COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

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

DECLARATION OF JULIE A. CANNY AND MARILYN C. DEVITO ON BEHALF OF VERIZON VIRGINIA INC.

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DECLARATION OF JULIE A. CANNY AND MARILYN C. DEVITO

1. My name is Julie A. Canny. I am the Executive Director - Regulatory Support for Wholesale Performance Assurance for Verizon Services Group. I am responsible for developing the performance measurements and performance assurance plans for wholesale products and services provided to Competitive Local Exchange Carriers ("CLECs") and Resellers by Verizon's local operating telephone companies.

2. I assumed my present position in August 1997 after the merger of Bell Atlantic and NYNEX. I had similar responsibilities for NYNEX from 1995 until the merger. From 1989 to 1995, I was Director of Quality for NYNEX, supporting all staff departments. In that function, I was involved with the implementation of Quality processes and, in particular, the development of performance measurements for business purposes. From 1985 to 1989, I held positions of increasing responsibility in Installation, Maintenance, and Construction Engineering in Boston and New Hampshire. From 1980 to 1985, I held various positions in Planning and Budgeting. Before joining New England Telephone and Telegraph Company, I was Senior Statistician at Liberty Mutual

Insurance Company, where I was responsible for the integrity of Workers Compensation experience filings with various regulatory bodies. I received a Bachelor of Science degree in Mathematical Economics and Management from Simmons College in 1977; and a Master of Business Administration degree, with a concentration in Finance, from Babson College in 1980.

3. My name is Marilyn C. DeVito. I am employed by Verizon Services Group as Director for Wholesale Performance Assurance. I am responsible for developing and implementing the performance measurements for wholesale services provided to Resellers and CLECs throughout the former Bell Atlantic South jurisdictions.

4. I assumed my current responsibilities in August 2000. I previously held the position of Director, Compliance Management, Program One, where one of my responsibilities included overseeing systems initiatives undertaken by Verizon (and before that, Bell Atlantic) to meet the requirements of the Telecommunications Act of 1996 (the "Act"). In prior positions with NYNEX, I was responsible for project management of the Information Systems work related to Unbundled Network Elements ("UNEs"), IntraLATA Presubscription, and various other products. Over the course of my career, I have held various management positions in customer care centers for retail business, retail residence, and wholesale services. I received a Bachelor of Arts degree in Communications from Queens College of the City University of New York.

I. PURPOSES OF DECLARATION

5. One purpose of this Declaration is to describe the Virginia Carrier to Carrier Guidelines Performance Standards and Reports ("Guidelines") adopted on August

11, 2000, which provide a comprehensive set of performance measurements, standards and reports applicable to wholesale service provided by Verizon Virginia Inc. ("Verizon VA").[1] The Guidelines can be found on the Commission website at www.state.va.us/scc/division/puc/ossdocs.htm. The performance measurements in the Guidelines cover the areas of Pre-Ordering, Ordering, Provisioning, Maintenance and Repair, Network Performance, Billing, and Operator Services and Databases. The performance measurements also include a General category covering Directory Listing Verification Reports; Poles, Ducts, Conduits and Rights-of-Way; and Bona Fide Requests.

6. This Declaration also shows that the reported performance results present a reliable and accurate picture of the quality of wholesale service provided by Verizon VA. Reports of performance results for the months of November, December and January, including a log of implementation issues associated with each report, are Attachment 401 to this Declaration. Special studies showing performance results for DSL line sharing during those months are Attachment 403. The Checklist Declaration and Operations Support Systems ("OSS") Declaration discuss performance results, and how Verizon VA meets the 14-point competitive checklist in Section 271 of the Act.[2]

7. Beginning with the February 2002 data month, Verizon VA will report performance under guidelines adopted by the Commission on January 4, 2002 (the "New

[1] *See* In the Matter of third-party testing of Operation Support Systems for Bell Atlantic-Virginia, Inc., Case No. PUC000035, Project Leader Ruling Adopting Metrics, dated August 11, 2000 ("Guidelines Order").

[2] Attachment 405 shows the Summary of Performance for November, 2001 through January, 2002.

Guidelines").[3] The New Guidelines can be found on the Commission website at www.state.va.us/scc/division/puc/ccimomfiles/compliancec2c.pdf. Attachment 402 is a matrix comparing the current Guidelines to the New Guidelines that became effective for the February data month. Like the current Guidelines, the New Guidelines also provide a comprehensive set of performance measurements, standards and reports that will allow regulators, CLECs, and Resellers to monitor Verizon VA's performance to verify that other carriers continue to receive service meeting requirements of the Act.

8. Although a performance assurance plan is not a requirement for 271 authority, "the existence of a satisfactory performance monitoring and enforcement mechanism would be probative evidence that the BOC will continue to meet its 271 obligations after a grant of such authority."[4] The Commission is currently considering adoption of a performance assurance plan in Case No. PUC010226.

9. Pending adoption of a performance assurance plan by this Commission, Verizon VA is subject to incentive payments established by the Federal Communications Commission ("FCC").[5] To secure FCC approval of their merger, the former Bell Atlantic and GTE agreed to make voluntary incentive payments to the United States Treasury if wholesale service provided by the combined entity failed to meet performance standards

[3] *See* Establishment of Carrier Performance Standards for Verizon Virginia Inc., Case No. PUC010206, Order Establishing Carrier Performance Standards with Implementation Schedule and Ongoing Procedure to Change Metrics, dated January 4, 2002.

[4] 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, CC Docket No. 01-138, Memorandum Opinion and Order, released September 19, 2001 ("Pennsylvania 271 Order"), ¶ 127.

[5] *See* 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, Memorandum Opinion and Order, released June 16, 2000 ("Merger Order"), ¶ 280.

adopted by the FCC.[6] The amount of the payments is subject to monthly state-specific caps, including an annual cap in 2002-2003 of $23,275,300 for Virginia.[7]

II. DEVELOPMENT AND ADOPTION OF THE GUIDELINES

10. The Guidelines were initially drafted by the Commission's independent consultant KPMG.[8] They were derived from metrics adopted in other jurisdictions -- principally New York, Pennsylvania and New Jersey -- where metrics were developed in open proceedings, with industry input. In addition, the New York metrics had been scrutinized by the FCC.[9] The Commission's Project Leader modified the draft metrics based on comments received from various parties, including Verizon VA, CLECs and the Attorney General of Virginia, and adopted the Guidelines on August 11, 2000.

11. The New Guidelines, which became effective for the February 2002 data month, are the product of a process that included industry collaboratives, extensive briefing of the issues, and Commission review.[10] When it adopted the New Guidelines, the Commission also adopted a procedure for future modification of the New Guidelines based upon changes to performance metrics adopted in New York.[11]

12. Both the current Guidelines and the New Guidelines are comparable to the guidelines adopted in New York, Pennsylvania, Massachusetts, Connecticut and Rhode

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[6] *See* Merger Order, ¶ 280.

[7] *See* Merger Order, n.630 and Attachment A-6.

[8] *See* Guidelines Order, pp. 1, 8.

[9] *See* Guidelines Order, p. 8.

[10] *See New Guidelines Order, n.3.*

[11] *See* New Guidelines Order, pp. 14-17. Pursuant to the Commission's modification procedure, Verizon VA filed revised Guidelines on February 22, 2002.

Island, where Verizon has been authorized to provide competitive long distance service,[12] and in New Jersey and Vermont where state regulators and the Department of Justice have stated that they support Verizon's pending 271 applications.[13]

III. STRUCTURE OF THE GUIDELINES

13. The Guidelines have three main components: performance measurements (which are sometimes also referred to as metrics); performance standards; and descriptions of the computational methodologies used to determine whether Verizon VA has met the applicable performance standard.

14. Performance Measurements: The performance measurements are the business rules, formulae and processes that Verizon VA uses each month to measure the

[12] *See* 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, Memorandum Opinion and Order, 15 FCC Rcd 3953 (1999) ("New York 271 Order"); Pennsylvania 271 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, CC Docket No. 01-9, Memorandum Opinion and Order, released April 16, 2001 ("Massachusetts 271 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, CC Docket No. 01-100, Memorandum Opinion and Order, released July 20, 2001 ("Connecticut 271 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), Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Rhode Island, CC Docket No. 01-324, released February 22, 2002 ("Rhode Island 271 Order").

[13] *See* In the Matter of the Consultative Report of the Application of Verizon New Jersey, Inc. for FCC Authorization to Provide In-Region, InterLATA Service in New Jersey, CC Docket NO. 01-347, dated January 14, 2001 ("NJ Consultative Report") ; Evaluation of the Department of Justice in the Matter of Application by Verizon New Jersey Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks, Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Service in New Jersey, CC Docket No. 01-347, dated January 28, 2002; Comments on Federal Proceeding, Application by Verizon New England Inc., d/b/a Verizon Vermont for a favorable recommendation to offer InterLATA Services Under 47 U.S.C. §271, Docket No. 6533, dated February 6, 2002 ("Vermont Consultative Report"); Evaluation of the United States Department of Justice, In the Matter of Application by Verizon New England Inc, Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Vermont, FCC Docket No. 02-7, dated February 21, 2002.

quality of its performance for each CLEC and Reseller in Virginia, and for all CLECs and Resellers in aggregate.

15. Performance Standards: Performance standards, which are established for certain measurements, identify the level of service quality that Verizon VA should provide. Not all measurements have performance standards. Some measurements are for diagnostic and informational purposes only. One example is MR-3-03, % Missed Repair Appointment – CPE/TOK/FOK,[14] which measures missed repair appointments for troubles that are reported as trouble in Verizon VA's network, but are eventually found in CPE or are not found at all.

