COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

IN THE MATTER OF THE INQUIRY INTO VERIZON VIRGINIA INC.'S COMPLIANCE WITH THE CONDITIONS SET FORTH IN 47 U.S.C. § 271 (c)	**)**	**Case No. PUC-2002-0046**

OSS REPLY DECLARATION

ON BEHALF OF VERIZON VIRGINIA INC.

DECLARANTS:

Kathleen McLean

Beth Cohen

Warren Geller

Maryellen Langstine

Jonathan Smith

Sean J. Sullivan

R. Michael Toothman

COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

IN THE MATTER OF THE INQUIRY INTO VERIZON VIRGINIA INC.'S COMPLIANCE WITH THE CONDITIONS SET FORTH IN 47 U.S.C. § 271 (c)	**)**	**Case No. PUC-2002-0046**

OSS REPLY DECLARATION

1. My name is Kathleen McLean. My business address is 1320 North Courthouse Road, Arlington, Virginia. I am employed by Verizon Services Corp. as Senior Vice President, OSS Policy and Performance Assurance within the Information Technology organization. My responsibilities and background were set forth in the OSS Declaration filed on March 15, 2002, in this Docket.

2. My name is Beth Cohen. My business address is 1310 North Courthouse Road, Arlington, Virginia. I am employed by Verizon Services Corp. as a Director in the OSS Policy and Performance Assurance group within the Information Technology organization. My responsibilities and background were set forth in the OSS Declaration filed on March 15, 2002, in this Docket.

3. My name is Warren Geller. My business address is 1095 Avenue of the Americas, New York, New York. I am employed by Verizon Services Corp. as Director, Wholesale Billing Assurance and Solutions. My responsibilities and background were set forth in the OSS Declaration filed on March 15, 2002, in this Docket.

4. My name is Maryellen Langstine. My business address is 999 West Main Street, Freehold, New Jersey. I am employed by Verizon Services Corp. as a Director in the Wholesale Customer Support organization. My responsibilities and background were set forth in the OSS Declaration filed on March 15, 2002, in this Docket.

5. My name is Sean J. Sullivan. My business address is 125 High Street, Boston, Massachusetts. I am employed by Verizon Services Corp. as a Director in the Wholesale Operations Support organization. My responsibilities and background were set forth in the OSS Declaration filed on March 15, 2002, in this Docket.

6. My name is Jonathan Smith. My business address is 1095 Avenue of the Americas, New York, New York. I am employed by Verizon Services Corp. as an Executive Director in the Local Interconnection Billing and Wholesale Billing Support organization. My responsibilities and background were set forth in the OSS Declaration filed on March 15, 2002, in this Docket.

7. My name is R. Michael Toothman. My business address is 13100 Columbia Pike, Silver Spring, Maryland. My title is Director – CLEC Communication. My responsibilities include oversight of Change Management.

8. Prior to assuming my current position, I held a number of positions of increasing responsibility in the areas of system requirements/development, change management and testing. I have been involved in telecommunications for 28 years.

I. PURPOSE OF REPLY DECLARATION

9. The purpose of this OSS Reply Declaration is to respond to the various OSS claims presented by CLECs in their comments and declarations filed May 3, 2002. As discussed in detail below, CLECs have not demonstrated that Verizon VA has failed to meet its requirement to provide nondiscriminatory access to Verizon's OSS. To the

contrary, Verizon VA is providing CLECs with this nondiscriminatory access – a conclusion that is supported both by commercial usage and by the comprehensive review and testing of Verizon VA's OSS conducted by the Commission using KPMG Consulting ("KPMG").

A. **Verizon VA's OSS Are In Commercial Operation Today**

10. A number of CLECs ignore the existence of commercial usage and the comprehensive third-party testing of Verizon's OSS, and instead demand that the Commission should establish a period of "commercial availability." (AT&T at 13.)[1] There is no reason for such a delay. As Verizon VA has demonstrated, there is already very substantial "real life" commercial activity in Virginia. Nor was such an artificial commercial availability period required by the New York, Massachusetts, Rhode Island or Vermont commissions as part of their section 271 review process. Finally, the FCC has never required a commercial availability period, as evidenced by the FCC's approval of Verizon's section 271 applications for states that have not required such a period.

11. Verizon VA's OSS currently support substantial commercial operations on a daily basis. Over 75 CLECs are using them in their commercial operations in Virginia. There are 12 CLECs using application-to-application interfaces to obtain access to these OSS, while these and others also use the access provided by Verizon's Web-GUI interface. In the month of March 2002, alone, these OSS supported more than 166,000 pre-order transactions, and more than 61,000 ordering transactions in Virginia. Similar volumes have been sustained throughout the past year. Furthermore, the interfaces and gateway systems used by CLECs to access Verizon's OSS in Virginia are the same

[1] References to AT&T are to its OSS Declaration (AT&T: Kirchberger, Kamal and Nurse), unless otherwise noted.

interfaces and gateway systems used by CLECs throughout the former Bell Atlantic jurisdictions. These systems have processed over 698,000 local service requests ("LSRs") or orders from April 2001 to March 2002 and more than 2.1 million pre-order transactions in Verizon VA during the same period.

12. While many CLECs still call in their trouble reports, the electronic Repair Trouble Administration System ("RETAS") interface to Verizon VA's maintenance and repair OSS supports over 2,500 maintenance transactions per month for Virginia customers. Finally, Verizon's Virginia Billing OSS generate hundreds of CLEC bills per month and millions of call usage records per month. Clearly, these systems are handling substantial volumes of "real life" commercial activity across the region and in Virginia.

II. THE KPMG REVIEW IN VIRGINIA

13. AT&T and Cavalier attack KPMG's test of Verizon VA's OSS – a test that was done at the Commission's direction and under its supervision. (AT&T at 14-30; Cavalier Clift at 8.) The KPMG Report speaks for itself in response. Significantly, CLECs were invited to participate in the KPMG test. Moreover, the Commission provided a full hearing on the results of the KPMG test. During this hearing, KPMG witnesses were questioned on the full scope and substance of the KPMG test and, as the absence of specific criticisms demonstrates, CLECs were unable to raise any serious questions regarding the accuracy, thoroughness, and conclusions of the KPMG test.

14. While the KPMG test was conducted under the direction of the Commission, it is also important to note that the test was modeled after substantially similar tests that KPMG had previously conducted in New York, Massachusetts, Pennsylvania, and New Jersey. The FCC has concluded that this prior testing constituted "persuasive evidence of Verizon's OSS readiness," and the same conclusion applies to

the testing that KPMG did here in Virginia. (*See New York Order* ¶100; *see also Massachusetts Order* ¶46.) The results of this test are indisputably excellent: KPMG evaluated 545 test points for the purpose of assigning them a ranking of either Satisfied or Not Satisfied. Only one evaluation criteria was Not Satisfied, only two were deemed Inconclusive, and three were Not Applicable. (KPMG Final Report at 22.) This third party testing, which the FCC has concluded can "provide valuable, relevant evidence of OSS performance" (*Pennsylvania Order* ¶33) quite properly trumps the vague, stale, and isolated performance incidents raised by some CLECs.

III. CUSTOMER SERVICE RECORDS

15. Cox raises several concerns related to the Customer Service Record ("CSR"), the record containing end user account information with Verizon VA. First, Cox complains of experiencing problems with error messages indicating CSR "not found" and claims the problem began in the first quarter of 2002 and has steadily increased during the first four months of 2002. As Verizon VA demonstrated in its response to Cox's discovery request on this complaint, there has been no "steady increase" of CSR requests with error messages, and thus the factual predicate upon which Cox's complaint is based, is faulty. (See Verizon VA's response to Cox 2-12 and 3-7, provided herein as Attachment 316 and 317.) Indeed, when pressed to document this contention by Verizon VA, Cox was forced to admit that it does not have "comprehensive records" to support its allegation. (Cox Response to Verizon VA's First Set of Discovery, Question 1.)

16. Cox goes on to recommend that when Verizon identifies an error in a CLEC request for a CSR with the error message "CSR not found," Verizon should be required to provide in the error message to the CLEC the reason that the CSR is not

found. (Cox Sheeley at 5–8.) As stated in the "Verizon Pre-Order and Trouble Administration Error Messages" document, which can be found on the Wholesale website at http://128.11.40.241/east/business_rules/error_messages.htm, "CSR not found" is one of 16 CSR error conditions. There are no other specific messages that can be sent to explain why the CSR is not found, because the message means that there is no account in the database that matches the information provided at that point in time.

17. Cox also complains that expressTRAK does not provide the breakdown of address locations as was done in the legacy system and cites an example of an expressTRAK problem where such a breakdown was not provided. Cox goes on to describe how it submitted an unanswered trouble ticket in late April and suggests that this problem requires it to call the NMC and sometimes wait up to 3 days for a query. (Cox Sheeley at 6 and 7.) Verizon is aware that for certain products such as Centrex, which can have multiple Secondary Location Addresses ("SLAs") within the same account, expressTRAK had been improperly excluding SLAs from the CSRs. Verizon has undertaken a software adjustment to address this situation, and this adjustment is scheduled to be implemented with the June 16, 2002 release, thus eliminating the problem. Until the software adjustment is accomplished, CLECs experiencing the problem are being instructed to contact the NMC to retrieve the information needed.

18. Lastly, Cox says it opened a trouble ticket on March 22 regarding a CSR it was trying to access which received the error message, "CSR not found." Verizon investigated the complaint, found that a software fix was required, and implemented the fix on April 20th. Cox complains that that is too long to wait for a software fix and indicates that it is continuing to experience problems in this area. (Cox Sheeley at 8-9.)

While Verizon endeavors to update and adjust software in its systems as quickly as possible, making such changes for large and complicated systems does take time. Until the software adjustment was accomplished, CLECs experiencing the problem were instructed to contact the NMC to retrieve the information needed. The April 20th software adjustment addressed a subset of CSRs that were not correctly formatted for retrieval, so this was not the only reason CSRs might not have been found. Cox would still receive the "CSR not found" error message in situations where the account was not in the database at that point in time or an input error had been made. The important point, as Cox itself notes, is that the "fix" was accomplished and the specific problem related to Cox's trouble ticket no longer exists.

IV. ORDER PROCESSING

A. Flow Through

19. AT&T makes a series of claims regarding Verizon flow-through performance for Virginia. (AT&T at 30-38.) AT&T asserts that Verizon VA is not able to flow-through a satisfactory commercial volume of orders and as such requires a "ramp up" provision in the PAP, and that Verizon VA's flow-through levels are not comparable to levels in other 271 approved Verizon states. AT&T also claims that Verizon VA's performance on OR-5-01 (Total Flow Through) and OR-5-03 (Achieved Flow Through) represents a failure to meet the Checklist requirements. WorldCom also questions Verizon VA's performance on these measurements. (AT&T at 32 & 33 and WorldCom Pearce ¶¶ 14-17.) These claims are without merit.

20. First, the FCC has not set a minimum level of order flow-through for 271 approval. To the contrary, the FCC long ago emphasized that "it would be inappropriate to consider flow-through rates as the sole indicia of parity." (*New York Order* ¶ 161;

Massachusetts Order ¶ 77.) In fact, the FCC has stated that flow-through rates are not a 'conclusive measure of nondiscriminatory access to ordering functions,' as AT&T suggests, but rather "one indicium among many of the performance of Verizon's OSS," (*Pennsylvania Order* ¶48.) As far back as December 1999, the FCC rejected AT&T's attempt to impose on Verizon such a minimum flow-through requirement by stating: "we conclude that Bell Atlantic's [Verizon NY's] overall ability to return timely order confirmations and rejection notices, accurately process manually handled orders, and scale its systems is more relevant and probative for analyzing Bell Atlantic's ability to provide access to its ordering functions than a simple flow-through test." (*New York Order* ¶163.)

21. As discussed below, Verizon VA has established a substantial record of timely and accurate order processing, whether these orders are handled mechanically or manually, and there is no question – given the commercial volumes of orders being handled throughout Verizon today and Verizon's excellent operating results – that its systems are scaled to meet demand.

22. Second, contrary to AT&T's and WorldCom's suggestion, Verizon VA itself is currently handling a commercial level of LSRs through its systems. In the three-month period from January through March 2002, Verizon VA confirmed more than 115,000 LSRs for CLECs in Virginia. This is a very substantial level of commercial activity.

23. Third, Verizon VA's overall order flow-through rate was over 65% in March 2002. This rate of order flow is higher than the overall flow-through rate in New

York (57.53%), Massachusetts (40.5%), Pennsylvania (47.54%), Rhode Island (61%), and Vermont (55%) at the time those states were concluding their 271 reviews.

24. With respect to total UNE order flow-through, the current overall UNE flow-through rate in Virginia (60.51% in March 2002) is comparable to the overall UNE flow-through rate in New York (62.81% in September 1999) and higher than both Massachusetts (39.51% in July 2000) and Pennsylvania (55.5% in February 2001) at similar points in their state 271 proceedings. Importantly, within the Virginia average, there are individual carriers realizing UNE flow through rates as high as 95.67% and as low as 23.91% -- a fact that the FCC has concluded in other states demonstrates flow through rates are dependent on the actions of CLECs as well as Verizon.

25. Based solely on its numerical analysis, AT&T claims that Verizon VA's performance does not show it can adequately flow-through CLEC orders. (AT&T ¶ 69.) However, as was the case in New York, Massachusetts and Pennsylvania, AT&T has provided no evidence of any actual harm in Verizon VA's handling of these orders. In fact, the C2C reports show that Virginia orders are being timely and accurately addressed.

