

SUMMARY OF VERIZON MA TELRIC INITIAL AND RECONSIDERATION ORDERS

COMPLIANCE TRACKING MATRIX (D.T.E. 01-20)

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	IV. <u>COST MODELS</u>	
58	<p><u>Verizon MA LCAM</u> Verizon MA must demonstrate changes to its TELRIC studies for other UNEs caused by changing the values in the copper/fiber matrix.</p>	<p>In addition to Loop-related UNEs, the copper/fiber matrix is an input to the Switch Study.</p> <p>Book 3, Part C-1a (Ports) Workpaper, Section 38, Page 3 of 4 Line 1, GR303 ports: 39.75% Line 2, Analog ports: 60.25% Note: For switching, the analog percentage represents the mix of copper and UDLC.</p>
	V. <u>GENERAL INPUTS</u>	
	<u>Cost of Capital</u>	
78	<p>The Department approved a weighted cost of capital of 11.45 percent, resulting from a capital structure of 25 percent debt and 75 percent equity, a 7.55 percent cost of debt, and a 12.75 percent cost of equity.</p>	<p>Use the VCost Data Table Utility (“DTU”) and the following table/parameters to see the compliance capital structure: Table: Global Parameters Asset Life Scenario: MACOMP2002 Time Key: 1999 Data Set Time Stamp: 1-28-03. Methodology: TELRIC Jurisdiction: Massachusetts Economic Scenario: CMP</p>

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		<p>All Network, Marketing, Other Support and Common Overhead ACFs were revised using the new FLC. Each factor has its own workbook with different cites that include the FLC input of 59.0% described above:</p> <p>?? Book 3, Part G-4 Marketing: see the embedded file that develops regional investments on Tab 3, Investment Summary. Within that embedded file, there are two investment development files. The file called MA FinalRegInv Jan 2003.xls contains a FLC reference cell (Column B) for every USOA account with positive investment values in every jurisdiction.</p> <p>?? Book 3, Part G-5 Network Factors, The new FLC of .59 is shown in MA Network Files.doc, VZ MA Network Exp Fctrs Compliance Feb 2003.xls, tab 2, column F</p> <p>?? Book 3, Part G-6 Other Support: see Tab 7; the same embedded file described under Marketing above is embedded in the Other Support Documentation because it uses this same investment levels.</p> <p>?? Book 3, Part G-2 Common Overhead: see Tab 2, VZEAST, Line 46 and Line 48</p>

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		<p>contain references to and use of the FLC. Line 46, calculating Common Overhead for NRC studies, uses the standard FLC of 59.0%. Line 48, the Common Overhead calculation for recurring studies uses an adjusted FLC value because expenses included in the Total Company Expense denominator of Common have already been computed using 59.0% in the other ACFs. Therefore, in the recurring calculation the FLC is only used for the capital portion of Total Company Costs. The adjustment methodology used to adjust FLC can be found in the embedded file on that same tab at the bottom of the sheet: New_FLC_COH_MA Jan 2003.xls.</p>
106	<p><u>Productivity and Merger Savings</u></p> <p>The Department found that the productivity gain should be applied over the entire five-year period that TELRIC rates are anticipated to be in effect and directed Verizon MA to project the gains (and inflation) through 2004, <i>i.e.</i>, the expected mid-point of the period during which rates established in this proceeding are to be in effect.</p> <p>.</p>	<p>Use the Vcost DTU and the following table/parameters to see the productivity offsets of 4.5% for years 2002 through 2004: Table: Indices Jurisdiction: Massachusetts Data Set Time Stamp: 1-28-03</p> <p>All Compliance Studies revised using the</p>

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112	The Department also directed Verizon MA to use a productivity offset of 4.5 percent for each of the years, 2002 through 2004, and to re-run VCost with this adjustment. In its compliance filing, Verizon MA must provide printouts from VCost that demonstrate the compliance with this directive.	Planning Period of 2002 here through 2004 as directed.
116	<p><u>Retail-Related Expenses</u></p> <p>The Department directed Verizon MA to revise its ACFs to exclude all retail-related expenses to the extent required by the <i>Consolidated Arbitrations</i>.</p>	Verizon MA used Section II, Page 4 of 14 in <i>Consolidated Arbitrations</i> to calculate a percent avoided for each account as ordered. The file that documents how Verizon MA calculated these percent avoided %s is found in Book 3, Part G-1 and replaces all Verizon MA's Avoided Cost Studies previously filed. These percents are imported to each of the applicable documentation files for Network, Marketing, Other Support and Common Overhead, except as directed for the Marketing sub-factor called Advertising. See Order Reference for page 130 below.
121	<p><u>Network ACFs</u></p> <p>The Department directed Verizon MA to revise Verizon MA's proposed "M" and "R" dollars for copper cables to five percent</p>	Book 3, Part G-5 - Network Factors MA Network Files.doc \ VZ MA Network Exp

