

**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 )                   D.T.E. 99-271  
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 )  
)

**VERIZON MASSACHUSETTS  
SUPPLEMENTAL OSS AFFIDAVIT**

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D.T.E. 99-271

**SUPPLEMENTAL OSS AFFIDAVIT**

1. My name is Brian Barry. My business address is 125 High Street, Boston, Massachusetts. My responsibilities and background were described in the OSS Affidavit dated May 26, 2000.
2. My name is Marilyn DeVito. My business address is 1095 Avenue of the Americas, New York, New York. My responsibilities and background were described in the OSS Affidavit.
3. My name is Paul Haven. My business address is 13100 Columbia Pike, Silver Spring, Maryland. My responsibilities and background were described in the OSS Affidavit.
4. My name is Kathleen McLean. My business address is 1320 North Courthouse Road, Arlington, Virginia 22201. I am employed by Verizon Communications as Vice President, OSS Policy and Performance Assurance within the Information Technology

organization. My responsibilities include assuring the implementation of OSS capabilities and system performance measures as required under Section 271 of the Telecommunications Act of 1996 and in fulfillment of other legal/regulatory obligations. In addition to the testimony presented herein, I also adopt the testimony of Marion C. Jordan with respect to these proceedings.

5. Prior to assuming my current responsibilities, I was Vice President for Architecture and Technology, and Vice President of Wholesale Systems within the Telecom Group Systems (“TGS”) at Verizon. In this capacity, I led a 680-person department composed of multiple technology organizations, including Systems Architecture, Call Management Technologies, Corporate Data Management, Marketing Systems and Data Warehouses, Internet Center of Excellence, and Infrastructure Support. I was also responsible for directly managing the Wholesale Systems software development districts and program management of systems development work across TGS in support of the wholesale line of business. Prior to joining Verizon, I was Vice President, Telecommunications Industry Group at American Management Systems, Inc. an international business and information technology consulting firm.
6. My name is Stuart Miller. My business address is 1095 Avenue of the Americas, New York, New York. My responsibilities and background were described in previous affidavits in this proceeding. I earlier provided testimony in this proceeding on May 24, 1999, on August 27, 1999, and on May 26, 2000, as well as at the Technical Sessions held in late 1999.
7. My name is Richard Sampson. My business address is 1 Washington Park, Newark, New Jersey, 07102. I am employed by Verizon Communications as Director, Resale and UNE Billing and Collections. My responsibilities include the oversight of bill inquiry, claims

and adjustments and collections for all resale and UNE products across the Verizon footprint.

8. Prior to assuming my current responsibilities, I held a variety of positions of increasing responsibility in Wholesale Markets, Network Services and Operations.
9. My name is Thomas Sautto. My business address is 540 Broad Street, Newark, New Jersey, 07101. My responsibilities and background were described in the OSS Affidavit.
10. My name is Sean J. Sullivan. My business address is 125 High Street, Boston, Massachusetts, 02110. My responsibilities and background were described in the OSS Affidavit. I also provided testimony in this proceeding at the Technical Sessions.
11. My name is R. Michael Toothman. My business address is 13100 Columbia Pike, Silver Spring, Maryland, 20904. My responsibilities and background were described in the OSS Affidavit.
12. This Affidavit on behalf of Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon-MA”)<sup>1</sup> responds to the various OSS claims presented by CLECs in their comments and affidavits filed July 18, 2000, in this proceeding and updates the record with respect to certain OSS issues addressed earlier. Throughout the affidavit reference is made to the Carrier-to-Carrier (“C2C”) reports filed periodically with the Department and attached to the Supplemental Measurements Affidavit.
13. There are five Exhibits associated with this Affidavit, labeled Exhibit E through Exhibit I (Exhibits labeled A through D were associated with the OSS Affidavit.)

## **I. BACKGROUND**

### **A. Verizon-MA’s OSS Are Supporting Commercial Operation Today**

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<sup>1</sup> Verizon Massachusetts was formerly known as New England Telephone and Telegraph Company, d/b/a Bell Atlantic-Massachusetts.

14. The OSS used by Verizon-MA to support CLECs are in substantial commercial use today. Seventy-nine CLECs are using them in their commercial operations in Massachusetts. There are eight CLECs using application-to-application interfaces to obtain access to these OSS, while the others use the access provided by Verizon's Web-GUI interface. In the month of June 2000 alone, these OSS supported almost 700,000 pre-order transactions, and nearly 500,000 ordering transactions in New England and New York. While many CLECs still call in their trouble reports, the electronic Repair Trouble Administration System ("RETAS") interface to Verizon-MA's maintenance and repair OSS supported 4,300 maintenance transactions per month for Massachusetts customers, with functionality that exceeds that available to Verizon-MA's retail representatives. Finally, Verizon's New England Billing OSS generates nearly 2,000 CLEC bills per month and more than 48 million call usage records per month.
15. Verizon-MA also has in place a full suite of CLEC support services. These include the TISOC service representatives who help CLECs with their orders and the Verizon System Support personnel who assist CLECs from their help desk positions. The support also includes an extensive library of publications from the CLEC Handbooks, that provide comprehensive information on how to do business with Verizon-MA to detailed technical publications that speak directly to CLEC technical and systems personnel. Verizon-MA also introduces, operates and changes the access it offers CLECs for obtaining access to its OSS in accordance with a Change Management Process developed in collaboration with CLECs and lauded by the FCC. (*Bell Atlantic Approval Order* ¶ 111)<sup>2</sup>

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<sup>2</sup> *In the Matter of Application of Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the state of New York*, CC Docket 99-295, Memorandum Opinion and Order, FCC 99-404, rel December 22, 1999 ("*Bell Atlantic Approval Order*").

**B. KPMG Has Thoroughly Reviewed Verizon-MA's OSS**

16. The Department engaged KPMG in August 1999 to evaluate Verizon-MA's OSS and the interfaces provided to CLECs in Massachusetts. Under the guidance and supervision of the Department, KPMG designed its test to address all stages of a CLEC's relationship with Verizon-MA, including initial establishment of the relationship, performing daily operations, and maintaining the ongoing relationship. KPMG included each of the potential service delivery methods a CLEC might use – Resale, UNEs, and UNE combinations – in its review. Hewlett Packard Corporation (“HPC”) built the interfaces used by KPMG based on documentation provided by Verizon-MA – the same documentation that is available to CLECs. The test focused specifically on the five OSS functional areas of pre-ordering, ordering, provisioning, maintenance and repair, and billing as well as the metrics process. In addition to the systems tests, KPMG analyzed Verizon-MA's day-to-day operations and CLEC support and operational management practices, including policy development, development of methods and procedures, and procedural change management, to determine whether the processes functioned correctly and according to documentation and expectations.
17. KPMG's test was designed to be “representative of an entire CLEC marketplace, which was much broader than that likely to be experienced by any single CLEC in the near future.” (KPMG Draft Final Report at § II.A.6)<sup>3</sup> Overall, KPMG examined 804 test points and concluded that Verizon-MA had satisfied the evaluation criteria on 799 of them – over 99%. Verizon-MA is currently resolving the issues associated with the 5 test points that were not satisfied and expects to complete this activity, including any KPMG re-testing, that may be necessary, by the end of August.

## II. PRE-ORDERING

### A. Systems and Interfaces

18. As discussed in the affidavits and testimony provided earlier by Verizon-MA, Verizon provides CLECs with the same pre-order systems and functionality in Massachusetts as in New York. The record also shows that Verizon-MA service representatives and CLEC employees obtain the same pre-ordering information from the same OSS. (Miller Aff. ¶ 23; Tr. 2046 – 64; OSS Affidavit ¶¶ 31-33.)
19. CLECs have raised very few issues with respect to preorder functionality. To begin, WorldCom<sup>4</sup> raises two issues which have already been resolved. First, WorldCom claims that a glitch in the SMARTS clock that Verizon corrected on April 16, 2000 may not have been successfully fixed because WorldCom continues to receive SMARTS clock responses with installation intervals that are too long. (WorldCom ¶ 107) In brief review, the New York PSC Staff contacted Verizon personnel on or about April 13, 2000, regarding a CLEC's allegation that it was experiencing long due-date intervals (greater than 5 days) from Verizon's pre-order Smarts Clock. The CLEC further perceived that these intervals were greater than those being offered to Verizon retail customers. Upon investigation, Verizon determined that there were discrepancies between those appointments being given by the SMARTS Clock to Verizon retail customers and those CLECs requesting appointments through the Web GUI. A root cause analysis determined that the difference in due-date intervals appeared after a February software release and affected both Web GUI and Electronic Data Interchange ("EDI") customers. Verizon determined that an information-mapping problem inadvertently affected certain

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<sup>3</sup> References to the KPMG Draft Final Report are to the July 26, 2000 version, which was provided to the participants in this case for their comments.

appointments for CLECs. For example, if a CLEC requested an “All-Day appointment” option, the SMARTS clock logic treated this as a “First Job” or “Last Job”. Consequently, the SMARTS clock factored in these limitations in providing the next available “green light” (next available appointment based on the identified conditions) date to CLECs. Until this situation was brought to Verizon’s attention, and corrective action was initiated, CLECs did experience longer “green light” availability intervals. Verizon implemented a fix the weekend of April 16, 2000. Two recent sampling efforts by Verizon indicate that the SMARTS Clock logic has been corrected and CLECs are receiving appointment availability dates consistent with Verizon retail customers. KPMG tested Verizon-MA’s pre-ordering responses for accuracy and confirmed the accuracy of the Due Date Availability responses provided by the SMARTS Clock. (KPMG Draft Final Report at § III, POP 1-6-1)

20. WorldCom also claims that the SMARTS Clock is inconsistent with business rules in that it considers an all-day appointment to mean anytime between 8:00 a.m. and 7:00 p.m., whereas the business rules state any time between 8:00 a.m. and 5:00 p.m. (WorldCom ¶ 108) Investigation of this issue when it was raised showed that this was not a business rule issue, but rather an EDI coding problem. The system was returning an incorrect value that was not consistent with the stated business rules. A correction was made and implemented on July 14, 2000.
21. Rhythms and Covad claim that “address validation continues to be a time-consuming, frustrating endeavor because it requires exact duplication of the customer’s address into the GUI.” They also state that it is difficult to ascertain the serving central office because

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<sup>4</sup> References to WorldCom are to the Lichtenberg/Sivori Affidavit filed July 18, 2000, unless otherwise specified.

that information is not provided by the GUI. (RLI/C 41 and Szafraniec/ Katzman ¶ 28)<sup>5</sup> These claims are not correct. The address validation transaction returns the local serving office NPA/NXX of the end-user customer, as well as the common language location identification (“CLLI”) of the switch serving that location. The Verizon business rules provided to CLECs explain in detail how to obtain this information. (Miller Aff. May 24, 1999, Exhibit Book 1, Tab 1; OSS Affidavit ¶ 39) Moreover, the business rules give explicit information on how to complete the address validation. For example, Covad notes that if it enters “street” instead of “St.” the order is queried back to them with an “address not valid” error message. (*Id.*) Covad is correct; in that incorrect entries will be returned with an error message. However, the pre-order business rules provide detailed information on how thoroughfares must be input to the systems. Verizon-MA retail representative must abide by exactly the same rules. If a CLEC chooses not to follow the documented business rules, it will receive an error message advising it of such mistakes.