26. Instead, AT&T offers only speculation about possible problems that Verizon could encounter when CLEC mass-market entry occurs. It appears that the mass marketing efforts to which AT&T is referring are the high order volumes submitted by it and WorldCom in some other Verizon states. Here, AT&T wants to leave the impression that these order volumes will "inundate" National Market Center ("NMC") resources. (AT&T at 37.) AT&T has provided no examples of this happening. To the contrary, AT&T carefully avoids noting that these "mass market" orders do not require massive

numbers of additional NMC representatives because they in fact flow through Verizon's systems at high rates. For example, the current UNE-P flow-through rates for AT&T and WorldCom are ** **Begin AT&T Proprietary** [See AT&T Proprietary Attachment, Item 1][2] **End AT&T Proprietary** ** and ** **Begin WorldCom Proprietary** [See WorldCom Proprietary Attachment, Item 1] **End WorldCom Proprietary** **, respectively, in New York, where AT&T submits ** **Begin AT&T Proprietary** [See AT&T Proprietary Attachment, Item 2] **End AT&T Proprietary** ** of orders monthly and WorldCom submits ** **Begin WorldCom Proprietary** [See WorldCom Proprietary Attachment, Item 2] **End WorldCom Proprietary** ** of orders monthly. Similarly, the flow-through rate for WorldCom in Pennsylvania is ** **Begin WorldCom Proprietary** [See WorldCom Proprietary Attachment, Item 3] **End WorldCom Proprietary** ** where it also submits ** **Begin WorldCom Proprietary** [See WorldCom Proprietary Attachment, Item 4] **End WorldCom Proprietary** ** monthly. Indeed, the broader participation of these carriers in those markets using UNE-P to serve residential customers is a large factor in the higher UNE flow-through rates that are currently being experienced in those states.

27. In Virginia, AT&T's current UNE-P flow-through rate is ** **Begin AT&T Proprietary** [See AT&T Proprietary Attachment, Item 3] **End AT&T Proprietary** ** with a volume of less than ** **Begin AT&T Proprietary** [See AT&T Proprietary Attachment, Item 4] **End AT&T Proprietary** ** orders each month. The reason for AT&T's current flow through rate in Virginia has to do with the types of orders and products that AT&T is currently submitting. As a factual matter, in Virginia AT&T is

[2] Attachments 320, 321, 322, 323 and 324 to this declaration contain information proprietary to Allegiance, AT&T, Cavalier, Covad and WorldCom, respectively.

ordering more complex products than the products that AT&T orders in New York. Many of these more complex products do not flow-through. The types of orders and products AT&T is submitting in volume in New York would flow-through in Virginia, and therefore, if AT&T were to place the same kind of "mass market" orders in Virginia using the same product mix as in New York, its flow-through rates in Virginia would sharply increase. WorldCom would also have similar results if it was submitting the same orders and product mix in Virginia as it is currently submitting in New York.

28. Thus, the facts show that Verizon has worked effectively with these carriers to flow-through their volume orders in other Verizon states, and that there is no risk of "inundation" to the NMC. Of course, this effective working relationship requires that these CLECs operate in good faith, and share their plans for market entry order types and quantities on a confidential basis with Verizon VA so that Verizon can provide them with the support they need. If, however, for whatever reason, these entities decline to provide adequate advance notice as to their needs, Verizon will be forced to operate reactively, rather than proactively, which is clearly a less optimal customer/supplier relationship. A "ramp up" period allows Verizon to observe CLEC ordering behavior in precisely this circumstance and adjust its operations, including OSS, to best serve the market in Virginia.

29. Moreover, even for the subset of total orders considered in the "achieved" flow-through rate measure for UNEs, Verizon has a higher flow-through rate in Virginia at this point in the review process (85.45% in March 2002) than Verizon did in Massachusetts during the course of the FCC's review of Verizon's section 271 compliance in that state (71.13% in January 2001).

30. Nor is it the case, as AT&T suggests, that achieved flow through data is an express requirement for section 271 relief. As the FCC has specifically advised, "[c]ontrary to the claims of some commenters [citing AT&T and WorldCom], we do not specifically require Verizon to provide data on its achieved flow-through rate to determine that Verizon's OSS are capable of offering high flow-through." (*Pennsylvania Order* ¶ 48; citing *Massachusetts Order* ¶80.) Indeed, in its section 271 decisions in New York, Massachusetts, and Pennsylvania, the FCC noted with approval that KPMG testing had successfully tested Verizon's systems for their flow through capability -- the same testing has been done by KPMG here in Virginia. (KPMG Final Report 197 - 203.)

31. In any event, Verizon's achieved flow-through rates for UNEs in the former Bell Atlantic jurisdictions are continuing to increase, including in Virginia. And contrary to the suggestions of some CLECs, increasing the total number of orders that flow-through is a high priority for Verizon VA, since this increase benefits both its wholesale customer carriers and Verizon. In an effort to increase flow-through, Verizon analyzes LSRs that do not flow-through to identify root causes and determine appropriate courses of action. As a result of this ongoing analysis, a number of flow-through enhancements were implemented in March, April and May. The analysis process is ongoing and as opportunities present themselves, other enhancements will be identified and implemented.

32. As stated in the OSS Declaration, Verizon also conducts monthly CLEC education workshops to assist CLECs in increasing the quality of their LSR preparation, which is a critical factor in whether orders are able to flow-through. Each month, Verizon analyzes system-generated "error codes" – reasons why LSRs were rejected or

failed to flow-through. The monthly workshops, along with other topics, focus on the CLEC errors, and address the most prevalent error types that are rejected to the CLECs. The educational packages used at these workshops are posted on the Verizon Web site. (OSS Declaration ¶ 85.)

33. Further, to help CLECs perform their own analyses of the causes that prevent their LSRs from flowing through, Verizon creates a report of flow-through errors by individual CLEC and by mode-of-entry. This information is made available to CLECs that request it through Change Management. This information helps CLECs manage their ordering processes more effectively and reduce the errors that they make, both of which will ultimately reduce the number of LSRs rejected and increase their flow-through rates. (*Id*. ¶ 86.)

34. For all of these reasons, this Commission can be confident that, in the words of the FCC, "Verizon's flow-through rates will improve over time as individual carriers gain experience with the OSS and as Verizon conducts monthly workshops for competing carriers to help them improve their order submissions." (*Massachusetts Order* at ¶ 78.)

35. In summary, Verizon VA is processing over 65% of the confirmed orders it is currently receiving in an automated fashion and continues its efforts in Virginia (and elsewhere) to further increase the number of orders that are processed in this manner. Verizon's efforts will provide increases to both the overall UNE flow-through and the UNE achieved flow-through rates.

B. **NMC**

36. AT&T expresses concern that manually processed orders are subject to errors and that, as the volumes of orders in Virginia increase, the National Market Centers ("NMCs") will not be able to handle the increased workload. (AT&T at 37.) There is no factual basis for AT&T's concern. To the contrary, a review of the Verizon VA Carrier to Carrier ("C2C") results for the Order Confirmation Timeliness (OR - 1) and Reject Timeliness (OR - 2) for non-flow through orders indicates that Verizon VA's performance on manually processed orders has been timely. The resale results consistently meet or exceed the standard. For the period of January through March 2002, Verizon VA's performance on resale order confirmation and reject timeliness has averaged over 99%. Similarly, Verizon VA's performance on UNE order confirmation and reject timeliness has averaged over 98%. The majority of the UNE categories that missed the standard were near misses (performance above 90% but below the 95% target) or misses in very low volume categories (10 or fewer observations). Three of the misses involved DS1 metrics with a performance standard of 48 hours. The standards for all confirmations and rejects for UNE Specials DS1 and above will be moving to 72 hours in accordance with Verizon VA's February 22, 2002 filing.[3] The change will be effective with the June data month. The March performance on OR-1 - 06 % - On Time LSRC >= 6 Lines - DS1-Electronic Non Flow-Through was the result of a single CLEC submitting more than 500 orders for new DS1 service. These orders, which are atypical in the amount of engineering work they require – outside of the NMC – were not identified by

[3] *See* C2C Guidelines filed on February 22, 2002, in Case No. PUC010206

the CLEC in the forecasting process and this unexpected volume of orders requiring facilities checks created a temporary backlog.

37. In addition, Verizon VA has a very high level of accuracy in processing manually handled orders. As indicated by the C2C results, Verizon VA has demonstrated continued strong performance in the Percent Accuracy-Opportunities measure for the entire period of February and March 2002 for both UNE and Resale. UNE and Resale accuracy results were consistently over 97% for these months. In terms of Percent – Accuracy Orders, Verizon has also demonstrated strong performance during February and March 2002 for both UNE and Resale. UNE loop accuracy results were achieved at 95.75% and 95.16% levels, respectively, for these months. UNE Platform accuracy results were achieved at 91.35% and 89.66% levels, respectively, for these months and Resale accuracy results were at 87.59% and 85.50% levels, respectively. A review of the November 2001 through January 2002 C2C Reports shows that Verizon VA's historical performance on order accuracy had generally been at or above the 95% standard. The decline in performance experienced in February and March was due to a new procedure implemented by Verizon that gave NMC service representatives the ability to modify the application date generated by the system. Prior to February 2002 this field could not be modified. Before this change, when a service representative created a service order, the system automatically generated the date the order was created as the application date. The new procedure allows the service representative to modify the application date generated by the system if the application date is different from the actual date the order is entered. Verizon VA believes that this new procedure generated errors as to the application date, but did not impact the actual service provided to the CLEC, including

the customer due date itself. After reviewing the February results, the NMC management team determined that this new functionality needed to be reviewed again with the service representatives and therefore the management team conducted reinforcement training in the centers during the month of March. Verizon VA expects that this reinforcement training will result in performance percentages similar to those that were recorded before the change in procedure was put in place.

38. In terms of staffing at the NMC, Verizon utilizes several tools to ensure that the NMCs are staffed with trained personnel to handle increases in orders that require manual processing. First, there is the CLEC forecasting process. This process provides CLECs and Resellers with a structured format to submit semi-annual forecasts for Resale, UNE, Collocation and Trunks. The individual forecasts are aggregated by the operations and planning organizations and are used as an input to the product specific forecasts by state. These forecasts, coupled with additional market data (including historical and current customer activity that is shared with Verizon during customer meetings), market trends, product cross-elasticity and regulatory impacts, form the basis of the comprehensive 5-year forecast. Details regarding this forecasting process are provided to CLECs at http://128.11.40.241/east/wholesale/resources/resources.htm#Forecasting.

39. The NMC also utilizes a Force Planning Model to aid in capacity planning. A copy of the Force Planning Model for the State of Virginia was provided as a Proprietary attachment to Verizon VA's response to an AT&T request for data. *See* Verizon VA's response to AT&T Set 1 #62 (provided herein as Attachment 318). Information gathered from the CLEC forecasting process is used as an input to the Force Planning Model. The Force Planning Model also considers product-specific flow-

through levels in determining the force requirements for the center. The results of the Force Planning Model are then compared against the actual staffing levels in the NMCs in order to determine if, and when, additional representatives will be required. The analysis also allows the NMC management team to decide whether there is a need to cross-train existing representatives. Nor is it the case that the NMC is unprepared in the event of an unanticipated sharp increase in the volume of orders requiring manual processing. The NMC has several tools available to meet short-term increases in demand. If the increase in volume is affecting one work group in the Silver Spring center, the manager of this group can seek the assistance of the cross-trained representatives from another work group in the Silver Spring Center. For example, all of the representatives in the UNE Platform group are also trained on residence and business resale. In addition, one NMC can temporarily route calls to another NMC that has spare capacity. For example, if the Chesapeake, Virginia NMC experiences an unexpected increase in Virginia DSL orders, these orders can be routed to the DSL Center in Boston, Massachusetts which has service representatives trained on Virginia DSL ordering procedures. In addition, the NMCs have the option of adding additional service representative hours through the use of overtime and weekend work.

40. AT&T and Cox imply that NMC representatives are not adequately trained. (AT&T at 38 & 39; Cox Sheeley at 11.) AT&T and Cox are simply wrong. Verizon VA maintains a strong training program at the NMC. Service Representatives are trained by professional instructors using professionally developed training material. The initial training period consists of a four to six week curriculum, including two to four weeks of formal classroom training and two weeks of on-the-job training. Additional

"follow up" training is provided as needed. When re-training is warranted as a result of lack of current experience, re-training is scheduled. Prior to attending the formal training, if there is an immediate need to utilize those employees on subjects where they may lack experience or expertise, Verizon VA provides the necessary assistance through on-the-job training by pairing the inexperienced service representative with a more experienced representative, thus, providing the needed assistance while simultaneously meeting the needs of the operation. Verizon has successfully followed similar practices in its retail operations.

41. When asked in discovery to provide the factual basis for its contention that Verizon representatives at the NMC "are in need of extensive training," Cox was only able to summon up a single incident, in which Cox claims that a Verizon supervisor did not know "what a SPID" was. While it is theoretically possible that every single Verizon representative always remember every one of the hundreds of products, codes, and systems for which he or she is responsible immediately when asked, without having to review any backup materials, it is not practicable, nor is this a standard that any carrier – not Verizon and not Cox – can satisfy. However, this single incident hardly proves that Verizon provides substandard training. In fact, when asked about the training that Cox provides its employees who interact with the Verizon NMC, Cox stated that these employees receive training in a "variety of matters" but virtually all of this training was actually training done by *Verizon* for CLECs. *See* Cox Response to Question No. 4 of Verizon VA's First Set of Discovery (Cox employees receive training by "attend[ing] Verizon's training for directory, resale and UNE orders . . . . Some are trained by their peers that have attended these training sessions . . . . Such employees may also utilize the

Verizon website . . . ."). Verizon VA is quite confident that its training is among the best in the industry, and that the training resources that it makes available to its own representatives and to CLEC representatives are more than adequate.

42. Some CLEC questions can easily be resolved through a review of the materials that Verizon makes available. For example, Cavalier complains that it has no idea when Verizon will provision an unbundled loop and provides an example of submitting an order for an additional line, once with Cavalier and once with Verizon, and suggests different due dates were provided. (Cavalier Clift at 6 & 7 and Exhibit 1.) First, CLECs should be aware of the date on which they should expect Verizon to deliver a service. Interval information is made available in the Product Interval Guide found at http://128.11.40.241/east/wholesale/resources/master.htm. For simple order types and limited service quantities, CLECs have two means of determining the appropriate due date. For orders that do not require the dispatch of a Verizon technician to the end user's premises, CLECs should use the standard interval found in the Product Interval Guide. For orders that do require the dispatch of a Verizon technician to the end user's premises, the CLEC should use the Due Date Availability preordering transaction to determine the next available due date in a given geographic area. (*See* OSS Declaration ¶ 41.) For more complex orders or orders for larger quantities, the due dates are negotiated. Thus, if Cavalier really has "no idea when Verizon will deliver an unbundled loop" (Cavalier Clift at 6), it is only because Cavalier has not taken the steps to obtain this information. Thus, for example, merely by referring to the Product Interval Guide, Cavalier could determine that the interval in the former Bell Atlantic South area for a 2 Wire Analog Loop is the "green day" for orders of 1 to 10 loops, 10 days for orders of 11 to 20 loops,

and negotiated for orders greater than 20 loops. The "green day" is defined as the next available date for that geographical region. The "green day" is based upon the workforce and workload in a given geographical region and is applicable to both retail and wholesale orders. As noted above, a CLEC may determine the "green day" by submitting the Due Date Availability preorder transaction.