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	and 15 percent, respectively. The Department also noted that its directives to revise Verizon MA's network assumptions (<i>e.g.</i> , copper/IDLC/UDLC proportion) may lead to network expenses different from what Verizon MA proposed. Accordingly, the Department directed Verizon MA to submit in its compliance filing network expenses that reflect revised network inputs, with supporting documentation that shows in detail how those revisions were incorporated and how the level of network expenses changed for each plant account.	Fctrs Compliance Feb 2003.xls Tab 6, column E, lines 10, 12, 14, and 16 Tab 7, column E, lines 10, 12, 14, and 16 Tab 13
130	<p><u>Wholesale Marketing ACF</u></p> <p>The Department found that Verizon MA should revise its ACFs to exclude all retail-related expenses (<i>i.e.</i>, "avoidable" costs). Accordingly, the Department directed Verizon MA to revise its proposed "avoided" costs discount of 40.42 percent in Product Management (see Exh. VZ-37, Part G-1 (Avoided-Cost Study), Tab 1, Account 6611 (Product Management)) using the current "avoidable" cost discount.</p> <p>In addition, the Department found that an expense relationship based on Verizon MA's 1999 retail advertising budget was not a reasonable estimate of its forward-looking wholesale advertising budget and directed Verizon MA to use its wholesale advertising budget in Massachusetts for year 2002 as the basis for a revised wholesale advertising factor.</p>	<p>See Order Reference page 116 above regarding the PLM avoidable percent as directed in <i>Consolidated Arbitrations</i>.</p> <p>Verizon MA provided its wholesale advertising budget to a record response (RR DTE-96P) and was instructed to use this value to revise its Wholesale Advertising Factor. Verizon MA did this in the file named MA Marketing Factor Jan 2003.xls in Part G-4 on the CD. See Tab 2, Line 12 and 13 - the Budgeted Dollars are divided by MA-Only forward-looking investments (since the marketing budget was for</p>

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		Verizon MA only). All inputs are sourced on the file.
	<u>OUTSIDE PLANT INPUTS</u>	
144	<p><u>Technology Mix for Feeder: Copper vs. Fiber</u></p> <p>The Department adopted 100 percent fiber the Metro zone, as proposed by Verizon MA. However, for the remaining three zones, the Department directed Verizon MA to use a 9,000 feet threshold. The Department estimated that a zero threshold in the Metro zone and a 9,000 foot threshold in the remaining three zones yield approximately 41.2 percent copper and 58.8 percent fiber.</p>	<p>Book 2, Parts B-1a through B-1f Section 5 - Study Inputs Subsection 5.3 Thresholds - Page 1 of 1 Threshold Table: Metro = 0 kf Urban = 9 kf Suburban = 9 kf Rural = 9 kf</p>
154 161	<p><u>Fiber Feeder Technology Choice: UDLC vs. IDLC</u></p> <p>The Department found that it was reasonable to assume that the existing IDLC/UDLC ratio will continue into the future. Therefore, the Department directed Verizon MA to revise its proposed ratio of IDLC to UDLC to 2:1. Based on its ruling on the copper/fiber thresholds and the resulting copper/fiber proportion, the Department concluded that the copper/IDLC/UDLC proportion should be approximately 41.2/39.2/19.6.</p>	<p>Book 2, Parts B-1a through B-1f, Link Cost Summary Page 1 through 3, Lines 1,2, and 3 GR303 weighting: 67% TR057 weighting: 33% Link Cost Summary: CD # 2, Part B-1: ma sum 3 and 4 cells.xls</p>

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162	<p><u>DLC Concentration Ratio</u></p> <p>The Department adjusted Verizon MA's proposed concentration ratio for GR-303 equipment to 4:1</p>	<p>Book 2, Parts B-1a through B-1f Section 5 – Study Inputs Subsection 5.2 Study Factors – Page 1 of 4 FACTOR ID: CONC-303 4.</p>
	Fill Factors	
182	<p><u>Distribution Fill Factor</u></p> <p>The Department directed Verizon MA to reduce the adjustment factor for potential units to three percent and to reduce the adjustment for loss to competitors to three percent. The Department indicated that the incorporation of the aforementioned changes in adjustment factors yields a 48 percent fill.</p>	<p>Book 2, Parts B-1a through B-1f Section 5 - Study Inputs Subsection 5.10 Wire Center Related Values Part 1, Page 1 of 5 UTIL_MD: .4800 Metallic Distribution</p>
188	<p><u>Copper Feeder and RT Common Equipment Fill Factors</u></p> <p>The Department directed Verizon MA to use a fill factor of 69 percent.</p>	<p>Book 2, Parts B-1a through B-1f Section 5 - Study Inputs Subsection 5.10 Wire Center Related Values Part 1, Page 1 of 5 UTIL_MF: .6900 Metallic Feeder</p>

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190	<p><u>Fiber Feeder Fill Factor</u></p> <p>The Department directed Verizon MA to revise its fiber feeder fill factor to 75 percent.</p>	<p>Book 2, Parts B-1a through B-1f Section 5 - Study Inputs Subsection 5.2 Study Factors Page 3 of 4 UTIL_FS: .75 Fiber Strand</p>
193	<p><u>Duct Fill Factor</u></p> <p>The Department directed Verizon MA to revise its proposed duct fill factor to 55.4 percent.</p>	<p>Book 2, Parts B-1a through B-1f Section 5 - Study Inputs Subsection 5.2 Study Factors Page 3 of 4 UTIL_C : .554 Utilization Conduit</p>
195	<p><u>Remote Terminal Channel Units Fill Factor</u></p> <p>The Department directed Verizon MA to use an 88 percent fill factor for channel units.</p>	<p>Book 2, Parts B-1a through B-1f Section 5 - Study Inputs Subsection 5.2 Study Factors Page 3 of 4 UTIL_EP: .88 Utilization Equipment Plug-In</p>
	<p><u>Central Office Terminal Fill Factor</u></p>	

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197	The Department ruled that the ratio of RT to COT should be determined as an output by running the model with other input adjustments and directed Verizon MA to calculate a new RT to COT ratio and to submit workpapers that show how adjustments in other related inputs affect that calculation.	Book 1, Tab 3, Item #8
203	<p><u>House and Riser Cable</u></p> <p>(1) The Department directed Verizon MA to modify its tariff to indicate that the “service establishment terminal charge” is applicable only when the intermediate terminal block is requested.</p> <p>(2) The Department found that a reasonable estimate for time to place a terminal block is ten minutes and directed Verizon MA to eliminate the backboard time element.</p>	See MA DTE 17, Part B, Section 12.2.4.B that states “A Service Establishment Charge applies to the TC for the installation by the Telephone Company of each 50 pair terminal block requested by the TC for their terminations”.
204	<p>(3) The Department directed Verizon MA to adopt a cable termination rate of 150 pairs per hour.</p> <p>(4) The Department directed Verizon MA to eliminate the cost of the cable stub from its cost study.</p>	<p><u>Work Time Estimate Reduction</u></p> <p>Book 2, Part B-4, Horizontal Riser / House and Riser Elements</p> <p>Section 5.1 ECRIS Inputs</p>
205	The effect of these modifications is a reduction in the work time estimate for installing a 50-pair terminal block from 352 minutes to 83 minutes.	