16. There are two types of performance standards in the Plan: Parity and Benchmark. For measurements for which it appeared there was a reasonably analogous Verizon VA retail service, the performance standard is parity with VZ Retail. The parity standard uses statistical methodologies to compare the service quality that Verizon VA provided to its own retail customers in Virginia with the service quality that it provided to CLECs and Resellers in Virginia. For performance measures that appeared to have no reasonably analogous Verizon VA retail service, a benchmark standard is established to determine whether Verizon VA is providing CLECs with a specified level of service. Benchmark performance standards set an objective level of service quality, in contrast to the relative level of service quality established by parity standards.

17. Computational methodologies: These are the methodologies, including the statistical methodologies, that Verizon VA uses each month to determine whether its

performance for a CLEC or Reseller, or for CLECs and Resellers in aggregate, met the appropriate performance standard. To ensure statistical validity for measurements using a parity performance standard, Verizon VA will calculate whether it met the applicable standard only if there are ten or more observations in a month.

18. For performance measures using parity as the performance standard, and for which there are at least 30 observations for Verizon VA and for the Reseller or CLEC, Verizon VA uses the modified Z statistic for percent measures and modified t statistic for average measures. Verizon VA's performance for a Reseller or CLEC will be judged not to have met the performance standard if the critical Z or t value is less than -1.645 (*i.e.*, farther away from zero), which provides a 95% confidence level that Verizon VA's performance for a CLEC or Reseller was actually different from -- and worse than -- its performance for its own retail operations. With a Z or t score of less than -1.645, however, there is always a 5% probability that, because of sampling variations, Verizon VA will be judged to have missed a measure even though it actually provided the CLEC or Reseller with the same service quality that Verizon VA provided its own retail operations. The Z and t tests do not work well for small sample sizes, however. Therefore, if the number of observations for a parity measure is from 10 to 29, and Verizon VA's performance for a CLEC or Reseller (or CLECs or Resellers in aggregate)

[14] "CPE" refers to Customer Premises Equipment, "TOK" refers to Test OK, and "FOK" refers to Found OK.

is worse in absolute terms than Verizon VA's performance for itself, Verizon will use a permutation test to determine whether it met the performance standard.[15]

19. For measures using benchmark performance standards, pursuant to the Guidelines, Verizon VA does not use statistical methodologies. For those measures, Verizon VA will compare its performance for a CLEC or Reseller, or for all CLECs and Resellers in aggregate, against the benchmark performance standard. These benchmark standards are established at various levels of service for different metrics. At this strict level of performance, unless its average level of performance is above the target, normal variation in Verizon VA's performance will cause it, on occasion, to fall below the requisite benchmark.

20. Together, these performance measurements, standards, and computational methodologies provide the Commission, and ultimately the FCC, with objective data establishing that Verizon VA is providing CLECs and Resellers with the level of wholesale services necessary for checklist compliance. Of course, the Commission's evaluation of whether Verizon VA is providing the required level of wholesale services must be a contextual decision based on the totality of the circumstances and the information before it, not just on whether Verizon VA meets a particular performance standard.[16] Even if Verizon VA misses a performance standard, the Commission should consider whether the standard is higher than what is necessary to meet the statutory nondiscrimination standard, or whether the measured difference in performance has little

[15] Permutation test results were not performed and reported in data months prior to January 2002. As a result of this inadvertent omission, performance reported as a "Miss" in prior data months for metrics with small sample sizes may actually have been a "Met".

[16] Pennsylvania 271 Order, Appendix C, ¶¶ 8, 10.

or no competitive significance in the marketplace.[17] Likewise, the Commission should consider whether a particular measurement provides an accurate depiction of the quality of Verizon VA's performance.[18] In this Declaration, we discuss certain measurements and performance standards that demonstrably do not accurately depict the quality of Verizon VA's wholesale performance. Moreover, the Commission should recall that a single month miss -- which often is nothing more than a reflection of statistical randomness or normal variations in performance in the field -- should be considered in the context of Verizon VA's performance over time.[19]

IV. KPMG'S REVIEW OF VERIZON VA'S PERFORMANCE MEASUREMENTS AND REPORTS

21. As discussed in the OSS Declaration, KPMG Consulting ("KPMG") conducted a comprehensive review of Verizon VA's OSS on behalf of the Commission. As part of that effort, KPMG evaluated the procedures and systems that Verizon VA has implemented to measure and report its performance for the measurement categories in the Guidelines: Pre-ordering, Ordering, Provisioning, Maintenance and Repair, Network Performance, Billing, Operator Services and Databases, and General. The measurement

[17] Pennsylvania 271 Order, Appendix C, ¶ 8 (The FCC may find that statistically significant differences in measured performance may exist, but that such differences have "little or no competitive significance in the marketplace."); New York Order, ¶59; Connecticut 271 Order, Appendix D, ¶¶ 8-10.

[18] Pennsylvania 271 Order, Appendix C, ¶8; New York 271 Order, ¶ 59 ("[W]e will examine the explanation that Bell Atlantic and other commenters provide about whether these differences provide an accurate depiction of the quality of Bell Atlantic's performance. For instance, we may examine the data on a more disaggregated level, in order to evaluate arguments made by Bell Atlantic that competitive LEC error, or differences in the composition of competitive LEC orders, or sudden changes in quantity or timing of orders made by competitive LECs, are responsible for the apparent poor performance."); Connecticut 271 Order, Appendix D, ¶¶ 8-10.

[19] Pennsylvania 271 Order, ¶8 (The FCC may also examine "how many months a variation in performance has existed and what the recent trend has been.") and ¶9 ("[A] disparity in performance for one measure, by itself, may not provide a basis for finding noncompliance with the checklist."); New York 271 Order, ¶ 60 ("A steady improvement in performance over time may provide us with an indication that problems are being resolved."); Connecticut 271 Order, Appendix D, ¶¶ 8-10.

portion of KPMG's review included 126 "test points." KPMG concluded that Verizon VA satisfied 122 of the 123 test points that were applicable. As described below, Verizon VA implemented a change control effective for the January data month to correct the issues raised by KPMG regarding the single unsatisfied test point. (KPMG Draft Final Report, Version 1.0, dated March 4, 2002 ("KPMG Report"), Section VIII.)[20]

22. KPMG's review of Verizon VA's measurements was extensive, covering five areas. First, KPMG found that Verizon VA has implemented satisfactory practices for documentation and distribution of metrics standards and definitions, and distribution of metrics reports. Verizon VA met each of KPMG's 3 test points. (KPMG Report, PMR1.)

23. Second, KPMG found that Verizon VA has implemented satisfactory policies and practices for collecting and storing the unprocessed or "raw" data that it uses to calculate Verizon VA's reported performance results. Verizon VA met each of the 49 test points. (KPMG Report, PMR2.)

24. Third, to test the adequacy of the processes that Verizon VA uses each month to calculate and report performance metrics and retail analogs, KPMG replicated Verizon VA's results. KPMG's replication effort covered all measurement categories in the Guidelines. Verizon VA satisfied all but one of KPMG's 32 test points. (KPMG Report, PMR3.) KPMG successfully replicated results for all metrics in the December data month except NP-5-01, % of Network Outage Notices Sent Within 30 Minutes. (KPMG Report, PMR3-1-F.) Results reported for NP-5-01 in the December data month

[20] KPMG concluded that three test points were not applicable. In connection with its evaluation of procedures for replicating and converting the raw performance data to produce reportable results, KPMG determined that Operator Services and Databases data used in calculation of performance metrics were already in rawest form. Test points PMR4-1-H, PMR4-2-H, PMR4-3-H were accordingly inapplicable.

were incorrect because of a typographical error in the metric calculation formula. In addition, the process for calculating the metric had been incorrectly applied in the November through January data months, outage reports other than initial reports were counted in total volume, and some outage reports were improperly included in the calculation of results. Verizon VA issued and implemented a change control to correct all of these issues effective for the January 2002 data month.[21]

25. Fourth, KPMG concluded that Verizon VA has implemented appropriate procedures for replicating and converting the raw performance data to produce reportable results, as called for by the Guidelines. Verizon VA satisfied all of the 24 applicable test points. (KPMG Report, PMR4.)

26. Finally, KPMG considered Verizon VA's change control practices -- the practices that Verizon VA has implemented to manage changes to the performance standards, metric definitions, and calculation of performance results. Verizon VA satisfied each of KPMG's 15 test points. Among other things, KPMG was satisfied that Verizon VA has consistent processes for developing, evaluating and implementing change controls, and an adequate notification process of metric changes and errors. (KPMG Report, PMR5.)

V. SPECIFIC PERFORMANCE MEASUREMENTS

[21] In its comments, KPMG noted that Verizon VA had not reported December results for PO-8-01, % On-Time – Manual Loop Qualification. The transaction measured by this submetric was not implemented until October 2001. Verizon VA began reporting results in the January 2002 data month, and provided results for the December 2001 data month when it submitted its January report. (KPMG Report, PMR3-2-A.) In addition, as KPMG noted, a difference of 0.09% in results calculated by KPMG and Verizon VA for MR-1-06, Average Response Time – Test Trouble (POTS Only), was attributable to Verizon VA's inadvertent inclusion of test data, which has been corrected effective for the February data month. (KPMG Report, PMR3-1-D.)

27. The Guidelines include the performance measurements, standards, and reports provided by Verizon VA. The Guidelines establish performance measurements in eight key categories: Pre-Ordering (PO), Ordering (OR), Provisioning (PR), Maintenance and Repair (MR), Network Performance (NP), Billing (BI), Operator Services and Databases (OD), and General (GE). The purpose of these performance measurements is to monitor the timeliness, reliability, and quality of Verizon VA's wholesale service performance.