C. CONFIRMATIONS, QUERIES AND JEOPARDIES

43. In the specific example provided as Exhibit 1 by Mr. Clift of Cavalier, the PON was for a new address that was not yet in Livewire, and Cavalier's confusion was caused by its own failure to follow required procedures. The Verizon Business Rules state that "when a new address needs to be built in Livewire in order for the facilities to be assigned, the CLEC must populate the SADLO field on the LSR, which is item #16 in the Local Service Request." Cavalier did not populate the SADLO and associated address information in accordance with the Business Rules on any version of the PON submitted to Verizon, thereby causing the system-generated queries. Once Cavalier contacted the NMC, the address was built in Livewire and Cavalier was able to submit a successful order.

44. Cavalier also complains that Verizon sends multiple order confirmations for the same service order, which it contends causes additional work on the part of Cavalier. (Cavalier Panel at 44.) Cavalier is correct that Verizon does send multiple confirmations when necessary. However, these multiple confirmations are required by and conform to the industry guidelines. In fact, they are the only means by which Verizon VA can notify the CLEC that it has received its request and is processing the order. As a general rule, Verizon sends a confirmation back to the CLEC each time the CLEC sends a Local Service Request ("LSR") to Verizon. Verizon also sends a

confirmation each time the CLEC supplements its LSR (i.e., changes information on the original LSR). Under any of these circumstances, therefore, it is normal operating procedure for Verizon to generate multiple confirmations on a single customer request.

45. Moreover, if there were an error on the initial confirmation, the Verizon service representative may initiate a second confirmation in order to correct the error. For example, if the first confirmation inadvertently provided an incorrect service order number, it is conceivable that a second confirmation may be sent nearly immediately to correct the order number. This is normal business practice and should not be viewed as an incorrect or faulty procedure. However, because the service representatives need the ability to send a second confirmation under certain circumstances as explained above, it also introduces the chance of human error. Verizon has provided reinforcement training on the processing of confirmations to service representatives in December 2001 and again in February 2002.

46. Next, Cavalier complains that Verizon can stop the clock on metrics while it issues queries that shouldn't have been issued. (Cavalier Panel at 50.) Cavalier is wrong. Cavalier has provided no specific examples to support this allegation. Reject Notices (or queries), like confirmations, are subject to C2C performance standards. Verizon strives to send confirmations and reject notices within the prescribed standards and, as the C2C results demonstrate, Verizon VA has excellent performance in this area. Verizon simply does not issue fictitious queries in order to avoid missing a confirmation timeliness measure.

47. Next, Cavalier complains about getting queries from Verizon VA on circuit identifiers provided to Verizon by Cavalier in the ordering process. (Cavalier

Panel Testimony at 45.) Circuit Identifiers are unique codes assigned to certain UNEs so that both CLECs and Verizon can maintain a standard approach to the identification of the UNE. The issue raised by Cavalier arises when Cavalier receives a query for a circuit identifier "not found"; this means that Verizon does not currently have a record of the circuit identifier that Cavalier has sent on an order. This query can quite properly be generated for a variety of reasons – including Cavalier's failure to send an order with the correct circuit identifier or if an order arrives prior to an initial Verizon record update. Moreover, not only is this query issue not a problem from a systems standpoint, but also it is clear that Cavalier has overstated the number of such queries that it receives. A Verizon review has determined that during the time period from March 15 – April 15, 2002, Cavalier received a total of ****BEGIN CAVALIER PROPRIETARY** [See Cavalier Proprietary Attachment, Item 1] **END CAVALIER PROPRIETARY**** queries and only approximately 1% of these queries were for circuit identifiers not found.

48. Cavalier also expresses concerns about the Jeopardy Notice process. (Cavalier Panel Testimony at 47.) Verizon's electronic jeopardy notification process, which was implemented in October 2000, conforms to the industry standards for LSOG 4 and LSOG 5. Contrary to the suggestion of Cavalier, the Verizon business rules contain the information necessary to enable a CLEC to distinguish between a confirmation, a jeopardy notice, and a query. The jeopardy notification process is fully documented and can be found on the Wholesale customer web site at http://128.11.40.241/east/wholesale/html/pdfs/jeopardy_notification.pdf.

49. Moreover, Verizon did not unilaterally impose the jeopardy notification process. Instead, Verizon worked with CLECs to establish the jeopardy codes, determine

how each code would be used, and what actions would be required of CLECs after they received a jeopardy notice. Since establishing these jeopardy codes, Verizon has continued to work with the CLEC community to clarify and refine the process as needed. In fact, Verizon has made a number of changes to the jeopardy notification process since June 2001. All such changes are fully documented on the Wholesale Customer Support Website.

50. A jeopardy notice is the means by which Verizon notifies a CLEC that Verizon has determined that the due date for the CLEC's order may not be met. The notice not only notifies the CLEC that the order is "in jeopardy," but also provides information as to why the order has been placed in jeopardy status. Depending on the circumstances, a single order may generate more than one jeopardy notice as the order is processed. This does not mean that a prior jeopardy notice was inaccurate, as Cavalier suggests, but rather that there is an additional reason why the order is in jeopardy. If a CLEC ignores additional jeopardy notices for an order the CLEC is virtually guaranteeing that the order will be late and/or the end user customer will be unaware of this fact. It is therefore imperative that CLECs review all confirmations and jeopardy notices that they receive.

51. Given the importance of this process, Verizon provides CLECs with training regarding the jeopardy notification process. Verizon recently conducted a Jeopardy Notification Workshop on January 24, 2002 and on February 13, 2002, Verizon conducted a Notifier Workshop where jeopardy notifiers were extensively discussed. All CLECs were welcome at these sessions, and Cavalier participated in the January session.

52. Cavalier also raises a question about a jeopardy notice being sent after a CLEC has received a PCN. (Cavalier Exhibit 33.) Upon learning of this situation, Verizon investigated this issue and found that this "jeopardy after provisioning" situation was occurring in a very limited set of circumstances – when Verizon receives and processes conflicting orders for the same end user from two CLECs or from a single CLEC. To clarify this situation, Verizon implemented a new code on the jeopardy notice for this circumstance on January 7, 2002. Verizon also discussed this issue with CLECs at the January 24, 2002 Jeopardy Notification workshop and documented it in the January 2002 version of the Jeopardy Notification Process. The problem about which Cavalier complains has thus been resolved.

53. Cavalier also complains that when using expressTRAK, Cavalier experienced a billing telephone number ("BTN") having been converted incorrectly (Cavalier Panel Testimony at 48.) Cavalier suggests that this is evidence of a wider system problem. (Cavalier Panel Testimony at 48.) While Cavalier is correct that it encountered a problem with some BTNs, this problem was not the result of a system problem or even a systemic problem. As Cavalier is aware, Verizon investigated this specific claim and found that the problem had been caused by a work center error. Specifically, an NMC service representative had inadvertently reassigned the BTN to another CLEC. As a result, when Cavalier issued its disconnect order, the system did not recognize that the account belonged to Cavalier.

54. Cavalier suggests that Verizon did very little to resolve the problem or to make the necessary corrections, but this is simply not true. The WCCC and the NMC worked with Cavalier to implement a workaround and identify the PONs that were

affected by the error and then devised a plan to resolve the problem. Specifically, Verizon issued orders to correct over 70 Cavalier BTNs. Cavalier was provided with the new BTNs and issued the appropriate LSRs to complete any disconnect orders affected by this problem. Moreover, as Cavalier is also aware, in March 2002, Verizon implemented a process enhancement and automated the process for assigning the BTNs. It is no longer possible to assign duplicate BTNs to different customers.

55. Cavalier suggests that as part of the resolution to its BTN problem, Verizon directed Cavalier to the Change Management process. (Cavalier Panel Testimony at 51.) Cavalier is mistaken. Cavalier was directed to Change Management not to resolve their specific PON errors, but because they wanted to introduce a change to the interfaces. Change Request ("CR") 2470 was submitted by Cavalier on April 4, 2002 to remove error message 7070UA03 "REQUEST RSID/AECN DOES NOT EQUALACCOUNT RSID/AECN CSR- LSR IN QUERY". When a change is requested to the interfaces that affects all the CLECs doing business with Verizon, it must go through the Change Management process where it can be reviewed and discussed by the industry as a whole. Contrary to Cavalier's suggestion, Verizon cannot simply make a systems change at the request of one CLEC, when that change will affect other CLECs using the systems. When Cavalier requested that Verizon change the systems, therefore, Cavalier was properly directed to the Change Management process. But as set out above, the resolution of the particular BTN issue Cavalier raised was not dependent on the Change Management process.

56. Cox complains that when Verizon provides CSRs, sometimes the information that substantively appears on the CSR will delay a number porting order for a

customer who is moving to a CLEC. Specifically when a customer's CSR contains either (a) a Local Service Provider Freeze or (b) DSL line sharing indicators, a customer's number porting order will likely be delayed if they are unsuccessful in getting the Verizon retail office to remove the coding on the account. (Cox Sheeley at 5-6.) Similarly, Mrs. Carhart of Cox suggests that Verizon should not be permitted to prevent a porting order from Cox from going through just because an account is flagged as a DSL Line sharing account.

57. In both the retail and wholesale segments of Verizon, end users have the option of placing a "freeze" indicator on their telephone accounts. This will allow a customer to freeze an entire account or selected lines on an account. When the account/line is frozen, the Local Service Provider cannot be changed until the "freeze" indicator is removed by the end user. This process has been implemented by local service providers as a protection against slamming, which as the Commission is aware, is one of the most frequent complaints of end user customers.

58. This Local Service Provider Freeze is a service that is available upon request; it is not marketed or proactively offered by the Verizon Retail organization. Verizon does not solicit" freezes" or in any other way actively market them under our retail service center business practices. Verizon administers the local service provider freeze option consistent with FCC rules.

59. When Verizon receives a request to migrate an entire account or selected lines on an account for which the end user has requested a Local Service Provider Freeze, the end user cannot be migrated without the end user's express permission. In such a case, Verizon notifies the CLEC of the existence of this local service freeze by querying

the LSR back to the CLEC with the following message: *"Local Service Provider Freeze in effect."* This message tells the CLEC that in order to migrate the line, the end user must contact their current local service provider (whether Verizon or a CLEC) and request that the "freeze indicator" be removed. Once removed, the CLEC may submit a supplemental order to change the migration date for the LSR to be reprocessed. Obviously, if the local service freeze is going to be effective, it cannot be automatically lifted without the express permission of the end user.

60. The process for addressing this local service freeze is long- established, and in fact, Verizon sent out an Industry letter about the process more than three years ago – on November 25, 1998.

61. While Cox recommends the elimination of the Local Service Provider freeze, such a step would be inconsistent with the availability of this option under the FCC's rules[4] and with customer preferences. Recognizing that the elimination of the service freeze is unlikely, Cox in the alternative requests that Verizon VA make a commitment to only provide it on customer request (no marketing) and to follow the FCC's rules on signing up customers and on removing the freeze. But Verizon VA already follows the FCC's rules regarding the local service freeze and does not affirmatively market the freeze option. Verizon VA assumes that all other local service providers in Virginia, including Cox, are following the same procedures.

62. Cox is also correct in that a migration may not be performed if line sharing exists on the line contained in the migration order. At this time, the industry has not

[4] *See generally, In the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996 and Policies and Rules Concerning Unauthorized Changes of Consumer's Long Distance Carriers*, Second Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 94-129 (released December 23, 1998).

reached consensus on how to accomplish this migration. Verizon is working with the CLECs in the collaborative process to prioritize the development and implementation of the different order scenarios associated with DSL services. If such an LSR is submitted, it will be queried with a message that indicates that line sharing exists on the account and that it is not eligible for migration until the line sharing is removed.

63. Of course, the recent decision of the United States Court of Appeals for the District of Columbia may eventually render this entire issue moot.[5] But until the issue is finally decided, Verizon continues to develop processes for CLEC to CLEC migrations, including a Line Sharing to Line Sharing scenario. The Line Sharing to Line Sharing scenario being developed will allow for a line sharing migration to occur through the submission of one LSR from the acquiring CLEC. Until this process has been fully developed and implemented, Verizon has provided an interim process that allows for this type of migration scenario. The interim process has been communicated to the CLECs through Change Management in April 2002.

64. In other scenarios where line sharing is present, such as a number porting order, line sharing must be removed before the number can be ported. To remove line sharing from a customer line, the end user is required to contact its current data provider and have the data provider submit a Local Service Request ("LSR") to Verizon to disconnect the line sharing. Verizon will process the disconnect order on the date requested by the current data provider. Once the line share disconnect is processed, the CLEC can then process an LSR to port the telephone number. The standard interval for a line share disconnect is 2 business days.

[5] *United States Telecom Assoc. et al. v. FCC,* No. 00-1012, consolidated with 01-1075, 01-1102, 01-1103 D.C. Cir. (Decided May 24, 2002).