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208	<p>(5) The Department directed Verizon MA to eliminate the adjustment for undeveloped zoned land and loss to competitors, and to revise its HARC fill factor to 51.3 percent.</p> <p>(6) The Department determined that the average length of horizontal cable would fall somewhere in between 90 and 150 feet. The Department directed Verizon MA to reduce its recommended length by ten percent to 135 feet.</p>	<p>The Department's Order reduced selected time estimates in the ECRIS inputs. In order to verify the compliance results, the following is a summary of those inputs as filed versus the compliance filing (similar adjustments made in all zones):</p> <table> <tr> <th>Material</th><th>Orig Hrs</th><th>Orig Hrs</th></tr> <tr> <td>BB183A1</td><td>0.88</td><td>0.00</td></tr> <tr> <td>BLK DISC KRONE-50/66</td><td>0.89</td><td>0.17</td></tr> <tr> <td>10A1/50-20</td><td>1.14</td><td>0.00</td></tr> <tr> <td>Join 100 Pairs</td><td>1.68</td><td>0.00</td></tr> <tr> <td>Terminate 50 prs</td><td>1.28</td><td>0.33</td></tr> <tr> <td>Travel Time</td><td></td><td>0.88</td></tr> <tr> <td>Total (expressed in min)</td><td>353</td><td>83</td></tr> </table> <p><u>Utilization</u> Book 2, Part B-4a, Horizontal Riser Section 3.4 – Inputs Line 12 Utilization: 0.513000</p> <p><u>Cable Length</u> Book 2, Part B-4a, Horizontal Riser Section 3.1 – Assumptions Line 35: Formula multiplies Cable investment per ft by 135</p>	Material	Orig Hrs	Orig Hrs	BB183A1	0.88	0.00	BLK DISC KRONE-50/66	0.89	0.17	10A1/50-20	1.14	0.00	Join 100 Pairs	1.68	0.00	Terminate 50 prs	1.28	0.33	Travel Time		0.88	Total (expressed in min)	353	83
Material	Orig Hrs	Orig Hrs																								
BB183A1	0.88	0.00																								
BLK DISC KRONE-50/66	0.89	0.17																								
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214	<p><u>Dark Fiber</u></p> <p>The Department directed that Verizon MA use the following fill factors for dark fiber - 75 percent for dark fiber loop and 80 percent for dark fiber IOF.</p>	<p>Book 3, Part F-1</p> <p>For each Dark Fiber Study, see</p> <p>Subsection 5.9 (IOF), Line 16: 80%</p> <p>Subsection 5.10 (Loop), Line 16: 75%</p>
215	<p>The Department also directed Verizon MA to submit deaveraged dark fiber loop rates.</p>	<p>Book 3, Part F-1</p> <p>Dark Fiber studies conducted for both 4 and 3 zones: Metro; Urban; Metro / Urban; Suburban: Rural</p> <p>See DTE No. 17, Part M, Section 5</p>
219	<p><u>Geographic Zones For Deaveraging Loop Costs</u></p> <p>The Department directed Verizon MA to submit two versions of those portions of Part B of its cost study that are affected by geographic deaveraging, including all workpapers associated with its calculation of the possible consolidated Urban zone. This issue affects the Local Loop, Dark Fiber and DC Power Consumption portions of Verizon MA's Recurring Cost Study. In its compliance filing, Verizon MA must estimate administrative, advertising, provisioning, or other costs associated with a consolidation of density zones. If Verizon MA does anticipate significant costs associated with the implementation of a rate structure change to a Metro/Urban zone consolidation, it shall submit detailed information about such</p>	<p><u>Loop</u></p> <p>Book 2, Part B-1a through B-1f, Pages 1 through 3</p> <p><u>Dark Fiber</u></p> <p>Book 3, Part F-1</p> <p><u>Collocation – DC Power Consumption</u></p> <p>Book 6, Part CA</p> <p>Book 2, Parts B-1a through B-1f (Loop)</p> <p>Book 3, Part F-1 (Dark Fiber)</p> <p>Book 6, Part CA (Collocation)</p>

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237	<p><u>Wideband Testing System</u></p> <p>The Department found that Verizon MA did not present any specific evidence to show that an optional WTS affects its ability to meet service quality standards and permitted Verizon MA to file a revised WTS charge.</p>	<p>Book 2, Part B-5 Optional WTS costs re-filed with updated factors.</p>
239	<p><u>Cooperative Testing</u></p> <p>The Department rejected Verizon MA's proposed charges for cooperative testing based on its prior ruling in D.T.E. 98-57.</p>	<p>Book 2, Part B-5 Cooperative Testing Costs removed from study Verizon MA has not included rates for cooperative testing in DTE No. 17</p>
259 260	<p><u>Loop Conditioning and Qualification</u></p> <p>The Department denied Verizon MA's request to be allowed to charge for conditioning loops greater than 18,000 feet, since those loops would be fiber in a forward-looking network.</p> <p>For loops less than 18,000 feet, the Department maintained its policies established in D.T.E. 98-57-Phase III, which approved the application of loop conditioning charges in situations when a CLEC requests conditioning on a CSA-compliant loop of less than 18,000 feet.</p>	<p>Book 2, Part B-5 Loop Conditioning Costs (27kft) removed from study.</p> <p>Book 4, VMA NRCM Line # 71 UNE Aerial Load Coil Removal - 27K Ft - Columns C-F & H-K - Values set to "Zero".</p>