22. Covad sets forth an unsubstantiated litany of allegations claiming that, unlike Covad, Verizon-MA has immediate access to the customer’s record and only requires his/her telephone number to ascertain whether DSL is available, can immediately confirm that a customer’s order is received, can immediately inform the customer of the due date for service, and quickly responds to service problems so that its customers’ service is not unduly delayed or interrupted. (Szafraniec/Katzman ¶ 19) The discrimination issue that Covad attempts to raise here has already been resolved with the FCC’s *Bell Atlantic Approval Order*. In fact, Covad has comparable access to the same information as Verizon-MA retail. The CSR pre-ordering transaction provides Covad and other CLECs

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<sup>5</sup> Throughout this document citations to RLI/C refer to the Comments of Rhythms Links Inc. and Covad Communications Company on Section 271 Compliance Filings of Bell Atlantic – Massachusetts and citations to

with immediate access to a customer's record. Verizon-MA also provides Covad and others with the Loop Qualification transaction to determine whether DSL is available. In addition, Verizon-MA provides Covad and others with a Local Service Confirmation ("LSRC") within the objective intervals set in the C2C guidelines, and Verizon-MA provisions service for Covad and other CLECs in parity with Verizon-MA retail. (See Section III C below and Supplemental Checklist Aff., respectively)

**B. System Performance and Volumes**

23. Pre-ordering transactions are processed through a common system used throughout the New England and New York region. During 1999, Verizon received and processed more than 2.6 million pre-order transactions from CLECs in the region. That is nearly double the volume processed during 1998. In the first half of 2000, Verizon has already received and processed more than 2.7 million pre-ordering transactions from CLECs, more than double the volume processed during the same period last year.
24. Verizon reports pre-ordering response times and interface availability in Massachusetts using the same measurements and data collection processes used by Verizon in New York. As shown in the Supplemental Measurements Affidavit, response times for pre-order transactions with direct retail equivalents consistently demonstrate results better than the "retail plus four seconds" standard established in the New York C2C collaborative. (Supp. Measurements Aff. Exhibit G1) In addition, Verizon-MA's performance has also bettered the C2C standard levels for the parsed CSR transaction which has no retail analogue. Further, excellent results have also been recorded for the Web-GUI and CORBA pre-order interfaces. (*Id.*)

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Szafraniec/Katzman refer to the Declaration of Bogdan Szafraniec and James Katzman on Behalf of Covad Communications Company.

25. In addition, Verizon-MA reports the availability of the interfaces provided to CLECs during both “prime time” (6:00 a.m. to 12 midnight Eastern time, Monday through Saturday) and “non-prime time” (12:01 a.m. to 5:59 a.m. Eastern time, Monday through Saturday; all day Sunday and holidays). As shown in the Supplemental Measurements Affidavit, the interfaces were available more than 99% of the time that they were scheduled to be available during prime time and non-prime time during the first six months of 2000 for 35 of 48 measurements, with many others close to 99% availability.
26. AT&T claims to be continuing to experience problems with the New York pre-order process. (AT&T, page 18).<sup>6</sup> AT&T utilizes the CORBA pre-ordering interface. Despite the occasional system outages that AT&T details, the CORBA systems has been available over 99% of the time it has been scheduled to be available during the first six months of 2000. (Supp. Measurements Aff. Exhibit G1) Mechanized systems are complex in that they include multiple areas where troubles could and do occur including networking, connectivity, hardware and software on both sides of the interface. However, when a problem does occur, Verizon-MA works cooperatively with the CLECs to research and resolve the problem as quickly as possible.
27. WorldCom, Z-Tel, Rhythms and Covad argue that the GUI was frequently out of service or was working slowly. (WorldCom ¶¶ 91-100, Z-Tel, Page 4, RLI/C, page 42) Verizon acknowledged that the CLECs were experiencing problems in accessing the Web GUI in a memorandum sent to the CLECs via the Change Management process on July 25, 2000. (See Exhibit E) In that memorandum, Verizon outlined three distinct problems in the Web-access hardware and the supporting infrastructure that were identified and have been corrected.

28. The first of these problems was caused by intermittent failure of the vendor software that provided authorization services to the users of the Web GUI via the Internet. The second problem was an intermittent resource issue on the servers that support the Web GUI application. Finally, there was a network router resource issue that caused temporary slowdowns in performance when the network utilization reached peak levels. Verizon corrected all three problems during May and June by installing various hardware and software changes, as outlined on Exhibit E. These changes and enhancements have improved Web GUI performance significantly. In addition to the above, the Web GUI also suffered several slowdowns and outages during this time period that were directly caused by a "Robot" that one CLEC had created to run against the Verizon system. (A "Robot" is a program designed to enter transactions automatically against a GUI interface by mimicking a human user.) The "Robot" was creating problems by entering error-prone transactions many thousand times faster than a human user could and was tying up resources on the boxes that could be used to service other user requests. When the "Robot" was discovered, Verizon immediately addressed the issue with the CLEC, who stopped using the "Robot" on the Verizon systems. As the tables and chart on Exhibit E indicate, the number of GUI trouble tickets reported from July 14 through July 20 was 15 compared to an average weekly level of 94 during the May 1 through June 22 period. Moreover, of the 15 GUI trouble tickets reported during the July 14<sup>th</sup> to 20<sup>th</sup> period, none related to a system outage.
29. During its testing, KPMG monitored instances of EDI pre-order and order interface downtime, as well as GUI interface downtime, as reported by Verizon-MA Change Control notices. KPMG found that both the pre-order and order EDI interfaces were

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<sup>6</sup> References to AT&T are to the Supplemental Comments filed on July 18, 2000.

available 100% of the scheduled hours of availability and that the Web GUI interface was available 99.85% of the scheduled hours of availability during the KPMG study period. (KPMG Draft Final Report at § III, POP 1-1-1, 1-1-2 and POP 2-1-1)

### **iii. ORDERING**

#### **A. Ordering Systems and Interfaces**

30. As earlier explained by Mr. Miller and other Verizon witnesses, the ordering systems used in Massachusetts are the same as those used by Verizon-NY. (Tr. 2152-2184) In approving Verizon-NY's Section 271 application, the FCC found that Verizon provided nondiscriminatory access to these systems in keeping with the 1996 Act's requirements.
31. Verizon-MA provides CLECs a choice of two interfaces for submitting Resale and UNE orders – EDI and the Web GUI. Currently eight carriers are using EDI in Massachusetts, and 71 are using the Web GUI. During the first half of 2000, Verizon processed over 2.5 million LSRs in New England and New York, including more than 237,000 LSRs in Massachusetts.
32. KPMG has tested Verizon-MA's ability to process normal, peak and stress order volumes and found that it satisfied all of the test criteria. (KPMG Draft Final Report at § III, POP 1) That test, together with the commercial volume of orders that Verizon-MA already is handling, confirms that Verizon-MA provides nondiscriminatory order processing to CLECs operating in Massachusetts.
33. Rhythms and Covad claim that Verizon-MA has not upgraded its internal systems to allow for line sharing on an automated, electronic basis thereby causing unnecessary delay and the potential for error. (RLI/C, page 38) Line sharing is a new and complex service offering, which was only required on May 17, 2000. Nonetheless, CLECs are able to order the service from Verizon utilizing either the Web GUI or an EDI interface. Although line

sharing is currently not a flow-through product, there is a review underway to determine the system requirements necessary to make it a flow-through product.

**B. OSS Order Flow-through/Order Reject Rates**

34. The OSS Affidavit addressed the level of CLEC orders that flow-through or are rejected in the Verizon-MA OSS. As stated therein, “flow-through” is the process by which electronically submitted CLEC orders are received and entered into the Service Order Processor (“SOP”) without manual assistance by Verizon personnel. However, the actual order flow-through rate is dependent on more than simply the number of orders designed to flow-through the system. For example, the order that the CLEC submits must contain all appropriate information for the type of request. Second, the order must pass all parameters designed for establishing the order in SOP. (OSS Aff. ¶ 53) If the order submitted by the CLEC is deficient in either respect, it will not flow through, even if the order type is theoretically supposed to do so.
35. Thus, the level of CLEC care in order preparation will result in a higher level of order flow-through for those CLECs exercising a greater level of care and conversely will result in a lower level of flow-through for those exercising less care. The importance of this factor was emphasized by the FCC in its Section 271 application approval orders for both Verizon-New York and the Southwestern Bell - Texas.<sup>7</sup>
36. Earlier, the OSS Affidavit provided evidence of the wide variation of CLEC success in achieving high order rate flow-through and low order reject rates. (OSS Aff. ¶¶ 61-63) This pattern has continued since that time. For example, one large Reseller has averaged better than 80% order flow-through and roughly 20% order reject levels in the first half

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<sup>7</sup> *Bell Atlantic Approval Order* at paras. 166-167, 175; *In the Matter of Application of SBC Communications, et al Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Service in the*

of 2000, while another has averaged 35% order flow-through and roughly 60% order reject levels.<sup>8</sup> Similarly, one UNE-based CLEC has experienced both a flow-through rate approximately 50% higher than other CLECs and a reject rate approximately 50% lower, while UNE-P carriers have experienced a range in average flow-through levels from more than 70% to more than 90% and average reject levels varying from 20% to 35% range.

37. Verizon-MA earlier detailed its efforts to increase order rate flow-through, both through system enhancements and through CLEC educational efforts such as CLEC ordering workshops. (OSS Affidavit ¶¶ 57-67)<sup>9</sup> These efforts have continued since that time and have generated a Resale order flow-through rate of 43.8% (47.1% for simple orders) in June 2000 – even with an increase of more than 40% in Resale orders since February -- and a UNE order flow-through rate of 38.5% (48.7% of simple orders), while the level of orders more than doubled over this period. (Supp. Measurements Aff. Exhibit G1)
38. Two other factors substantially affect the overall levels of CLEC order flow-through attained. The first is the number of times that CLECs change and cancel their orders *after submission* to Verizon-MA. Thus, while an order type may be eligible for flow-through, CLEC “supplements” to these orders previously submitted must be routed for manual handling by Verizon to ensure that CLEC requests to change their orders already in process are properly served. The vast numbers of such changes has put an extraordinary downward pressure on the level of overall order flow-through. For

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*State of Texas*, CC Docket 00-65, Memorandum Opinion and Order (“SWBT Approval Order”), FCC 00-238, rel. June 30, 2000 at para. 176.

<sup>8</sup> As discussed below, the C2C measured order “reject rates” used herein understate these carriers success in submitting orders for acceptance.

<sup>9</sup> As stated earlier, Verizon has developed a complete inventory of flow-through errors by individual CLEC and by mode-of-entry in order to help CLECs perform their own analyses of the specific causes that prevent the flow-through of their orders. (OSS Affidavit ¶ 67). This diagnostic tool has been made available to CLECs via New

example, approximately 7,500 of the slightly more than 20,000 UNE loop and LNP orders received from CLECs in June were cancellations or changes to the orders they previously submitted. The result of all these late CLEC order cancellations and changes was that nearly 40% of all CLEC UNE “orders” were ineligible for flow-through due to this cause alone. This adverse CLEC conduct also substantially affects Resale and UNE-P orders, since 25% of all Resale orders and 17% of all UNE-P orders during this period were simply CLEC order cancellations and changes to their previously submitted orders. Thus, the flow-through rate that Verizon-MA achieved for CLECs was effectively held far below its potential level by the CLEC’s own conduct in changing and canceling their orders.