65. Cox also complains that they experience delays when submitting requests to port all but one Centrex line from a single end user customer. (Cox Sheeley at 10.) Cox did not specify the extent of the delays and they have failed to provide any details for this allegation in response to Verizon VA's discovery request. Cox's description of the process utilized when the Verizon Centrex customer wishes to leave a line with Verizon and port all the other Centrex lines to a new service provider is accurate. Centrex is a service that requires more than one line. If the end user wishes to retain only one telephone number of a Centrex account, the service associated with the remaining telephone number must be changed to POTS. Verizon cannot initiate service-related discussions with the end user once a CLEC provides notification that the end user is porting their telephone numbers. Therefore, the end user must first contact Verizon to change the remaining line to a POTS service before the remainder of the Centrex lines can be moved to Cox. This process may involve rearrangement of Centrex features, termination of a Centrex contract and re-establishment of the end user customer's billing account. Verizon cannot confirm a date when the port will take place until the end user customer's service is transitioned from Centrex to POTS. This activity, which does introduce some delay in the porting process is necessary to obtain the end user's desired exchange service on the remaining line and to maintain continuity of service on that line. The delay is dependent upon the completion of Verizon's negotiations with the end user and the amount of work required to complete the transaction. Verizon is not denying porting the telephone numbers as requested by the CLEC nor introducing unnecessary delays and is therefore meeting requirements for number portability.

66. Cox also complains that Verizon's system sometimes queries orders incorrectly due to outdated information. (Cox Sheeley at 6.) Cox has provided no specific examples supporting this allegation. It is unlikely that a manual query would be generated based upon "outdated" information as it is standard practice for the service representatives to check for pending service order activity before issuing a query. However, if a service representative failed to check for pending order activity or performed a check but failed to notice activity it is possible that a query could be generated.

67. Cox also complains about ordering problems caused by the Presidents Day 2002 release. And while Cox contends that the workarounds provided by Verizon were unacceptable and the process too lengthy, in the end Cox admits what is most relevant for its contention: the problem was fixed more than three months ago, on February 25, 2002. (Cox Carhart at 12-14.) The workaround required only the entry of a single character into a single field on the LSR and was only in place for four days.

68. Cox observes that queries from the NMC for additional information can take three days. (Cox Sheeley at 7.) This assertion is correct, but Cox fails to highlight that this timeframe is consistent with the C2C Guidelines, which provide standards for returning reject notices of up to 72 hours for orders requiring a facilities check. Verizon VA issues the query as soon as it determines there is a problem; however, that may be as late as 72 hours into the process. This is not a failing on Verizon VA's part, nor is it evidence of discrimination. As noted earlier, Verizon retail orders requiring a facilities check are handled in the same manner as wholesale orders. And as can be seen from the C2C results, Verizon VA's performance in this area has been strong. It is also important

to remember that these queries are issued for the most part because a CLEC order does not contain all of the required information or has been completed incorrectly or incompletely.

69. In the Declaration of Margaret T. Pearce, WorldCom attempts to demonstrate that Verizon VA's performance has been unacceptable by focusing on a number of OSS related measurements. Specifically, WorldCom claims that Verizon VA is masking poor performance on confirmation and reject timeliness by using averages. (WorldCom Pearce ¶ 10.) Attachment 307 to the OSS Declaration displays Verizon VA's performance on every confirmation and reject measurement. The Commission can determine for itself the level of Verizon VA's performance, and there has certainly been no attempt by Verizon to "mask" performance. Indeed, it is WorldCom that seeks to present a skewed view of this performance, by highlighting some measurements and not others, and by merely counting misses without looking at the scope and scale of these misses. The individual results, as well as the averages, displayed on Attachment 307 provide a clear demonstration of Verizon VA's excellent performance. Moreover, as discussed above, the few misses highlighted on this attachment are for the most part near misses (e.g., 93.51% versus the 95% standard) that have no competitive significance, are in low volume categories, or are associated with orders requiring a facilities check.

D. Directory Listings

70. Several CLECs have expressed concerns about directory listings. Significantly, these carriers do not so much complain about the accuracy of the listings as published in Verizon's directories as they do with the directory listings process. Some CLECs have contended that the systems and procedures responsible for processing directory listings are not working properly. In this declaration, we respond to this claim,

and demonstrate that while the directory listing process is not perfect, it does achieve the goal of producing accurate listings. We also demonstrate that the systems used to produce directory listings are themselves accurate and effective. The Checklist Reply declaration responds to other directory listings claims.

71. Directory Listings are simple and complex listings (described further below) that include the name, address, and telephone number of an individual, firm or organization. The listings appear in the Directory Assistance ("DA") records and the White Pages Directory for the area in which the telephone service is located. Directory Listings are provided in connection with Resale, UNE Platform, and UNE Loop accounts and are also available to facilities-based carriers as standalone listings.

72. Each residence main number is entitled to a standard straight line or indented listing in the white pages directory. Each business main number is also entitled to a standard straight line or indented listing in the yellow page directory. Listings may also be included in Directory Assistance records. Customers also have the choice of listing their telephone line (meaning a listing is published in the directory and in directory assistance records), having their line non-listed (meaning the line will not be listed in the directory but will be included in the directory assistance records), or non-published (meaning the line will not be listed in the directory or in the directory assistance records).

73. There are also a variety of alternatives for how a customer's listing will appear in the directory. For instance, a simple listing indicates that the customer simply wants the name, address and telephone number listed in the directory. The majority of listings in the directory are simple listings. However, there are many other alternatives

available and utilized by customers that would make the listing complex. For instance, customers often want their listings indented with multiple layers under a main heading such as when a business is listed with the Company name followed by a series of departments and associated telephone numbers within the company. Residence customers may want indented listings as well. For instance the main listing may be the parents with an indented listing for the children. A review of the Commonwealth of Virginia's listing in the Richmond Directory provides an excellent example of complex listings.

74. In addition, there are a variety of listing types. A customer's main listing is generally the first listing to use the account telephone number. But often, customers want additional listings for that same telephone number or a different number that would normally be unlisted. Customers often want one telephone number listed under multiple names within the same book or they may want their telephone number listed in a different book, which is called a foreign listing. Customers also seek alternate call listings where the reader is directed to call a different number depending on the time of day or if no one answers the first line. And there are other variations too numerous to discuss here. At any rate, listings are complex, time consuming, and require a tremendous attention to detail.

75. The process is further complicated by the type of service the CLEC is using in order to provide service to its end user. If the CLEC is providing service using either resale or the UNE Platform, Verizon VA is always aware of the telephone number associated with the account, since Verizon supplies the dial tone. In these cases then, the provisioning of the listing can be initiated by the same CLEC order that requests the

actual platform or resale service, since Verizon knows what the telephone number is or will be. In these cases, when the CLEC initiates an order to disconnect that line, Verizon VA will also automatically remove the listing, since Verizon VA knows the telephone number connected with the service.

76. If a CLEC leases loops from Verizon, however, these loops are cross-connected to the CLEC facilities at the collocation site and the CLEC provides the dial tone and therefore the telephone number out of its own switch. In these cases, because Verizon VA does not know what telephone number will be used to serve the end user, Verizon cannot automatically arrange for the listing. For this reason, the CLEC must make a specific request for such a listing and then subsequently advise Verizon VA when the listing is to be changed or deleted. This same process must be followed when a CLEC provides service to its customers without using any of Verizon VA's facilities, since in this case as well, Verizon does not know the telephone number that the CLEC has assigned the end user customer.

77. These differences in services also affect the manner in which the listing information is maintained. For resale and platform accounts, directory listings are kept on the same billing account number as the associated platform or resold service. For loop and full facilities-based accounts, directory listings information is maintained on a special bill number ("SBN") account used only for directory listings. Separate SBNs are created for residence and business accounts and when the special billing account reaches its maximum capacity (approximately 17,500 listings), the CLEC is notified and an additional SBN is created.

78. In order to keep track of multiple listings within the same billing account, (whether resale, UNE-P, loop or stand-alone), industry standard codes, known as Alpha/numeric Listing Identifier ("ALI") codes are used. These ALI codes provide a unique identification for each listing within a billing account and are used as a means of listing identification between the CLEC and Verizon VA. Contrary to the suggestions of some CLECs, they are not only relevant but essential to directory order processing accuracy. And also contrary to the suggestions of some CLECs, these ALI codes were not invented by Verizon but rather were established by Telcordia, are supported by the industry Ordering and Billing Forum, and are used by telecommunications companies throughout the industry for both retail and wholesale accounts. The code is 3 to 6 characters in length and appears with a directory listing on a CSR. ALI codes are only used on resale and platform accounts when multiple listings are present on the same account.

79. When a CLEC migrates a line or creates new listings associated with loop or full facilities-based services, the listings are added to the directory listing SBN and are assigned an ALI code by Verizon. For all non-complex listings, the ALI code that Verizon assigns to the listing is returned to the CLEC on the local service confirmation and on the billing completion notice so that the CLEC may maintain this information in its own records and/or systems. It is important for CLECs to maintain a record of directory listing SBN and ALI codes for each directory listing in their records. This will enable them to provide the SBN and the ALI code to Verizon VA when subsequently changing or deleting directory listing information for their end user customers. Unfortunately, it appears that some CLECs have not always abided by this requirement.

80. CLECs can electronically review ALI code assignments on the CSR maintained by Verizon VA. CSRs are obtained using any one of the pre-order interfaces – EDI, CORBA, or Web GUI. Verizon VA recognizes that loop and full facilities-based accounts that have grown to thousands of listings may be too large to retrieve via the Web GUI. In these cases, CLECs can request a copy of the CSR from its Verizon Account Manager. In addition, in order to make it easier for CLECs providing service using loops or through their own facilities (since identifying the desired ALI Code on the CSR may be cumbersome), Verizon has made available to CLECs an ALI Code Report. For any requesting CLEC, the ALI Code Report is provided weekly and contains a list of the CLEC's ALI codes for directory listings associated with loop and facilities-based services. Resale and UNE Platform accounts are excluded from this report, since accounts associated with these types of service are easily identified using the CSR.

81. CLECs submit their directory listings requests to Verizon in the same manner in which they make all other service requests, via the Local Service Request ("LSR"). The LSR is the ordering vehicle based on the industry standard Local Service Ordering Guidelines ("LSOG"). Verizon publishes business rules on how to complete the LSR and modifies and enhances the business rules as necessary to accommodate new products and to ensure the LSR is completed accurately and produces the result desired by the CLEC.

82. Contrary to the suggestions of some CLECs, when a CLEC is migrating a Verizon retail end user, a resale customer, or a platform customer, the CLEC may simply indicate to Verizon to move all associated directory listings with the end user customer "as is." The CLEC does not have to restate the directory listings information on the LSR.

CLECs indicate this to Verizon by a positive notation on the LSR in the End User Retaining Listings ("ERL") field. On subsequent order activity, of course, in order to ensure that the correct listing is changed or deleted, CLECs must supply the account number and the ALI code for that specific listing when changing or deleting a listing. This applies to listings associated with platform, resale, loops, and full facilities-based services.

83. The process of managing a directory listing begins with the submission of a valid LSR by the CLEC to Verizon (the ILEC). Verizon translates the LSR into a service order in the Service Order Processor ("SOP"). Each business day, the SOP distributes completed service orders to the directory company, Verizon Information Services ("VIS"). VIS in turn updates its systems (BEACON/SOBER) using the service order information. This update process occurs throughout the year. The process for CLEC service orders is the same process for Verizon retail service orders. As part of the directory publication process, VIS distributes Listing Verification Reports to CLECs thirty days before the service order close date for a given directory to enable CLECs to verify and correct listings as necessary. This is followed by the actual publication and distribution of the directories. Throughout the process that begins with an LSR and ends with publication, there are various checkpoints at which the CLEC can verify the accuracy of the listings information. For example, in response to submission of a valid LSR, a CLEC receives a local service confirmation that includes a recap of directory listing information. When that LSR is billing completed, a CLEC receives a billing completion notifier that also includes a recap of the directory listing information. CLECs

can review the listing information on these notifiers and submit changes if the information should be changed.

84. In addition, prior to publication in the directory, Verizon provides CLECs with a Listing Verification Report ("LVR") at least 30 days prior to directory publication, so that the CLEC can review the listing in detail as planned for the actual directory and make any needed changes before the book is published. The LVR contains the information necessary for the CLEC to confirm that the listing information that is sent to the directory publisher is accurate (i.e., there are no typographical or other errors) prior to actual publication. The LVR reports include such information as the degree of indentation, the type of listing, the customer's name, the address, the telephone number, the class of service, the directory name and the directory appearance. The CLEC receives an LVR report for each directory that contains end user listings of that CLEC. Finally, in addition to these checks that are routinely provided by Verizon, CLECs also have available to them a mechanized transaction known as a Directory Listing Request that enables the CLEC to retrieve existing listing data from the VIS systems for a specific end user at any time.

85. Verizon provides CLECs with extensive documentation regarding the directory listings product and the procedures for listing their customers in directories. This documentation is available on the Verizon Wholesale web site: http://www22.verizon.com/wholesale/lsp/bridge/0,2631,4-lib,FF.html. The specific documents with directory listing information include:

- Resale & CLEC Handbooks
- Business Rules
- Test Deck Ordering Scenarios that include Directory Listings
- Directory Listings - Service Order FIDS

- Directory Production Schedule
- Classified Yellow Page Headings
- Regional NXX Reference
- New Local Number Portability Localities
- Directory Titles / Designations

CLECs experiencing problems or difficulty with submitting directory listing requests can contact the Wholesale Customer Care Center or the Customer Inquiry Response Team ("CIRT") for assistance and problem resolution.

86. Since the speed and accuracy of the directory listings process is dependant on the accuracy of the LSRs submitted by CLECs, Verizon has conducted a series of CLEC education workshops and training sessions on this topic. These workshops cover a wide range of topics, such as an overview of the directory listing process, as well as specific training on topics such as foreign listings, additional listings, and listings for 800 service. Eleven of these workshops have been held since January 2001. As recently as May 22, 2002, Verizon conducted a training session on the directory listings process, which was devoted to caption listings.

