

**ATTACHMENT B TO SURREBUTTAL TESTIMONY OF DEBORAH WALDBAUM**

**CHRONOLOGICAL SUMMARY OF EVENTS CONCERNING  
ECONOMICS AND TECHNOLOGY, INC. SERVICE ORDER**

? ? Economics and Technology, Inc. (ETI) placed its original request for the move of its T1 line on March 26, 2001 with AT&T customer service personnel in Atlanta, Georgia. ETI stated that the T1 move must be completed by May 18, 2001.

? ? The request was forwarded to the AT&T Denver Provisioning Office where an ASR was generated and sent to Verizon on April 20, 2001. Although AT&T received the original order from ETI on March 26, it is Verizon's policy not to accept an order for this type of facility more than 30 days before the requested due date.

? ? Contrary to Verizon's contention, AT&T did not submit an "incomplete" ASR on April 20. Rather, confusion arose concerning the Circuit Facility Assignment (CFA) for the order. The CFA is placed on the ASR to identify for Verizon the location on the AT&T frame the facility is to be delivered. Prior to sending an ASR, an AT&T agent checks an internal data base that reflects the CFA availability. Since frame space is limited, AT&T routinely re-uses CFAs once it has issued a disconnect order to Verizon for the facility originally placed in that CFA. At the time of the order, AT&T did not have the ability to check Verizon's records prior to sending the ASR. On May 1, 2001, Verizon notified AT&T that the CFA on the original ASR was 'busy.' Unfortunately, AT&T's disconnect orders do not routinely flow through to Verizon's database. Therefore, circuits appearing available to AT&T personnel were considered unavailable by Verizon, requiring the submission of a supplemented ASR. Though Verizon personnel would have had immediate knowledge of a circuit availability issue on April 20, AT&T was not contacted concerning the issue until April 25, 2001.

? ? From April 25 to May 1, 2001, AT&T personnel made repeated attempts to contact Verizon personnel in an effort to resolve the CFA issues. Escalation to a third level of Verizon personnel was required before AT&T finally received a response on May 1. Once again, Verizon stated that the CFA provided to Verizon was busy requiring a new CFA assignment. This problem arose at least two more times in the subsequent week.

? ? On May 9, 2001, after numerous exchanges, Verizon finally accepted the third CFA provided by AT&T, and responded with a Firm Order Commitment (FOC) date of July 26, 2001.

? ? Given that the FOC date was several months beyond the customer's required installation date, beginning on May 11, 2001, AT&T personnel began to escalate with Verizon personnel in an attempt to have the FOC date pushed up. Verizon personnel first informed AT&T on May 11 that the order was in its design stage and was being escalated internally for engineering. Later that same day, Verizon personnel informed AT&T that Verizon was without outside plant facilities to service the ETI order.

? ? Between May 11 and May 17, 2001, AT&T personnel repeatedly attempted to contact Verizon personnel to determine if Verizon was able to resolve the outside plant issues. AT&T received a response from Verizon on May 17 with a FOC date of July 26, 2001 – the same date that had been provided earlier.

? ? At this time, AT&T personnel began to explore the possibility of provisioning ETI's service out of an alternate collocation site in the hopes of obtaining facilities from that location. On May 22, 2001, a second ASR was submitted using a different central office. To ensure that related orders are tracked properly, AT&T modifies the original purchase order number

(‘PON’) submitted to Verizon with the addition of an alpha-numeric character. Therefore, the second ASR sent was identical to the first, except for the addition of an “A”. Verizon responded that no facilities were available at this second central office.

? ? On May 22, 2001, a Verizon Outside Plant Technician who had been dispatched to check building facilities visited ETI. At that time the Verizon technician stated that it was possible to provision the order on copper facilities, thereby allowing for a quicker installation date. Although ETI told the Verizon technician that copper was acceptable, Verizon made no attempt to inform AT&T personnel of the availability of a copper option. ETI contacted AT&T sales personnel on May 22 regarding the use of copper, but the AT&T provisioning center was first informed of the copper option on May 30. At that time AT&T began escalating the issue with Verizon.

? ? Between June 1, 2001 and June 15, 2001, AT&T personnel made repeated calls to Verizon in an effort to confirm that the project could be completed via copper and to ask whether a better FOC date could be acquired. Verizon failed to provide an answer to either request.

? ? On June 19, 2001, Verizon requested that AT&T cancel one of its ASRs. According to the log notes of the AT&T provisioning agent, Verizon did not specify which order should be cancelled.

? ? On July 3, 2001 Verizon informed AT&T personnel that the installation would take place on July 5, 2001. Verizon informed AT&T on July 6, 2001 that ETI turned a Verizon technician away on July 5 due to framing and format issues, although ETI informed AT&T that they did not turn a technician away. A review of AT&T’s ASR shows that AT&T had submitted the

correct framing and formatting information. The circuit was finally installed by a Verizon technician on July 9, 2001.

? ? Testing delays ensued due to technical difficulties incurred by Verizon. Verizon personnel replaced the line card (a plug-in electronic circuit card that operates certain functions on the line) and remapped the circuit a minimum of three times in the days subsequent to July 9. The ETI circuit was tested clean and turned to active status on July 14, 2001.