28. Each of the eight measurement categories in the Guidelines contains a number of metrics, for a total of 49 metrics.[22] Each of the 49 metrics in the Guidelines contains one or more submetrics, for a total of 206 submetrics.[23] Verizon VA measures and reports its performance at the submetric or disaggregated submetric level. The Guidelines contain 2,087 disaggregated submetrics, which are the 206 submetrics further broken out by geographic regions (*e.g.*, NOVA, Central), mode of entry (*e.g.*, UNE, Resale), product type (*e.g.*, POTS, xDSL, trunk), and various combinations thereof.[24] In addition, Verizon VA generally measures its performance for each applicable disaggregated submetric for each CLEC and Reseller in Virginia.

[22] For example, the Pre-Ordering category (PO) contains eight separate metrics: PO-1, Response Time OSS Pre-Ordering Interface; PO-2, OSS Interface Availability; PO-3, Contact Center Availability; PO-4, Timeliness of Change Management Notice; PO-5, Average Notification of Interface Outage; PO-6, Software Validation; PO-7, Software Problem Resolution Timeliness; and PO-8, Manual Loop Qualification.

[23] For example, metric PO-1 contains ten submetrics.

[24] For example, for the submetric OR-1-04, which measures the percent of on-time CLEC order confirmations, Verizon VA measures and reports its performance separately for eight UNE product categories and for seven Resale product categories.

29. A series of Appendices to the Guidelines provide additional information concerning service and maintenance codes used by Verizon VA, methodologies, processes, and status reports.

A. Pre-Ordering Category: PO-1 through PO-8.

30. The Pre-Ordering measurement category contains eight metrics assessing different aspects of the quality of Verizon VA's pre-ordering and ordering-related services and systems: (i) response times of Verizon VA's OSS to queries by CLECs (PO-1), (ii) availability of access to the OSS (PO-2), (iii) availability of contact centers for CLECs (PO-3), (iv) timeliness of change management notices (PO-4), (v) timeliness of notification of interface outages (PO-5), (vi) software validation (PO-6), (vii) software problem resolution timeliness (PO-7), and (viii) manual loop qualification response timeliness (PO-8).

31. PO-1: Response Time OSS Pre-Ordering Interface. "Response time" is the number of seconds that elapse between the transmission of a request for pre-ordering information by a service representative (Verizon VA retail, Reseller, or CLEC) and receipt of the information in a specified field and screen. The amount of elapsed time for CLECs is measured based on the access platform chosen by the CLEC to submit orders. CLEC response times are measured and reported separately for each of the following access platforms: Electronic Data Interchange ("EDI"), Web-based Graphical User Interface ("Web GUI"), and Common Object Request Broker Architecture ("CORBA"). Verizon VA's performance for itself is measured directly to and from the OSS. Verizon VA measures the timeliness of responses for the following transactions: (i) Customer Service Records, (ii) Due Date Availability, (iii) Address Validation, (iv) Product and

Service Availability, (v) Telephone Number Availability and Reservation, (vi) Facility Availability for ADSL Loop Qualification, (vii) Rejected Queries, (viii) Percent of time-outs, (ix) Parsed CSR, and (x) Parsed CSR – CLEC total. Each of these is described in the Guidelines.

32. Verizon VA cannot measure actual OSS response time for its own retail pre-ordering operations with its current systems. Therefore, Verizon VA utilizes a performance monitoring system called EnView that permits comparison of the timeliness of responses to CLEC requests against the timeliness of responses experienced by Verizon VA retail representatives for the same types of requests submitted at the same time of day. The EnView system accurately simulates real world CLEC experience by replicating the key strokes of CLEC representatives through the EDI, Web GUI, or CORBA access platforms and of Verizon VA representatives directly to and from the OSS (including log-on). EnView makes requests at the rate of ten transactions per hour, for each type of transaction (*e.g.*, customer service record, due date availability), from 6:00 a.m. to 10:00 p.m. Eastern Time, Monday through Saturday, excluding holidays. EnView measures the transaction from the point at which the "enter" key is struck until a response is returned to the display screen. Because the nature and complexity of a request can affect the time it takes the system to respond, EnView sends identical transactions for both CLECs and Verizon VA. This ensures a meaningful comparison of response times.

33. Consistent with the Guidelines, EnView is used to measure CLEC and retail transactions for all PO-1 metrics except PO-1-10, which is reported using actual transactions rather than EnView simulations. Pursuant to the New Guidelines

implemented for the February data month, actual transactions will be used to measure CLEC transactions for all PO-1 metrics except PO-1-07.

34. The performance standards for PO-1-01 through PO-1-07 are "parity plus not more than four seconds." For PO-1-09, the performance standard is "parity plus not more than ten seconds." The four and ten second differentials allow for variations in functionality and additional security requirements of the CLEC interface. No performance standards have been established for PO-1-08, % Timeouts, which is a diagnostic metric, or for PO-1-10, Parsed CSR – CLEC Total, which measures performance already captured by PO-1-09, Parsed CSR. In the New Guidelines implemented for the February data month, the performance standard for PO-1-04, Average Response Time – Product and Service Availability, has been changed to "parity plus not more than ten seconds." For PO-1-01 through PO-1-03, PO-1-05 and PO-1-07, the standard will become parity plus seven seconds for access to the OSS using Web GUI. Experience has shown that the four second differential originally established was not adequate to account for variations in functionality and additional security requirements of the interface.

35. There is an apples-to-oranges problem with PO-1-05, which measures average response time for Telephone Number Availability and Reservation, another type of preorder transaction. The measurement of PO-1-05 is faulty because it compares the timeliness of Verizon VA's response to CLECs -- which includes *two* types of information, *i.e.*, telephone number selection and address validation -- to the timeliness of Verizon VA's response to its retail representatives -- which provides only *one* type of information, *i.e.*, telephone number selection information. Verizon VA has prepared a

special study to show its performance for the November, 2001 through January, 2002 data months, using Verizon VA retail response times that include both address validation and telephone number selection times. The performance reports show an average EDI response time for telephone number availability for CLECs of 6.66 seconds in November, 6.58 seconds in December, and 6.11 seconds in January; and an average response time for Verizon VA retail of 2.04 seconds in November, 0.76 seconds in December, and 0.76 seconds in January. However, the Verizon retail response time does not include the time for address validation, which is included in the time for CLECs using EDI. When that extra time is included in the average response time for Verizon VA retail, the response time for CLECs is 0.40 seconds more than retail in November, 2.06 seconds more than retail in December, and 1.57 seconds more than retail in January.[25] Thus, when the comparison is truly apples-to-apples, Verizon VA meets the performance standard of parity with Verizon VA plus four seconds. The problem with PO-1-05 is corrected in the New Guidelines implemented for the February data month, which provide an apples-to-apples comparison.

36. PO-2: OSS Interface Availability. "OSS Interface Availability" is the percent of time in hours and minutes that the Pre-Ordering and Maintenance Interfaces are actually available as a percentage of scheduled availability to carriers. Because Verizon VA retail and CLEC representatives obtain Pre-Ordering, Ordering, Provisioning, and Maintenance information from the same underlying OSS, if the OSS is unavailable to a CLEC, it is equally unavailable to Verizon VA. Any difference in OSS

[25] Adding the extra time results in a retail response time of 6.26 seconds in November, 4.52 seconds in December, and 4.54 seconds in January.

availability for CLECs, therefore, will be caused by the unavailability of the interface by which CLECs obtain access to the OSS.

37. Verizon VA measures OSS interface availability. For the Pre-Ordering interface, Verizon VA measures Prime Time, which is 6:00 a.m. to 10:00 p.m. Eastern Time, Monday through Saturday (excluding holidays), and Non-Prime Time, which is 10:00 p.m. to 6:00 a.m. Eastern Time, Monday through Saturday and all day Sundays and Holidays. For the Maintenance interface, Verizon VA measures Prime Time, which is 6:00 a.m. to 12:01 a.m. Eastern Time, Monday through Saturday (excluding holidays), and Non-Prime Time, which is 12:01 a.m. to 6:00 a.m. Eastern Time, Monday through Saturday and all day Sunday and holidays. To meet the performance standard, Verizon VA's OSS interface must be available 99.5% of Prime Time (PO-2-02). Advanced notice of scheduled outages for systems upgrades (which are not excluded from this metric) is provided to carriers based on OSS Change Management guidelines.

38. For each OSS interface serving Virginia, Verizon VA separately reports: Pre-Ordering EDI, Pre-Ordering Web GUI, Pre-Ordering CORBA, Maintenance Web GUI, and Maintenance Electronic Bonding. Verizon VA measures availability of the EDI, Web GUI, and CORBA interfaces based on (i) out-of-service troubles reported by CLECs and (ii) EnView measurements for the Retail comparator. For EnView, the hours of the day are divided into ten-minute measurement periods. If an interface for any type of transaction has at least one successful transaction in a ten-minute measurement period, the interface is considered available. The interface is considered unavailable if all transactions for the interface in a ten-minute period are unsuccessful and one or more

corresponding OSS transactions are successful. Scheduled downtime and "new release" weekends are not excluded from the calculation of this metric.

39. As of the December data month, all EnView servers were included in the PO-1 and PO-2 metrics. No interface outages were reported by CLECs in November, December or January.

40. PO-3: Contact Center Availability. "Contact Center Availability" measures the response time for answering calls placed to the National Market Center ("NMC"),[26] and the Regional CLEC Maintenance Centers ("RCMC"). For purposes of this metric, the pertinent hours are those during which support is provided to CLECs doing business in Virginia, and the Guidelines identify the hours of operation for each of the CLEC assistance functions supported by these centers.