87. Verizon has made a number of substantial improvements to the processing of directory listings. For example, in the fall of 2001, Verizon implemented a quality verification process of manually processed directory listings orders. This verification is undertaken after the entry of a service order into the SOP from a CLEC's LSR, and is designed to verify whether the information contained in the LSR and the service order is identical. This verification process demonstrates that there is now a high degree of accuracy associated with the white pages process. The results of Verizon VA's OR 6-04 "listing metric," which takes a random sample of "listing affecting" LSRs and compares the information on the LSR to the service order are excellent. This metric measures the

accuracy of the manual work performed by the NMC to translate listing information from LSRs to service orders. In effect, it measures the results of the listing verification process described above. As this is the process step where Verizon translates CLEC requests into internal formats, accuracy in this "up front" process is a good indicator of accuracy throughout the process. For the March data month reported by Verizon VA , the accuracy of this process as reflected in OR 6-04 was 100%. Verizon VA performed a special study to confirm the accuracy of the process end-to-end by verifying the service order update process through to the VIS systems. Using the service orders from the March OR 6-04 metric, Verizon VA compared the information from the service orders to the information updated in the VIS systems (the same systems from which the LVR is generated). The study results show that 95.6% of the service orders match the information contained in the VIS systems, and another 4.03% are in the process of being updated by VIS representatives for a total of 99.63% match rate between service orders and the VIS systems. There was 1 service order for which the information did not match. There are valid reasons why the information in the VIS systems at a moment in time may not match the information on a given service order. These include subsequent service order activity on the listing; or a change to the listing resulting from activity between the VIS Directory Advertising Sales department and the end customer; or a "new" listing being added for a telephone number for a new customer where an "old" listing for the telephone number for a previous customer has not been removed by the carrier when the number was disconnected.

1. CLEC Directory Listing Claims

88. Allegiance alleges that Verizon does not have a reliable process to get a customer listing into directory assistance. (Allegiance at 9.) In response to Verizon

VA's discovery on this contention, Allegiance provided only 47 PONs in support of this contention, and of these 47 PONs, 43 predate the improvements that Verizon put in place in the fall of 2001. In light of Allegiance's allegation, Verizon VA has reviewed Allegiance's most recent data and this data demonstrate that Verizon does have a reliable process in place. For the more than ** **BEGIN ALLEGIANCE PROPRIETARY** [See Allegiance Proprietary Attachment, Item 1] **END ALLEGIANCE PROPRIETARY**** orders that Allegiance submitted in Virginia from January through April, Allegiance submitted only 30 PONs indicating directory listings errors – and when Verizon VA reviewed this small number of PONs, it discovered that approximately half of these errors were not the responsibility of Verizon but were the responsibility of Allegiance.

89. While AT&T claims that in Virginia CLECs have experienced a substantial number of directory listings errors involving the omission of listings from the directory, AT&T fails to provide any evidence to support its position, which appears to be refuted by AT&T's own experience in Virginia. (AT&T Panel at 38.) In fact, AT&T (Media One) currently has more than ****Begin AT&T Proprietary** [See AT&T Proprietary Attachment, Item 5] **End AT&T Proprietary**** listings for its customers in Virginia and Verizon is unaware of any outstanding issues.

90. Cavalier claims that Verizon VA does not check its own input on directory listings, and that the LVR has huge numbers of errors which causes Cavalier to expend resources to check Verizon's accuracy. Cavalier provides examples of Hampton Roads and Richmond Directory closings. (Cavalier Panel at 18-21.) Similarly, NTELOS claims that its listings sometimes appear incorrect on the LVR. (NTELOS Checklist 8 ¶ 3.)

Cavalier and NTELOS are correct in that Verizon was experiencing some difficulties in terms of order accuracy prior to October 2001.

91. As indicated above, in October 2001, Verizon implemented a quality verification process of manually processed directory listings orders to improve the process and ensure the accuracy of listings. In addition, as each Cavalier directory listing request is processed, Verizon returns a confirmation notice to Cavalier that includes the information that Verizon entered into its systems as a result of Cavalier's request. This information can be compared to Cavalier's initial request to verify the accuracy at the time the request is processed instead of waiting until the LVR is produced. This information is supplied both when the request is confirmed and when it is completed. It is critical that the CLECs play an active role in confirming that what Verizon plans to publish in the directory is in agreement with what the CLEC expected.

92. Cavalier suggests that its only role in the directory process is to submit an order and that Cavalier should not be obligated to perform any further review. This approach is not only unrealistic, but if followed, would guarantee an *increase* in the number of directory listings errors. It is beyond dispute that CLECs themselves are responsible for some directory errors. Both Cox and NTELOS admit that they are responsible for some of the errors introduced into the directory listing process, although both carriers are either unable or unwilling to quantify the number of these errors. Prior to Verizon VA's section 271 filing, Cavalier provided the Commission staff with approximately 50 listings in the Richmond directory that it claimed contained errors, and suggested that Verizon VA was responsible for these errors. Subsequently, Cavalier conceded that by its own count it alone was responsible for some of these errors, because

it had submitted inaccurate information to Verizon VA in the first place. *See* Verizon VA Checklist Reply Declaration. The only way that these CLEC errors can be captured prior to the publication of a directory is if the CLEC remains involved in the directory listings process after submitting an order and verifies the accuracy of the information that it has submitted.

93. Cavalier also complains that Verizon has offered no solutions or compensation regarding problems with directory listings, and that Verizon has expressed very little concern for the issue. (Cavalier Panel testimony at 23-25.) Cavalier's claim is without merit. Over the past year, Verizon has instituted the quality verification process described above. In early 2002, a significant portion of this verification process was automated.

94. Further, Verizon is continuing to enhance the automated processing of listings. For instance, Verizon worked with CLECs in 2001 to significantly increase the functionality available through the use of the ERL field on the LSR. A change request was opened by a CLEC through the change management process in 3Q2001 and Verizon and interested CLECs collaborated on the changes to be made to the directory listing process. Verizon worked with CLECs to expand the use of the ERL field and make other improvements to the directory listing process. The changes were implemented in the February 2002, release. Prior to the enhancements, ERL was only available on full migrations and the only options were to move the listings as is or fully restate the listings on the directory listing form accounting for the disposition of each listing on the account to be migrated (migrate as is, change, or delete).

95. Use of the ERL field was expanded to include partial migrations. CLECs were given the additional options of positive reporting of directory listings or end state reporting. With positive reporting, Verizon will verify that the CLEC provided instructions for all listings associated with the services to be migrated, deleted, or changed. With end state reporting, CLECs only specify how the listings will look after the migration. Verizon will replace all the existing listings with those specified by the CLEC, deleting those that were not addressed by the CLEC.

96. Verizon also has a dedicated directory team that works with the CLECs to make sure that any LVR listing discrepancies reported by the CLECs are resolved in time to meet the book closing dates. Moreover, Cavalier's suggestion that it has been imposed upon because it has had to involve itself in the directory listings process demonstrates Cavalier's failure to recognize that its involvement is an integral aspect of managing listings on behalf of its end user customers, and is a responsibility of being a local service provider that it must be prepared to undertake.

97. Moreover, Verizon is currently completing a project for Cavalier in which Verizon removed almost 10,000 "dead" listings from the South Hampton Roads directory. These dead listings were in the directory because Cavalier had failed to submit the disconnect LSR for the directory listing when the associated loop was disconnected. As a result, thousands of listings remained in the directory when they should have been removed. Verizon developed a software program that generated the necessary service orders to remove these listings, which eliminated the need for Cavalier to submit thousands of LSRs to remove the listings. And in addition, the Verizon NMC performed the necessary work to remove over 1300 of the listings when Cavalier could not provide

the information needed to create the automatically generated service orders. Verizon did all of this additional work, which was generated solely because of Cavalier's failure to follow the rules, without seeking compensation from Cavalier.

98. Cavalier raises a number of assertions regarding ALI codes. These assertions demonstrate Cavalier's fundamental confusion regarding the nature and purpose of ALI Codes.

99. Cavalier claims that ALI codes were not required in LSOG 3, and that it is only with LSOG 4 that they have been required. (Cavalier Panel at 45-46.) Cavalier also contends that the ALI code spreadsheet provided by Verizon is often inaccurate. (Cavalier Panel at 45-46.) Both of these claims are incorrect.

100. ALI codes are unique codes used to identify and keep track of customer directory listings. Where multiple listings exist, every CLEC listing is identified with a unique ALI code. For example, if a customer had five additional listings, each listing would be separately identified with a specific ALI code for future reference (e.g. listing A, B, C, D or E). This process allows a CLEC to clearly identify the listing it wishes Verizon to change or delete when the CLEC issues subsequent orders in connection with those listings. Without this designation, Verizon cannot know for certain which listing a CLEC wishes to change or delete. Cavalier suggests that ALI codes are required for every order. This is incorrect; an ALI code is only required when changing or deleting a listing.

101. Contrary to Cavalier's suggestion, Verizon has always required an ALI code when processing service orders that affected additional customer listings. Verizon VA can only assume that Cavalier is referring to the use of LSOG 2 to submit directory

listing requests, since LSOG 3 was never used in Verizon East for ordering. The ALI code has always been required information on the order. Prior to the implementation of LSOG 4 in March 2000, if an LSR was missing the ALI code, the LSR was routed to the NMC for manual processing. The NMC service representative then attempted to determine the identity of the ALI code before submitting the service order for processing. If, after this manual review, the Verizon service representative still could not ascertain the ALI code, the service representative manually queried the LSR back to the CLEC. Under the LSOG 4 guidelines, if the LSR is missing the ALI code, the LSR is automatically rejected back to the CLEC for correction. This explains why Cavalier may have incorrectly concluded that this requirement started with the introduction of LSOG 4.

102. Cavalier also asserts that the ALI code spreadsheet provided by Verizon is often wrong, but identifies only two isolated incidents. (Cavalier Panel at 45-46.) In February 2002, Cavalier advised Verizon that it was missing ALI code information for one Billing Telephone Number ("BTN") on the ALI Code spreadsheet. BTN 023 927 1077 was not complete on the spreadsheets that Cavalier was receiving from Verizon. Verizon investigated and determined that there was a corrupt record causing the problem. The problem was corrected in March 2002. No other BTNs were impacted. It is also important to note that no listings in the directory were affected by this error.

103. The second issue Cavalier identifies is a problem with duplicate ALI codes on the listing associated with BTN 023-927-1087. Verizon monitors the CLECs listing BTN for ALI code capacity on a weekly basis. The ALI code capacity per BTN is about 17,500. When the BTN reaches 80% ALI code capacity, Verizon creates a new

BTN and advises the CLEC to use the new BTN going forward. This Cavalier BTN was omitted from one week's report and reached exhaustion before Verizon could create a new BTN. A system error caused the repeated assignment of the ALI code "B" to each subsequent listing. A solution was devised and the new BTN and ALI code assignments were implemented at the end of May. Reports identifying the new and old BTN, ALI code and Listed Telephone Number ("LTN") are now generated and provided to Cavalier. To date, no Cavalier orders have been rejected due to the duplicate ALI code "B" condition since the system uses the BTN, ALI code and LTN combination to perform the data validation.

104. Next, Cavalier complains that pulling the CSR to get an ALI code does not work because 1) Cavalier does not pull a CSR for every residential customer, 2) the ALI code information on the CSR is not standardized and 3) pulling the CSR is a time consuming process taking up to a minute. (Cavalier Panel Testimony at 46 & 47.) Cox also states that utilizing CSRs to obtain ALI codes is not a user-friendly procedure. (Cox Gee at 13.)

105. First, as discussed above, the directory listings process requires effort on the part of both Verizon and CLECs, and obtaining critical information in the ordering process is a prime example of this required effort. Moreover, Cavalier could collect and maintain assigned ALI codes in their own systems and databases so that the information would be readily available when needed. For whatever reason, Cavalier has declined to make this investment. Second, ALI Codes are available on the CSR for Cavalier's directory listing accounts, not on the individual residential CSR as Cavalier has suggested.

106. Moreover, as discussed above, the current account structure for loop listings and listings for facilities-based CLECs may make it cumbersome for the CLEC to easily identify the desired ALI Code on the CSR, and therefore Verizon has made available to CLECs an ALI Code spreadsheet. This spreadsheet was created to assist the CLECs in providing the necessary information on the LSRs. For any CLEC who requests it, the ALI Code spreadsheet is provided weekly and contains a list of the CLEC's ALI codes (excluding resale and platform accounts because these have end user level accounts which are easily identified using the CSR). Cavalier has been receiving this spreadsheet from Verizon since May 2001. In addition, Verizon provides the ALI code on simple listings to the CLEC on both the Local Service Confirmation and the Billing Completion Notice for the Local Service Request that established the listing.

107. Cavalier complains that the expressTRAK ALI codes are not on the ALI Code spreadsheet. This is no longer the case. ExpressTRAK listings were added to the ALI Code spreadsheet in February 2002, and today the ALI Code spreadsheet provides the information for both the legacy and the expressTRAK accounts.

108. Like Cavalier, Cox complains about ALI codes. (Cox Gee at 13.) Cox claims that Verizon does not provide a reliable database to research past ALI code assignments. As is the case with Cavalier, it appears that Cox has declined to track this information in its own systems but instead appear to be tracking ALI Codes by reviewing directory listing CSRs after the order has been processed. Verizon does make available each week to Cox an ALI Code report that contains the complete database of Cox's ALI Codes for Cox's directory listing accounts. Cox began to receive the ALI code spreadsheet in November 2000.

109. Cox complains about the format of the ALI code spreadsheet (*Id.)* While it is difficult to know precisely to what Cox is referring, it is the case that for a two-month period, when Verizon first began to provide expressTRAK accounts on the ALI Code spreadsheets in February 2002, the format of these spreadsheets changed. However, since April the format for ALI Code spreadsheets is the same for Virginia, Maryland, Washington D.C., West Virginia, New Jersey, Pennsylvania, and Delaware.

110. Cox claims that it has demonstrated through documents that it attached to its testimony (exhibit D-7) that Verizon's business practices are inconsistent with the CLEC support business rules. According to Cox, the business rules require ALI codes to be numerics and 100 or greater, but the three sample pages for Verizon South CLEC Directory Listings show an alphabetical rather than numeric code. (Cox Gee at 13.) Cox is simply wrong. The ALI code spreadsheet that Verizon provides to the CLECs is consistent with the business rules that are documented on our Customer Support Web site. The business rules to which Cox's exhibit D-7 refers are not business rules for Verizon VA but rather are the order business rules for Verizon West (former GTE). Thus, Cox is comparing business rules for Verizon West with a sample ALI Code spreadsheet for Verizon VA (East). The Verizon VA (East) LSOG 4 Order business rules clearly state that the ALI code is an alpha/numeric data entry. This is consistent with the sample spreadsheet that shows the ALI code on the spreadsheet provided to COX is comprised of alpha characters.

