OSS FOR UNBUNDLED DSL LOOP, LINE-SHARING, LINE-SPLITTING, AND RESOLD DSL ORDERS

Verizon provides CLECs with the OSS functionality in Virginia for UNE DSL loops, line-sharing, line-splitting and resold DSL orders as it does throughout the rest of the former Bell Atlantic footprint, including Pennsylvania – approved by the FCC as meeting the requirements of Section 271, in September, 2001. Pre-order and order functionality is discussed herein. The related provisioning and maintenance operations and performance of these orders are discussed in the accompanying Checklist Declaration.

I. UNBUNDLED DSL LOOPS

A. Pre-Order

CLECs have a choice of the same three electronic interfaces to obtain access to pre-ordering information for DSL loops in Virginia, as they do throughout the former Bell Atlantic service areas including Pennsylvania, New York, Massachusetts, Connecticut and Rhode Island. They can use the Web-based Graphical User Interface ("Web GUI"), the Electronic Data Interchange ("EDI") interface, or the Common Object Request Broker Architecture ("CORBA") interface. A CLEC receives the same pre-ordering information regardless of the interface it chooses to use.

Verizon provides CLECs that offer DSL services with access to loop information in multiple ways:

1. Loop Pre-Qualification

A CLEC can submit an electronic loop pre-qualification request using its chosen pre-order interface to Verizon's LiveWire database, which contains loop qualification (and other) information. LiveWire provides real-time access to loop qualification

information on a pre-order basis via the xDSL Loop Qualification (LXR) Inquiry transaction. As of December 2001, the LiveWire loop qualification database included 100 percent of the former Bell Atlantic central offices in Virginia. All (100%) of the loops in these central offices have been tested and categorized, and a second review of the "reason not qualified" is being conducted on approximately 5% of these loops. If the loop is not qualified, the response will include data on why the loop does not qualify (*e.g.*, presence of Digital Loop Carrier, T-1 in the binder group, or load coils). The loop qualification database was enhanced to add this information to the response as a result of working with the DSL Collaborative in New York after the initial population of the database with loop length information. In the case where the loop is not qualified because it has not been tested (i.e., was not pre-qualified), the "reason not qualified" indicates that loop qualification data are not available in the database and a manual loop qualification request should be submitted.

Verizon also provides CLECs with the ability to obtain loop pre-qualification information "in bulk." Under this alternative, Verizon posts to a server files of the working telephone numbers in central offices that have been qualified for DSL along with loop length information. CLECs can then download the files, which indicate for each working telephone number in the central office whether the number is qualified for DSL or not. Verizon has provided user IDs and passwords to access these files to the CLECs that have requested access. Verizon posts updated files each week.

2. "Manual" Loop Qualification

If for some reason the loop qualification information for the customer's address has not been included in LiveWire, or if a CLEC fails to pre-qualify a loop through LiveWire, or a CLEC wants a retest on the customer's specific line, a CLEC can request

a “manual” loop qualification either by using the pre-order transaction (xDSL Loop Qualification – Extended (LXE) Inquiry transaction), or when it submits its local service request (“LSR”) for a DSL loop by entering an indicator in the appropriate field to show that manual loop qualification is needed. Manual loop qualification provides CLECs with the same type of information they would receive from LiveWire using the pre-order xDSL pre-qualification (LXR Inquiry) transaction. When an LSR is received that indicates the CLEC has not pre-qualified the loop, Verizon’s system automatically performs mechanized pre-qualification using the LiveWire database. If pre-qualification information is available for the loop in the LiveWire database and the loop is not qualified because the loop length exceeds the service specification, a query will automatically be sent back to the CLEC indicating the loop is not qualified and the reason not qualified. This is the same information the CLEC could have obtained by using the pre-order xDSL pre-qualification (LXR Inquiry) transaction. If pre-qualification information is not found in the LiveWire database or the reason not qualified is other than loop length, then Verizon will perform a manual loop qualification.