39. To respond to this CLEC activity, Bell Atlantic will initiate a system change this month to flow-through those CLEC order cancellations where there is the least risk that the flow-through order processing will not be too late to prevent Verizon-MA’s implementation of the earlier order. Still, it will require changes in CLEC behavior to decrease the number of change orders and substantially raise the order flow-through rate.
40. The other factor that substantially affects the CLEC order flow-through rate is the product mix being ordered. WorldCom’s comments best illuminate this issue. It asks why Verizon has not raised the level of order flow-through as it said it would by making the system changes targeted last fall, and discussed in the OSS Affidavit (¶¶ 60-63). (WorldCom ¶ 127) In fact, those committed changes were directed at the flow-through of UNE-P orders and *they have had* the planned and desired effect. (OSS Aff. ¶ 56) Indeed, the overall level of flow-through attained for UNE-P orders in Massachusetts was

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York C2C subcommittee meetings. The objective is to help individual CLECs manage their ordering processes more effectively and reduce ordering errors, both of which will ultimately increase their flow-through rates.

77% in June and has been 92% in July (through July 24<sup>th</sup>). More importantly, this means that when the largest CLECs finally choose to bring their mass market UNE-P efforts to Massachusetts (as they did in New York), Verizon-MA will be readily able to flow-through the vast majority of their orders.<sup>10</sup> Here, it is also noteworthy that KPMG has confirmed that properly prepared orders designed to flow-through do in fact flow-through Verizon-MA's OSS. (KPMG Draft Final Report at § III, POP 3) Thus, the Verizon-MA flow-through rate will rise as UNE-P orders increase in Massachusetts.

41. Rhythms/Covad also speak to the flow-through issue from the perspective of a certain type of order. Specifically, these CLECs claim that Verizon has not enabled new ADSL orders to flow-through. (RLI/C 42; Szafraniec/Katzman ¶ 5) This claim is outdated. As reported in the OSS Affidavit (¶ 62), Verizon enabled the flow-through of pre-qualified UNE Loop orders in the June 17, 2000 release. A review of new ADSL orders submitted and confirmed after the June release indicate that new ADSL orders do flow-through.
42. As noted above, an order may fail to flow-through because of an error in the order itself or because the order type is not eligible for flow-through in the Verizon-MA OSS. For example, if an order fails to contain a valid due date or provides a listed address in an incorrect format, it will be rejected by the system front-end edits. In some cases, the reject is sent back to the CLEC, while in others it is sent to the TISOC for manual processing.
43. Verizon-MA measures the order "reject" rate in accordance with the C2C guidelines adopted in New York. This mode of measurement substantially overstates the true level at which orders are rejected. First, this is because it treats as "rejected" both flawed

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<sup>10</sup> See, e.g., WorldCom's statement that UNE-P will be the vehicle it uses in Massachusetts, as in New York, for mass marketing. (WorldCom ¶ 17; see, also, AT&T 9.) This statement is reinforced by Verizon's New York experience where the level of UNE-P orders currently exceeds other UNE orders by more than 600%.

orders that are returned to the CLEC for correction and resubmission and flawed orders that are sent to the TISOC for review and may be subsequently corrected by TISOC personnel and entered into the system. Even more significantly, while the C2C methodology for calculating the order reject rate reflects all order “rejects” in the numerator, it does not reflect all order submissions in the denominator. Instead, it reflects a submitted LSR only upon order confirmation, regardless of the number of versions previously submitted. Thus, a poorly prepared CLEC order that is rejected the first and second time it is submitted, before acceptance on the third submission, will show a 200% “reject rate” (two failures for 1 LSR/PON) instead of a 67% reject rate. In calculating the measurement in this way, these orders mask the success other CLECs have with their orders.<sup>11</sup>

44. Notwithstanding this measurement distortion, Verizon-MA has been able to reduce the C2C-measured level of order rejections through its educational efforts with CLECs. Thus, the measured reject rate for Resale has been reduced from 54.4% in February to 39.3% in June 2000, and for UNE orders from 28.7% in February to 26.1% in June even as Verizon-MA introduced LSOG 4 to the CLECs.<sup>12</sup> For example, the number of erroneous USOCs on Resale orders was reduced by the CLECs by more than 60% from February to June (from 389 to 137). Further, a special study conducted in June -- correcting the April and May results to include all submitted orders in the denominator -- shows that even these improved “rejection rates” are in fact substantially overstated. When the order “rejection rates” are calculated on the basis of *all orders submitted*, they

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<sup>11</sup> For example if three other CLEC orders were submitted and accepted, the reject rate would appear to be 50% (2 rejects divided by four orders), rather than 33% (2 rejects divided by 6 orders submitted) or 25% (1 PON rejected of 4 submitted).

drop for Resale from 44.3% to 33.8% (April), 48.3% to 36.6% (May) and 39.34% to 31.39% (June) and for UNEs from 26.9% to 12.5% (April), 29.1% to 18.5% (May) and 20.8% to 16.99% (June).

45. Accordingly, the order processing success rate was at least 68% for Resale and 83% for UNEs in June. We say “at least” because orders requiring manual handling by the TISOC are automatically directed by the system to the appropriate work group based on order type. There, the TISOC representatives process any orders that are not designed to flow-through or that fail to flow-through as the result of an error. Importantly, the TISOC representatives also review the flawed orders. If a discrepancy is uncovered that requires input from the CLEC, the representative sends a query to the CLEC for clarification. However, the TISOC representative will correct flawed orders where a simple and readily correctable error has been made.
46. Verizon-MA is working with CLECs to enable them to understand and correct the causes why their orders fail to flow-through. That progress will continue. But the current level of order flow-through (a level that will substantially increase with additional UNE-P orders) is more than adequately supporting CLEC competitive efforts today. The FCC has rejected the argument earlier advanced by AT&T that a very high level of order flow-through was a necessary prerequisite to Section 271 approval. (OSS Aff. ¶ 55) This argument was first rejected by the FCC in the *New York Approval Order* and its conclusion was reiterated in the *SWBT Approval Order*.<sup>13</sup> Instead, the FCC has indicated that Section 271 applicants can meet their order processing responsibilities by

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<sup>12</sup> Verizon’s continuing review of order flow-through and order rejects also earlier revealed a system error that prevented certain Resale orders from flowing through to SOP. This error was corrected in the July 19, 2000 system release.

<sup>13</sup> *New York Approval Order* at paras. 161-163; *SWBT Approval Order* at paras. 180-181.

establishing internal processes to manually handle those orders that do not flow-through promptly and accurately. As discussed below, Verizon has done so.

**C. Ordering Notices**

47. As explained in the Supplemental Measurements Affidavit, the C2C standards have set an objective benchmark for returning order confirmations or rejections for mechanized flow-through orders, whether Resale or UNE, of 2 hours; a benchmark for order confirmations or rejections for manually-handled orders for Resale or UNE POTS with fewer than 10 lines of 24 hours; and for Resale or UNE POTS with 10 lines or more of 72 hours. The C2C results from January through June 2000 show that Verizon-MA performance on flow-through orders was consistently above the 95% level. (Supp. Measurements Aff. Exhibit G1)
48. As previously discussed in the OSS Affidavit, Verizon-MA has demonstrated that it is able to staff its centers with enough representatives to handle the orders that require manual processing. Between November 1999 and July 2000, Verizon-MA increased its staffing over 126%. As a result of this force augmentation, Verizon-MA has substantially improved its confirmation and reject response times to the point where it now demonstrates outstanding service results. In fact, in June 2000, Verizon-MA provided 98.34% of all manually-processed Local Service Request Confirmations (“LSRC”) on time for Resale and 97.85% of all manually-processed LSRCs on time for UNEs. Similarly, Verizon-MA’s on time performance for all manually-processed rejects was 97.89% for Resale and 96.45% for UNEs. Moreover, Verizon-MA’s excellent performance extends as well to nearly all of the individually reported piece-part results shown in the C2C report. Indeed, in terms of the reject timeliness, the only measurement that has been below the 95% objective level, Loop/Pre-qualified/Complex/LNP, has

shown results that have consistently been in the 92% - 93% range every month since March, 2000 -- a significant increase over the prior period. This improved performance tracks with the new DSL Center commencing service and the personnel additions that were implemented. (Supp. Measurements Aff., Exhibit G1)

49. Verizon-MA's performance in the areas of order confirmation and reject timeliness refutes Rythms' and Covad's claim that the TISOC "is a bottleneck in getting loops provisioned." (RLI/C, page 42) Further, Verizon-MA's performance results for order confirmation timeliness for Loop/Pre-qualified Complex/LNP, which show that Verizon-MA's performance has exceed target for every month since January 2000, contradicts Covad's claim it has trouble obtaining due dates from Verizon-MA. (See Supp. Measurements Aff.. Exhibit G1)
50. Currently, 717 representatives are handling wholesale volumes and additional representatives can easily be added. On July 1, 2000, a new group, called the TISOC Support Center, was created to assist all of the wholesale centers with directory listings, post completion discrepancies, and facilities issues. There are 66 service representatives staffing the TISOC Support Center.
51. Covad continues on to claim that "TISOC availability is inconsistent and unreliable." (Szafraniec/Katman, ¶ 5) But the fact is that, as described above, Verizon-MA's performance on manually-processed LSRCs and rejects is strong and improving. In addition, a review of Verizon-MA's UNE Contact Center Availability for both ordering and repair shows that Verizon-MA has generally exceeded its target of answering 80% of calls within 30 seconds. Further, Covad stated that it "is often unable to obtain the status of orders or assistance with orders in a timely fashion." (*Id.*) Covad's claim is

inaccurate. The status of an order can be checked by the CLECs by utilizing the service order inquiry function.

52. Covad also alleged that the TISOC's hours of operation are not sufficient to handle CLEC volume. (*Id.*) Again, Verizon-MA's performance in terms of manually-processed LSRCs and rejects on time clearly contradicts this claim. Further, while the DSL center is open Monday through Friday from 8 a.m. to 6 p.m., a DLEC can place a DSL order through the Verizon interfaces 24 hours a day, 7 days a week. In other words, the DLECs' ability to place an order with Verizon-MA is not constrained by the TISOC's hours of operation. Covad also attempts to compare Verizon's retail DSL channel's "extended" hours of operations to the TISOC's hours of operations. (*Id.*) However, this is not a valid comparison, because Verizon-MA's residential retail DSL channel is much more similar to Covad's (or any other DLEC's) retail operations. Covad is in complete control of its own retail hours, whether they be longer, the same, or shorter than Verizon's retail DSL hours. Moreover, Verizon-MA's retail operations can only place DSL orders during its hours of operations. In fact, Verizon-MA's retail channel actually has less opportunity to place DSL orders than Covad and the DLECs, which have access to the interfaces 24 hours a day, 7 days a week.
53. Covad claims that the TISOC is not staffed to handle the volume of premium and DSL orders. Further, Covad claims that the increases in TISOC personnel have been "short term, temporarily fixes – it simply is not scaleable." (Szafraniec/Katzman, ¶ 44) Again, Verizon-MA's performance results for manually-processed orders contradicts Covad's claim. The DSL Center processing orders for the Verizon – North region currently has 122 full time service representatives. The work load of the center is monitored and personnel are added as appropriate. During the months of May and June, 60 service

representatives were added to this center. The DSL Center has not received any complaints from DLECs about gaining timely access to the center. Covad and all of the DLECs have been provided with escalation procedures and contact telephone numbers so that it can immediately raise any access issues it believes it is facing..