41. Verizon VA designed its systems and processes so that CLECs can enter orders and trouble tickets electronically. As a result, unlike the corresponding Verizon VA retail centers, the ordering and repair assistance centers for CLECs and Resellers are not high volume call centers for placing orders or reporting troubles. Instead, they are designed as help desks that provide information and assistance to Resellers and CLECs using the electronic interfaces.

42. Metric PO-3 measures the average speed with which ordering and repair calls are answered, as well as the percent of ordering and repair calls answered within a specified period of time. For calls placed to the general access number of the NMC, Verizon VA measures elapsed time from the CLEC's selection of a call direction option

from the call management system menu until the call is answered at the NMC. For calls dialed directly by a CLEC to a specific NMC representative that are unanswered and forwarded to the call management system, Verizon VA measures elapsed time from the CLEC's request that the call be directed to the next available NMC representative or to voice mail until the call is answered by an NMC representative or voice mail. For calls to the RCMC, Verizon VA measures elapsed time from a CLEC call entering the call management system until it is answered by a Verizon VA representative.

43. The performance standard for this metric is 85% of calls answered within 20 seconds. Under the New Guidelines that became effective for the February data month, the performance standard will be 80% within 30 seconds. Results for this metric are reported separately for each center.

44. PO-4: Timeliness of Change Management Notice. This metric measures the percent of Change Management Notices and Confirmations sent on time for the enumerated change types, and average delay days for Change Management Notices and Confirmations that were delayed for one to seven days and for eight or more days. The established performance standards are 95% of notices for all types of changes sent on time, and zero sent eight or more days late.

45. PO-5: Average Notification of Interface Outage. "Average Notification of Interface Outage" measures the average amount of time that elapses between Verizon VA identification of an interface outage and notification to CLECs that an outage exists. Verizon VA provides notice of an interface outage by electronic mail. To meet the

[26] The NMC was formerly known as Telecommunications Industry Services Ordering Center ("TISOC").

performance standard, Verizon VA must provide notice of an interface outage within 20 minutes on average.

46. PO-6: Software Validation. "Software Validation" measures the failure rate of test transactions used to validate the successful implementation of non-emergency software releases. The performance standard is a failure rate of not more than 5%. Scheduled software releases occur in the months of February, June, and October. This metric is accordingly reported three times per year, with results of the software validations reported for the data months in which the release occurs.

47. PO-7: Software Problem Resolution Timeliness. Four submetrics measure the timeliness of Verizon VA's resolution of "Production Referrals." Production Referrals are failed pre-order or order transactions reported by CLECs or identified by Verizon VA during testing within 30 days following implementation of a non-emergency software release. A Production Referral is resolved when a change is implemented that corrects the root cause of the failure. The standard for PO-7-01 is 95% on time, according to target response intervals stated in the metric. There is no performance standard for PO-7-02 through PO-7-04, which are diagnostic measurements of delays in resolution. Although the software releases occur in the months of February, June, and October, the results for this metric are reported in the data month following the release in order to account for the 30-day time period referred to above.

48. PO-8: Manual Loop Qualification. Two submetrics measure the response time for the provision of loop qualification information when such information is not available through an electronic database. (Loop qualification is the manual step whereby

it is determined if a loop facility meets or can be made to meet specifications necessary for ISDN or xDSL services.) Excluded from elapsed time are weekend hours (5:00 p.m. Eastern Time Friday to 8:00 a.m. Eastern Time Monday) and holiday hours (5:00 p.m. Eastern Time of the business day preceding the holiday to 8:00 a.m. Eastern Time of the first business day following the holiday). Manual Loop Qualification (PO-8-01) and Engineering Record Requests (PO-8-02) are reported separately. The performance standard is 95% within 48 hours for PO-8-01 and 95% within 72 hours for PO-8-02.

B. Ordering Category: OR-1 through OR-10.

49. The Commission has established ten ordering metrics in five categories: (i) the timeliness of order status notices (*e.g.*, confirmations, reject notices, completion and acknowledgement notices provided to CLECs), (ii) the percentage of orders that are rejected and that flow through for CLECs, (iii) service order accuracy, (iv) timeliness and accuracy of acknowledgements, and (v) percent of lost order trouble tickets.

50. OR-1 and OR-2: Order Confirmation and Reject Timeliness. Verizon VA measures the timeliness with which it confirms LSRs and Access Service Requests ("ASRs") for Resale, UNE orders and Interconnection Trunks (OR-1). Verizon VA also measures the timeliness of reject notices (OR-2). The timeliness of order confirmations and reject notices for Resale and UNE orders is measured in hours (and minutes as a percentage of an hour) from the time Verizon VA receives the order until the confirmation or reject notice is distributed. Confirmation and reject notices are sent out by Verizon VA over the same interface that the CLEC used (*i.e.*, Web GUI or EDI) to submit the order. Verizon VA also measures the timeliness of Firm Order Confirmations ("FOCs"), Design Layout Records ("DLRs"), and reject notices for interconnection

trunks in business days from when Verizon receives the order until the FOC, DLR, or reject notice is returned to the CLEC.

51. Verizon VA reports separate measurements for the following types of Resale orders: POTS, Complex Services (2 Wire Digital Services and 2 Wire xDSL Services), and Special Services. POTS measurements, including pre-qualified Complex POTS orders, are reported separately for flow-through orders (*i.e.*, orders requiring no manual handling), for orders submitted electronically that require manual handling, and for faxed or mailed orders. Electronic orders that require manual handling and faxed/mailed orders are measured separately for those that have fewer than six lines and those that have six or more lines. Measurements for Complex Services (which require manual loop qualification) and Special Services are separate for orders that have fewer than six lines and orders that have six or more lines, for both electronic and faxed/mailed orders.

52. Verizon VA also reports separate measurements for the following types of UNE orders: POTS (Loop, Platform and pre-qualified Complex), Complex (2 Wire Digital Services and 2 Wire DSL Services requiring manual loop qualification), and Special Services. As with Resale, POTS measurements are reported separately for flow-through orders, for electronically-submitted orders requiring manual handling, and for faxed/mailed orders. Except for flow-through orders, the measurements are reported separately for orders that have fewer than six lines and those that have six or more lines. Measurements for Complex and Special Services are separately reported for orders that have fewer than six lines and orders that have six or more lines, for both electronically-submitted non-flow-through orders and orders submitted by fax/mail.

53. For interconnection trunks, Verizon VA measures the timeliness of the FOC and of reject notices in business days, beginning from receipt of the ASR to the distribution of the FOC or reject notice. In addition, Verizon VA measures the timeliness of both Design Layout Records ("DLR") and responses for requests for inbound augment trunks.

54. The time for providing the notices measured, and the way notice is provided to the CLEC, generally depend on the type and volume of the wholesale product ordered, and the method used to submit the service request. Because Verizon VA representatives do not receive order confirmations or rejects as part of the retail ordering process, there is no analogous retail function against which to compare its performance for CLECs. Therefore, benchmark standards have been established for returning confirmations or rejections for each type of notice and for each product or service category. The established performance standard is 95% of confirmation and reject notices within the established benchmarks. Measurements of the average time it takes to confirm or to reject CLEC orders are diagnostic, and therefore no performance standard has been set by the Commission.

55. There are several implementation issues associated with OR-1 and OR-2. A small number of UNE Loops, which should have been classified as Complex have been improperly classified as POTS or Specials. Verizon VA expects to resolve this effective with the February data month. In addition, the apparent understatement of orders for Direct Inward Dialing trunks in results reported for six or more lines will be corrected for the July data month. Some ASR Special Services disconnect orders and trunk orders that have been omitted from reported results will be included with the

implementation of the New Guidelines in the February data month. Finally, during the data months of November, December and January, Verizon VA counted some UNE ASR reject notices twice. This is also expected to be resolved with the February data month.

56. OR-3: Percent Rejects. Verizon VA also measures, for both UNE and Resale services, the percent of orders it receives that are rejected or "queried" back to the CLEC. Orders are rejected or queried back to the CLEC because they were submitted with erroneous or incomplete information. Therefore, OR-3-01 captures the quality of CLEC orders, not the quality of Verizon VA's performance. No performance standard has been established because the provision of correct information is within the control of the CLEC and is not within Verizon VA's control.

57. OR-4: Timeliness of Completion Notification. Verizon VA measures the timeliness with which it returns provisioning and billing completion notices to CLECs for Resale and UNE orders (OR-4-01, OR-4-02, OR-4-04, OR-4-05, OR-4-09, OR-4-10 and OR-4-11). In addition, Verizon VA measures the timeliness of service order systems and billing systems in posting completions to the service orders. (OR-4-03, OR-4-06, OR-4-07 and OR-4-08).

58. OR-4-01, Completion Notice – Average Response Time and OR-4-02, Completion Notice - % On Time measure performance from the time of the billing system completion to the time the billing notifier is sent to the CLEC. OR-4-04, Work Completion Notice – Average Response Time, OR-4-05, Work Completion Notice - % On Time and OR-4-10, % SOP to Provisioning Completion Within 2 Business Days measure the timeliness from the completion in the service order systems to the

notification of provisioning completion. OR-4-09, % SOP to Bill Completion Within 3 Business Days measures timeliness from the SOP completion to the notification of billing completion. The remaining metrics measure Verizon systems performance. OR-4-03, % Orders excluded from % On Time Measurement measures the number of orders where completion time in the billing system can not be determined. Measures of timeliness from completion in the service order processor to completion in the billing system are OR-4-06, Average Duration – Work Completion (SOP) to Bill Completion, OR-4-07, % SOP to Bill Completion $\geq$ 5 Business Days, and OR-4-08, % SOP to Bill Completion > 1 Business Day.