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261	<p>Because Verizon MA's loop conditioning cost study is part of its NRCM, the Department's findings with respect to the NRC task times in Section X.D (Task Time Methodology) apply here. Verizon MA was directed to provide supporting documentation that demonstrates its compliance with this directive.</p> <p>The Department also rejected Verizon MA's proposed charge to add electronics for ISDN-type services.</p>	<p>Line #75 UNE Underground Load Coil Removal - 27K Ft - Columns C-F & H-K - Values set to "Zero".</p> <p>Book 5, VMA NRCM See Columns 70 and 74 in Tabs for Typical Occurrence factors and Forward Looking Adjustments.</p> <p>Book 2, Part B-5 ISDN Electronic Cost removed from study Mechanized Loop Qualification costs removed from study</p>
	<u>SWITCHING</u>	
302 Recon p.25	<p><u>Switch Material Prices</u></p> <p>The Department directed that Verizon MA use a blend of 90 percent new switches and ten percent growth switches reflecting the existing mix of Lucent 5ESS and Nortel DMS 100 switches. The Department approved the discount that Verizon MA proposed for Nortel-supplied new and growth switching equipment (Exh.VZ-37, Part CP, Part CP-1, Part CP-3).</p>	<p>CD #4 - C-P Folder File name: MA Compliance Discount Exhibit.xls Exhibit, Part C-P, Page 1 of 1</p>

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Recon. pg. 54	<p><u>Getting Started” Costs and EPHC</u></p> <p>The Department found that Verizon MA shall assign 50 percent of getting started and EPHC costs to non-traffic-sensitive UNEs and 50 percent to traffic-sensitive UNEs.</p>	<p><u>Traffic Sensitive Adjustment</u> Book 3, Part C-2 - End Office Section 4, Page 1 of 3 L 1A, 2A, 10A - Tandem & TOPS Section 5, Page 1 of 2 L 1A, 2A</p> <p><u>Non-Traffic Sensitive Adjustment</u> Book 3, Part C-1 - Getting Started Section 39A, Page 3 of 7 L 1A, 6A, 10A - EPHC Section 39A, Page 4 of 7 L 1A, 6A, 10A</p>
Recon pg. 50	<p><u>Feature Port Additive Costs</u></p> <p>The Department approved Verizon MA’s proposed costs for those features that do not rely on “product management” (e.g., automatic callback for Centrex lines, simplified message desk interface, etc.) with the incorporation of those modifications necessary to comply with all other relevant directives (e.g., regarding material investment, EF&I factors, etc.).</p>	<p>Book 3, Part C-1 Workpapers Section 9, Page 1, Line 1A Section 16, Page 2, Line 1A Section 17, Page 2, Line 1A Section 18, Page 2, Line 1A Section 24, Page 2, Line 1A</p>

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	<p>The Department directed Verizon MA “to reduce the following inputs in the workpapers in Part C-1 by 60 percent: Section 9, line 1; Sections 16 through 18, page 2, line 1; Section 24, page 2, line 1; Section 29, line 1; and Section 34, page 2, line 1. Verizon MA shall increase the following inputs in the workpapers in Part C-1 by 60 percent: Section 10, line 2; Section 30, line 2 and Section 34, page 2, line 4. Verizon MA also shall incorporate those modifications necessary to comply with all other relevant directives (e.g., regarding investment, annual to busy hour ratio, etc.).”</p>	<p>Section 29, Page 1, Line 1A Section 34, Page 2, Line 1A Section 10, Page 1, Line 2A Section 30, Page 1, Line 2A Section 34, Page 2, Line 4A</p>

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Recon. pg. 29	<p><u>EF&I Factor</u></p> <p>The Department directed Verizon MA to increase the sum of the vendor portion and the Verizon MA portion of the Department-directed EF&I factor (<i>i.e.</i>, 0.24) by the ratio of Verizon MA's proposed switch investment to the switch investment that corresponds with the Department's directives in this order, and to then add the 5 percent sales tax for the final EF&I factor.</p>	<p>Book 3, Part G-3 Workpaper, Page 8, EF&I Factor Worksheet, pages 1 and 2 of 2.</p> <p>Verizon MA has calculated the ratio of Verizon MA's proposed switching investment to the level of switch investment corresponding to the Department's directives on switching. This ratio was applied to the Department-directed EF&I of 0.24. To this, Verizon MA added 0.05 for sales tax. The new EF&I factor for switching is 0.4665. Workpapers detailing the derivation of this factor may be found in Part G-3 of the cost study documentation, MA Investment Loading Factors DTE Order 01-20A_02_2003.xls.</p>
324	<p><u>Call Completion Ratio</u></p> <p>The Department directed Verizon MA to submit the more up-to-date call completion data and any supporting studies and/or documentation in its compliance filing. If such data are not available by this date for the Department and interested parties to examine, Verizon MA shall use 80 percent as the call completion ratio.</p> <p>Verizon MA must demonstrate in its compliance filing that when it</p>	<p>See Book 1, Tab 3, #6 – Call Completion Ratio</p>