111. Next, Cox claims that the directory listing ("DL")response from the Web GUI does not consistently contain the ALI Code and the billing account number ("BAN") for every account. Cox goes onto suggest that the DL response should be upgraded to

include ALI code/BAN for all listing. (Cox Carhart at 6 and 23.) The directory listing inquiry was not designed to always return the ALI code. The proper source for the ALI code is the confirmation and billing completion notice that is associated with the directory listing request, Cox's directory listing Customer Service Record or the weekly spreadsheet.

112. Cox further suggests that Verizon make a sortable, electronic LVR available. (Cox Clarke at 4; Carhart at 5&23.) Since the LVR is available to all CLECs operating in the Verizon footprint, Verizon cannot simply make a change to it at Cox's request. As Cox well knows, requests for changes to the LVR should be submitted through the Change Management process. And while Ms. Gee indicates that she represents Cox at Change Management meetings, Cox has never submitted a change request regarding the LVR.

113. Next, Cox complains that the current LVR requires stare and compare which is a manual, time consuming process. (Cox Carhart at 7-9.) Cox is correct. It is a manual, time consuming process. That is why it is important that CLECs use the information returned on the confirmation and billing completion notices to verify listings as orders are completed.

114. Next, Cox cites discrepancies between information on the ALI code spreadsheet and the DL response and contends that tracking ALI Codes months after the listing order has been completed is difficult. (Cox Carhart at 6.) The ALI Code and associated billing account number are two pieces of information that should easily be entered and tracked in Cox's OSS at the time the directory listing order is completed. Instead of tracking this data itself, it appears that Cox is relying on locating the data in

Verizon OSS. It is correct that Verizon did not anticipate that certain CLECs would not build the systems necessary to track this essential information, and it is therefore not surprising that a search through multiple sources for data that was not intended to be tracked through these sources might be cumbersome. As Verizon VA has explained, this cumbersome search would not be necessary if Cox would track the ALI Code information that is provided on the confirmations. And as Verizon VA has explained, in order to facilitate looking up ALI Codes on the directory listing CSR, Verizon provides information contained on the directory listing CSR in spreadsheet format.

115. Cox also cites to a trouble ticket (548668) that it opened for a listing on its LVR for which it had no knowledge; Cox also claims that because it does not have an ALI Code, it does not know how to delete the listing. (Cox Carhart at 8.) On April 2, 2002 Cox issued a PON to Verizon to change the listing on a line from a published to a non-published listing. The LSR was queried back to Cox with the error message. *INVALID LSR/DL FORM - ALI/TN COMBINATION - LSR IN QUERY*. The WCCC investigation determined the number was in the directory both as published and non-published. The WCCC successfully closed the trouble ticket with Cox by having the published listing deleted from the directory database. Cox advised Verizon that the problem was resolved and the WCCC closed the trouble ticket on April 18, 2002.

116. Cox also complains that it is having problems with Foreign listings and is trying to resolve with NMC (Cox Carhart at 20.), but as Cox has conceded in response to Verizon VA's discovery on the question, the problem has been resolved and therefore the issue is now moot. *See* Cox Response to Verizon Discovery Request Set 1, Number 11.

117. Cox points to Exhibit E-1 as examples of CLEC "problems" with ALI Codes. Cox's "evidence" is a change control report. (Cox Gee at 14.) Cox correctly points out that the Verizon Change Management process provides a forum for the CLECs to introduce change requests to enhance the usability of the Verizon OSS. (Cox Gee at 14.) It is, however, also much more than that. The Change Management process, which was jointly developed by the CLECs and Verizon, defines the way Verizon and the CLECs work together to implement changes to the OSS interfaces, business rules and associated business practices. It oversees the publication of documentation, conducts workshops, and is the vehicle by which Verizon communicates OSS related information and other items of interest to the industry to CLECs operating in the former Bell Atlantic region.

118. Another function of the Change Management Process is to track and publish the status of pending change requests. Cox exhibit E contains examples of meeting materials pertaining to Type 5 change requests submitted by CLECs that are used at Change Management meetings to facilitate the discussion or to track an existing change request. They contain statements that provide insight into why a CLEC may consider a change in the existing process or interface to be necessary. They do not, however, represent documentation of system problems or represent a chart that "summarizes CLEC problems," as Cox contends. Cox's misuse of a select portion of this information as so-called "evidence" of "problems" undermines the change management process. The only "fact" that CLEC proposals establish is that there is a process in place that allows CLECs to raise suggestions, proposals, and questions.

119. Cox also complains of issues that occurred coincident with the Verizon February 2002 software release. These were identified as issues with the Service Address for Standalone Listings and use of the drop-down box option for the End User Retained Listing ("ERL") field. Additionally, Cox complains of another problem that occurred last year in February 2001, related to directory listing orders. (Cox Carhart at11-20.) First and foremost, all of the issues about which Cox complains have been successfully resolved.

120. Cox is correct that changes were made to the Service Address in the February 2002 release. This enhancement was communicated to CLECs well in advance of the release date, at the November 13, 2001 Change Management meeting as part of the "Items by Release" Report. A revised report was distributed to the CLECs on November 14, 2001, with a description of the change. Verizon had a software problem with the February 2002 implementation of this change to the Service Address field, which caused the wrong address to be populated in the listing's Service Address field. As a result of this error, the CLEC order was queried back to the CLEC due to an address mismatch and some directories were delivered to Cox instead of to the listed end user. On March 29, 2002, Verizon implemented a software fix to generate the correct Service Address on each new "standalone" listing request. In addition, Verizon identified the sites that were receiving the directories in error and stopped the further delivery beginning March 25, 2002. Verizon also recovered the directories that had been delivered to Cox in error.

121. In response to issue associated with the drop-down box option for the ERL field, on February 18, 2002, Verizon implemented a software upgrade to flow-through Local Service Requests ("LSR") when the End User Retained Listing ("ERL") field was

populated. Following implementation, a few CLECs contacted the Wholesale Customer Care Center ("WCCC") and opened trouble tickets concerning problems they were having with Local Number Portability ("LNP") orders submitted via the Web GUI. Verizon researched the problem and discovered a system problem when populating the ERL field with "N." A workaround was quickly identified and the system fix was implemented on February 23, 2002.

122. In response to the issue last year, February 2001, a change was made to the Web GUI that incorrectly established edits on the listing location field. As a result, a CLEC using the Web GUI to submit orders could not submit an LSR containing both street address and locality information. CLEC customers with the locality name problem were listed in the printed directory with the name, address, and telephone number as provided by the CLEC. The locality name would not be present.

123. Verizon took immediate action to resolve this issue. First, a manual workaround was developed. Cox was advised to put the locality information in the remarks section of the LSR. The Verizon NMC processed the orders using the locality field based on the remarks field information.

124. Verizon then extracted all of Cox's PONs with a locality name in the remarks field and issued orders for these listings to insert the locality name. These orders corrected the listings for both the printed directory and directory assistance records. Cox was provided an updated Listing Verification Report ("LVR") for their review. Any missing information was provided back to Verizon for correction.

125. Verizon implemented a change to the production system on May 12, 2001, that eliminated the need for this workaround process. All CLECs were notified of this

production change through the Change Management Process on May 11, 2001. The problem, while regrettable, has been corrected.

E. **Notifiers**

126. AT&T claims that Verizon VA has not produced evidence that it can provide timely provisioning completion notifiers ("PCNs") in commercial volumes. (AT&T at 39) AT&T is incorrect. In fact, Verizon VA has produced this evidence in its OSS Declaration at ¶¶ 108 – 109. The special studies included with OSS Declaration demonstrated strong performance for PCN timeliness; this strong performance was demonstrated despite the fact that the special studies used a standard more stringent than the one imposed by the guidelines.

127. AT&T also alleges that Verizon has failed to implement proactive systems to affirmatively check for notifiers, and instead relies on the PON Shop to investigate CLEC complaints. (AT&T at 28.) AT&T is also wrong on this point. As Verizon VA demonstrated in its response to AT&T's discovery request on this question (*See* AT&T 1-69, provided herein as Attachment 319), Verizon proactively monitors the systems and work processes that are involved in generating PCNs and BCNs to CLECs. The process for generating completion notifiers is described in the OSS Declaration ¶ 106. Completion notifiers are generated for an LSR; however, an LSR may have one or more service orders associated with it. All associated service orders must have been completed in SOP before the completion notifiers can be generated, the SOP must notify the gateway system that each service order has been completed, the gateway system associates the service orders back to the LSR, creates the completion notifiers and sends them to the CLEC via the same interface by which the CLEC had submitted the LSR. If a completion notifier is late, Verizon will investigate whether the work has, in fact, been

completed for all associated service orders; and whether each of the processing steps has completed successfully. If not, a corrective action will be taken to effect the work step and subsequently generate the completion notifiers.

128. AT&T also expresses a concern regarding the architecture of expressTRAK. According to AT&T, because in expressTRAK, PCNs and BCNs are generated simultaneously, this will somehow increase the chance that two notifiers will be missing. (AT&T at 10.) This is pure speculation, and it could just as easily be argued that because the notifiers are generated from the same trigger, this increases the chance that the two notifiers will be properly generated. In any event, there is no need for such speculation, since Verizon VA's objective performance in providing both timely PCNs and BCNs is strong, as demonstrated in the OSS Declaration ¶¶ 108 – 113.

129. AT&T also makes several vague claims regarding Verizon VA's notifiers. First, AT&T implies that customer problems are created when PCNs and BCNs are not delivered in a timely fashion. (AT&T Panel at 9 & 10.) AT&T goes on to claim that without PCNs and BCNs it is completely "in the dark" about its customer's status and cannot reply to customer inquiries. (AT&T at 41.) The completion notifier performance results set forth below clearly indicate that PCNs and BCNs are delivered in a timely fashion – hardly leaving AT&T and other CLECs "in the dark." In April 2002, 97.56% of the Resale orders and 95.48% of the UNE orders had a PCN generated by noon the next business day after the work completion. Furthermore, CLECs can use the same inquiry transactions available to Verizon retail representatives to verify the status of an order. These are the Installation Status Inquiry and Service Order Inquiry transactions available through the EDI, Corba and Web GUI interfaces.

130. AT&T also states that without a BCN, Verizon VA will continue to bill the end user and will not provide the CLEC with unrated usage. (AT&T at 10.) As noted in the Measurements declaration, C2C results reported for OR 4-02 have been based on the more conservative measurement start point of work completion. These results, too, clearly indicate billing completion notifier timeliness, thereby reducing the incidence of double-billing. In April 2002, 97.29% of the Resale orders and 95.15% of the UNE orders had a BCN generated by noon the next business day after the work completion.

131. WorldCom states that Verizon VA has failed to meet the performance standards for OR-4-02 (Completion Notices Percent On Time), OR-4-06 (Average Duration – Work Completion – SOP to Bill Completion), and OR-4-07 (Percent SOP to Bill Completion >= 5 Business Days). (WorldCom Pearce ¶ 10.) As Verizon VA has explained above, as well as in greater detail in its metrics declaration, pointing to isolated measurements, without providing context, is not a sufficient basis to support WorldCom's conclusion. To point to only the most obvious example, WorldCom fails to mention that the OR-4-02 as reported in the C2C reports is measuring an interval longer than that required by the C2C Guidelines – a fact that Verizon explained in its initial OSS Declaration. (OSS Declaration ¶ 111.) The same holds true for the OR-4-05 and OR-4-10 special studies, which use work completion date/time as a substitute for SOP Completion date/time, thus establishing a more stringent measure than imposed by the C2C guidelines for BCN measures. And despite these longer intervals, Verizon VA's results are still strong. Likewise, while WorldCom points to Verizon VA's failure to satisfy OR-4-06 and OR-4-07, WorldCom declines to point out several critical facts regarding these metrics – that they measure internal Verizon service order updates, not

notifiers sent to CLECs, and that a parity standard is inappropriate as they include processing situations that occur in wholesale but that do not occur in retail, and therefore it is not at all surprising that wholesale times are longer than retail times. See Verizon VA's Metrics Declaration at ¶ 63.

132. Verizon VA's performance in this area is strong and has even improved in the most recent months for which data are available. Verizon VA performed the special studies referenced in the OSS Declaration ¶¶ 108 – 113 for March and April 2002, continuing to use work completion date/time as a substitute for SOP Completion date/time. The March performance is displayed in the following table:

VA Special Studies Using Work Completion Date/Time in place of SOP Completion Date/Time March 2002			
		Perf	Obs
OR 4-05 – SOP to PCN by noon next business day (Web & EDI) 95%	Resale	90.50%	10,949
	UNE	92.75%	23,236
OR 4-09 – SOP to BCN in 3 business days (EDI) 95%	Resale	98.81%	4,792
	UNE	98.02%	1,819
OR 4-10 – SOP to PCN in 2 business days (EDI) 95%	Resale	98.50%	4,792
	UNE	97.47%	1,819

VA C2C March 2002			
		Perf	Obs
OR 4-02 – Bill Completion to BCN by noon next business day (Web & EDI) 95%	Resale	91.07%	11,096
	UNE	93.19%	23,055

In the month of March, there was a problem with the update of a third-party workflow management software application that affected the timely generation of PCNs and BCNs for approximately 750 Virginia PONs, and this issue had an impact on the OR 4-02 and OR 4-05 results. The problem was quickly identified and corrective action immediately taken, which is why there was no impact on the OR 4-09 and OR 4-10 results. In order to demonstrate what the results might have been if not for this third party software problem, Verizon has recalculated the results for OR 4-05 and OR 4-02, using the assumption that

the PCN and BCN would have been successfully generated on the first attempt if the software problem did not exist.