59. Performance standards have been established for many of the OR-4 metrics. OR-4-02 and OR-4-05 have a standard of 97% by next day at noon, OR-4-06 and OR-4-07 have a standard of parity with retail. OR-4-09 and OR-4-10 have a standard of 95% within the specified business days and OR-4-11 has a standard of not more than 5% of orders completed without a BCN and PCN within 3 business days. OR-4-01, OR-4-03, OR-4-04 and OR-4-08 are for diagnostic purposes and therefore have no standard.

60. In October 2001, the New York PSC approved the elimination of all of the then-existing OR-4 measurements — with the exception of OR-4-11, which has been revised — and created new measurements addressing provisioning and billing completion notifiers for orders submitted over the Netlink EDI system. Consistent with the New York PSC order, Verizon VA has proposed in the revised Guidelines filed on February 22, 2002, the revised OR-4-11, has added two new submetrics: OR-4-16 - % Provisioning Completion Notifiers sent within one (1) Business Day; and OR-4-17 - %

Billing Completion Notifiers sent within two (2) Business Days and has eliminated all remaining OR-4 submetrics.

61. Verizon VA has determined that not all time stamps needed for reporting of the OR-4 metrics are available for service orders processed in the expressTRAK system. As a result, timeframes reported for certain OR-4 submetrics have either been understated or overstated. Specifically, for submetrics OR-4-04, OR-4-05, OR-4-09, OR-4-10, OR-4-11 the date and time of generation of the PCN has been used instead of the date and time that completion is posted in SOP. Because generation of the PCN occurs after posting of completion in SOP, reported results for these submetrics understate the timeframes reported by these submetrics. For other submetrics, including OR-4-01 and OR-4-02, the date and time of work completion has been used instead of the date and time that billing completion is posted in SOP. Because work completion occurs before billing completion is posted in SOP, this has resulted in overstating the timeframes reported by these submetrics.

62. Verizon is currently working on the system changes necessary to capture the SOP completion date/time stamps. These changes are in development and are scheduled to be implemented in June 2002. Verizon VA has performed a series of special studies for OR 4-05, OR 4-09 and OR 4-10 using work completion date/time as a substitute for SOP Completion date/time. Because work completion occurs before SOP completion, the special studies apply a measure of performance that is more stringent than the Guidelines and that maximizes elapsed time. The results of the special studies are provided in Attachment 406. As noted above, results reported for OR-4-02 have used the more conservative measure point of work completion rather than SOP completion.

63. Verizon VA has experienced implementation issues with OR-4-06 through OR-4-08. Specifically, weekends were incorrectly excluded in the calculation of the OR-4-06 metric. Also, CABS orders have been incorrectly included in the calculation of metrics OR-4-06 through OR-4-08. These issues affected both retail and wholesale results and will be corrected for the February data month. Finally, parity with retail is not an appropriate standard for these metrics, as there are processing situations that occur in wholesale that do not occur in retail, and which by definition cause some wholesale orders to take longer to complete than retail orders. In wholesale, migration requests require multiple service orders to be completed. Where there are multiple associated service orders, they must process in a specific sequence. For example, if the second order attempts to process first, it will be automatically re-cycled by the system to enable the associated orders to process in the proper sequence. For the orders that are recycled, the elapsed time from SOP completion to billing system completion is elongated by the re-cycle time. From a service order processing perspective, there is no retail equivalent to a two-service order wholesale migration.

64. OR-5: Percent Flow-Through. Verizon VA measures the percent of valid orders (orders not rejected or queried) received through the electronic ordering interfaces that are processed directly into the SOP without manual intervention. The metric OR-5-01 measures the total valid flow-through orders. The denominator for this metric is all electronically received valid orders, whether or not they are of a type that is designed to flow-through to the service order processor. Thus, this measurement provides the best picture of the distribution of mechanized (flow-through) and manually (NMC-assisted) processed CLEC orders.

65. Verizon VA also reports two additional subsets of order flow-through. The first is the percent of "simple" orders that flow-through (OR-5-02). Simple orders are defined as orders for basic POTS services, excluding Centrex. Verizon VA reports these measures separately for Resale and for UNE orders. Verizon VA also reports on another subset of orders in metric OR-5-03, Flow-Through Achieved. This "achieved" flow-through measure calculates the percent of orders designed to flow through that actually do flow through, this is measured against a performance standard of 95%.

66. OR-6: Order Accuracy. Verizon VA measures whether electronically-submitted orders that require manual intervention (*i.e.*, do not flow through) are accurately processed. To do so, Verizon VA randomly samples 20 orders for each of Resale and UNE services each business day. Then, for each order, Verizon VA compares the fields specified by the metric on the latest version of the LSR submitted by the CLEC with the completed Verizon VA service order. For OR-6-01, orders that have at least one "mismatch" are scored as inaccurate. Verizon VA then compares the total number of mismatched fields to the total number of audited fields (or opportunities), to provide an accuracy percentage for the audited fields. Verizon VA separately measures and reports the percentage of orders without errors (OR-6-01), the percentage of fields that are accurately populated on orders (OR-6-02), and the percentage of LSR confirmations ("LSRCs") that are resent due to error by Verizon VA (OR-6-03). To meet the performance standards, 95% of orders must be free of mismatch and not more than 5% of LSRCs can be resent due to Verizon VA error.

67. OR-7: % Order Confirmation/Rejects Sent Within 3 Business Days. Verizon VA measures and reports the percent of UNE and Resale LSRs submitted

through the EDI interface that are confirmed or rejected within three days of receipt, as a percent of total LSRs received. OR-7 is reported separately for UNE POTS Platform and POTS Loop/LNP. To meet the Commission's performance standard, Verizon VA must confirm or reject 95% of LSRs within three business days of receipt**.**

68. OR-8: Acknowledgement Timeliness. Verizon VA also measures and reports the percent of UNE and Resale LSRs submitted through the EDI interface that are acknowledged within two hours. Verizon VA must acknowledge 95% within this timeframe to meet the performance standard.

69. OR-9: Order Acknowledgement Completeness. Verizon VA also measures and reports the percent of UNE and Resale LSR acknowledgements that are sent on the same day that Verizon VA received the LSR. This measurement applies to LSRs sent through the EDI interface and received through Verizon NetLink. To meet the performance standard, Verizon VA must provide same-day acknowledgements for 99% of LSRs received.

70. OR-10: Lost Order Trouble Tickets. Verizon VA measures and reports the percent of CLEC trouble tickets received by Verizon VA that indicate that a submitted order has never been acknowledged, confirmed, or rejected. This measure is diagnostic in nature and no performance standard has been established for the metric. The New Guidelines that became effective for the February data month do not include OR-10.

C. Provisioning Category: PR-1 through PR-9.

71. Verizon VA measures almost every aspect of its provisioning of services for Resellers and CLECs. Provisioning measurements include (i) the "intervals" for service offered to CLECs by Verizon VA and orders completed by Verizon VA, (ii) the percentage of missed installation appointments, including the number missed because Verizon VA lacked facilities, (iii) the quality of Verizon VA's installation services, (iv) orders in "jeopardy" status, (v) the number of open orders in a hold status, and (vi) hot cut performance.[27]

72. PR-1: Average Interval Offered; PR-2: Average Interval Completed; PR-3: Completed within Specified Number of Days (1-5 Lines). Verizon VA measures both the "Average Interval Offered" (PR-1) and the "Average Interval Completed" (PR-2) for Retail, Resale, UNE, and Trunk orders. In addition, Verizon VA measures the percent completed within specified numbers of days -- one, two, three, four, five, and six days -- for POTS orders of five or fewer lines (PR-3).

73. A performance standard of parity with Verizon VA retail applies to most of the PR-1, PR-2 and PR-3 submetrics. Verizon VA, however, does not make appointments or determine due dates when it installs interconnection trunks in its own network. Therefore, for interconnection trunks, the comparator used is provisioning trunks for Interexchange Carriers ("IXCs"). For PR-2-09, UNE Interoffice Facilities ("IOF") and Enhanced Extended Loops ("EEL"), the standard is the applicable interval

[27] As the comparator for certain PR and MR metrics with a parity standard, the New Guidelines provide that Verizon Advanced Data Inc. ("VADI") will be used as the surrogate for retail for xDSL. Verizon is in the process of reintegrating VADI into the core business. After that reintegration is complete, Verizon VA expects to revise the Guidelines to reflect the reintegration of VADI.

stated in the Verizon Product Interval Guide. For PR-2-13 through PR-2-17, which apply to 2 Wire xDSL, the Commission has not established a standard. It should be noted that, in New York, hot cuts have been removed from PR-1 and a separate metric has been adopted that establishes a 95% on time performance standard. New York has thus recognized that a retail comparator is inappropriate for UNE POTS hot cut loops. In New York, PR-2 has been removed entirely. These New York changes are reflected in the revised Guidelines filed by Verizon VA on February 22, 2002.

74. The "Average Interval Offered" (PR-1) measures the number of business days between the date Verizon VA receives a valid order and the "committed due date" (or appointment date) it gives the CLEC. Although the metric refers to an interval "offered," this is a misnomer because CLECs, not Verizon VA, select the due date during the pre-order process. Verizon VA then confirms the due date to CLECs on the LSRC or FOC. The selected due date may or may not be the interval established by Verizon VA for that product. A committed due date is the due date selected by the CLEC during the pre-order process and confirmed by Verizon VA on the order confirmation. Depending on the type of service order, the needs of CLECs' customers, and CLECs' own business requirements (*e.g.*, the number of CLEC personnel available), the CLEC can take the next available appointment from the Livewire system, the standard interval in the Product Interval Guide posted on the Verizon Wholesale Website, or a later appointment date. CLECs can also negotiate with Verizon VA for an earlier, expedited or later date, but Verizon VA's performance is excluded from these metrics.