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	translates the UNE costs into UNE rates, that it is not double-recovering for NCT and call attempts.	
Recon pg. 38	<p><u>Busy Hour to Annual Conversion Factor</u></p> <p>The Department directed Verizon MA to use 270 days as the basis for computing MOU costs and 0.075 in its calculation of the BHAR.</p>	<p>Vcost DTU Table: Call Profile Table Busy Hour to Day Ratio: .075 Equiv Bus Days: 270 Busy Hour to Annual Ratio: .000278</p> <p>Switch Book 3, Workpaper Part C-2, Section 8 Line 3, BHAR: 0.000278</p>
330	The Department directed Verizon MA to use its proposed SCIS in its compliance filing and shall submit any and all supporting workpapers associated with Verizon MA's incorporation of the Department's modifications both in the SCIS model and in Part C of its Recurring Cost Study.	<p>The SCIS Model (Release 2.8) is included on proprietary CD #3. The Department's requirements are included in the SCIS Mouser database file on CD #3.</p> <p>The SCIS model develops the switching investments. The cost associated with investments and contained in Parts C-1, 2, and 3.</p>

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334 335	<p><u>Right to Use Fees</u></p> <p>For 1999 costs, the Department directed Verizon MA to use the more representative figure of \$184,600,00, which excludes the effect of the SOP98-1 implementation (Exh. VZ-37, Part G-9, Workpaper at 1; Exh. ATT-VZ 12-2-2S). For 2001 the Department directed Verizon MA to use the more recent 2001 RTU data in its compliance filing.</p>	
Recon. pg. 11	<p>The Department directed Verizon MA to only include the bids that correspond with the winning vendor (RR-DTE-102; Exh. ATT-VZ 31-1; RR-ATT-3; see also Exh. ATT-33-P, exh.10; Exh. VZ-60-P at 4; see also Exh. ATT-33-P, exhs. 5, 6), and to remove the three Virginia switches that it did not purchase from the table presented in Tab 1 (see RR-DTE-102, RR-DTE-103). The Department directed Verizon MA to submit a table that includes information only about the 13 switches and the RTU fees, and the average RTU fee.</p> <p>Using the newly calculated average initial RTU fees for Nortel and Lucent, based on a revised version of the table that appears in Tab 1, the Department directed Verizon MA to replicate the methodology it describes in Exhibit DTE-VZ 3-4(a), with one clarification, and to use the budgeted 2002 expenditures for years beyond 2001.</p>	<p>Book 3, Part G-9 MA RTU Documentation_ DTE Order 01-20A_02_2003.xls WP_Pg1 Initial RTUs Tab</p> <p>Book 3, Part G-9 MA RTU Documentation_ DTE Order 01-20A_02_2003.xls WP_Pg1 Initial RTUs Tab</p> <p>Book 3, Part G-9 MA RTU Documentation_ DTE Order 01-20A_02_2003.xls</p>

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	The Department directed Verizon MA to use the budgeted 2002 expenditures for years beyond 2001, and to assign these costs to non-traffic-sensitive UNEs.	WP_Pg1 Initial RTUs Tab
339	<p><u>Reciprocal Compensation</u></p> <p>The Department found that, apart from its findings on the proper assignment of “getting started” and RTU costs, Verizon MA’s costs for reciprocal compensation and terminating usage should be identical.</p>	Verizon MA’s compliance costs for reciprocal compensation and terminating usage are identical, apart from the assignment of “getting started” and RTU costs.
349	<p><u>INTEROFFICE FACILITIES</u></p> <p>The Department directed that Verizon MA’s use 3.83 nodes in its compliance filing for computing both fixed and distance-sensitive IOF costs and provide workpapers that document how it implemented this directive.</p>	<p>Originally the IOF network was designed to optimize the ADM at 16 DS3’s on 6 node rings.</p> <p>The use of 3.83 nodes allows the number of DS3s to be increased to 25. Therefore, the EXCEL manufacture specific equipment files, that detail the equipment requirements were changed. For the Fujitsu equipment, the file name is FLM 2400 Compliance.xls (see file on</p>

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		<p>Proprietary CD #4). In the DS3 Tab, the configuration of equipment was changed and the new investment per DS0 is reflected in Column I rows 43, 55 and 66. For the Lucent equipment the file name is DMOC48_2001 Adj 7_19_02.xls (see file on Proprietary CD #4). In the DS3 Tab, the configuration of equipment was changed and the new investment per DS0 is reflected in Column G rows 28, 40 and 51.</p> <p>The investments per DS0 are then linked to the master IOF model, VCost MA Inputs – Cmpl.xls (see CD2, Part D-6) and are reflected on the COE Invest Tab, Column B rows 154 – 172, 203 – 221. The new investments are used in the appropriate fixed and variable locations throughout the model. The model performs the necessary weightings by equipment manufacturer to develop the total investment per transport rate. The total investment per transport rate is an input to the VCost system where appropriate Annual Charge Factors are applied.</p>
357	The Department directed Verizon MA to increase the eleven IOF utilization factors (<i>i.e.</i> , all but the fiber) to 83 percent.	CD 2, Part D-6, VCost MA Inputs - Cmpl.xls Parameter Tab,

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		Lines 15 through 25, Column D: 0.83
364 Recon pg. 61	<p><u>IOF - Digital Cross-Connect Frames Bundled with Dedicated Transport</u></p> <p>The Department clarified that “the Order did not intend to require Verizon MA to provide unbundled DCS as a standalone UNE. The Department intends that Verizon MA offer DCS as an option at the termination end of IOF circuits, only at those locations where Verizon MA has installed DCS.”</p>	<p>Please see Book 1, Tab 3, Item #3, IOF DCS Option</p> <p>Book 3, Part D-6 Section 2.1, Cost Summary DS-1 costs are display with and without DCS functionality (also see Section 2.2 – Unbundled DS-1 and Section 2.3 – Unbundled DS-1 without DCS).</p>
369	<p><u>Weighted Average Distance Between Wire Centers</u></p> <p>The Department directed Verizon MA to re-compute the weighted average distance based on a representative sample of the data in its Trunk Information Recordkeeping System.</p>	<p>Part C-2, Common Transport Section 3 – Inputs The mileage inputs used in this study for local, toll, local and toll trunks were developed from a study of the TIRKS database.</p> <p>see MA TIRKS local toll mileage.xls, Proprietary CD #4</p>
	<u>COLLOCATION</u>	