54. Rhythms and Covad complained that “information on order errors (called “queries”) is not complete, consistent, or provided in a timely fashion and is highly dependent on the Verizon representative who is handling the order.” (RLI/C 42-43; Szafraniec/ Katzman, ¶ 45) In May 2000, Verizon instituted a standardized query note, at the request of the CLECs. This practice provides the TISOC service representatives with a standardized list of queries, thereby ensuring that the actual message contained in a query will be the same regardless of the service representative who issues the query. A copy of the method and procedure for standardized queries is provided as Exhibit F. This exhibit contains information which is proprietary to Verizon and will be made available pursuant to the Protective Order.
55. The commentators are correct to note that Verizon-MA representatives will not always return a flawed order. As described in Verizon-MA’s response to item (d) of Information Request DTE-WorldCom 4-3, Verizon service representatives will seek to correct CLEC errors on orders when they “can easily determine, with certainty, how to correct the order by looking at the customer service record (“CSR”).” And, of course, the level of these corrections will vary based upon the level of expertise of the particular service representative handling the order. This is not a cause for complaint.
56. Covad claims that Verizon “often sends queries *months after* Covad receives a due date for the loop installation. Covad would have no reason to check the GUI for orders that it believes are complete and moved on to provisioning. When Covad fails to respond to the

queries, Covad's end users are taken out of service for no apparent reason." (RLI/C 42-43; Szafraniec/Katzman, ¶ 5) The commentators have not supplied any details to support this claim. But, to respond generally, it may be necessary for Verizon, on occasion, to query an order after the order has been confirmed based on the initial record search. For example, Verizon may subsequently determine that the assigned facilities are damaged or that a line station transfer is unavailable. In these circumstances, engineering will inform the TISOC or the provisioning center ("CLPC") that service cannot be provided. (This same situation equally impacts Verizon-MA's retail DSL operations.) The TISOC representative will then query or reconfirm the DLEC for a supplemental order to cancel the original order.

57. Covad, like all CLECs, should be checking for Verizon queries on a regular basis. As of June 2000, Verizon revised its treatment of orders in query status. Prior to June, if an order was queried and there was no response from a CLEC within three days, the order would be re-queried. Then, if the second query was not responded to by the CLEC, the order would be cancelled. Verizon no longer cancels orders in the query status, but rather allows these orders to remain in query status pending activity by the CLEC. Verizon will wait to see whether CLECs respond to these queries or simply let them accumulate. Currently, Verizon is working with the CLECs to develop a new query/cancellation procedure. However, despite Covad's claim, Verizon-MA's current, and past practice for handling orders in query status *in no way* impacts customers who are in service.

58. Z-Tel expressed concerns regarding SMARTS Clock dates for wholesale service versus retail service. Specifically, Z-Tel refers to problems it has encountered with cut through service. (Z-Tel, ¶¶ 8-10) Cut through is the term used to describe dedicated facilities for a primary residential line. Cut through service is available in Verizon – North for CLECs

and Resellers for installations of new residential lines and moves of existing residential service to an existing location. Cut through service is not available for additional lines. These same rules are applicable to Verizon's retail service.

59. Cut through availability is determined by the CLEC (requesting UNE-P) or Reseller by accessing the Address Search screen in LiveWire. If cut through availability exists, the CLEC or Reseller must make a positive entry in the expedite field on the LSOG 2 LSR and note in the remarks section that cut through facilities exist and a specific due date is requested. For LSOG 4 LSRs, the Reseller must populate the cut through field on the LSR. This will allow the order to flow Level 5. Cut through service has not yet been enabled for UNE-P orders. However, a special handling procedure has been implemented. The interim procedure requires the CLEC to populate the cut through field and the expedite field on an LSOG 4 LSR. This combination causes the LSR to drop to Level 2 processing, so that a service representative can override the SMARTS Clock date, and assign a due date of the next business day, if an error free LSR is received prior to 12 p.m., or two business days, if an error free LSR is received after 12 p.m. In the case of cut throughs, the expedite charges do not apply.
60. On July 21, 2000, Verizon issued an updated method and procedure on the cut through process. The method and procedure has been reviewed with all of the service representatives in both the Resale and the UNE-P Centers. Level 5 cut through processing for Platform services is scheduled to be implemented in December, 2000. A copy of the method and procedure for cut through service is provided as Exhibit G. This exhibit contains information which is proprietary to Verizon and will be made available pursuant to the Protective Order.

61. In short, Verizon has substantially enhanced the TISOC staffing levels and is promptly and effectively addressing those CLEC orders that do not flow through. Moreover, Verizon has made and continues to make organizational changes and operational improvements that further enhance its ability to provide effective service to CLECs.

**D. Missing Notifiers**

62. As explained in the OSS Affidavit, in late 1999, it became apparent that there was a significant problem with CLECs reporting delayed status notices. Verizon-NY corrected these problems through a series of actions taken earlier this year. (OSS Aff. ¶¶ 77-87) Since that time, Verizon-NY has shown through its daily reports to the New York PSC and weekly reports to the FCC that the problems have indeed been resolved. Both the FCC and the New York PSC have agreed. On June 6, 2000, the FCC issued a letter agreeing that Verizon had met the obligations. On July 27, 2000, the New York PSC issued its order relieving Verizon-NY from its daily reporting requirement.

63. AT&T states that it “has encountered continuing problems in New York with these notices and that “BA-MA’s allegation that 97% of all orders they received were successfully processed during the months of the so called NY Service Crisis reflects only the orders that made it to their back end systems. When Bell Atlantic’s front end application lost the orders, Bell Atlantic’s statistics never even reflected such orders.” (AT&T, 19) Verizon-MA’s assertion that 97% of New York CLEC orders were processed by Verizon-NY despite the notifier problem is correct. It does not reflect “only the orders that made it to their back-end systems” as alleged by AT&T. It reflects all orders received by Verizon-NY during the period in question. Verizon-NY can only process orders it receives. As the EDI interface is an application-to-application interface between trading partners, problems in the CLEC’s systems or the connectivity between

trading partners also can result in incomplete transmission and receipt of orders and notifiers. Under the supervision of the New York PSC, Verizon-NY performed extensive analyses with the CLECs to ensure all orders sent by the CLECs were being received by Verizon-NY. As stated earlier, the New York PSC has agreed that the problem is resolved.

64. KPMG's functional and volume tests in Massachusetts showed that Verizon-MA returned an acknowledgement to KPMG in 100% of the cases. The volume test included more than 21,000 LSRs. (KPMG Draft Final Report at § III, POP 1-4-1, and 1-5-1) Moreover, of the 21,012 order transactions sent during the volume test, KPMG indicated that 99.7% received either a LSRC or a reject message. (KPMG Draft Final Report at § III, POP 1-3-1)

**E. Order Accuracy**

65. There are three order accuracy measurements reported on the C2C reports: orders, opportunities, and LSRCs. ASCENT cited Verizon-MA's below target performance in the area of "service order accuracy." (ASCENT Comments, page 6) ASCENT has chosen not to make any reference to the other two measurements. In fact, Verizon-MA's performance in the measurement area of opportunities has consistently been far above target. For example, in June, the measurement looked at over 14,400 items or "opportunities" on the sampled order and there were only 192 errors, or a 98.67% accuracy rate. (Supp. Measurement Aff., Exhibit G1) As discussed below, Verizon-MA's performance in the area of LSRC accuracy has consistently been above target for UNE Loop and Platform and recent Resale performance is also above target. (*Id.*)
66. As described in the OSS Affidavit, in reviewing the "% Accuracy – LSRC" metric, the Wholesale Customer Care group determined that the New England Resale Center was

creating a number of LSRCs that did not carry the Account Telephone Number. An investigation into this issue revealed that some representatives were unaware that they needed to populate the Account Telephone Number field on the LSRC manually when preparing manual orders. The representatives had mistakenly assumed that this field was automatically populated. This misconception did not affect the CLEC's receipt of the LSRC. A review of the June results shows that the New England Resale Center is now populating the service orders with the correct account number 99.11% of the time.

67. The service order accuracy measurement has been a difficult metric to administer. (OSS Aff., ¶ 89) The service order accuracy metric measures "mismatches" between the last version of the LSR and the completed service order, not errors. (Measurements Aff., ¶ 48) As discussed in the OSS Affidavit (¶¶ 88-93), Verizon uncovered several issues that were negatively impacting the reported Service Order Accuracy metric. Improvements were made in the administration of the measurement and a revised method and procedure was issued in May 2000, and service representative training was completed by June 3, 2000. The results of these process improvements are just beginning to show. The June performance results for Service Order Accuracy are as follows: Resale 83%, Platform 90%, and Loop/Pre-qual 93%. While these results are not yet at the 95% target, they represent a significant improvement over the reported February 2000 results.
68. Even in the June sample, however, there were orders that pre-dated the implementation of the revised method and procedure and the completion of the service representative training. Importantly, the metric still treats all "mismatches", even those that were actually corrections by a Verizon-MA service representative and eliminated a rejection to the CLEC, are scored as an error. After correcting for both of these factors, Verizon-MA's June results are as follows: Resale 86%, Platform 92%, and Loop/Pre-qual 98%.

Further, some of the remaining “mismatches” are merely technical in nature. That is, while the field is incorrect, the customer’s service is in no way impacted, *e.g.*, an incorrect application date which *did not* result in an incorrect due date. Removing such technical “mismatches” from the adjusted June results produce the following measurements: Resale 91%, Platform 94%, and Loop/Pre-qual 98%. [Exhibit H provides the calculations supporting these adjusted June results.]

69. The fact that the results of the Service Order Accuracy measure do not reflect Verizon-MA’s actual performance is further confirmed by the results for installation quality. (Supp. Measurements Aff., Exhibit G1) Since customers submit trouble reports if the services they ordered were not installed, or were not installed correctly, if Verizon-MA were actually generating inaccurate orders, installation quality measures (*e.g.*, percent troubles reported within 30 days) would reflect this performance, and they do not.
70. Verizon-MA continues to monitor its performance in the area of service order accuracy. In July 2000, the Wholesale Customer Care group noticed that the Massachusetts service order accuracy results for Resale were not improving as dramatically as expected. Further investigation suggested that two additional groups, the Service Order Entry Center (“SOEC”) and the Service Order Entry Center Special Services (“SOECSS”) needed to be trained on the application date and due date method and procedure which was revised in May. On July 14<sup>th</sup>, the SOEC received training on the method and procedure and Verizon-MA is working with the SOECSS to address this issue. In addition, the Wholesale Customer Care group has realigned the components of its monthly service representative quality reviews to ensure that individual representatives are creating accurate service orders.

**F. Jeopardy And Completion Notices**

71. Verizon-MA currently provides Open Query System (“OQS”) reports for both provisioning and maintenance to the CLECs. Verizon-MA posts OQS reports three times each day. As a result, any status information transmitted by the Verizon-MA technician during the day to the Work Force Administration system is available with the next update. Verizon-MA retains the reports for approximately 30 days so that CLECs can go back to check on earlier reports if desired. Verizon has also implemented a temporary process whereby Verizon notifies CLECs of jeopardy situations via e-mail. Moreover, Verizon will implement an electronic jeopardy notification process via the EDI interface, as well as the Web GUI, in October.
72. Once an order is completed through the billing system, Verizon-MA provides a billing completion notice to the CLEC over the same interface used to submit the order. In addition, since August 1999, Verizon-MA also provides CLECs with an additional completion notice that is sent over the same interface used to submit the order upon completion of the actual provisioning of an order (prior to completion in the billing system). As explained in the Measurements Affidavit, the C2C Guidelines provide that Verizon-MA will return 95% of billing completion notices by noon of the day following order completion in the billing system and 95% of provisioning completion notices by noon the day following the completion of provisioning. During the first half of 2000, Verizon-MA far exceeded this standard for provisioning completion notices, returning more than 99% of UNE and Resale provisioning completion notices within the required time frame in every month. Billing completion notices have exceeded the standard in 5 out of the last 6 months for UNE and 3 of the last 6 months for Resale. (Supp. Measurements Aff., Exhibit G1) April, May and June results for Resale were 86.83%, 93.29% and 92.43% respectively. The June result for UNE was 85.05%. As explained in

the Measurements Affidavit, we determined upon investigation 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 in the measurement process. As a result, some completion notices were being counted as a miss when the completion notices were actually being sent to the CLECs on time. The problem was resolved on August 3.