Orders that require a manual loop qualification in Virginia are directed by the gateway systems to the Chesapeake, Virginia DSL/Line Sharing Center, which processes transactions for unbundled DSL loops, line sharing, and line splitting for Delaware, New Jersey, Pennsylvania, Maryland, Virginia, West Virginia and the District of Columbia. A manual loop qualification request is created from information on the LSR and transmitted to the CLEC Loop Provisioning Center (“CLPC”). The CLPC checks the same LiveWire database that is available to CLECs to determine whether the loop is qualified and the reason why it is not qualified, if it is not. At times, the CLPC finds the loop qualification

information in LiveWire; in other words, the CLEC could have obtained the requested information itself by using the pre-order LXR Inquiry transaction. The CLPC simultaneously performs a MLT on the loop to verify the loop length.

If the loop is qualified, the Center returns a local service request confirmation ("LSC" or "LSRC") to the CLEC providing, among other things, a due date for the order. If the loop is not qualified, the Center returns a "query" to the CLEC providing the same information regarding why the loop is not qualified that the CLEC would receive in response to the LXR Inquiry (*e.g.*, load coils, T1 spectrum management, digital loop carrier).

If the CLPC is unable to determine the loop length and qualification from LiveWire or MLT, the CLPC forwards the request to the Facilities Management Center ("FMC"). In the FMC, engineers examine paper records to determine the loop length, whether or not the loop is qualified, and, if the loop is not qualified, the reason why it is not qualified. The FMC returns the information to the Center, which returns the information to the CLEC. This is the same type of information the CLEC would have obtained had the loop been in LiveWire, except the loop length is determined from paper records rather than the electrical characteristics of the loop.

3. Access to Loop Make-up Information

Verizon also provides CLECs with electronic access to the limited loop make-up information contained in a back office inventory system known as Loop Facilities Assignment and Control System ("LFACS"). LFACS is primarily a loop inventory and assignment system for voice grade service that contains limited loop make-up information. As Verizon has explained to the CLECs in the DSL Collaborative in New York, the percentage of terminals for which LFACS contains at least one loop make-up

(not the percentage of loops for which LFACS contains loop make-up information, nor the percentage of terminals that contain a complete loop make-up from the central office to the customer address) is limited. In Virginia, it is about 10 percent of the terminals. At the terminal level, the loop make-up represents the make-up of a single loop and does not necessarily represent the characteristics of any other loops in that terminal. Further, loop make-ups can change during the normal course of engineering the network. Verizon implemented an electronic pre-order transaction to provide this loop make-up information on a real-time basis as part of the October 2001 release (Loop Make Up (LMU) Inquiry transaction).

4. Engineering Record Requests

Finally, a CLEC may also submit an Engineering Record Request (sometimes called an Engineering Query) to Verizon. This is a request for a full loop make-up, including loop length, type of facility, cable gauge for each section of the loop, location of any load coils, and location and length of any bridge tap. This type of request is also handled by the FMC, which may, as a starting point, check Verizon's internal loop inventory system, LFACS, for any loop make-up information that may be present. Because LFACS contains limited loop make-up information, which may be inaccurate or out of date, the FMC also conducts a detailed examination of Verizon's paper records for the loop.

The information returned to the CLEC is more detailed than the information returned in response to a loop qualification request but is similar to the information returned in response to a loop make-up request (when the data is available in LFACS) which may include, where available: (1) the composition of the loop (e.g., copper, fiber, coax); (2) the existence, location and type of any electronic or other equipment on the

loop (e.g., digital loop carrier, remote concentration devices, feeder/distribution interfaces, bridge taps, load coils, pair-gain devices, T-1 in the binder group); (3) the loop length, including the length and location of each type of transmission media; (4) the wire gauge(s) of the loop; (5) the electrical parameters of the loop; and (6) engineering work in progress on the cables housing the loop. The process for performing an Engineering Query is described on Verizon's web site (http://128.11.40.241/east/wholesale/customer_docs/master.htm). Verizon has not received any Engineering Queries from November 2001 through January 2002 from CLECs in Virginia.

B. Ordering

CLECs have a choice of the same two interfaces for submitting local service requests ("LSRs") for unbundled DSL loops in Virginia, as they do throughout the former Bell Atlantic service areas including Pennsylvania, New York, Massachusetts, Connecticut and Rhode Island. CLECs can submit LSRs using the Web GUI interface or the EDI interface. Regardless of the electronic interface a CLEC uses, LSRs for DSL loops in Virginia are processed in the Chesapeake, Virginia DSL/Line Sharing Center.