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378	<p><u>Administration and Engineering Fee</u></p> <p>The Department directed Verizon MA to reduce its Administration and Engineering fee by 20.</p>	<p>Book 6, Collocation</p> <p>The Administration and Engineering fees in the Physical, SCOPE, CCOE, Virtual, On-Site Adjacent and, Adjacent Off-Site Arrangement cost studies were reduced by 20%. For each of the above cost studies, the calculation and subsequent 20% reduction can be seen on the following workpapers:</p> <p>PART CA, WP 1.0, Page 2, Line 14B PART CA, WP 1.1, Page 2, Line 14B PART CA, WP 1.2, Page 2, Line 14B PART CA, WP 1.3, Page 2, Line 14B PART CA, WP 1.4, Page 2, Line 14B</p> <p>PART CB, WP 1.0, Page 2, Line 14B PART CB, WP 1.1, Page 2, Line 14B PART CB, WP 1.2, Page 2, Line 14B PART CB, WP 1.3, Page 2, Line 14B</p> <p>PART CC, WP 1.0, Page 2, Line 14B PART CC, WP 1.1, Page 2, Line 14B PART CC, WP 1.2, Page 2, Line 14B PART CC, WP 1.3, Page 2, Line 14B</p>

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		<p>PART CD, WP 1.0, Page 2, Line 14B PART CD, WP 1.1, Page 2, Line 14B PART CD, WP 1.2, Page 2, Line 14B PART CD, WP 1.3, Page 2, Line 14B PART CD, WP 1.4, Page 2, Line 14B</p> <p>PART CG, WP 1.0, Page 1, Line 26B</p> <p>PART CI, WP 1.0, Page 1, Line 22B.</p>
392	<p><u>Space Conditioning</u></p> <p>The Department found that the existing credit mechanism could lead to over-recovery by Verizon MA and overpayment by CLECs exiting the market. The Department directed Verizon MA to replace the credit mechanism with a monetary refund to a vacating CLEC upon subsequent occupation of that space.</p>	See D.T.E. No. 17, Part A, Section 4.2.1
402	<p><u>Direct Current Power Consumption</u></p> <p>Utilizing AT&T's data in Exh. VZ-ATT/WC 1-90 and Verizon MA's methodology from Exh. VZ-29, the Department calculated a Power Installation factor of 2.15.</p>	<p>Book 6, Collocation The Digital Switch 377C – DC Power Installation factor was reduced from 2.7852 to 2.1500. The revised factor is displayed on the cost study factor page, PART CA, WP 17.0, Page 1, Line 10.</p>

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		<p>The revised Digital Switch 377C – DC Power Installation factor was applied to the DC Power Consumption cost study, PART CA, WP 5.0, Page 1, Line 32 and Line 57.</p> <p>The revised Digital Switch 377C – DC Power Installation factor was also applied to the DC Power Distribution cost study. See PART CA, WP 5.0, Page 1, Line 4.</p>
408	<p><u>Digital Switch ACF</u></p> <p>The Department directed Verizon MA to apply the Digital Circuit ACF to the DC Power Consumption cost study.</p>	<p>Book 6, Collocation</p> <p>The Digital Circuit Other ACF – 357C (0.3449), replaces the Digital Switch ACF (377C) in the DC Power Consumption cost study. See PART CA, WP 5.0, Page 1, Line 42 and Line 67.</p>
412	<p><u>Emergency Engine</u></p> <p>The Department directed Verizon MA to redo its DC Power Consumption cost study using emergency engine capacity expressed in DC amps.</p>	<p>Book 6, Collocation</p> <p>The revised DC Amp calculation can be seen in the DC Power Consumption cost study, PART CA, WP 5.0, Page 1, Lines 22 through Line 31, Columns C, D, E, F, G and H.</p>

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413-414	The Department provided specific direction for deriving the unit investment per DC amp in the Metro region. Verizon MA was directed to utilize this process to determine the unit cost per DC amp for each of the four density zones in its compliance filing and submit costs deaveraged among four zones and among three zones.	A new workpaper (Workpaper 3.0, Page 2) was developed that reflects the material investment of the emergency engine related to AC power. This calculation was added to the Building Expense on Workpaper 3.0, Page 1, Line 17.
417	<p><u>Deaveraged Rates</u></p> <p>The Department directed Verizon MA to deaverage its Power Consumption cost study among four zones and three zones.</p>	<p>See Book 1, Tab 3, Item #2 Geographic Density Zones</p> <p>Book 6, Collocation The DC Power Consumption cost study was deaveraged and expressed as three and four density zones (Metro, Urban, Suburban and Rural).</p> <p>This was accomplished by reflecting each of the four density zone weightings, PART CA, WP 5.0, Page 1, Lines 46 and 71, Columns C, D, E and F.</p> <p>The results of revising DC Power Consumption cost study into four density zones can be seen on PART CA, WP 5.0, Page 1, Line 80,</p>