75. The "Average Interval Completed" (PR-2) measures the number of business days between the date a valid order (LSR or ASR) is received and the completion date of that order.

76. For Average Interval Offered (PR-1) and Average Interval Completed (PR-2), for orders to install new service or to change existing service, Verizon VA reports average intervals separately for dispatch and no-dispatch orders for Retail, Resale, and UNE. The following products are reported separately: POTS, 2 Wire Digital, 2 Wire xDSL, Special Services, DS0, DS1, DS3, UNE IOF, UNE EEL, Retail Trunks, and CLEC-to-Verizon Interconnection Trunks. POTS is further broken down into Residence, Business, Hot Cut Loop, Platform, and Other. In addition, POTS is also reported separately by number of lines; and trunks are reported separately by number and forecasted/unforecasted. For disconnect orders, separate reporting is done for POTS/Complex (combined) and Special Services. Results are separately reported for four geographic areas for POTS and Complex (2 Wire Digital, and 2 Wire xDSL). For 2 Wire xDSL services, Verizon VA reports on the average interval completed (PR-2-13 through PR-2-17) for various combinations of with/without "due date minus 2 test results," with/without 800 number, and with/without serial number.

77. The "Completed within Specified Number of Days (1-5 Lines)" metric (PR-3) measures the percent of orders completed in the specified number of business days, measured from receipt of a valid service request to work completion date. For submetrics PR-3-01 through PR-3-09, separate reporting is done for dispatch and no-dispatch orders for Retail POTS, Resale POTS, and UNE POTS - Platform and Other (UNE Switch and Interim Number Portability ("INP"))(combined data). For PR-3-10, 2

Wire Digital and 2 Wire xDSL are also separately reported. Reporting is further broken down into four geographical areas. The specified number of business days ranges from one to six. PR-3 provides redundant and cumulative measures. That is, completions included in the two-day measure are also included in the three-day measure, and so on. Likewise, an order that was not completed in four days was also not completed in one through three days.

78. PR-4: Missed Appointments. Verizon VA also measures the percentage of installation appointments missed for Retail, Resale, UNE, and Trunk orders. This provisioning metric captures any orders which, because of fault on the part of Verizon VA, were not completed by the committed due date. Verizon VA reports missed appointments separately for "dispatch" and for "no dispatch" orders for Retail, Resale, and UNE. Verizon VA's measurements for Retail, Resale, UNE, and Trunks, are further broken down by the type of product (*e.g.*, Specials, UNE EEL, and UNE IOF) and geographic regions.

79. For missed appointment submetrics, the standard is generally parity with Verizon VA retail. For PR-4-07, "% On Time Performance – LNP Only," which measures the percent of local number portability orders provisioned on time, the standard is 95%. Performance results for PR-4-07 for the November and December data months were calculated based on telephone numbers. Effective for the January data month, the results will be based upon Purchase Order Numbers. Submetrics PR-4-14 through PR-4-18, UNE 2 Wire xDSL services, also have a performance standard of 95% on time. Because they do not measure Verizon VA's performance, no standard has been established for PR-4-03, which measures the percentage missed appointments due to

customer delay, and PR-4-08, which measures the percentage missed appointment due to customer delay when the reason for delay is identified as a late order confirmation.

80. PR-5: Facility Missed Orders. As a subset of Missed Appointments, Verizon VA measures the percent of orders completed after the committed due date because Verizon VA lacked the necessary facilities (PR-5-01). In addition, Verizon VA separately reports the percent of orders missed for lack of Verizon VA facilities that are held for more than 15 days (PR-5-02) and for more than 60 days (PR-5-03). Measurements are reported for Retail, Resale, and UNE orders and are further broken down into product categories (*e.g.*, retail POTS, Resale POTS, UNE POTS-Loop, UNE POTS-Platform). POTS, 2 wire digital services, and 2 wire xDSL services are also reported for the four separate geographic areas. Measurements are also reported for CLEC Trunks on a statewide basis. For each of these measures, the standard is parity with Verizon VA retail services.

81. In implementing the PR-5 metric, Verizon VA discovered that it had not provided an accurate measure of its performance because non-dispatch orders were included in the calculation of the numerator and denominator. In the case of retail provisioning activity, most lines are already installed, thereby avoiding the need to dispatch a technician. By contrast, in the UNE provisioning environment, many of the products require Verizon VA to assign facilities and dispatch a technician. For this reason, it is inappropriate to compare Verizon VA's performance completing wholesale orders to its performance completing retail orders if both dispatch and non-dispatch orders are included in the calculation of the metric. This has been corrected in the New Guidelines effective with the February 2002 data month.

82. PR-6: Installation Quality. Verizon VA measures the quality of its installation services by looking at the percentage of lines, circuits, and trunks for which a "trouble" (or problem) is reported and found in the network within 30 days of installation (PR-6-01), or within seven days of installation for POTS services (PR-6-02). For both measures, Verizon VA meets the Commission's performance standard if it provides parity with its retail services. Because an end user will report a trouble if a newly-installed service is not working properly, or if a service that was ordered is not installed, these measures capture the quality of provisioning and service order accuracy.

83. Verizon VA also measures the percent of troubles reported within 30 days of installation that are in CPE or are not found in Verizon's network ("TOK/FOK") (PR-6-03). Verizon VA has no control over troubles found in CPE or that are not found in its network. Therefore, rather than measuring Verizon VA's service quality, this submetric measures CLEC performance in diagnosing the trouble before reporting it to Verizon VA. No performance standard has been set for PR-6-03.

84. PR-6 measurements are reported for Retail, Resale, UNE, and Interconnections Trunks, and many are further disaggregated by specific product type (including Digital and xDSL) and geographic region. There is an "apples-to-oranges" problem in the PR-6 metrics for the UNE POTS loops product. The Retail results include automated installations (such as feature changes) which are compared to wholesale results that are comprised of orders for new service requiring physical work. As detailed in the Checklist Declaration, when the Retail comparator is adjusted to remove those types of automated orders, an "apples-to-apples" comparison results. *See* Checklist Declaration, Attachment 207.

85. Verizon VA recently discovered a software programming error that caused certain trouble reports for special services to be excluded from performance results reported prior to the December data month. This error affected the installation quality measures, including PR-6-01 and PR-6-03, and certain Maintenance and Repair metrics discussed below, for both resale and unbundled special services. Attachment 404 shows recomputed results for those submetrics for the month of November 2001. In November, overall performance results for resale remained the same. However, when all of the trouble reports were added, Verizon VA failed to meet the parity standard for UNE PR-6-01.

86. PR-7: Jeopardy Reports. Verizon VA measures and reports the percent of orders for EELs that were identified as being in a jeopardy status before the order was completed or cancelled. There is no standard for the % of EEL orders with a jeopardy status. Although this measure does not measure notification, the performance standard is 95% on time for the timeliness of notifications of jeopardy status.

87. In essence, there is a disconnect in PR-7 between what is being measured ("% Orders with Jeopardy Status") and the performance standard ("95% on time"). It should be noted that any missed orders will show up as missed appointments in PR-4. Based on industry consensus, PR-7 was eliminated in New York as of November 2001, and PR-7 is not included in the revised Guidelines that Verizon VA filed on February 22, 2002.

88. PR-8: Open Orders in a Hold Status. Verizon VA measures the number of "open orders" at the close of the reporting period that, through its own fault, have been

on “hold” for more than 30 calendar days (PR-8-01) or more than 90 calendar days (PR-8-02). An open order is a valid order that has neither been completed nor canceled. Open orders in a “hold” status include open orders that, for reasons within Verizon VA’s control: (i) have passed the originally-committed completion due date, or (ii) have not been assigned a completion due date. Measurements are reported for Retail, Resale, UNE, and Interconnection Trunks, and are further disaggregated by product type. Measurements for POTS, 2 Wire Digital Services, and 2 Wire xDSL Services are broken out by four geographic regions. The performance standard is parity with Verizon VA retail.

89. PR-9: Hot Cuts. Finally, Verizon VA measures the percent of UNE loop Hot Cut orders it completes within established timeframes referred to as Cut-Over Windows (PR-9-01). Because Verizon VA does not provide an analogous Hot Cut function for its retail customers, the performance standard is 95% “on time.” Six additional submetrics (PR-9-02 through PR-9-07) measure the following for both lines and orders: % Early Cuts (cut-over before the beginning of the Cut-Over Window), % Defective Cuts (lines cut after a CLEC has notified Verizon VA of a problem on the line), and % Late Cuts (cut-over after the close of the Cut-Over Window). Submetric PR-9-08 measures the average duration of a service disruption, and PR-9-09 measures the percentage of total Hot Cut orders that are supplemented or cancelled by a CLEC at Verizon VA’s request. Since the Guidelines were adopted, Verizon VA has stopped requesting supplemented or cancelled orders, so the results for PR-9-09 are always 0. Because submetrics PR-9-02 through PR-9-09 are diagnostic, no performance standard is applied.

90. For some submetrics of PR-4 and PR-8, the retail comparator for EEL and IOF services does not present an accurate measure of parity for these services. Presently, these services are compared to the universe of retail Special Services. A more accurate comparison would compare EEL services to retail Specials DS1, and would compare IOF services to retail Specials DS3. This change was supported by industry consensus in New York and implemented in New York effective for the November data month, and Verizon VA has proposed this change in the revised Guidelines filed on February 22, 2002.