The recast performance for the OR 4-05 special study is as follows:

		Perf	Obs
OR 4-05 – SOP to PCN by noon next business day (Web & EDI) 95%	Resale	96.35%	10,949
	UNE	93.18%	23,236

The recast performance for OR 4-02 is as follows:

		Perf	Obs
OR 4-02 – Bill Completion to BCN by noon next business day (Web & EDI) 95%	Resale	96.85%	11,096
	UNE	93.65%	23,055

The April performance results demonstrate that Verizon VA is meeting the standard in all categories: The April performance is displayed in the following table:

VA Special Studies Using Work Completion Date/Time in place of SOP Completion Date/Time April 2002			
		Perf	**Obs**
OR 4-05 – SOP to PCN by noon next business day (Web & EDI) 95%	Resale	97.56%	9,947
	UNE	95.48%	26,112
OR 4-09 – SOP to BCN in 3 business days (EDI) 95%	Resale	99.57%	4,226
	UNE	99.36%	2,978
OR 4-10 – SOP to PCN in 2 business days (EDI) 95%	Resale	99.57%	4,226
	UNE	98.89%	2,978

VA C2C April 2002			
		Perf	Obs
OR 4-02 – Bill Completion to BCN by noon next business day (Web & EDI) 95%	Resale	97.29%	10,085
	UNE	95.15%	26,423

133. These most recent results demonstrate that Verizon VA is providing notifers on a timely basis, and that CLECs are able to track their orders in a timely manner.

V. BILLING

134. Verizon VA demonstrated in its initial OSS Declaration and the Supplemental OSS Declaration that it provides daily usage records that are accurate,

complete and timely; and provides wholesale bills in a manner that gives CLECs a meaningful opportunity to compete in the local market in Virginia.[6] Claims asserted by the CLECs in this proceeding do not refute these conclusions. Moreover, Verizon VA continues to improve billing performance in the ways described below.

135. The Commission's consultant, KPMG Consulting ("KPMG"), has verified Verizon VA's ability to provide nondiscriminatory billing to CLECs. KPMG's evaluation of the Billing domain included tests of both billing procedures and actual bills generated by Verizon VA, and Verizon VA satisfied every one of the 75 test points evaluated by KPMG.[7] KPMG confirmed the quality of the paper bill. The PricewaterhouseCoopers LLP ("PwC") examination confirmed the comparability of the BOS BDT bill to the paper bill, thereby confirming the quality of the electronic bill.

136. The quality of Verizon VA's billing performance is also confirmed by the results for metrics that are included in the Guidelines and by the data discussed below. Verizon VA has continued to exceed the standard of 95% of DUF records sent within 4 business days (BI-1-02); indeed, Verizon VA has achieved results above 98.7% in every month from November 2001 through March 2002. Verizon VA has also continued to exceed the performance standard for timeliness of providing carrier bills to CLECs (BI-2-01). Results for the months of November 2001 through March 2002 show that Verizon VA has provided 100% of carrier bills to CLECs within 10 business days.[8]

---

[6] *See* OSS Declaration, paras. 130-141; Supplemental OSS Declaration on behalf of Verizon Virginia Inc., filed on May 29, 2002.

[7] KPMG's evaluation is discussed in paragraphs 136-138 of the OSS Declaration and paragraph 11 of the Supplemental OSS Declaration.

[8] As noted in the Measurements Declaration, results prior to the March 2002 data month did not include paper bills for the Legacy system that expressTRAK replaces. (*See* Measurements Declaration, para. 114.) These bills were included as of the March data month, and Verizon VA's performance continues to be 100% on time.

137. WorldCom acknowledges that Verizon VA's performance has exceeded the standards established for BI-1-02, Percent DUF in 4 Business Days, and BI-2-01, Timeliness of Carrier Bill, but asserts that Verizon VA "did not perform so well in regard to Billing Accuracy."[9] WorldCom bases this statement on the December and January results for BI-3-03, % Billing Adjustments. However, results for BI-3-03 do not support that conclusion. In fact -- as shown by the KPMG and PwC reports, and data discussed below -- Verizon VA bills its customers with a high degree of accuracy.

138. BI-3-03 measured the percentage of billing adjustments (amount of dollars adjusted for billing errors divided by total dollars billed). As of the February data month, BI-3-03 was removed from the Guidelines, leaving BI-3-01, % Billing Adjustments – Dollars Adjusted, which also measures amount of dollars adjusted for billing errors divided by total dollars billed.[10] Both of these metrics are flawed by design, as explained in the Measurements Declaration.[11] In each, the numerator represents the dollars credited in the reporting month due to billing errors -- regardless of what month the error occurred or when the CLEC submitted the claim -- while the denominator is the *current* charges on bills in the reporting month. This means that the credits reported in a month do not relate to the charges billed in that month. The result for a particular month is therefore not indicative of billing accuracy; rather, it simply indicates the amount of credits applied in a month as a percentage of unrelated charges billed that month. In fact, December results were affected by implementation issues referenced in

[9] WorldCom (Pearce) Declaration, para. 18.

[10] *See* Measurements Declaration, para. 116.

[11] *See* Measurements Declaration, para. 116.

the Measurements Declaration.[12] And, results for BI-3-03 in January, and for BI-3-01 in February and March, were primarily attributable to the fact that large numbers of claims were resolved during those months; for example, the amount of credits could relate to multiple months, or to a problem that has already been fixed.

139. The resolution of large numbers of claims is a result of changes made in the Wholesale Claims organization beginning in January 2002. At that time, a Vice-President was appointed to be solely responsible for the handling of billing claims within Verizon. A task force was organized that had the responsibility to analyze open claims, provide a root cause analysis of the claims and implement corrective and preventive measures. This task force made recommendations aimed at improving claims resolution performance in both the short and long term. As a result of these recommendations, the Wholesale Claims organization was reorganized and expanded, and additional analytical tools were implemented, all aimed at improving claims resolution performance.

140. The results of these efforts have been significant. For claims resolved in 2001 for Virginia, the average time to resolve a claim was approximately 120 days. For claims submitted in 2002, the average time to resolve a claim is 36 days. In addition, Verizon VA has conducted special studies analogous to BI-3-04, % CLEC Billing Claims Acknowledged within 2 Business Days, and BI-3-05, % CLEC Billing Claims Resolved within 28 Calendar Days after Acknowledgement, which are scheduled to become effective in Virginia for the June data month. For claims submitted after March 1, 2002, Verizon VA has achieved an acknowledgement rate in March and April of more than

[12] Measurements Declaration, para. 116.

95% acknowledged in two business days, and a resolution rate in March and April of 100% resolved within 28 calendar days of acknowledgement.

Table B-1: BI-3-04 and BI-3-05 Special Study

BI-3-04	March	April	BI-3-05	March	April
Num	116	199	Num	59	77
Den	121	201	Den	59	77
Result	95.87%	99.00%	Result	100.00%	100.00%

141. In addition, the improvements made since January 2002 have resulted in a significant decrease in outstanding disputes. At the beginning of January 2002, there were approximately 1700 open claims representing almost $5 million dollars in disputes. Currently, there are approximately 650 open claims representing less than $2 million dollars in dispute. This is over a 60% decrease in the number of claims and disputed dollars.

142. Verizon VA has also performed an additional special study that compares the amount disputed by CLECs for a given bill month to the current charges in that month.[13] Of course, the fact that a charge is disputed does not mean that the bill is not accurate. Nonetheless, the FCC has previously looked to actual commercial practice by CLECs in submitting disputes as one indicator of the parties' actual commercial experience in working with the bills.[14] The numbers below show that the experience in Virginia compares favorably to New York, where CLECs have agreed that the quality of Verizon's billing is good.

[13] Unlike BI-3-01 and BI-3-03, this special study compared amounts for claims disputed to the current charges in the most recent bill month disputed, not the month the claim was resolved.

[14] Pennsylvania 271 Order, para. 26.

Table B-2: Claims vs. Current Charges for VA and NY

Virginia			
Month	Amount of Claims For Bill Month	Totaled Billed (Current Charges)	% Amount Claimed of Total Billed
Nov-01	$420,937.59	$9,532,389.00	**4.4%**
Dec-01	$260,472.98	$9,611,475.00	**2.7%**
Jan-02	$210,450.85	$8,508,220.00	**2.5%**
Feb-02	$659,283.00	$9,522,424.00	**6.9%**
Mar-02	$1,161,176.60	$10,576,710.00	**11.0%**
Total	**$2,712,321.02**	**$ 47,751,218.00**	**5.7%**

New York			
Month	Amount of Claims For Bill Month	Totaled Billed* (Current Charges)	% Amount Claimed of Total Billed
Nov-01	$3,585,978.95	$55,251,979.10	**6.5%**
Dec-01	$6,847,397.08	$56,057,698.12	**12.2%**
Jan-02	$1,651,522.16	$52,401,148.03	**3.2%**
Feb-02	$3,214,545.88	$49,334,454.01	**6.5%**
Mar-02	$6,427,015.15	$48,765,751.01	**13.2%**
Total	**$21,726,459.22**	**$261,811,030.27**	**8.3%**

143. Other CLECs have provided additional comments regarding Verizon billing, but Verizon VA has already addressed and resolved the issues they raise. AT&T, Cox, Cavalier, and NTELOS state that delays in the transmission of Billing Completion Notifiers ("BCNs") result in "double billing" to the end user for monthly service elements.[15] "Double billing" refers to billing of the end-user customer by both Verizon retail and a CLEC after the end-user has migrated to the CLEC. However, bills from Verizon for charges incurred prior to the customer migration are not "double billing." Verizon VA undeniably experienced problems with "double billing" in the past, but "double billing" has now been virtually eliminated.

[15] AT&T at 10, Cox Gee at10-12, Cavalier Panel at 41, NTELOS at 6.

144. "Double billing" occurs when billing completion in Verizon systems is delayed, and the CLEC begins to bill prior to receipt of the BCN. Billing completion can be delayed if the line is provisioned, but the service order does not update the billing system because of inconsistencies between the service order and information contained in Verizon's billing system. If the order does not update the billing system before the subsequent bill date, and the CLEC bills the end user before it receives a BCN, "double billing" occurs. When the service order migrating a customer completes, the BCN is sent and the billing system automatically calculates and applies the appropriate credits to the end user's bill.

145. In November 2000, Verizon established the Double Billing Team to address "double billing" complaints. Since that time, the number of complaints submitted to the Double Billing Team has decreased and, in fact, many of the complaints received recently are not instances of "double billing." A special study conducted by Verizon found that for the month of April 2002, Verizon received 46 complaints from the CLECs claiming that "double billing" had occurred. Of those complaints, only 18 were found to be "double billing." The remaining 28 were returned to the CLEC's for the following reasons:

a. CLEC did a partial migration, and did not take all working telephone numbers or services on accounts. Thus, the Verizon charges to the end-user were correct.

b. Charges applied were for Directory Advertising, which Verizon will continue to bill directly to the end user through the end of the contract.

c. Verizon charges were valid charges incurred prior to migration.

d. The account was previously found not to have a "double billing" issue but was resubmitted by the CLEC for review, and further review confirmed there was no issue.

Despite the greatly reduced occurrences of "double billing," the Double Billing Team remains in place, and reviews all CLEC complaints and responds directly to a CLEC within 10 business days. The turnaround time for the investigation of urgent requests is negotiated with the CLEC, and replies have typically been within 3 business days.

146. Current data show the significant reduction in "double billing" in Virginia. In February 2002, Verizon provisioned an average of 300 migration orders per day, for a total of about 9000 migrations. Instances of "double billing" occurred on less than 0.5% of total migrations in April**.**

147. Covad claims in its comments that Verizon's billing system and performance continue to be fraught with problems.[16] However, Covad offers no quantitative evidence to support this claim. Rather, Covad goes on to discuss a single case where Verizon manually billed Covad for certain non-recurring and recurring charges associated with Line Sharing, which were incurred from July 2000 through June 2001. The charges on this bill that were directly related to Virginia were less than ****BEGIN COVAD PROPRIETARY** [See Covad Proprietary Attachment, Item 1] **END COVAD PROPRIETARY**** which is well below 1% of Covad's billing for that period. To facilitate explanation and verification of these charges, Verizon had applied the charges to a single bill and provided spreadsheets with supporting data by billing telephone number, by month. Verizon adjusted those charges after it received a claim

[16] Covad ¶ 47

from Covad, and subsequently met with Covad to help explain the charges on the bill and the adjustment. This manual billing of certain elements of Line Sharing affected only two other CLECs. As of January 2002, Verizon has ceased manually billing for the remaining rate elements that have not been mechanized.

148. Covad also asserts that the Commission should limit Verizon's ability to backbill CLECs to a 6 month period.[17] Covad cites no authority to support this position. In addition, it is important to note that in every backbilling situation, a CLEC has received service, but has either paid nothing for the service, or paid a charge that is less than the correct charge specified in its agreement with Verizon or in Verizon's tariffs. Finally, there are instances where backbilling is beyond the control of Verizon. An example is rate changes with retroactive effective dates mandated by the regulatory authorities.

149. Next, Cox cites two instances in which Verizon applied inaccurate charges to its bills to Cox. In both instances, Cox submitted claims to the billing center and these claims have now been resolved. In addition to the fact that it has now been resolved, one of the instances is an interexchange carrier billing issue that is not relevant to Section 271 compliance.

150. In the first instance, Cox was incorrectly assessed taxes on its bills. This has been corrected. All of Cox's accounts have been made tax exempt and appropriate credits have been issued. In the second instance, Cox claimed it was overcharged on its Special Access bills. Again, as result of the claim Cox submitted, the account was corrected and credit given. It is important to note that the instance involved "access

[17] Covad ¶ 53.

circuits" ordered by Cox in its capacity as an interexchange carrier, out of Verizon's federal tariff. These circuits are not resold services, interconnection trunks, or unbundled network elements. The FCC has repeatedly held that the Section 271 checklist compliance is not intended to encompass the provision of access services.[18]

151. Cox goes on to assert that Verizon VA has failed to implement effective quality control measures to ensure that federal taxes are not assessed against exempt wholesale accounts. However, such measures are in place. When a CLEC establishes its accounts with Verizon VA, it provides Verizon VA with a tax exemption certificate enabling Verizon VA to setup the accounts as tax exempt. This is documented in the CLEC and Resale Handbooks (Volume 1, Section 5.2 and Volume 1, Section 4.7). If the CLEC fails to provide a tax exemption certificate at that time, Verizon VA will bill all applicable taxes. A CLEC may subsequently submit a tax exemption certificate to its account manager and Verizon VA will update the tax exemption status of the CLEC's accounts. If a CLEC discovers an account is lacking a tax exemption after the CLEC has provided the appropriate tax exemption certificates, the CLEC should notify the billing center, which will ensure that the correct tax exemption is applied.