73. KPMG's test in Massachusetts included a review of the completion notification process. (MTP IV-2) Of the 592 Resale and UNE provisioning completion notices received, 92.9% were received by noon one business day following the completion date. An additional 4.1% were delivered after noon on the business day following the provisioning completion date and 2.5% were delivered two business days following the completion date. KPMG indicated that 14 provisioning completion notices that it expected to receive were not received by KPMG. (KPMG Draft Final Report at § III, POP 1-4-8) Verizon-MA's analysis of the 14 provisioning completion notices not received by KPMG indicates that one was still in a query state awaiting a KPMG response, four related to a minor system glitch that was corrected on May 25, and the remaining nine were related to two additional minor system glitches which are scheduled to be fixed on August 19, 2000.
74. KPMG also evaluated the timeliness of the Billing Completion Notices ("BCN"), however, no conclusion can be reached from KPMG's evaluation because it did not utilize the appropriate C2C measurements. As KPMG indicated in its comments on POP 1-4-9, it derived a service order's Billing Completion Date from the completion date element returned within the BCN response. By contrast, the C2C objective and measurements require the use of the CRIS Bill Completion Date and time to establish the timeliness of Verizon's response. (KPMG Draft Final Report at § III, POP 1-4-9)

75. AT&T makes a series of claims regarding its LSOG 4 production testing experience in Massachusetts. (AT&T, pages 20-23) Before responding, it is important to note that it is difficult for Verizon-MA to address AT&T specific “measurements” concerning the production test because it has not been a cooperative test between two trading partners. During the initial planning and since the test has begun, AT&T has declined to share its data with Verizon or to adopt a naming convention on their orders to allow Verizon-MA to differentiate AT&T test orders from production orders. Moreover, AT&T declined to work with a Verizon test manager who would have observed the test and worked cooperatively with AT&T personnel to resolve any issues as they arose. Since it is not possible to check either specific metrics or the AT&T measurement methodology (e.g., its timeliness calculations) that AT&T quotes in its comments because Verizon-MA does not have access to AT&T’s list of orders, Verizon-MA has reviewed all AT&T orders submitted in Massachusetts from May 15 to June 17, 2000. Although this approach may capture more than just AT&T test orders, the overall numbers appear comparable to AT&T’s quoted volume of 2000 orders and should therefore represent a close match. Overall, Verizon-MA reviewed 1,996 unique LSRs submitted by AT&T in Massachusetts during the time frame specified above.
76. AT&T claims that it did not receive an acknowledgement from Verizon-MA for more than 5% of the orders sent during the high volume week of production testing in Massachusetts. (AT&T, page 20) It is difficult for Verizon-MA to determine when AT&T’s high volume week might have been. However, Verizon-MA data show that an acknowledgement was returned to AT&T for 100% of the 1,996 orders submitted. Verizon-MA can be certain of this fact because Verizon records a successful acknowledgement response only when the transmission to the 2nd party is successfully

completed. Although Verizon-MA can be certain that AT&T received acknowledgements on 100% of their orders, it cannot positively determine if AT&T read or acted on them.

77. AT&T claims that Verizon did not provide LSRCs or Rejects at all for 22% of the orders sent. (AT&T, page 21) Upon investigation of the 1,996 transactions that AT&T submitted, Verizon-MA data show that either a LSRCs or a Reject notice, as appropriate, was sent on 100% of the transactions submitted by AT&T. Again, Verizon-MA can say this with certainty since it only counts responses that are successfully received by AT&T. The EDI protocol requires CLECs to acknowledge receipt of Verizon-MA's confirmations and many CLECs follow this convention. AT&T does not follow the convention, however, so Verizon-MA is unable to positively verify that AT&T recognized or acted upon the successful receipt of confirmation and/or reject notices.
78. AT&T also claims that only 66% of the orders that should have received a LSRC actually received one within 24 hours during the highest volume week of testing. (AT&T, page 21) Again, it is difficult for Verizon-MA to determine which week was AT&T's high volume week. However, looking at the entire universe of AT&T orders during the period in question, Verizon-MA data show very different results. Verizon-MA data show that for AT&T orders submitted during the test period, Verizon returned 98.7% of the confirmations and 98.7% of the rejects on time according to C2C standards.
79. Next, AT&T claims that only 54% of the provisioning completion notices received by AT&T in its Massachusetts production testing were on time and that only 91% of all AT&T orders in the Massachusetts production testing that were eligible to be completed actually ever received either a provisioning or billing completion notice at all. AT&T further claims that only 88% of the orders received a billing completion notice." (AT&T

22) AT&T does not define its method for calculating completion notice timeliness, however, according to C2C standards, 100% of provisioning completion notifiers were delivered to AT&T on time. AT&T also does not define the term “eligible to be completed”. However, of the 1,996 LSRs that Verizon-MA reviewed, 347 were rejected and 252 were cancelled making them ineligible for completion. Without discounting those orders that had yet to be physically completed, that leaves 1,397 LSRs as “eligible for completion”. Of these, 97% received provisioning completion notifiers and 95% received billing completion notifiers.

**IV. PROVISIONING**

80. As discussed in the Checklist Affidavit, the provisioning systems and processes used for most CLEC orders are the same as those used for Verizon-MA retail provisioning. This includes all Resale, UNE-P, and new UNE loop orders other than data loops. For UNE-loop conversions (“hot cuts”), which involve physically disconnecting an end user’s loop from the Verizon-MA switch and connecting it to the CLEC’s transmission equipment, a specific coordination process has been developed between the CLEC and Verizon-MA to minimize the disruption of the customer’s service. Similarly, a specific process has been developed to deliver data loops. These are also described in the Checklist Affidavit. However, the same OSS are used to support these processes.
81. KPMG has tested the provisioning process in Massachusetts. KPMG’s tests included a Provisioning Process Parity Evaluation that reviewed the Verizon-MA processes, systems, and interfaces that provide provisioning for CLEC and Reseller orders as well as a Provisioning Coordination Process Evaluation that reviewed the procedures, processes and operational environment used to support coordinated provisioning with CLECs.

KPMG reviewed 77 individual test points associated with the provisioning process and found all of them to be satisfied. (KPMG Draft Final Report at § III, POP 6 and POP 7)

v. **MAINTENANCE AND TROUBLE REPORTING**

**A. Systems and Interfaces**

82. Verizon-MA provides CLECs with a Web GUI interface for obtaining access to Verizon-MA's maintenance and repair OSS, via a platform called Repair Trouble Administration System ("RETAS"). Approximately 250 CLECs in the Verizon region comprising the former Bell Atlantic states use the Web GUI.

**B. System Functionality**

83. KPMG has tested the Maintenance and Repair process in Massachusetts. KPMG's tests included a Functional Evaluation, a volume and stress test, as well as capacity management, process, documentation, work center support, network surveillance, coordination and work center capacity evaluations. Overall, KPMG evaluated 220 test points and found every one of them to be satisfied. (KPMG Draft Final Report at § IV)

**C. Volumes and Performance**

84. During the first half of 2000, CLECs used the interfaces serving Verizon-MA to perform an average of approximately 55,000 maintenance transactions per month, with a peak of nearly 78,000 in the normally busy month of June. CLECs have used the interfaces serving Verizon-MA to perform an average of over 4,300 maintenance transactions per month, for Massachusetts customers alone, and a peak of over 4,900 in the busy month of June.
85. During the first half of 2000, trouble reporting response times have bettered the standards in all areas and in all months with the exception of the trouble report history transaction, which was explained in the OSS affidavit. (OSS Aff. ¶119) By June however, as a result

of changes referred to in the OSS affidavit, trouble report history response times are also better than the standard. (Supp. Measurements Aff. Exhibit G1 )

86. Of the dozens of CLECs using RETAS, only Covad raised claims. Specifically, Covad claims to have many problems with RETAS and goes on to assert that trouble tickets are difficult to input and ticket status is difficult to interpret. (RLI/C, page 43 and Szafraniec/Katzman ¶ 5) Covad has not complained about RETAS in any of the forums open to CLEC comments, including the NY PSC Collaboratives on DSL and Line Sharing. Verizon provides training classes, User Guides and other documentation to help CLECs understand and use RETAS. Covad should avail itself of these resources. If Covad has issues with the system or ideas as to how to improve the performance or usability, they are encouraged to bring them to the Maintenance Process Improvement meetings that have started out of the Verizon User Group meetings. Covad has not yet done so. KPMG performed an extensive expert review of the user friendliness of RETAS and found that the procedures for entering trouble reports and receiving results was clear and understandable. (KPMG Draft Final Report at § IV, MR 1-3-3)

## **VI. BILLING**

### **A. Systems and Interfaces**

87. The billing systems Verizon-MA uses to accumulate and provide CLECs with usage billing information, including access records, are the same billing systems Verizon-MA uses for retail and interexchange carriers. Additional functionality was added to the existing systems to accommodate the billing of new usage rate elements, non-recurring and recurring charges to CLECs, and to produce the wholesale bill. Retail and wholesale call usage data is recorded at the central office switches, as appropriate. Usage information is also used in creating the wholesale bill. (OSS Affidavit ¶¶ 125-127.)

## **B. Volumes and Performance**

88. Currently, Verizon produces more than 1,500 wholesale CRIS bills and more than 300 wholesale CABS bills per month in New England. Verizon produced more than 445 million EMI records in New England in 1999. To date in 2000, Verizon has been creating more than 48 million EMI records per month in New England, a 30% increase over 1999 volumes.
89. The C2C standard for the provision of usage data is 95% within 4 business days. In New England, Verizon has exceeded this standard every month since July 1999. (Supp. Measurements Aff., Exhibit G1) The C2C standard for bill timeliness is 98% within 10 business days. Results for New England exceeded the standard for Carrier Bill Timeliness every month in 1999 and every month since March 2000. The results for January and February 2000 were explained in the OSS Affidavit. (OSS Aff. ¶ 130)
90. KPMG reviewed 170 different test points in its billing evaluation of Verizon-MA and found each of them to be satisfied. Nevertheless, CLECs raise a myriad of “issues”, many of which have already been resolved. None of these detract from Verizon-MA’s overall accomplishments, as verified by KPMG, in providing tens of thousands of bills and millions of billing records to competing carriers in Massachusetts.
91. AT&T claims that the quality of the DUF and Wholesale bills has been poor and referred to its Massachusetts production testing. Specifically, AT&T states that it found that the first outgoing DUF it received from Verizon was only 88% accurate, due to incorrectly including billing from other resellers. AT&T goes on to claim that the access DUF was also inaccurate, with 19% of the records having a mismatch between the bill time and conversation time and that the DUF was missing approximately 12% of the call records expected. (AT&T, page 28) AT&T’s 88% accuracy rate is based on a small sample size

where the DUF file that AT&T alludes to included another carrier's usage due to a typographical error where AT&T's carrier code was inadvertently entered on another carrier's order. This error resulted in that carrier's usage being provided on AT&T's DUF. Upon notification to Verizon-MA through the opening of a trouble ticket, the problem was corrected and AT&T's trouble ticket was closed. AT&T's claim regarding that 12% of the expected call records were missing from the access DUF also resulted in AT&T opening a trouble ticket with Verizon. Upon investigation, Verizon-MA determined that the data was sent to AT&T on two separate DUF files. When Verizon-MA notified AT&T of this fact, AT&T replied that it was experiencing data transmission problems on its end during the period that the files were transmitted. Verizon-MA re-sent the files at AT&T's request and this resolved AT&T's concern. Verizon-MA cannot respond to AT&T's claim regarding 19% of its records having a mismatch between billable time and conversation time because AT&T did not open a trouble ticket on this issue. As indicated earlier, it is difficult, if not impossible, to address problems encountered during a test if the test is not a completely cooperative effort between the two testing parties.