D. Maintenance and Repair Category: MR-1 through MR-5.

91. Verizon VA measures and reports five different aspects of the timeliness and quality of its maintenance and repair services for CLECs: (i) the response time of the OSS maintenance interface, (ii) the trouble report rate, (iii) the percentage of missed repair appointments, (iv) the duration of "troubles," and (v) the quality of repair service, as captured by repeat troubles.

92. MR-1: Response Time OSS Maintenance Interface. Verizon VA measures and reports the time, in seconds, between a CLEC or Verizon VA retail representative requesting maintenance and repair information and the receipt of a response. Verizon VA provides such measurements and reports for six types of transactions: Create Trouble, Status Trouble, Modify Trouble, Request Cancellation of Trouble, Trouble Report History (by telephone number or circuit), and Test Trouble (POTS only). Although the vast majority of transactions are presented in Web GUI (97% in December, 2001) response times are separately measured for both the Web GUI and Electronic Bonding interface. Through the November 2001 data month, Verizon VA

used an OSS called Caseworker to measure its OSS response times for its retail operations. Effective for the December 2001 data month, the Retail Caseworker system was converted to Common Agent Desktop ("CAD"). For CLECs, Verizon VA measures the actual response times reported by the Repair Trouble Administration System ("RETAS").

93. The standard for the timeliness of Verizon VA's response to requests for maintenance and repair is parity plus not more than seven seconds for access using Web GUI, and parity plus not more than four seconds for access using Electronic Bonding.

94. MR-1-05 is intended to measure the response time of the OSS maintenance interface from issuance of a query request for a Trouble Report History, to receipt of a response by the requesting carrier. The electronic bonding interface does not have the functionality to provide Trouble Report Histories at this time. Electronic bonding has been developed by the industry through industry standards, but this functionality has been removed from the agenda of the industry standards body, the Alliance for Telecommunications Industry Solutions ("ATIS"), because of lack of interest by industry members. Results for this metric are currently reported as "No Existing Functionality" ("NEF").

95. MR-2: Trouble Report Rate. Verizon VA also measures the number of reported troubles that are found in its network -- drop wire, cable, and central office -- per 100 lines, circuits, or trunks in service. Verizon VA measures the trouble report rate for Retail, Resale, UNEs, and Interconnection Trunks. POTS Loop, POTS Platform, 2 Wire Digital services, 2 Wire xDSL services, Special Services, and Trunks are each

reported separately. POTS services are further broken down by geographic regions. All troubles (except for Special Services and Trunks) are categorized by whether the trouble is found in the loop (either drop wire and cable) or in Verizon VA's central office. In addition, for Retail, Resale, and UNE POTS (Loop and Platform), 2 Wire Digital, and 2 Wire xDSL services, Verizon VA reports the percent of "Subsequent Reports," which are additional customer calls concerning a trouble that has already been reported and is still pending.

96. The standard for the network trouble report rate -- for total, loop, and central office -- is parity with Verizon VA retail. For CLEC Trunks, the retail equivalent is IXC Feature Group D Trunks. No performance standard has been established for MR-2-04, which is a diagnostic metric.

97. Verizon VA also reports the percent of troubles reported that are found in CPE or that are not found at all (TOK/FOK) (MR-2-05). Verizon VA has no control over troubles found in CPE or that are not found in its network. Rather than measuring Verizon VA's service quality, these submetrics measure CLEC performance in diagnosing the trouble before reporting it to Verizon VA. There is, therefore, no performance standard established for this submetric.

98. MR-3: Missed Repair Appointments. Verizon VA also measures the percentage of POTS, 2 Wire Digital Services, and 2 Wire xDSL Services network troubles that are not repaired and cleared by the date and time committed for Retail, Resale, and UNE services. POTS, 2 Wire Digital Services, and 2 Wire xDSL Services measurements are further broken down by four geographic areas. Verizon VA separately

measures troubles found in the loop (drop wire and cable) (MR-3-01) and in the central office (MR-3-02). The standard for these MR-3 metrics is parity with Verizon VA retail.

99. MR-3-03 measures missed repair appointments for troubles that, although reported as trouble in Verizon VA's network, are eventually found in CPE or that are not found at all (TOK/FOK) (MR-3-03). As discussed with respect to MR-2-05, Verizon VA has no control over troubles found in CPE or that are not found in its network. Rather than measuring Verizon VA's service quality, MR-2-05 and MR-3-03 measure CLEC performance in diagnosing the trouble before reporting it to Verizon VA. Although MR-3-03 measures Verizon VA's performance in meeting the committed due date, the CLEC's misdiagnosis of a trouble resulted in an erroneous report of trouble in Verizon VA's network, and no action by Verizon VA should have been required. There is no performance standard established for this submetric.

100. MR-4: Trouble Duration Intervals. Verizon VA provides numerous measures of the duration of reported troubles. First, it measures the "Mean Time to Repair" (MR-4-01), which is the average time, in hours and portions thereof, from receipt of a trouble report until the trouble is cleared. Mean Time to Repair is measured for Retail, Resale, UNE and Interconnection Trunks, and for the product groups of POTS Platform and POTS Loop, 2 Wire Digital Services, 2 Wire xDSL Services, Special Services, IXC Feature Group D Trunks, and CLEC Interconnection Trunks.

101. Second, Verizon VA measures, for POTS, 2 Wire Digital Services, xDSL, and Special Services, the average time to repair loop troubles (MR-4-02) and, for POTS, 2 Wire Digital Services and xDSL only, the average time to repair central office troubles

(MR-4-03). For POTS services, the duration of troubles is measured on a "running clock" basis, which includes weekends and holidays. For Special Services and Trunks, duration is measured on a "stop clock" basis, which excludes time when a CLEC is testing, when Verizon VA is awaiting carrier acceptance, or when Verizon VA is unable to obtain access to make repairs.

102. Third, Verizon VA measures the percent of all troubles cleared within 24 hours of being reported to Verizon VA (MR-4-04). It separately measures Retail, Resale, UNE and Interconnection Trunks, and for the product groups of POTS Platform and POTS Loop, 2 Wire Digital Services, 2 Wire xDSL Services, Special Services, IXC Feature Group D Trunks, and CLEC Interconnection Trunks.

103. Fourth, Verizon VA reports the duration of troubles in which the customer is out of service for more than two, four, twelve, and twenty-four hours (MR-4-05 through MR-4-08). For POTS, "out of service" means that the customer has no dial tone. For Special Services, "out of service" means that a trouble was found within Verizon VA's network. Verizon VA reports the percent of troubles creating an out-of-service condition that remain out of service for more than a specified number of hours. For these disaggregated submetrics, the standard is parity with Verizon VA retail.

104. MR-5: Repeat Trouble Reports. The quality of Verizon VA's maintenance and repair service is determined by measuring the percent of reported troubles cleared -- whether the initial disposition indicates a fault in Verizon VA's network or not -- which have an additional trouble reported within 30 days that is found to be in Verizon VA's network. Verizon VA separately measures the percent of repeated

trouble reports for Retail, Resale, UNE and Interconnection Trunks, and for the product groups of POTS Platform and POTS Loop, 2 Wire Digital Services, 2 Wire xDSL Services, Special Services, IXC Feature Group D Trunks, and CLEC Interconnection Trunks. The performance standard applicable to these submetrics is parity with Verizon VA retail. As in the case of provisioning metrics, the "retail" comparison for Interconnection Trunks is IXC Feature Group D Trunks.

105. As discussed above, Verizon VA recently discovered a software programming error that caused certain trouble reports for special services to be excluded from performance results reported prior to the December data month. This error affected the Maintenance and Repair metrics, including MR-2, MR-4 and MR-5, and certain Provisioning metrics discussed above, for both resale and unbundled special services. Attachment 404 shows recomputed results for those submetrics for the November data month. In November, overall performance results for resale were not impacted. However, when all of the trouble reports were added, Verizon VA failed to meet the parity standard for some of these measures for UNEs.

E. Network Performance Category: NP-1, NP-2, NP-5 and NP-6

106. To determine the network capacity available to carry calls, Verizon VA measures blockage of final common and dedicated trunk groups. Verizon VA also measures its timeliness in providing collocation arrangements, notification of network outages, and NXX installation updates.

107. NP-1: Percent Final Trunk Group Blockage. Sub-metrics NP-1-01 and NP-1-02 measure the percent of common and dedicated final trunk groups where blocked

calls exceed the engineered blockage design threshold for the trunk group, both with and without exclusions. Exclusions include when Verizon VA notifies CLECs of events that cause blocking that are not within the control of Verizon VA, such as: (i) trunk groups exceeding their designed blocking because of a CLEC network failure; (ii) CLEC failure to ask for augmentation on time; (iii) CLEC failure to make a timely response to a Verizon VA request for augmentation or outright denial of that request; or (iv) CLEC rearrangements of other interconnection trunks. Sub-metrics NP-1-03 and NP-1-04 measure the number of dedicated final trunk groups that exceed the engineered blockage design threshold for two and three months, exclusive of trunk groups that exceed due to CLEC failures. No performance standard has been established for sub-metrics NP-1-01, 02, and 03. If individual dedicated final trunk groups carrying traffic from Verizon VA to a CLEC exceed the engineered blockage design threshold for two consecutive months, the Guidelines require Verizon VA to provide an explanation and, if necessary, a plan for action.