152. During the first quarter of 2002, Wholesale Billing Support performed a review of tax exemption certificates on file for all wholesale customers in Virginia. When copies of certificates were not found on file, requests were made to the CLECs to provide them.

[18] *See*, *e.g.,* In the Matter of 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 at ¶¶ 156 and 193.

153. In the Supplemental OSS Declaration filed on May 29, Verizon VA responded to additional comments by two CLECs regarding Verizon's electronic billing (BOS BDT).[19] The Supplemental Declaration shows that their comments are either moot or without merit, and that Verizon VA provides the BOS BDT in a timely and accurate manner.

VI. CLEC SYSTEM SUPPORT

154. As indicated in the initial OSS Declaration and as set out briefly above, Verizon has designed and implemented an extensive array of support services for CLECs to use in entering and participating in the local telecommunications market throughout its service areas, including Virginia. These are the same support mechanisms favorably referenced by the FCC in approving the Section 271 applications of Verizon in New York and Massachusetts. *See New York Order* ¶¶ 101-127 and *Massachusetts Order* ¶¶ 102-116. Indeed, in Verizon's recent FCC filings, parties have not even contested Verizon's compliance with its obligations in these areas. *Pennsylvania Order* (¶ 12) or *RI Approval Order* (¶ 58).

155. Verizon's Wholesale Customer Support organization is led by a Vice President and has a professional staff of approximately 200 employees. This organization provides a wide range of technical services to assist CLECs. For example, the Change Management process ensures that CLECs receive timely information concerning interface changes, and the Wholesale Customer Care Center ensures that systems issues are resolved as quickly as possible. In addition, specialized teams work closely with individual CLECs to address specific needs. For example, teams assist

[19] See AT&T Declaration of Robert J.Kirchberger, Mohammed K. Kamal, and E. Christopher Nurse ("AT&T Declaration"); Cox Virginia Telecom Inc., Direct Testimony of Ms. Michelle Gee ("Cox Gee

CLECs in establishing connectivity and security for transactions with Verizon and provide ongoing support for connectivity changes; they assist CLECs with pre-order and ordering questions, such as how to format an LSR for a specific situation; they ensure that appropriate training and workshops are available to meet CLEC needs; they provide special assistance to small CLECs; and they assist with special projects such as the transition from LSOG 2 to LSOG 4.

156. During its independent third-party test in Virginia, KPMG evaluated Verizon's processes that support establishing and maintaining relationships between CLECs and Verizon in Virginia in its Relationship Management and Infrastructure ("RMI") domain. The KPMG test included, *inter alia*, OSS Change Management; Interface Development, Account Establishment and Management, and Help Desks and CLEC Training. KPMG was satisfied with Verizon's performance in Virginia for every test point. KPMG Final Report at Section III.

A. **Change Management**

157. Cavalier claims that the Change Management process is designed to defer problems rather that correct them and provides examples of seven change requests (CR 2469 through 2475) that they submitted to Change Management between March 29 and April 5, 2002. (Cavalier at 50-52.) A review of these seven change requests clearly demonstrates that the Change Management Process works as defined.

158. Each change request that Cavalier proposed was documented and assigned a tracking number. With the exception of one of the change requests, CR 2473 which was withdrawn by Cavalier on April 9, 2002, the Change Requests were discussed or

---

Declaration") and Direct Testimony of Ms. Mary Clarke ("Cox Clarke Declaration").

prioritized at the May 14, 2002, Prioritization Working Committee meeting. As a result of this meeting, two additional Change Requests were withdrawn, two were placed on hold and two were voted on by the industry and given an overall priority.

159. Both of the withdrawn Change Requests involved the elimination of an error message that Verizon returns to a CLEC when information on an LSR requires correction. However, the industry determined that these error messages were necessary to make sure that PONs are issued and processed only against accounts that belong to the CLEC issuing the PON.

160. Two of these change requests were put on hold, with Cavalier's consent, at the May 14, 2002 meeting. One change requests (CR 2472) was put on hold because it relates to a production issue that is already being addressed by the Wholesale Customer Care Center as a result of a trouble ticket that Cavalier opened, and the other (CR 2475) is on hold because other industry representatives asked Cavalier to clarify this proposed change request.

161. Verizon's handling and response to the seven change requests raised by Cavalier in its testimony demonstrates that the process works; that issues that may affect operations for multiple CLECs are raised, discussed, and addressed by the industry as a whole, not just by Verizon and a single CLEC. These are good examples of why many of the issues raised by CLECs in this 271 proceeding are more effectively addressed in the Change Management process.

162. Moreover, the Change Management process is only one of the support mechanisms available to CLECs for raising and resolving concerns. Other Verizon CLEC support functions that respond to day-to-day CLEC operational issues include the

Wholesale Customer Care Center ("WCCC"), the Customer Inquiry Response team ("CIRT") and the National Market Centers ("NMC"). CLECs should be well aware of these organizations and their respective functions. In September 2001, as part of the Change Management process, Verizon provided CLECs with a high level overview of the responsibilities for each of the centers. Additionally, functional information, contact numbers and escalation procedures are available for each of these centers on the Verizon Customer Support Web site.

163. Cavalier also claims that the CLEC User Forum ("CUF") does not solve problems. It is difficult to know the precise basis for this claim, since Cavalier is not a regular attendee at this forum. Verizon's records indicate Cavalier had not attended a CUF meeting in several months until last week's meeting on May 21, 2002. In other words, Cavalier is criticizing a forum with which it has very little recent experience.

164. The CUF is a forum hosted by the Verizon Account Management team. The CUF, formerly called the Bell Atlantic Users Group ("BAUG"), was organized to address CLEC initiated issues for both access and local service that are outside the scope of the Change Management process. Contrary to Cavalier's unfounded claim, the CUF does address issues when they are properly raised at this forum. In fact, since 1998 CLECs have raised approximately 70 different issues in the forum, and approximately 60 of them have been resolved. And of the remaining ten open issues, seven are new issues that have been raised since the March 2002 meeting.

165. Cavalier's objection to the CUF appears to be based on the fact that on April 4, 2002 Cavalier submitted to the CUF the same issues it had raised in the Change Management process and for which it had opened trouble tickets with Verizon's WCCC.

Cavalier has been told that the CUF will not address these issues since they are already being addressed in other Verizon forums.

166. Cox complains that Type 5 change requests are not given the same priority as Type 4 change requests. As described in the Change Management documentation, Type 4 change requests are initiated by Verizon while Type 5 requests are initiated by CLECs. Type 1 changes are maintenance/repairs, Type 2 are regulatory mandates and Type 3 are changes to industry guidelines. Both Type 4 and Type 5 requests are prioritized by the CLECs in the monthly Prioritization Working Committee meeting and have the same Change Management timeline for notification, business rules distribution, technical documentation distribution and CLEC testing. Type 4 and 5 change requests may not always be implemented in the priority order that is assigned by the CLECs due to the complexity of the change request or the relationship between the implementation of one change and those changes specified in another Change Request.

167. Regardless of the "type" assigned to change requests, Verizon dedicates substantial resources to the implementation of software changes to benefit CLECs. For example, the implementation of LSOG 4, a major change in industry guidelines was categorized as a "Type 4 (Verizon-initiated)" change but could equally have been categorized as a Type 3 (Industry Guidelines) change. Line Sharing changes arising from the FCC UNE Remand order also were classified as "Type 4" but could have been categorized as "Type 2 (Regulatory)" change. Other recent examples of Type 4 changes that originated outside of Verizon include line sharing, and new loop make-up and loop qualification-extended pre-order transactions. The assignment of CR types was not intended as a score-keeping mechanism. Since 1999, Verizon has implemented three

major "CLEC-affecting" software releases each year in February, June and October. Tens of thousands of analysis, design, development and testing hours are devoted to each of these releases which contain change requests of various "types," all of which directly or indirectly benefit the wholesale marketplace.

168. Cox also suggests that the Change Management process is somehow misguided because Verizon has not notified the CLECs of every change made to expressTRAK. Verizon does not notify Cox and other CLEC of every change made to its back-end OSS including expressTRAK. Verizon does notify CLECs of changes to those back-end OSS, as well as to the interface and gateway OSS, that will affect how CLECs interface with Verizon.

169. Cox also claims that Verizon fails to proactively test and identify system problems prior to software releases that impact day-to-day operations at a CLEC. (Cox Sheeley at 5.) This accusation is also unfounded. Verizon conducts internal testing before releasing software into a production environment. Verizon publishes regression and progression test decks and results for the three major CLEC-affecting releases each year. In addition, Verizon provides a CLEC test environment and CLEC test period for the thirty days prior to the February, June and October releases. This process is in place for CLECs operating in Virginia and is the same process that was in place and favorably reviewed by the FCC in the other Verizon states where 271 approval has been granted. .

170. Mrs. Carhart of Cox recommends that in the face of a software problem, CLECs should not have to resubmit orders on Excel spreadsheets or via the GUI. (Cox Carhart at 24.) Verizon strives to minimize the disruption to CLECs that software problems cause, but in some cases CLECs must be involved in the correction process as

there is no other way to capture this data. For example, if an order was rejected incorrectly, Verizon would no longer have the order and therefore the CLEC would need to resubmit the order.

B. **WCCC**

171. AT&T alleges that Verizon forces the CLEC to open trouble tickets for each missing notifier and the WCCC closes out tickets without resolution. (AT&T at 28.) AT&T is simply wrong. The WCCC procedures, available on the Verizon Customer Support web site, clearly outline the PON exception process for reporting missing notifiers. There is no restriction to the number of PONs associated with a trouble ticket. In fact, a PON exception trouble ticket rarely has just one PON. After the WCCC investigates the PONs, it provides a status of each PON to the CLEC. The CLEC can dispute the resolution of any PON and Verizon will continue to investigate the PONs until all the PONs on a trouble ticket have been resolved. The WCCC will not close out the trouble ticket until all the PONs on the trouble ticket are resolved and the CLEC has agreed.

172. AT&T predicts that the WCCC will not be adequately staffed to handle an increase in manually processed orders in Virginia. (AT&T at 37-38.) Again, AT&T provides no support for its claim, it is simply unfounded speculation. The WCCC today supports CLECs throughout the fourteen former Bell Atlantic jurisdictions. As part of the normal WCCC operations, the staffing requirements are regularly reviewed to determine that the WCCC is adequately staffed. This review, combined with reviews of the WCCC processes and automation support, ensure that adequate support is and will continue to be available to the CLECs.

173. Cox claims that on April 25, 2002 it was advised that the WCCC would not open trouble tickets for problems caused by a Verizon employee's human error. (Cox Sheeley at 11.) It is the policy of the WCCC to open a ticket for all customer complaints even those that are misdirected to the WCCC and require referral to another work center. If a CLEC encounters any difficulties opening trouble tickets with the WCCC, a manager should be contacted immediately to resolve the problem. The WCCC manager contacts and escalation procedures are available on the Customer Support Web site.

174. Next, Cox claims that it experienced delayed call backs on trouble tickets filed with the WCCC. (Cox Sheeley at 12.) The WCCC has defined practices on customer callbacks that can be found in the WCCC documentation available at the above web site. For example, for a systems error related ticket, the procedure calls for the WCCC manager to contact the customer within 1 business day of receiving the ticket. This is to advise the customer of the Verizon employee who is handling the trouble. In addition, the procedure states that the WCCC will provide status throughout the course of the investigation. If for any reason a customer is not satisfied, contact names and numbers are provided in the documentation for escalation purposes.

175. Finally, Cox alleges that CIRT employees either understand the former Bell Atlantic procedures or the former GTE procedures and therefore if you get the "wrong" employee he/she is not very helpful. (Cox Sheeley at 11.) The purpose of the Customer Inquiry Response Team ("CIRT") is to assist customers with questions concerning the use of the Web GUI. The CIRT specialists provide information to the CLEC regarding the forms that are required to complete orders and assist the CLEC in understanding queries and error messages they receive while processing pre-order and

order transactions. The CIRT was first created in August 2001 by combining two "help desks" teams. It is possible that there may have been an occasion where a CIRT specialist was not familiar with a particular process depending on their level of experience. However, the CIRT specialists use the same tools and resources that are already available to the customer to resolve the CLEC's question. This is done to help educate the customer so that the next time they encounter the same problem, the CLEC will know where to find the answer. If a CLEC is not satisfied with the help they have received from the CIRT, there is an escalation process available. The CIRT escalation procedures, along with the manager's contact numbers, are published on the Verizon Customer Support Web Site. There was no indication in Mrs. Sheeley's testimony that she did not receive an answer or, if she was not satisfied, that she escalated any problems beyond the initial call.

VII. CONCLUSION

176. Verizon VA's OSS are presently handling actual commercial volumes of CLEC transactions in Virginia with excellent performance. In addition to this real world proof, Verizon VA's interfaces, support systems, and processes passed nearly every element of the Commission's comprehensive third-party test. Verizon VA's handling of actual commercial transactions and the extensive testing of the interfaces, support systems and processes, demonstrate that Verizon provides CLECs in Virginia with nondiscriminatory access to its OSS, allowing them to offer local service in substantially the same time and manner as Verizon itself and providing them with a meaningful opportunity to compete.

177. This concludes our Reply OSS Declaration.

I swear, or verify, that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on _____, 2002

_____
Kathleen McLean

I swear, or verify, that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on _____, 2002

_____
Warren Geller

I swear, or verify, that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on _____, 2002

_____
Sean J. Sullivan

I swear, or verify, that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on _____, 2002

_____
Jonathan Smith

I swear, or verify, that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on _____, 2002

_____
Beth E. Cohen

I swear, or verify, that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on _____, 2002

_____
Maryellen Langstine

I swear, or verify, that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on _____, 2002

_____
R. Michael Toothman