92. Next, AT&T claims that it has had numerous problems with Wholesale Billing in New York and it suggests that there may be significant billing issues in Massachusetts as well. AT&T goes on to claim that in New York, AT&T has received bills from Bell Atlantic that improperly reflect data for other resellers. (AT&T, page 28) AT&T's claims are misleading in that they would have the Department believe that it has received numerous billing data belonging to other carriers. AT&T does not have resale end-users in either New York or Massachusetts and Verizon has received no claims from AT&T stating that it has been receiving Reseller data in Massachusetts which is not its own. The one issue

in Massachusetts relating to UNE-P DUF which was reported to Verizon on May 26, 2000 was resolved on June 2, 2000 as explained above. No other incidents have been reported.

93. AT&T also alleges that its billing claims go unanswered and require follow-up by AT&T to ensure that the claims are resolved. (AT&T, page 28) This is simply not correct. Verizon personnel are in constant communication with AT&T personnel via E-mail and telephone. Claims are acknowledged within 48 hours and generally resolved within 30 days.
94. Finally, AT&T claims that in New York there are several thousand customers for whom Verizon has not recorded any usage. (AT&T, page 29) Verizon-NY was notified by AT&T that it had New York accounts for which it was not receiving any usage records. Upon investigation, Verizon-NY determined that two central office switches in New York were inadvertently recording calls on these UNE-P lines as test calls. As a result, AT&T was not billed for any of the UNE usage and the usage records were not captured on the DUF. (Access calls and operator service calls that go through a TOPS office were not impacted.) The switch issue was resolved the very next day, and AT&T has confirmed it is now receiving DUF usage on these lines.
95. WorldCom claims that Verizon-NY disconnects WorldCom customers for non-payment of the Verizon bill prior to migration to WorldCom. WorldCom claims that this practice continues even after Verizon has implemented a fix. (WorldCom, ¶ 125) Verizon-NY acknowledges that certain retail accounts that were in a non-payment status at the time of a migration to a CLEC were sometimes inadvertently disconnected for non-payment after the migration. This was due to a process glitch where Verizon-NY retail personnel were not able to ascertain that the customer had migrated to a CLEC. To rectify this problem,

a system enhancement has been defined and is scheduled for implementation in August. In the meantime, a manual process has been established to prevent these accidental disconnects for non-payment. WorldCom claims that since this manual fix was put in place in late May, Verizon-NY has “snipped” an additional 25 customers for non-payment of pre-migration bills. (*Id.*) This is simply not correct. On June 12, 2000, WorldCom sent an e-mail to Verizon apologizing for including some disconnects as “SNPs” and modified its request to include only 7 lines for investigation. (A copy of this E-mail is provided as Exhibit I. This exhibit contains information, which is proprietary to Verizon and will be made available pursuant to the Protective Order.) Upon investigation, Verizon found that only 2 had been snipped after the fix date (May 24<sup>th</sup> and May 30<sup>th</sup>). These lines were snipped in error. The remaining 5 included 2 repair issues, 2 snipped prior to the fix, and 1 that was not an active account. Contrary to WorldCom’s claims, the manual process in effect is working successfully, and will continue to work successfully until the permanent fix is implemented in mid-August of this year.

96. Next, WorldCom claims that Verizon continues to lose track of payments that WorldCom has made and states that Verizon has lost track of WorldCom payments to it after cashing WorldCom’s checks on more than 100 occasions. (WorldCom, ¶ 136) Payments remitted by large carriers such as WorldCom are often unclear as to which bill the carrier is paying. If the carrier does not enclose the payment stub for each bill that is being paid, Verizon must drop the payment out of the normal process for manual processing. In order to reconcile WorldCom’s account, Verizon has been requesting WorldCom to provide proof of payment. The initial file provided by WorldCom in June was incomplete and Verizon advised WorldCom that the account information was

missing. WorldCom forwarded a new file on July 24th and the two companies are in the process of reconciling the account.

97. Next, WorldCom claims that although it has made numerous requests for specific billing dates, Verizon continues to send bills scattered throughout the month making it impossible to know when to expect bills and to audit bills against each other. (WorldCom, ¶ 137) WorldCom's claim is unwarranted. According to Verizon's CLEC Handbook, Volume III, Section 9, CLECs may choose from a series of bill dates and WorldCom has already done just that. WorldCom's monthly bills are processed in the 4<sup>th</sup> bill period every month.
98. WorldCom makes a series of claims regarding inaccuracies on the wholesale bill and the Daily Usage Files and cites several KPMG observations and exceptions. (WorldCom, ¶¶ 138-139) WorldCom is correct in stating that KPMG identified several issues associated with billing. However, the identification of miscellaneous inaccuracies in an audit as extensive as that performed by KPMG is reasonable and should be expected. Moreover, each and every billing observation and exception identified by KPMG has been satisfactorily closed.
99. Several CLECs have expressed concerns about Line Loss Reports. (AT&T page 24, Z-Tel ¶ 8, WorldCom ¶ 111-119) Line Loss Reports are reports provided to CLECs and Verizon retail identifying end user lines that have been migrated to another CLEC or Verizon. The Line Loss Reports provided to CLECs are largely accurate, although, some issues have been identified over the past several months. Verizon is actively addressing the issues associated with the Line Loss Reports through individual meetings with CLECs and via the Change Management process. As a result of these discussions, several system enhancements have already been defined and implemented. Examples of

these changes include adding a “Customer Code” to the Line Loss Report to make an account more identifiable to the CLECs, correcting the Resale program which was inadvertently identifying certain gains as losses, correcting the Local Service Provider (“LSP”) indicator to reflect accurately where the line is migrating to, and also changing the program so that the Service Order Completion Date matches the actual effective date of the order. Additional modifications such as providing transmission over either NDM or EDI, eliminating “change of class of service” type orders as eligible for inclusion on a line loss report and others are in the process of being scheduled.

100. As indicated in the Supplemental Measurements Affidavit, Exhibit G1, from March through June, the percentage of billing dollars adjusted for CLECs has been less than BA-MA retail in April and June. In March and May, the CLEC billing adjustment rates were higher than BA-MA retail. The March results were higher due to the fact that the metric was manually calculated and elements such as DTE performance credits were included. However, according to the C2C guidelines, these credits are eligible for exclusion and therefore should have been removed from the “billing adjustment” pool. Eliminating these exclusions in the metric calculation results in a corrected billing adjustment rate of 3.69% for March. The May results were higher due to a one-time credit to a single CLEC, as a result of a settlement agreement in a civil law suit. Although this credit was captured in the measurement results due to the manner in which it is provided on the CLEC’s account, it is not the result of a billing claim or adjustment and should not be viewed in the context of Billing Accuracy. Eliminating this one time credit in the metric calculation results in a corrected billing adjustment rate of 0.22%.

## **VII. CLEC SYSTEM SUPPORT**

101. As indicated in the OSS Affidavit, on September 1, 1999, Verizon created a Vice President-led department (CLEC System Support) dedicated to supporting the full life cycle of system changes on behalf of CLEC users. This support addresses the interfaces through which the CLECs obtain access to the preorder, order/provisioning, billing, and trouble/maintenance OSS. The life cycle includes the creation and prioritization of system changes, documentation of requirements, system development, change notification and documentation, and testing. The CLEC Systems Support department is staffed with director-led groups that handle Change Management, CLEC Testing and Common Interface implementation. (OSS Affidavit ¶ 152)

**A. Change Management**

102. Verizon and the CLECs have jointly developed a region-wide Change Management Process for managing the life cycle of system changes. This process is designed to accommodate changes requested by CLECs, changes requested by Verizon, emergency changes and changes required by standards bodies or regulatory authorities. A copy of the Change Management Process document was provided with Verizon-MA's May 24, 1999 filing as Exhibit 6, Book 5, Tab 13.

103. Verizon implements a number of CLEC-impacting software releases each year. With each new planned release, Verizon produces draft detailed business rules and technical specifications describing those changes. These draft specifications are shared by electronic mail with over 500 individual CLEC users that participate in the Change Management Process.

104. Verizon-MA uses the same measurements for the Change Management process in Massachusetts as are used in New York and were commended by the FCC. (*FCC Bell Atlantic Approval Order* ¶¶ 113-118) The specific measurements are described in the

Measurements Affidavit, and the operating results are attached as Exhibit G1 to that document. These measurements show that Verizon has continued to adhere to the Change Management Process. The “Timeliness of Change Management Notice” metric requires Verizon to meet the established dates for publication of draft and final business rules and technical specifications without any subsequent material changes. As shown in the Supplemental Measurements Affidavit, Change Management Notices have been issued on time during the first half of 2000. This includes 100% performance in January, March, May and June. In February, the sole exception was the final issuance of the EDI technical specifications for LSOG 4. However, since no CLEC planned to use EDI for LSOG 4 in production immediately, this did not have a significant impact on the CLECs. In April, 80% of the Change Management Notices were issued on time and the others were delayed by only 4 days. (Supp. Measurements Aff. Exhibit G1)

105. AT&T claims that Verizon does not implement CLEC-sponsored changes as fast as Verizon-sponsored changes. (AT&T, page 25) This is not correct. Working with the CLECs, Verizon has introduced a process in which CLEC-impacting Verizon-initiated changes and CLEC-initiated changes are assigned priorities based upon agreed criteria. Once prioritized, these projects are scheduled for implementation using the priority of the change as a key-determining factor. For example, last Fall, Verizon and a number of CLECs conducted a collaborative session to address their highest priority – uniform business rules for LSOG 4. Verizon agreed to make many changes in the LSOG 4 business rules. Seventeen such changes were made with the March 1, 2000 release of LSOG 4 and 22 additional requested changes were made by July 1, 2000. When asked to prioritize these Verizon -sponsored changes along with CLEC-initiated changes, the AT&T representative refused stating that these changes would be done anyway.

Moreover, AT&T fails to mention that many of the Verizon-sponsored changes are done at the request of the CLECs. Many other Verizon-sponsored changes are as a result of regulatory action. And still many more Verizon-sponsored changes are to increase flow through which also benefit CLECs. In fact, the vast majority of Verizon-sponsored changes directly benefit CLECs or are required by regulatory action such as the FCC's *UNE Remand Order*, which again directly benefits the CLECs.

