4-01) for Special Services averaged just 4.18 hours for CLECs as compared to 5.19 hours for retail customers.

CONCLUSION

387. Verizon VA has met the 14-point checklist in Section 271(c)(2)(B) of the Act. All 14 checklist items are available and are being provided to local market

competitors in Virginia pursuant to interconnection agreements and, in some cases, tariffs filed with the FCC. Verizon VA's rates for interconnection, UNEs and resold services have been and continue to be set by the Commission in accordance with the pricing requirements of the Act.

388. Verizon VA provides all checklist items to CLECs in a nondiscriminatory manner. Verizon VA satisfies this obligation by using nondiscriminatory processes that are like or comparable to the processes used in Verizon VA's retail operations. In addition, Verizon VA's Commission-ordered performance measures confirm that Verizon VA is satisfying its nondiscrimination obligations. Verizon VA's measurements, standards and reports, and its proposed performance assurance plan will ensure that Verizon VA will continue to do so in the future.

389. This concludes the Checklist Declaration.