COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy upon its own motion pursuant to Section 271 of the Telecommunications Act of 1996 into the Compliance Filing of Verizon New England Inc., d/b/a Verizon Massachusetts as part of its application to the Federal Communications Commission for entry into the in-region interLATA (long distance) telephone market	)	D.T.E. 99-271

VERIZON MASSACHUSETTS

SUPPLEMENTAL MEASUREMENTS AFFIDAVIT

Dated: August 4, 2000

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SUPPLEMENTAL MEASUREMENTS AFFIDAVIT

1. My name is Beth A. Abesamis. My business address is 1095 Avenue of the Americas, New York, New York 10036. I am the Director for Wholesale Performance Assurance for Verizon New England Inc., d/b/a Verison Massachusetts ("Verizon-MA").[1] I previously filed the Measurements Affidavit on May 26, 2000 in this proceeding. My experience and responsibilities in my current position were set forth at that time.

2. My name is Julie A. Canny. My business address is 1095 Avenue of the Americas, New York, New York 10036. I am Executive Director – Operations Support and Implementation of Legal and Regulatory Requirements for Verizon

[1] Verison Massachusetts was formerly known as New England Telephone and Telegraph Company, d/b/a Bell Atlantic-Massachusetts.

Services Group (formerly Telesector Resources Group). I previously filed the Measurements Affidavit in this proceeding, and I testified at the Technical Sessions held late last year. My experience and responsibilities in my current position were set forth in the affidavit.

I PURPOSE

3. This Supplemental Measurements Affidavit is filed on behalf of Verizon-MA to update the Carrier-to-Carrier ("C2C") performance measurements that Verizon-MA is presenting to support its compliance with the Section 271 checklist through June 2000. The C2C results establish that Verizon-MA is consistently providing service to Resellers and CLECs that is at or above C2C objective levels for every measurement category, although particular individual measures may not meet the objective in some cases.

4. This Supplemental Affidavit presents results of the C2C measures for the months of March through June 2000, and provides an updated summary for the period from July 1999 through June 2000. There are five Exhibits associated with this Supplemental Measurements Affidavit, labeled G through K (Exhibits labeled A through F were associated with the Measurements Affidavit). Exhibit G1 (Summary) and Exhibit G2 (Monthly) provide the performance data to rebut claims made by the CLECs in their Supplemental Comments. The accompanying Supplemental Checklist Affidavit and the Supplemental OSS Affidavit also address Verizon-MA's performance in areas addressed by CLECs' comments. Exhibit H contains an update of Exhibit F from the Measurements Affidavit and presents a series of metrics organized by major checklist areas. In addition,

Exhibit I is a special study that demonstrates that Verizon-MA provides CLECs with the requested due-date, regardless of the standard interval. Exhibit J provides the production data for the mechanized and manual Loop Qualification process being used by Verizon-MA today. Exhibit K is a special study of interval results for 3-day LNP requests.

II PERFORMANCE MEASUREMENTS

A. Pre-Ordering

5. The C2C Pre-Ordering measurements include: (i) the response times of Verizon-MA's Operations Support Systems ("OSS"); (ii) the availability of access to OSS; (iii) the availability of support functions (*e.g.*, Contact Center); and (iv) the timeliness of Change Management notices. All of the Pre-Ordering measurements have been fully described in the Measurements Affidavit.

6. Overall performance has been good throughout the study period as shown on pages 3 and 11 of Exhibit H.

7. Recently, a response time metric was added to the C2C guidelines for an additional application-to-application interface – CORBA – used principally at this time by AT&T. Verizon-MA began reporting these results in the month of April. The response times for the CORBA interface have met the standard for all months since April.

8. C2C measurements for manual Loop Qualification and Engineering Work Order are still under development. The implementation of this C2C Loop Qualification metric requires the establishment of a pre-order transaction that does not currently exist. This needs to be prioritized and scheduled by the CLECs through the

Change Management process. Implementation has not been scheduled as of today. In the interim, however, production data for these transactions has been collected from the Digital Loop TISOC center and is included in our Exhibit J. For April through July the results for manual loop qualification show steady improvement, from 86% in April to 93% in July. The C2C measure for mechanized loop qualification is under development. Production data for these transactions has been collected and is also included in our Exhibit J. An analysis of mechanized Loop Qualification for CLECs shows response times ranging from 4.35 to 6.0 seconds. The absolute values are close to the four-second differential built into the standard.

9. The "Software Problem Resolution Timeliness" metric measures the percent of rejected Pre-Order and Order transactions reported to the Help Desk within 30 days following a software release that are resolved within the target intervals. This metric is under development and is expected to be reported with the August results.