106. AT&T cites two examples of CLEC-sponsored changes which it claims were delayed (AT&T, page 26). First, AT&T claims that it and other CLECs have been requesting fielded completions for more than a year. However, when Verizon-MA offered to implement this change in December 1999, the CLECs requested the implementation be delayed because of Y2K concerns. Verizon-MA implemented fielded completions in June 2000 in advance of industry requirements.
107. The second example cited by AT&T is electronic jeopardy notifications. WorldCom also expresses concerns about the current jeopardy notification process stating that "such problems would not exist if jeopardies were transmitted via EDI." (WorldCom ¶ 122). WorldCom refers to Verizon-MA's proposal to implement jeopardy notification via EDI in phases in August and October 2000. However, after the industry agreed to move forward with this plan, WorldCom backed-out stating it could not accommodate the August implementation and asked that the change be deferred until October. Subsequently, AT&T agreed with this deferral.
108. AT&T claims that Verizon did not follow proper change control procedures during the June release testing to notify AT&T of a late change Verizon made to its business rules concerning the Account Telephone Number (ATN). (AT&T, pages 25-26) The business rule change in question changed an existing field from optional to prohibited. Prior to the

change, data populated in the field was not used by Verizon-MA. After the change, the LSR was rejected if data was populated in the field. On June 7, Verizon-MA sent an e-mail to AT&T stating that the "business rules will be modified shortly via bulletin. ... The otherwise optional phrase will be removed". The formal bulletin announcing the change was distributed on Monday June 19 -- the day after the change went into production on June 18. When notified by AT&T that it was having problems, Verizon reversed the change which resolved the problem for AT&T. Going forward, all business rule changes resulting from release testing will go through the Type 1 change notification process and will be communicated to the industry via bulletins prior to the change being introduced into production.

109. WorldCom claims that Verizon is not adhering to its Change Management process and cites KPMG Observation 55 where KPMG initially observed that from October 1, 1999 – March 28, 2000, documentation was released without providing the required 15 business days for CLEC review in 14 of 29 cases, and commented that final documentation for Type 4 changes was released without providing the required 45 calendar-days notification. in 28 of 29 cases. (WorldCom, ¶ 61) Upon review of Verizon-MA's response to this observation, KPMG recognized that Verizon-MA provided notification on time in 99% or 100% of the cases reviewed for Type 1, 2, 3, and 5 changes (KPMG Draft Final Report at § III, RMI 1-6). The result for Type 4 changes is 77% due primarily to a minor delay in the release of LSOG 4 documentation in December 1999. As KPMG notes, 100% of the Type 4 documentation was released on time for the June 2000 release. (*Id.*)
110. WorldCom claims that Verizon is not adequately assisting with the roll out of expressTRAK and is violating the Change Management process by not providing

documentation changes and holding meetings according to the plan. (WorldCom ¶ 73-86) Plans to deploy expressTRAK in Verizon-MA are currently under review. We continue to work individually with CLECs and through Change Control on specific implementation plans.

111. KPMG has tested the Change Management process in Massachusetts. KPMG's tests included a review of the process, documentation, and Verizon performance. KPMG reviewed 8 individual test points associated with the Change Management process and found all of them to be satisfied. (KPMG Draft Final Report at § VI, RMI 1)

**B. Testing Process**

112. Verizon also assists CLECs in testing the interaction of the systems and interfaces they have developed with Verizon's interfaces and OSS as part of managing the OSS life cycle. Specifically, Verizon has developed CLEC application-to-application test procedures and a totally separate test environment (CLEC Test Environment) that mirrors the actual production environment. CLECs can use the procedures and test environment to certify their software for entry into the local services market (new entrant testing) or to verify that new types of orders previously unused are entered and processed appropriately. CLECS can also use the testing environment and procedures to validate the continuity of interface capability and/or new functionality when Verizon introduces new software releases (new release testing).
113. Verizon provides dedicated test coordinators to work with CLECs on both new entrant and new release testing. The test coordinator assists the CLEC in the development of a test plan uniquely suited to the business that the CLEC operates and the functionality that it intends to use. The test coordinator oversees the execution of the test and validates results with the CLEC.

114. WorldCom complains of documentation errors in both the February and June releases and goes on to explain its negative experiences in testing LSOG 4 during the June Release testing in Pennsylvania and New York. Specifically, WorldCom claims that it found almost 80 business rule and EDI documentation errors resulting in failed test cases during its June Release testing. (WorldCom, ¶¶ 51-56) While it is impossible to be sure what is contemplated in the “80 documentation errors” that WorldCom claims existed, Verizon is aware of the following information based on a WorldCom issues log that was shared with Verizon to track our discussions: WorldCom marked 132 questions as being Order Business Rules related. Of those, 44 were not Business Rules, but rather questions regarding Verizon EDI Documentation. Of the 88 remaining questions that were Business Rules related, Verizon provided WorldCom with answers to 74 items, none of which required a correction or adjustment to the Business Rules. These are clearly not errors or omissions, but rather clarifications to WorldCom’s questions on the application of the rules to their business scenarios. Three of the remaining 14 items were administrative in nature (*e.g.*, a missed capitalization on a note), and 9 of the issues resulted in requests for enhanced functionality to support specific variations on existing business scenarios that WorldCom requested be included in the documentation. Only 2 resulted in an industry notification to correct an error.
115. Regarding its June Release testing claims, WorldCom fails to acknowledge that many of the problems it experienced resulted from WorldCom not following the agreed-upon testing process and refusing to submit test cases in a timely manner. More specifically, ten days after the agreed-upon date for the submission of test cases for the June 2000 release, WorldCom submitted an additional 44 test cases to the 29 that were submitted on time. Moreover, WorldCom did not even begin testing until May 31, 9 days after the

CLEC testing period began. On June 2nd, WorldCom indicated that 11 test cases would not be submitted until the week of June 5th and another 9 would not be submitted until the week of June 12th.

116. Throughout the testing process, WorldCom personnel stated that they would work with Verizon to resolve issues resulting from its testing. Notwithstanding this agreement, WorldCom now provides misleading information about the “success rate” of its test cases in an effort to paint a negative picture of testing. For example, WorldCom claims that on June 16, 2000, 30% of their test cases failed. This is misleading because Verizon was in the process of correcting problems identified by WorldCom the day before. As a result of WorldCom’s late start in the testing process, Verizon and WorldCom subsequently agreed to continue testing until July 1st. By that date, more than 95% of the test cases submitted in Massachusetts by WorldCom and 100% of the test cases submitted by another CLEC were successful. This CLEC then began using LSOG 4 in commercial operation in New York on June 19th. Considering only the WorldCom test cases submitted by the May 8 deadline, 100% were successful by July 1st.
117. WorldCom cites 5 specific examples of test case failures. (WorldCom, ¶ 55) The first was “the address returned on the CSR contained an abbreviation for ‘avenue’ that did not match Bell Atlantic’s business rules”. WorldCom was already aware of this expected result since WorldCom’s own minutes from a meeting in November 1999 acknowledged as much. Verizon-MA agreed to issue a clarification to the business rules. The second was “the address validation inquiry returned a different result when accessed using the customer’s telephone number than when accessed using the customer’s address.” Verizon-MA and WorldCom agreed to close this issue on June 29th as a testing abnormality resulting from the structure of a test account. The third was “the number of

characters returned in the CUSTSTRVAL field exceeded the limit specified in the documentation”. WorldCom never submitted a test case for this condition. Verizon-MA and WorldCom continue to review this issue. The fourth was “the submission of supplemental orders did not generate any response from Bell Atlantic (such as a FOC)”. By July 1, WorldCom had received all appropriate responses. The fifth was “Ringmate orders were not accepted by Bell Atlantic’s systems”. This issue was not raised until July 17th and was resolved on July 20th.

118. KPMG has conducted an extensive test in connection with Verizon-MA’s Quality Assurance testing environment. KPMG, acting as a CLEC, has utilized the test environment during the February and June Releases and has indicated that Verizon-MA has satisfied all test criteria. (KPMG Draft Final Report at § VI, RMI 2)

### **VIII. TRAINING AND ASSISTANCE FOR CLECS**

#### **A. Handbooks and Documentation**

119. As indicated in the OSS affidavit, Verizon-MA provides CLECs with extensive training and documentation to assist them in doing business with Verizon. (OSS Aff. ¶ 179) The documentation includes detailed CLEC Handbooks, which are provided on CD-ROM, advising CLECs, both Resale or facilities-based, on how to communicate effectively with Verizon’s OSS and personnel. These documents and others (such as the Web GUI User Guide) are also available on the Verizon web site and can be downloaded to a user’s PC. In addition, Verizon provides CLECs with extensive technical specification documentation enabling CLECs to program their systems for the use of EDI, including the Verizon Pre-Order EDI Guide, Verizon North Pre-Order Documentation, Verizon North Ordering Documentation and Verizon North Order EDI Guide. Further, Verizon provides CLECs with associated training on the use of the Web-GUI system for pre-

order, ordering, and maintenance and repair transactions. Also, Verizon conducts monthly flow-through workshops that provide information on how to improve order quality, reduce rejects and queries, and improve overall flow-through rates. This documentation and training underlies the active competitive environment that has seen Verizon-North process over 2.5 million CLEC orders in the first half of 2000 alone, proving that CLECs can and do successfully use Verizon documentation and interfaces.

120. Verizon's system documentation is updated as necessary to respond to CLEC needs. New and revised documentation needs arise for many reasons. For example, these needs can be driven by a CLEC's feedback based upon its reported operational uncertainty or experience. Documentation may be changed in these circumstances so that all CLECs in Verizon can benefit from this valuable feedback. As a supplier to all CLECs, Verizon is committed to communicating all changes, regardless of the size or impact, to CLECs in a timely fashion. As above, the jointly negotiated Change Management Process, in place since May 1998, ensures the timely notification of interface changes to all CLECs. Announcements and Bulletins are distributed electronically and monthly meetings are held to keep all CLECs informed of system changes.
121. In addition, as indicated in the OSS affidavit, Verizon developed the Integrated Documentation Application ("IDA"). (*Id.* ¶ 186) IDA uses the LSOG Industry Standard Guidelines as its baseline, and candles the Verizon Business Rules against those guidelines. In addition, IDA enforces consistency in naming conventions between the Business Rule form/field combinations and the Interface Specification, whether it is EDI or CORBA in the case of pre-order. Change logs are automatically generated by the application so that the CLEC is made aware of each change that is made to a new version

of the Business rules and or Interface Specification and the logs record, where appropriate, the Change request associated with the log entry.

122. In order to respond to the CLEC request to associate the Business Rule directly to the Interface Specification more easily, rather than work with two separate documents (the Rule and the Spec), IDA produces a document that combines the Business Rule with the Specification in a side-by-side format in a single document. This further simplifies the CLECs' task of programming their systems to communicate with Verizon. Verizon believes it is the first in the industry to produce such a document.
123. AT&T itself has argued to the FCC that Verizon publishes accurate and comprehensive EDI specifications. "Declaration of Nancy Dalton and Sarah DeYoung on behalf of AT&T Corp., ¶82, attached to Comments of AT&T Corp., in Opposition to Southwestern Bell Telephone Company's Section 271 Application for Texas, CC Docket No. 00-4, filed January 31, 2000.<sup>14</sup>" Moreover, KPMG's evaluation of Verizon-MA included an extensive review, as well as the continual use, of Verizon-MA documentation. This review included the pre-order and order business rules, the pre-order and order EDI guides, the CLEC Handbooks and various training manuals. KPMG's review uncovered a number of discrepancies, which is not surprising given the thousands of pages of technical documentation published. These discrepancies resulted in a series of observations and 5 exceptions and ultimately a "not satisfied" rating in POP 4-12. In all, KPMG reviewed 24 individual test points associated with Verizon-MA documentation and found all but this one to be satisfied. (KPMG Draft Final Report at § III, POP 4) Throughout the testing period and after the draft final report was issued, Verizon-MA

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<sup>14</sup> AT&T affiant states: "Unlike Bell Atlantic, SWBT has failed to publish accurate and comprehensive, SWBT-specific EDI interface documentation. While Bell Atlantic (and other BOCs) publish customized EDI specifications, SWBT does not." *Id.*

addressed each and every observation and exception noted by KPMG. As a result of these documentation corrections, Verizon-MA fully expects that the one “not satisfied” rating currently included in the draft final report to be changed to “satisfied”.