108. NP-2: Collocation Performance. Verizon VA measures the percentage of on-time responses to collocation requests, the average completion interval, the percent completed on time, and the average delay days for physical and virtual collocation arrangements. In addition, Verizon VA measures the average completion interval for Secured Collocation Open Physical Environment ("SCOPE") and Cageless Collocation Open Environment ("CCOE") collocation arrangements for both new and augmented applications. A performance standard of 95% on-time applies to NP-2-01,% On Time Response to Request for Collocation – Total, and NP-2-07, % On Time – Total. The

remaining submetrics are diagnostic, measuring average intervals (NP-2-02 through NP-2-06) and average delay days (NP-2-08).

109. NP-5: Network Outage Notification. Verizon VA measures the percentage of all notices of "network outage events" that are transmitted by electronic mail within 30 minutes of discovery of the outage. Network outage events include any disruption to Verizon VA's 911 service; failure of one or more T3s for specified periods; total switch failure for two minutes or more and certain partial switch failures for thirty minutes or more; any signaling interruptions (Signaling System 7 ("SS7") node isolation for five or more minutes, and Signaling Transfer Point/Service Control Point ("STP/SCP") down for two or more hours); any power failure resulting in a major service interruption; fires resulting or having the potential to result in major service interruption; and certain local loop or subscriber cable failures. The performance standard is parity with Verizon VA retail.

110. NP-6: NXX Updates. Verizon VA measures and reports, on a quarterly basis, the percentage of NXX updates that are installed by the effective date in the Local Exchange Routing Guide ("LERG"). This metric is reported on a quarterly basis, and the standard is parity with Verizon VA retail.

F. Billing Performance Category: BI-1 through BI-8.

111. BI-1 and BI-2: Timeliness of Daily Usage Feed and Carrier Bill. Verizon VA measures how promptly it provides CLECs with Daily Usage Feed ("DUF") (BI-1) and carrier bills (BI-2). The DUF provides CLECs with each day's usage records for their end user customers. The carrier bill is the monthly invoice provided to CLECs that

incorporates charges for all of the products and services provided to them by Verizon VA. Switches in Verizon VA's central offices collect and record usage data for both Verizon VA and CLEC end users as those calls are processed. The usage data is sent from Verizon VA's switches to Verizon VA's billing data center electronically. Usage data for Verizon VA and for CLEC end users are collected and recorded by switches at the same time, and on the same tapes, and are sent to Verizon VA's billing data center in the same way. Because daily usage data are captured for an entire switch, any delay in its capture or its delivery will affect Verizon VA and CLECs equally. Therefore, this service is necessarily provided at parity. CLECs' daily usage files are created at the billing data center by identifying and copying CLEC usage onto the DUFs. This is done before additional processing occurs for Verizon VA's own usage. Verizon VA then distributes the DUFs to CLECs by Connect:Direct, or electronic tape.

112. For the promptness with which it provides the DUF, Verizon VA measures the number of business days -- three, four, five, and eight -- from the creation of the record by the switch to the date Verizon VA makes the usage information available to the CLEC on the DUF. To meet the standard for BI-1-02, Verizon VA must give the CLECs 95% of their usage information within four business days.

113. Each month, Verizon VA sends each CLEC an invoice containing usage, recurring, and nonrecurring charges for services and products. A recurring charge is a charge that is incurred each month (*e.g.*, dial tone), while a nonrecurring charge does not repeat each month (*e.g.*, an installation fee). Verizon VA measures the percentage of expressTRAK and CABS paper carrier bills that it sends to the carrier within ten business days of the bill date (the end of the billing period for recurring, non-recurring, and usage

charges). To meet the performance standard for BI-2, Verizon VA must provide 98% of expressTRAK and CABS paper carrier bills within ten business days from the bill date.

114. As stated in the OSS Declaration, expressTRAK replaces Customer Records Information System ("CRIS"), the legacy billing system. CRIS paper bills are not included in the results reported for the data months of November 2001 through January 2002, although CRIS paper bills should have been included where conversion to expressTRAK has not yet occurred. These paper bills are scheduled to be included as of the March data month. For the remaining discussion of Billing metrics, references to expressTRAK include the legacy system bills unless otherwise indicated.

115. BI-3 through BI-8. Verizon VA measures the accuracy of expressTRAK paper carrier bills by calculating the percentage of dollar charges on each bill that are adjusted due to Verizon VA's billing error (BI-3). Verizon VA meets the Commission's standard if the percentage of adjusted billed dollars for Resellers' and CLECs' bills are the same as, or less than, the percentage of adjustments to its own end users' bills (BI-3-03). Adjustments due to billing errors resulting from order activity Post Completion Discrepancies ("PCDs") are excluded from BI-3-03, but included in BI-3-01.[28] Because BI-3-01 is redundant in light of BI-3-03, no performance standard was established for BI-3-01.

116. Based on industry consensus, BI-3-03 has been eliminated from the New Guidelines that became effective with the February 2002 data month. Verizon VA supported the elimination of this flawed metric, as well as the elimination of BI-3-01,

which is not included in the revised Guidelines filed by Verizon VA on February 22, 2002. The numerator of the BI-3 metrics is the total amount of dollars adjusted to CLECs as a result of billing errors in the reporting month, regardless of when the CLEC submitted the claim for the error or what month(s) the error occurred in. The denominator is the current charges billed to CLECs in the reporting month. This means that the credits reported in a month do not relate to the charges billed in that month and could, in fact, relate to multiple months being compared against a single month's charges, or to an error from several months ago that has already been corrected. In addition, Verizon VA has experienced implementation issues with BI-3, including incorrect calculation of the numerator for CRIS bills, and inadvertent inclusion in the denominator of unpaid balances prior to the January data month.

117. BI-4 through BI-8 have likewise been eliminated from the New Guidelines based on industry consensus. As of the February 2002 data month, Verizon VA will report results for BI-1, BI-2, BI-3-01 and new BI-3-02, % Billing Adjustments – Number of Adjustments.

118. BI-4-01 measured the percentage of all DUFs delivered to CLECs and Resellers that contain complete information and are in the proper format (BI-4). A performance standard of 95% applied to BI-4-01. No standard applied to BI-4-02, which was a diagnostic metric measuring the percentage of corrected DUFs that are delivered on or before the due date. BI-5 measured the accuracy of the mechanized feed for expressTRAK bills by determining the overall percentage of bill files delivered to all

[28] PCDs are errors generated as a result of the CRIS edit process, which occur after the pending work has been completed and the order has been received at the final processing location.

CLECs that contained complete information and were in the proper format. Verizon VA's performance met the standard for BI-5-01 if 95% of mechanized bill feed files contain complete, properly-formatted information.

119. BI-6 through BI-8 measured the completeness on the CLEC's expressTRAK paper bill of date-itemized usage charges (*e.g.*, toll charges) (BI-6), fractional recurring charges (BI-7), and non-recurring charges (BI-8) by determining the percent of such charges appearing on the bill that were recorded in the last two billing cycles. The performance standard for BI-6-02, BI-7-02, and BI-8-02 was parity with Verizon VA's retail operations. No performance standard was applied for BI-6-01, BI-7-01, and BI-8-01. Results reported for BI-6 before it was eliminated were understated because the process for collection of performance data resulted in the inclusion of extraneous data in the denominator.

G. Operator Services and Databases: OD-1 Through OD-3.

120. Verizon VA measures the time it takes its operator services and directory assistance to answer customers' calls (OD-1). Identification of the CLEC for branding or billing purposes does not affect call distribution. CLEC calls are handled on a non-discriminatory basis. For speed of answering for operator services (OD-1-03) and directory assistance (OD-1-04), a performance standard of 95% within 30 seconds applies. Verizon VA also measures the average speed of answer for operator services and directory assistance (OD-1-01 and OD-1-02). These are diagnostic measurements for which there is no performance standard. The New Guidelines do not include OD-1-03 and OD-1-04.

121. OD-2 establishes standards for LIDB, 800 Database, AIN, 911/E911, and Directory Listing Database Updates. Measurement of performance and reporting of results are not required by the Guidelines.

122. To measure the accuracy with which Verizon VA updates its directory assistance database, Verizon VA compares the information in its database with the update order sent by the CLEC. Accuracy is measured both including and excluding service order errors. A performance standard of parity with Verizon VA retail applies to the measurement that excludes service order errors (OD-3-02). OD-3 is not included in the New Guidelines.

H. General: GE-1 Through GE-2

123. GE-1: Directory Listing Verification Reports. Verizon VA provides each CLEC with a Listing Verification Report ("LVR") for White Page listings of CLEC end users at least 30 business days prior to the "service order close" date for a particular directory. The LVR contains all listings for the CLEC that are in the listing database for Verizon Information Services ("VIS") for publication in the upcoming directory, thereby allowing the CLEC to confirm the accuracy of its customers' entries prior to publication. Verizon VA also allows CLECs to view all published listings through a Web GUI interface, which gives them access to an up-to-date display of the listings database for Virginia. In this way, CLECs can see what is in the listings database prior to its publication. GE-1-01 measures the percentage of directory listing verification reports that are provided by the due date, with a performance standard of 95% on time.

124. GE-2: Poles, Ducts, Conduits, and Rights-of-Way. This metric measures the percentage of responses to requests for access that are provided by Verizon VA within 45 days of receipt of a request for access to poles, ducts, conduits and rights-of-way. The performance standard is 95% on-time.

125. GE-3: Bona Fide Request Response. Verizon VA measures the percentage of bona fide requests ("BFRs") for access to UNEs to which it responds on or before the due date for the response. The due date is either the date specified in the CLEC's interconnection agreement with Verizon VA or a later agreed-to date. A performance standard has not been set.

126. This concludes our declaration.