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		<p>Columns C, D, E and F.</p> <p>A similar calculation combining the Metro and Urban density zones into one density zone was performed and the results are displayed on PART CA, WP 5.0, Page 1, Line 80, Column G.</p>
Recon pg. 70-77	<p><u>DC Power Distribution</u></p> <p>The Department found that Verizon MA adequately supported the cable lengths it presented in its original cost study for its DC Power Distribution rate element, with the exception of cable lengths between the power plant and CLEC equipment. The Department ordered Verizon MA to reduce these lengths by 20 percent.</p>	<p>Book 6, Collocation The Digital Circuit Other ACF – 357C (0.3449) was applied to DC Power Distribution cost study, PART CA, WP 5.0, Page 2, Line 14.</p> <p>The DC Power Distribution Cables that extend directly to Verizon MA’s DC Power Plant were reduced by 20% as follows: The DC Power Distribution Cable study’s cable samples were sorted into their four density zones, and then again into two fuse groupings: 1) fuses “less than or equal to 60 amps” and 2) fuses “greater than 60 amps”. All of the cable samples in the “less than or equal to 60 amps” category extend or run from the Verizon MA’s BDFB to the CLEC’s</p>

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		<p>equipment. These cable samples are not subject to the Department's 20% reduction in cable lengths.</p> <p>The remaining cable samples in the "greater than 60 amps" grouping run directly from Verizon MA's DC Power Plant to the CLEC equipment.</p> <p>The "greater than 60 amps" cable samples were then reduced by 20%.</p> <p>The revised, "greater than 60 amps" cable lengths were then recombined with the original "less than or equal to 60 amps" cable lengths to make a statewide - "average length per DC Power cable for each type of cable gauge". The results of this calculation can be seen on PART CA, WP 5.0, Page 2, Line 1, Columns C through L.</p>
432	<p><u>Cost Recovery Transition Plan</u></p> <p>The Department directed Verizon MA to submit a plan as part of its compliance filing.</p>	See D.T.E. No. 17, Part E, Section 2.6.17

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	<u>NONRECURRING COSTS</u>	
441	<u>Forward-Looking Network Assumptions</u> The Department directed Verizon MA to document the way in which the revised technology mix affects the calculations in its NRCM.	Book 4, VMA NRCM, Tab “Cost Summary”, Lines #36 & #37, Columns D, E, I and J – UNE Products Two Wire Analog-Digital UNE-P New Initial and Two Wire Analog-Digital UNE-P New Additional.

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453	<p><u>Classification of NRCs</u></p> <p>The Department concluded that Verizon MA should recover loop maintenance and field dispatch costs through the ACF.</p>	<p>See Book 1, Tab 3, Item #5 Field Dispatch</p>
Recon pg.. 86	<p>Verizon MA may assess a nonrecurring field dispatch charge for optional field dispatches requested by CLECs. The Department further directed Verizon MA to remove all costs associated with optional field dispatches from its ACF to avoid double recovery and to specify in its compliance filing those instances where a CLEC would be charged a field dispatch NRC for optional tasks and the corresponding costs for each instance.</p>	<p>Book 3, Part G-5 Network Factors MA Network Files.doc / VZ MA Network Exp Fctrs Compliance Feb 2003.xls Tab 4, column B, line 5, and tab 9, columns E through J, lines 192 through 194. Tab 4, column B, line 5 shows the costs associated with optional field dispatches that are removed from the network component of the ACF. (Note that revenue has been used as a proxy for cost.) Tab 9, columns E through J, lines 192 through 194 show the development of the Other CO and Other OSP sub-factors (components of the Network Factor). It is from these sub-factors that the costs associated with optional field dispatches were removed. This section of the spreadsheet develops an adjustment factor representing the cost of the optional field dispatches, and subtracts this adjustment factor from the Other CO and Other OSP sub-factors.</p> <p>Please also see D.T.E. No. 17, Part A, Section 3.3. Also see individual rate application sections in Part B, and Part M, Section 1.3. (Installation Dispatch – Out) .</p>

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470 Recon pg. 82	<p><u>Task Time Methodology</u></p> <p>The Department directed Verizon MA to compute a 95 percent confidence interval around each of the task times and use the low end of the 95 percent confidence interval for the task times that it uses in its NRCM. In cases in which the Department’s approach results in a negative time, Verizon MA was directed to use the minimum reported task time.</p>	<p>Book 5, VMA NRCM, Tabs “CONN TIME” and “DISC TIME” – All Work Groups for revised times - - Cells C5 through DA299 95% Confidence</p> <p>Confidence Interval with negative times set to minimum time.</p>
474 475	<p><u>Forward-Looking Adjustment Factors and Typical Occurrence Factors</u></p> <p>The Department directed Verizon MA to decrease its FLAF by 20% across the board.</p> <p>The Department concurred with Verizon MA that the number of lines is a more accurate indicator of the probability of the need for technician travel and Verizon MA was directed to include this modification.</p>	<p>Book 5, VMA NRCM, Tabs “CONN FLAF” and “DISC FLAF”.</p> <p>All Work Groups Cells C5 through DZ299 (except for exceptions)..</p>
Recon	<p><u>Forward-Looking Adjustment Factors and Typical Occurrence Factors</u></p> <p>The Department directed Verizon MA to use FLAFs of 40 percent for RCMAC Activities 2 and 5, which, when combined</p>	<p>Book 5, Tabs “CONN FL ADJ”, “DISC FL ADJ” and “CONN OCC”, and “DISC OCC”</p>