124. WorldCom claims that Verizon “fails to provide adequate assistance to CLECs in constructing their interfaces and cites documentation errors identified by KPMG in various observations and exceptions. (WorldCom, ¶ 47-50) As indicated above, all documentation related observations and exceptions identified by KPMG have been responded to by Verizon-MA and subsequently closed by KPMG.
125. In short, Verizon has provided CLECs with the handbooks, documentation and training that provide them with a meaningful opportunity to compete in Massachusetts and the KPMG test has confirmed it.

#### **B. Help Desk Support**

126. As previously described, the Bell Atlantic Systems Support (“BASS”) Help Desk “serves CLECs and Resellers operating throughout the 14 state Bell Atlantic region.” (OSS Aff. ¶ 194) It was established to provide a single point of contact for all CLEC reports of systems issues, to provide timely notification to the CLECs of such events, and to ensure that any problems are resolved as quickly as possible. The BASS Help Desk answers incoming calls from CLECs regarding the Verizon Web GUI or the Verizon OSS interfaces to CLEC provided applications. (*Id.* ¶ 194) On July 24, 2000, the BASS Help Desk moved from Silver Spring, Maryland to Newark, New Jersey. Coincident with the move the BASS Help Desk was renamed the Wholesale Customer Care Center (“WCCC”).
127. WorldCom claims that Verizon is addressing Help Desk deficiencies by creating an entirely new Help Desk in New Jersey and that this new Help Desk will have very

different procedures. (WorldCom ¶ 90) Prior to moving the Help Desk from Silver Spring to Newark, the management team at the Help Desk reviewed all of the Help Desk's methods and procedures, in the spirit of continuous improvement. As a result of this review, certain methods and procedures have been refined. In most cases, the revised method and procedure is not very different from the original. However, there were some new methods and procedures that were implemented to support new features brought on line with the opening of the Newark WCCC. For example, the ACD at the WCCC now prompts the CLECs to categorize the nature of its call, i.e., systems issue, an exception (a report of a missing notifier), a billing problem, etc. Based on the CLEC input, the ACD routes the call to the appropriate group at the WCCC, eliminating the need to transfer the CLEC call from one WCCC group to another.

128. WorldCom claims that "Bell Atlantic implicitly acknowledges that the Help Desk representatives often lack the expertise to answer questions but states that they know how to obtain the answers to these questions" and cites Verizon-MA's OSS Affidavit at ¶ 200. (WorldCom, ¶ 88) WorldCom mischaracterizes Verizon-MA's statement in the OSS Affidavit. The referenced paragraph addressed WorldCom's allegation that the Help Desk personnel lacked the expertise to answer all questions and respond to all problems. The OSS Affidavit responded to this allegation by explaining that the "help desk agents are not isolated resources within Bell Atlantic" and that in order to resolve certain issues, the agents work with subject matter experts from other Verizon departments. KPMG noted that it was satisfied with this process in its draft final report: "customer questions that are within the scope of the BASS Help Desk, but cannot be answered are referred to Bell Atlantic Subject Matter Experts." (KPMG Draft Final Report at § VI, RMI 6-2)

129. WorldCom also claims that Verizon does not provide root cause analysis of Help Desk issues and, therefore, it has “no assurance that the problem has actually been identified and will not recur.” (WorldCom ¶ 89) WorldCom’s claim is inaccurate. When a system issue occurs, the Help Desk issues an initial bulletin, which informs all CLECs of a system outage. Subsequently, the Help Desk issues update bulletins on a regular basis, which provide the status of an outage and, the Help Desk issues a final bulletin to the CLECs which informs them that the system is working properly. The Help Desk’s top priority, in terms of the final bulletin, is to inform the CLECs that they can resume normal operations. Therefore, in those cases for which the root cause analysis has not yet been fully completed, the final bulletin will indicate that the resolution is still under investigation, rather than delaying the final bulletin until the root cause analysis has been completed. However, in the case of a major outage for which the root cause analysis has been completed before the final bulletin is issued, the final bulletin will contain the resolution. A recent example of such a bulletin contained the following information: resolution – recycled parsed CSR data for WEB GUI transaction, root cause category – hardware, root cause sub-category – connectivity. Another example of Verizon performing root cause analysis can be found in Exhibit E to this Affidavit where Verizon issued a memorandum to the CLECs advising them of its findings and solutions to Web GUI downtime.
130. WorldCom next states that it has not seen any root cause analysis from the tool that Verizon implemented in November 1999 and enhanced in February 2000. (WorldCom, ¶ 89) The tool referenced in the OSS Affidavit (¶ 204) is an internal administrative tool and has been used by Verizon for root cause analysis. Moreover, the tool was upgraded

on July 24, 2000, to enable Verizon to track trouble tickets according to the ACD selection entered by the CLEC at the time of the initial call to the Help Desk.

131. Next, WorldCom states that Verizon informed CLECs that “it is still attempting to negotiate internal service level agreements needed to support the Help Desk.” (WorldCom ¶ 90) This information was provided by Verizon at the July 18, 2000, CLEC meeting regarding the opening of the Newark WCCC. However, rather than presenting a cause for concern, this is simply another example of the continuous improvement activities at Verizon. In effect, Verizon is establishing documented procedures of its own operations to ensure that the WCCC will receive a response from the Verizon department to which a trouble ticket was referred within a specific time interval. The initial response from the receiving department indicates whether or not the department accepts responsibility for the trouble ticket. If responsibility is accepted, the receiving department is committed to providing an update or the resolution of the trouble within specified time frames. The time frames vary depending upon the nature of the trouble ticket. If responsibility is declined, the WCCC will reassign the trouble ticket to the appropriate department. Verizon finalized the initial, internal service level agreements on July 20, 2000.

132. WorldCom also claims that the Help Desk fails to provide replies as promised. (WorldCom, ¶88) It is the WCCC’s policy to return all calls to CLECs as promised. Return calls, or updates, are tracked by the Tivoli Problem Management system and are monitored by the supervisors at the WCCC. It should be noted that many return calls are updates and provide the CLEC with a status of the ticket as opposed to resolution. When the ticket is closed, the WCCC again agent calls the CLEC to inform the CLEC of the resolution. For both update calls and closure calls, the agent records the name of the

CLEC contact and the date and time of the call. KPMG found that “the Call Agent regularly provides the customer with an update on the trouble ticket until the issue is resolved between the CLEC and Bell Atlantic.” (KPMG Draft Final Report at § VI, RMI 6-9)

133. AT&T and WorldCom complain that they are unable to talk directly to the Verizon technical experts. (AT&T, pages 27-28) As a general practice, the Verizon technical personnel working on trouble ticket resolution direct their efforts towards resolving open issues, rather than engaging in customer interface responsibilities. Instead, customer interaction is the responsibility of the WCCC. As described by KPMG in the Draft Final Report, “...while the situation is being addressed by the Bell Atlantic Subject Matter Experts, the Call Agent regularly provides the customers with an update on the trouble ticket until the trouble is resolved...” (KPMG Draft Final Report at § VI, RMI 6-2) However, when the situation warrants, Verizon technical experts do speak directly with the CLEC, and these conversations are generally between the Verizon technical personnel and their counterpart CLEC technical personnel.
134. AT&T also complained about frequent turnover in Verizon personnel at the System Help Desk. (AT&T, page 28) For the last few months, there has been an unusually high turnover rate in personnel at the Help Desk due to the pending move of the center from Maryland to New Jersey. With the move now complete, Verizon anticipates that the WCCC work force will stabilize. However, Verizon took specific steps to maintain performance. In fact, two of the supervisors and the manager of the WCCC were transferred from Maryland to New Jersey in order to ensure continuity. In addition, the three new supervisors each spent two weeks in training at the Silver Spring Help Desk and four of the new agents spent a month in training at Silver Spring. And, three

experienced Silver Spring agents were temporarily assigned to the Newark WCCC to “walk the floor” and provide assistance to the new agents during the center’s first two weeks of operations. Finally, all of the new agents received two weeks of training prior to the opening of the WCCC.

135. AT&T stated that it has not experienced a reduction of the turnaround time of trouble tickets since the introduction of PONTRACKER. (AT&T, page 28) Verizon-MA believes that AT&T is referring to PONTRONICS, which is an internal tracking system. One of the functions of the system, currently implemented for PONS received via EDI and processed through NetLink, is designed to track a PON through the OSS (including all inbound and outbound transaction points), to ensure that all notifiers are generated. The WCCC utilizes PONTRONICS to investigate trouble tickets associated with CLEC reported missing notifiers, the WCCC has reduced the backlog of these trouble tickets by more than 66% within the last month and has reduced the trouble ticket turnaround time to within 3 days for 97.5% of the tickets. These performance improvements would have been difficult to achieve without the use of PONTRONICS. In terms of other types of trouble tickets, for example, trouble tickets associated with slow response times and system outages, the mean time to repair is less than two hours.
136. AT&T also alleges that Verizon works around the 3-day resolution interval ordered by the FCC, with respect to New York trouble tickets involving missing notifiers, by canceling the order and requiring AT&T to resubmit. (AT&T, page 27) In the case of exceptions, which are trouble tickets reporting missing notifiers, specific information, in the proper format, must be provided by the CLEC. Incomplete or improperly formatted reports are returned to the CLECs for correction. Verizon does not close or cancel trouble tickets without resolution.

137. Finally, Z-TEL notes that the effects of a GUI outage may be exacerbated if the system support help desk has less than complete information about what the problem is or when it will be fixed. (Z-Tel, ¶ 9) Z-Tel cites a recent example, where Verizon put out a notice stating that the GUI problems were due to a hardware failure, which would be replaced during the next maintenance window, but that the individuals at the Help Desk were unable to advise when the next maintenance window would be.
138. Verizon has investigated the situation described by Z-Tel and found that what occurred was an isolated incident and misunderstanding between the Help Desk agent and the CLEC representative. The “next maintenance window” set forth in the notice referred to the daily, scheduled maintenance downtime. The CLECs have been provided with a list of these maintenance windows. When the specific agent at the Help Desk was questioned about this incident, he replied that he knew what the “next maintenance window” meant but that perhaps he was unclear in communicating this information to the CLEC representative.
139. The WCCC records and responds to all CLEC questions or issues regarding connectivity and administration of their systems interface with Verizon. Coincident with the move to Newark several process improvements were implemented. Recent efforts at the WCCC have reduced the backlog of trouble tickets and have reduced the turn around time on trouble tickets. KPMG’s findings support the fact that the WCCC is providing a satisfactory level of customer service. (KPMG Draft Final report, §VI, RMI 16 – 18)

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140. This concludes our Supplemental OSS Affidavit.