B. Ordering

10. Ordering measurements include: (i) the timeliness of order status notices, such as confirmations, reject notices, and completion notices provided to CLECs; (ii) the percent of orders that are rejected and that flow-through for CLECs; and (iii) service order accuracy. These metrics have been fully explained in the Measurements Affidavit.

11. Pages 1, 4 and 11 of Exhibit H demonstrate an overall level of ordering service at parity or meeting objective standards. Several of the specific measurements are addressed in the Supplemental OSS Affidavit.

12. It should be noted here as well that the C2C calculated flow-through rate is significantly affected by the fact that, by design, CLEC order changes and cancellations ("supplemental orders") do not currently flow-through. This is to ensure that the CLEC's pending order is changed or stopped before implementation. In Massachusetts, these supplemental orders comprise approximately 40% of total UNE Loop/LNP orders (See Supplemental OSS Affidavit). Adjusting the C2C calculation to exclude supplements would increase the reported flow-through rate by 67%.

13. C2C calculated "reject rates" are not a measure of % rejects, but represent a ratio of rejects to confirmations, according to the definition in the Carrier-to-Carrier Guidelines. It includes multiple rejects in the numerator of the percentage calculation for a single confirmed order in the denominator (See Supplemental OSS Affidavit). The June C2C UNE reject rate is reported at 26%. When adjusted to include all submitted orders, the percentage of UNE orders not rejected is greater than 80%.

14. An additional metric adopted by the New York PSC in June 1999, measures "achieved flow-through," which is the percent of orders designed to flow-through that actually do flow-through. Verizon has been working collaboratively with members of the New York PSC staff and the Resellers/CLECs in the C2C Working Group to fine-tune appropriate exclusions for this metric. This issue

was not resolved in the August working group, and position papers will be submitted to the New York PSC on August 25. The PSC is expected to reach a decision in the fall.

15. Regarding the metric "OR-4-02 Billing Completion Notice-% On Time," performance has been reported as falling below the 95% standard for UNE in June and for Resale beginning in April. Upon investigation, we determined that the time stamp in the data feed for some notices was not being correctly populated and a default value was being assigned which was scored as a miss. Therefore, completion notices sent on-time were being counted in the reported measurements as missing the objective. The system solution to this measurement issue has been implemented and we will recalculate the April to June results.

C. Provisioning

16. Provisioning measurements include: (i) intervals in which Verizon-MA provides service; (ii) the percent of missed installation appointments; (iii) installation quality; and (iv) percent of missed installation appointments for specified order types that were given jeopardy notices. These metrics were fully defined and explained in the Measurements Affidavit.

17. Provisioning performance is discussed in the Supplemental Checklist Affidavit. However, one area of measurement concern in the reported results has been the numerous comparisons made between the "Average Offered Interval" and the "Average Completed Interval" for retail, Resale, and UNE orders. In the Measurement Affidavit, we explained the inherent weaknesses of the interval measures. (Measurements Aff. ¶¶ 58-76). Another example of potentially

misleading interval comparison results was found during a review of retail Special Services when compared with UNE DS1. A review of the months of March and April for interval offered and interval completed is shown below. It was found that ADSL services were erroneously included in the retail compare group for UNE DS1. The second table below shows the effect of removing this data from the category. Once removed, the data show that Verizon-MA is providing service to the CLECs that is at or better than parity with our retail customers. The retail compare group is in the process of being corrected, and we expect to have this corrected for the August results.

DS1	Performance Measure (C2C)	Retail	UNE
March 2000	PR1-07 Average Interval Offered	6.54	10.77
	PR2-07 Average Interval Completed	6.54	9.89
April 2000	PR1-07 Average Interval Offered	10.18	10.50
	PR2-07 Average Interval Completed	9.63	9.75

DS1	Performance Measure (w/o ADSL)	Retail	UNE
March 2000	PR1-07 Average Interval Offered	10.88	10.77
	PR2-07 Average Interval Completed	11.03	9.89
April 2000	PR1-07 Average Interval Offered	12.71	10.50
	PR2-07 Average Interval Completed	11.13	9.75

18. In addition, two factors outside of Verizon-MA's control can affect reported results for these interval measures. First, Verizon-MA does not control the due date that is requested by CLECs. CLECs may offer their customers the due date that Verizon-MA offers for a service or they may offer a longer due date. When a CLEC offers its customer the standard due date, they are supposed to code the order as a "W." Later due dated orders should be coded as "X." Therefore, if a CLEC miscodes longer requested intervals as "W" (in essence reporting that it has requested the standard interval), those incorrectly coded orders will distort the reported completion interval results for comparison purposes -- even though Verizon-MA provided service by the due date the CLEC requested.