LSRs for new connect DSL loops of 1 to 8 lines can flow through directly into Verizon's service order processor. Orders requesting a manual loop qualification cannot flow through and, along with all other DSL orders that do not flow through, are automatically directed to the Chesapeake DSL/Line Sharing Center.

II. LINE-SHARING ORDERS

CLECs may also choose to use Verizon's loops to provide DSL service to their customers by purchasing line-sharing. The same interfaces and OSS are used to provide

DSL in a line sharing arrangement as are used for unbundled xDSL loops. There are some differences in the ordering process that is described below.

A. Pre-ordering

Verizon provides access to the same pre-ordering capabilities to carriers that purchase line-sharing as it does to carriers that purchase unbundled DSL loops. CLECs have a choice of submitting pre-ordering transactions via the Web GUI, EDI, or CORBA electronic interfaces. As noted above, Verizon also has provided CLECs the ability to obtain mechanized loop qualification information "in bulk" by working telephone number.

B. Ordering

As discussed in the Checklist Declaration, CLECs submit line sharing orders in Virginia using the same processes and procedures as in Pennsylvania, New York, Massachusetts Connecticut, and Rhode Island. CLECs use the same interfaces and gateway systems to submit LSRs for line-sharing as CLECs use for requesting unbundled xDSL loops. CLECs can submit their LSRs for line sharing either through the Web GUI interface or the EDI interface. Verizon's wholesale web site provides extensive information on line sharing for CLECs, including information on collocation, order forms for line sharing collocation requests, line sharing ordering information and example LSRs. Verizon introduced flow-through capability on line-sharing orders for what is expected to be the most common type of line-sharing orders – new connections requesting fewer than 11 lines. For non-flow through orders, the LSRs are directed to Verizon's Chesapeake, Virginia DSL/Line Sharing Center.

III. LINE SPLITTING ORDERS

CLECs may also use line splitting to provide DSL service to their customers. As described in the Checklist Declaration, line splitting differs from line sharing in that it involves two wholesale service providers -- one for voice and the other for data. A CLEC can provide both the voice and data service itself or it can partner with another CLEC.

A. Pre-Ordering

Verizon provides access to the same pre-ordering capabilities to carriers that purchase line splitting as it does to carriers that purchase unbundled DSL loops or line sharing. CLECs have a choice of submitting pre-ordering transactions via the Web GUI, EDI, or CORBA electronic interfaces. As noted above, Verizon also has provided CLECs the ability to obtain mechanized loop qualification information "in bulk" by working telephone numbers.

B. Ordering

Verizon's interfaces and underlying OSS support several ordering scenarios for CLECs that want to line split using Verizon's unbundled switching. Verizon worked with CLECs in the New York DSL Collaborative to define the business relationships, rules, and practices that provide the requirements for Verizon to develop additional OSS capabilities to facilitate CLEC ordering of line splitting. These issues had to be addressed by the industry before Verizon could develop the system requirements and implement the line splitting OSS enhancements. Under the supervision of the New York PSC, the DSL Collaborative agreed on a schedule for the implementation of additional line splitting-specific OSS capabilities. Pursuant to that schedule, Verizon began offering additional line splitting capabilities in New York in June 2001 using new OSS

functionality that enables a DLEC to submit a single Local Service Request (LSR) to add DSL capability to a loop in an existing UNE platform arrangement while re-using the same network elements, including the loop, if it is DSL-capable. On October 20, 2001, Verizon implemented this scenario throughout its footprint, including Virginia, and also implemented the ability for a CLEC to convert from line sharing to line splitting using a single LSR, or drop data from a line splitting arrangement and revert back to UNE-P with a single LSR, even though each of these scenarios requires the creation and entry of multiple service orders into Verizon's backend OSS.

Verizon introduced flow-through capability on line-splitting orders for what is expected to be the most common type of line-splitting orders – new connections requesting fewer than 11 lines. For non-flow through orders, the LSRs are directed to Verizon's Chesapeake, Virginia DSL/Line Sharing Center.

IV. RESOLD DSL OVER RESOLD VOICE LINE

CLECs can resell Verizon's retail DSL offerings on resold voice lines in Virginia as in Pennsylvania. Exhibit A to this Attachment contains the information package that was distributed to CLECs describing the applicable pre-order and order processes.

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