

**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION  
DIVISION OF PUBLIC UTILITY ACCOUNTING**

**PRE-FILED STAFF TESTIMONY  
OF  
AMY J. GILMOUR**

2002 MAY 17 P 2:37

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**VERIZON VIRGINIA, INC.**

**CASE NO. PUC-2002-00046**

**MAY 17, 2002**

**PRE-FILED TESTIMONY  
OF  
AMY J. GILMOUR**

**VERIZON VIRGINIA, INC.  
CASE NO. PUC-2002-00046**

**Q1. PLEASE STATE YOUR NAME AND POSITION YOU HOLD WITH THE VIRGINIA STATE CORPORATION COMMISSION (“COMMISSION”).**

**A1.** My name is Amy J. Gilmour and I am a Principal Public Utility Accountant with the Commission’s Division of Public Utility Accounting.

**Q2. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY.**

**A2.** My testimony will describe the process used by the Staff of the Commission to analyze and replicate the metrics reported by Verizon Virginia, Inc. (“Verizon”) pursuant to the Commission’s Order in Case No. PUC-2001-00206. I will also introduce the metrics’ results for February and March data months.

**Q3. WHEN DID STAFF BEGIN TO REPLICATE VERIZON’S METRICS’ RESULTS?**

**A3.** Staff began its replication process during the third-party testing of Verizon’s Operational Support Systems (“OSS”) conducted by KPMG Consulting in Case No. PUC-2000-00035. Staff has been able to replicate a majority of the metrics’ results since the fall of 2001 and did so in conjunction with KPMG Consulting. Beginning with the January data month, Staff began to replicate the metrics by itself. Currently there is no projected or ordered end date for Staff’s replication project. However, in the proposed Performance Assurance Plan (“PAP”) for

Verizon in Case No. PUC-2001-00226, the language concerning Staff's replication project currently states that it will continue for at least six months after the PAP is ordered and may be continued thereafter at the Commission's discretion.

**Q4. BRIEFLY DESCRIBE THE SYSTEM USED TO ANALYZE AND REPLICATE THE METRICS.**

A4. Staff has developed Oracle-based codes that enable it to load the information from the detailed data files supplied by Verizon into tables and then replicate the metric results. Verizon's monthly Carrier-to-Carrier ("C2C") results are also loaded so that a comparison between Staff's results and Verizon's results can be done. By loading the data into tables Staff is not only able to replicate the metrics' results, but it can also run monthly comparisons and other special queries and reports. An example is a report that shows all failed metrics for a month and a comparison of those same metrics to the prior months' results. This type of report may be useful when a PAP for Verizon is implemented in Virginia.

**Q5. PLEASE BEGIN YOUR DISCUSSION ON STAFF'S REPLICATION PROCEDURES.**

A5. Verizon sends data files to Staff along with the C2C reports. The C2C reports contain the metrics' results per the Commission ordered guidelines, both in the aggregate and by specific Competitive Local Exchange Carriers ("CLECs") who have requested their individual metrics' results. At this time, Staff is only replicating the aggregate metrics' results, not the CLEC specific results. If it

becomes necessary in the future to replicate the CLEC specific results, Staff should already have the information to do so.

The data files supplied by Verizon essentially contain numerous fields that house both wholesale and retail transactions. The data is captured by various systems within Verizon's OSS. This data, which is a mixture of raw data and filtered data, is used by Verizon to calculate the metrics.

If Staff's replication results and the C2C results do not match, the metric is considered unreplicated by Staff. A change to the structure of the data, for example a new field is added, or an algorithm revision will cause a metric not to replicate. Also, an incorrect mapping of a metric result to the C2C report is another example of why a metric will not replicate.

**Q6. WHEN A METRIC IS UNREPLICATED, PLEASE EXPLAIN WHAT STAFF DOES NEXT.**

**A6.** Staff will first try to analyze the data and the code to see if an explanation is apparent. If Staff cannot find a solution with its data, then it contacts Verizon. Staff will send a spreadsheet to Verizon with the unreplicated metrics' results and an explanation of any procedures that Staff has done in an attempt to replicate. Verizon will then process it internally and respond to Staff's concerns. Common problems in the past have included an algorithm being updated by Verizon, but not sent to Staff or the list of test ID's was updated and Staff was not made aware of the update. Beginning on May 1, 2002, Verizon began sending Change Control Records ("CCRs") to Staff that include the necessary information to

revise the replication code prior to receiving the next month's data. Hopefully this should alleviate some of these common problems in the future.

**Q7. PLEASE EXPLAIN THE CHANGE CONTROL PROCESS THAT BEGAN MAY 1, 2002.**

A7. Staff currently receives two CCRs for each change control implemented by Verizon. One CCR is received pursuant to the C2C guidelines' Appendix N. The second, Staff specific CCR contains the same information as the CCR received by all parties, plus any additional information necessary for Staff's replication project. The Staff specific CCR process was put in place so that Staff may proactively revise its replication codes prior to receiving the data. This should alleviate some of the common problems encountered in the past by Staff with replication. Staff does review the CCRs to determine if the changes being made are consistent with the C2C guidelines (definitions of the metrics).

**Q8. PLEASE EXPLAIN WHAT HAPPENS IF STAFF FINDS A PROBLEM WITH VERIZON'S C2C METRICS' RESULTS.**

A8. Currently if Staff finds a problem with Verizon's C2C metrics' results, it is communicated to Verizon so that Verizon may revise its report or take other corrective action(s) as necessary. Verizon does not, at this time, submit a revised C2C report to Staff or other interested parties. Staff believes that the issue of determining if and/or when Verizon should be required to submit revised reports is important to our ongoing replication procedures evaluating the results of the

C2C report. It could also have a significant impact on payments to CLECs under a PAP. Therefore, this issue should be addressed in the near future.

**Q9. THE C2C GUIDELINES CHANGED WITH THE FEBRUARY DATA MONTH. DOES STAFF HAVE ANY METRICS' RESULTS SUBSEQUENT TO THE CHANGE?**

**A9.** Yes, Staff has metrics' results for the February and March data months. Attached to my testimony as Appendices A through H is a spreadsheet originally used in Verizon's filing as Attachment 405. I have updated the attachment to include the metrics' results for February and March 2002. If a metric is new to the C2C guidelines with the February data month, or the definition has changed making it not comparable to the prior months' results, it has been included at the end of the relevant Appendix.

**Q10. DOES THIS CONCLUDE YOUR TESTIMONY?**

**A10.** Yes, it does.

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