19. Verizon-MA conducted an interval study for the months of January and February 2000 to assess the reason for the perceived interval disparity that was described in the Measurements Affidavit. Overall the study shows that the C2C interval "offered," and therefore completed (*see* Verizon-MA's low missed appointment data), is substantially distorted by CLEC-requested intervals longer than those made available by Verizon-MA. This is the "X" and "W" coding effect. When these effects are removed, it can be clearly seen that Verizon-MA is providing service in timeframes consistent with retail or standard C2C intervals, as appropriate.

20. Verizon-MA has taken a number of steps to ensure orders are coded correctly. Specifically, product intervals are communicated to CLECs via the ordering processes and interfaces that are described in the OSS Affidavit. Verizon-MA has given written instructions to CLECs and has held workshops to educate and

inform CLEC personnel on proper coding and correct product intervals. In addition, Verizon TISOC managers have reviewed coding and appointment interval issues with their CLEC counterparts. In March 2000, Verizon-MA implemented a system change for CLECs using LSOG 4 that compares the requested interval to the available interval and automatically populates the correct appointment code. This is referenced by WorldCom (Lichtenberg/Kinard/Drake Aff. ¶ 49), and over time, will diminish the effect of CLEC-miscoded orders. However, even when the order-interval coding issue is overcome, differences in order mix will still cause absolute differences between order intervals for Resale/UNE CLECs and for Verizon-MA's retail customers. This is one of the reasons that few interval measures are included in the Performance Assurance Plan adopted by the New York PSC.

21. Second, the order mix also blurs the comparison between Verizon-MA and its competitors and unfairly penalizes Verizon-MA. Verizon-MA does not have control over the types of services that are requested by CLECs. That is, Verizon-MA does not control the proportions of different types of services (the "order mix") that a CLEC or all CLECs may choose to sell to customers. Despite the fact that Verizon-MA is offering the same interval for the same products, a CLEC's average interval may appear different if the CLEC has a substantially different mix of orders than Verizon-MA. In other words, a CLEC that orders proportionately more products with longer intervals than Verizon-MA's retail customers order will have a longer average interval even though the CLEC is

receiving "parity" service, because it receives the same intervals as Verizon-MA's retail customers for the same products.

22. Verizon-MA has tested its C2C results to measure if it is providing the interval (due date) requested by CLECs. The special study contained in Exhibit I supports the fact that Verizon-MA commits to provide service to the CLECs on the requested due date, even if the request is longer than the standard published interval. For the month of June, a review of all orders, other than complex orders, placed by 68 CLECs shows that Verizon-MA confirmed the requested due date about 95% of the time. (*See* Exhibit I) (In the case of complex orders, the need for preliminary loop qualification in addition to the standard provisioning interval cycle makes the same analysis far more difficult.) In short, Verizon-MA is providing the service intervals requested by its CLEC customers. Again, there are interval differences between wholesale and retail customers, but there is no lack of parity.

23. For example, some LNP-based CLECs have claimed that they request a longer due date than the standard offered interval (3-days) because of the supposed inability of Verizon-MA to meet the standard. Therefore, we have undertaken a special study on LNP to determine if three day requests are being honored. The results of this analysis show that, for the month of June, 98.7% of 784 LSRs for 3-day requests were completed on time.

24. Importantly, Verizon-MA also measures the percent of installation appointments missed for retail, Resale, UNEs, and trunk orders. This measure captures any orders that were not completed by the committed due date for which Verizon-MA

was at fault. The reports attached to this Affidavit show that Verizon-MA generally meets the wholesale due dates more often than it meets the retail due dates – this means that the CLECs are getting service above parity. The "Percent Missed Installation Appointments" metrics thus provide a more meaningful measure of Verizon-MA's performance for CLECs than do the average interval metrics.

25. For UNE Transport or Inter-Office Facilities ("IOF"), the absolute level of performance has been strong, *e.g.*, on-time performance is well above 90%. Apparent "parity misses" in missed IOF appointments, however, arise because the measurement is made against a retail service group that is not comparable to IOF. A closer review of the retail comparison group of "Special Services" reveals that the group contains services that are not custom designed (*e.g.*, foreign exchange service) and, therefore, have a generally lower missed appointment rate. A system change to remove these non-comparable services is being implemented through the change control process. This should better align the IOF appointment metric with a comparable group of retail services.