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pg. 137	with Verizon MA's typical occurrence factor of 5 percent, will yield the result that these levels of intervention occur 2 percent of the time.	Work Group RCMAC - Rows 77 and 80 Columns E through J, Y and Z
483	<p><u>OSS Efficiency: Manual Intervention and Fallout</u></p> <p>The Department directed that Verizon MA modify its NRCM to assume a fallout rate of two percent.</p>	<p>Book 5, VMA NRCM tabs “CONN FL ADJ” and “DISC FL ADJ”</p> <p>Work Group MLAC - Row 73 Columns C through DZ (except for exceptions). Also see work group RCMAC activities (FL ADJ x OCCURRENCE FACTOR = 2% or less).</p>
494	<p><u>Hot Cuts</u></p> <p>The Department directed Verizon MA to use the low end of the 95 percent confidence interval for the NRCM tasks times.</p>	<p>Book 5, VMA NRCM Tabs “CONN TIME”, “CONN OCC”, “CONN FL ADJ”, “DISC TIME”, “DISC OCC”, and “DISC FL ADJ”</p> <p>Tabs “CONN TIME” and “DISC TIME” – All Work Groups Cells C5 Through DA299.</p>
496	<p>The Department directed Verizon MA to assume OSS fallout of two percent and revise its cost calculations for these two TISOC tasks to be consistent with this directive.</p>	<p>Tabs “CONN OCC” and “DISC OCC” and “CONN FL ADJ”, and “DISC FL ADJ” – Work Group TISOC - Rows 5 and 6, Columns E&F, I&J, O&P and Y&Z.</p>
497	<p>The Department directed Verizon MA to apply a FLAF of 50 percent to these tasks, as opposed to Verizon MA’s proposed</p>	<p>Tabs “CONN FL ADJ” and “DISC FL ADJ” –</p>

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	FLAFs of 100 percent for these two tasks. The TOF for task 3, which includes travel to unstaffed central offices, shall be reduced as was discussed in more detail in Section X.E.	Work Group CO - Row 86, Columns E&F, I&J, O&P and Y&Z.
497	The Department directed Verizon MA to apply a FLAF of 60 percent to task 15, based on an expectation that Verizon MA can perform this step more efficiently in a more automated environment.	Activity #4 not #3 Tabs “CONN FL ADJ” and “DISC FL ADJ” – Work Group CO - Row 89, Columns E&F, I&J, O&P and Y&Z. Tabs “CONN FL ADJ” and “DISC FL ADJ” – Work Group CO - Row 100, Columns E&F, I&J, O&P and Y&Z.
497	Based on the Department’s directives in Section X.C, field work costs should be recovered in recurring costs and therefore, the Department directed Verizon MA to remove these tasks as well as any other field work-related tasks from the NRCM.	Tabs “CONN FL ADJ” and “DISC FL ADJ” – Work Group CO - Rows 102 – 103 , Columns E - L, O - R, and Y&Z.
497	The Department directed Verizon MA to apply a FLAF of 50 percent to RCCC task number 3.	Tabs ‘CONN FL ADJ’ and “DISC FL ADJ” – Columns E - L, O - R, and Y&Z Work Group MLAC Row 73 Work Group RCMAC Row 76.
497	The Department directed Verizon MA to apply a FLAF of 25 percent to the RCCC task number 6.	Tabs “CONN FL ADJ” and “DISC FL ADJ”– Columns E - L, O - R, and Y&Z Work Group RCCC Row 17.
498	The Department directed Verizon MA to apply a FLAF of 50	

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498	percent to RCCC Task numbers 18, 19, 20, and 21. The Department directed Verizon MA shall apply a 60 percent FLAF to Task number 33 and 34.	Tabs “CONN FL ADJ” and “DISC FL ADJ” Columns E - L, O - R, and Y&Z Work Group RCCC Rows 29 – 32. Tabs “CONN FL ADJ” and “DISC FL ADJ” – Columns E - L, O - R, and Y&Z Work Group RCCC Row 44. Tabs “CONN FL ADJ” and “DISC FL ADJ” – Columns E - L, O - R, and Y&Z Work Group RCCC - Row 45.
498	A 50 percent FLAF shall be applied to the one MLAC task, which is to “assign outside plant and central office facilities for non-flowthrough service orders” to be consistent with our OSS directives	Tabs “CONN FL ADJ” and “DISC FL ADJ” – Columns E - L, O - R, and Y&Z Work Group MLAC - Row 73 .
498	The Department directed Verizon MA to apply a 50 percent FLAF to RCMAC Task number 1 and CO Frame number 1.	Tabs “CONN FL ADJ” and “DISC FL ADJ” – Columns E , I, O, & Y Work Group RCMAC - Row 76 Work Group CO Frame - Row 86
498	The Department directed Verizon MA to apply the general directives regarding adjustment to FLAFs that were not specifically addressed and to apply task time adjustments directed in Section X.D to all task time estimates in the NRCM, including the hot cut tasks.	Tabs “CONN FL ADJ” and “DISC FL ADJ” – All Work Groups – Rows 5 through 299, Columns C through DZ (except for exceptions).

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498	The Department directed Verizon MA to develop a less costly hot cut alternative.	Please see Book 1, Tab 3, Item 4 titled Alternative Hot Cut Option Tab “Cost Summary”, Lines 3A, 4A, 5A, 6A, 9A, 10A, 19A, and 20A; Columns C through L for HOTCUT UNEs.
501	<u>Feature Port Nonrecurring Costs</u> The Department directed Verizon MA to specify a cost of \$0.65 for changes to feature port additives to be consistent with the service order costs for UNE-P orders.	Book 4, VMA NRCM, Tab “Cost Summary”, Line #28, Columns C and H – UNE Product Features - with Subsequent Service Order.
Recon pg. 90-91	<u>Access to OSS</u> The Department found no evidence to support an adjustment to Verizon MA’s historical costs nor any effort to provide such an estimate of forward-looking costs, and therefore denied Verizon MA’s motion for reconsideration regarding computer hardware costs.	Book 3, Part F-5 Workpaper 4, Page 3 Line 6: Value set to “Zero”. Workpaper 4, Page 10 Extract from ARMIS allowing allocation of costs to Massachusetts on basis of Access Lines.

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		Workpaper 4, Page 9 Calculation of levelized demand based on projection from 2002 through 2007 as provided in Exhibit ATT-VZ 4-29-2S.
518	<u>Daily Usage Files</u> The Department did not accept Verizon MA's proposed DUF charge.	Verizon MA has not included the DUF rate in the D.T.E. No. 17 tariff.