26. Similarly, with respect to "Delay Days", the Average Delay Days for provisioning Complex UNE Loops included xDSL and 2-wire digital services in January and February. By contrast, the retail comparison group consisted mostly of retail ADSL service, which is a very different product. In addition, the Delay Days measure reported for IOF reflects very few orders. For example, in the 2Q 2000, only 12 of 177 completed orders were captured in this measure. Moreover, even these "Delay Days" are anomalies, in that they measure the time when Verizon-

MA is awaiting construction of facilities, even though Verizon-MA has no obligation to construct facilities for IOF.

27. DSL/line sharing metrics have been proposed and have reached the consensus stage in the Carrier Working Group. Measures for DSL services will be disaggregated between DSL loops and line sharing. Line sharing will be compared to service provided by Verizon-MA to its data affiliate. It is expected that these measures will be submitted to the New York PSC in the September/October time period. If these consensus items are approved, the New York PSC will issue an order to modify the guidelines. Verizon-MA will comply with the Department's directive that changes made in New York metrics will automatically be applied in Massachusetts.

28. Verizon-MA also has a measure that is under development for the percent of EEL orders on which Verizon-MA gives a jeopardy notice to CLECs indicating the possibility of a missed appointment.

D. Maintenance and Repair

29. Maintenance and Repair measurements include: (i) response time of the maintenance interface; (ii) trouble report rate; (iii) repair intervals; (iv) the percent of missed repair appointments; and (v) repair service quality.

30. The performance standard established by the C2C Guidelines for the maintenance and repair measurements is parity, except for interface response time which is parity plus no more than 4 seconds. As is the case with provisioning measurements, the "retail" comparison for interconnection trunks is IXC Feature

Group D trunks. All of the details were provided in the Measurements Affidavit. The updated results can be found in Exhibit G1, pages 25 and 26.

31. The absolute performance for UNE maintenance and repair for complex loops (2-wire digital and xDSL) has been well within the acceptable range. As discussed earlier in provisioning, the compare group for UNE complex loops is retail POTS services. This results in the appearance of not being at parity because the metric is not comparing like services. When line-sharing is implemented, the comparison with service provided to Verizon's separate data affiliate will bring the reported service levels into alignment.

E. Network Performance

32. Network Performance measurements include blockage of final trunk groups and the timeliness of fulfilling collocation requests. These metrics were fully defined and explained in the Measurements Affidavit. The updated results can be found in Exhibit G1, page 27.

V VERIZON-MA'S PERFORMANCE RESULTS SUMMARY

33. The C2C performance reports and the summary attached to this Affidavit demonstrate that Verizon-MA's performance for CLECs is strong. As in the Measurements Affidavit, we have again grouped the metrics from Verizon-MA's proposed Performance Assurance Plan into families based on the competitive "checklist" item to which they relate. The grouping is shown in Exhibit H. The vast majority of all measurements show service in parity or consistent with objective standards. Overall, the data confirm that Verizon-MA is providing high

quality service in every category: Interconnection (Trunks/Collocation); UNE OSS; UNE Loops; UNE Transport; UNE Platform; Unbundled LNP; and Resale.

34. Indeed, the only area with any apparent weakspots is in the maintenance and repair subset of UNE Loop performance. Even in this area, measurement results have been generally good where there has been measured activity, *i.e.*, Network Trouble Report Rate-Specials, Network Trouble Report Loop (POTS), % Missed Repair Appointment-Central Office, Mean Time to Repair ("MTTR")-CO Trouble, and % Repeat Reports within 30 days-POTS. Only for two cycle time measurements (MTTR-Loop Trouble and % Out-of-Service>24 hours-POTS) and % Missed Repair Appointments-Loop do the results appear less favorable for wholesale than for retail customers. Here again, however, CLEC conduct plays a significant role in creating an apparent disparity, as discussed in the Supplemental Checklist Affidavit.

VII CONCLUSION

35. The C2C Guidelines adopted by the Department are a comprehensive set of performance measurements for timeliness, reliability, and quality which show an excellent level of service being provided to competitors. Verizon's procedures and systems for collecting and reporting results for those performance measurements have been subjected to extensive review by KPMG in Massachusetts. As described in the Supplemental OSS Affidavit, a few issues identified by KPMG are being addressed and will be retested during August. The performance reports that Verizon-MA provides enable both the Department and CLECs to monitor the service Verizon-MA provides to CLECs and its own

customers. In addition, the C2C Guidelines will continue to evolve to meet changing marketplace conditions. Therefore, the Department should determine that Verizon-MA is currently in compliance with checklist requirements and that it has in-place the ability to assure continued compliance in the future.

This concludes the Supplemental Measurements Affidavit.

_____	_____
Beth A. Abesamis	Julie A. Canny
Sworn to before me This 3rd day of August 2000	Sworn to before me this 3rd day of August 2000
_____ Notary Public	_____ Notary Public