NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

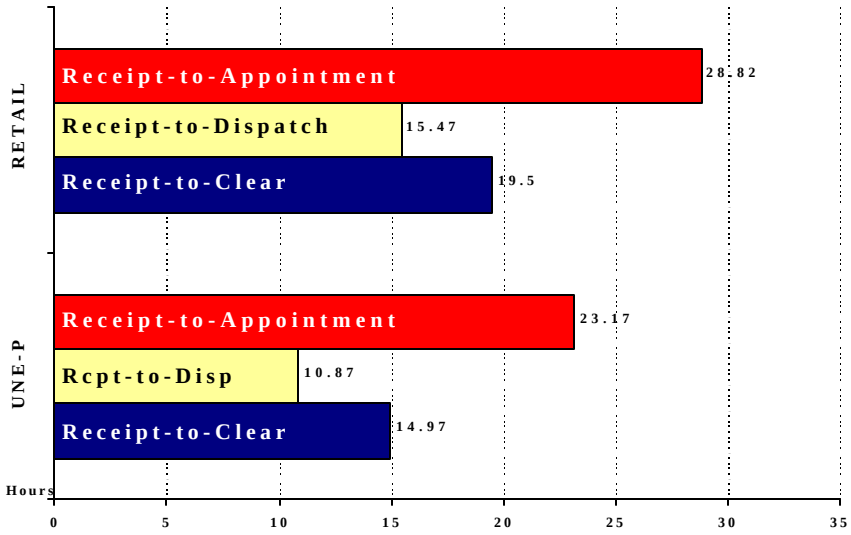
Respondent: Thomas Maguire
Title: Vice President - CLEC Operations

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: August 22, 2000

ITEM: DTE RR 321 Please recreate the chart on page 3 of exhibit 11 (entitled, "Race to Resolution") for retail as opposed to UNE-P service for the average receipt-to-appointment, receipt-to-dispatch, and receipt-to-clear intervals. Please include the number of hours for each interval.

REPLY: The following chart captures the requested information for both Retail and UNE-P service:



This chart examines Retail, non-complex (i.e., no DSL or ISDN) and UNE-P troubles attributed to the Verizon network.

As used here, the Verizon network is defined as outside wire including the drop wire (disposition code 3), cable (disposition code 4), or Central Office (disposition code 5) associated with the line in trouble.

The period reviewed is April 1 through July 31, 2000.

REPLY: DTE RR 321 The data points portrayed include:

- *Receipt-to-Appointment*: the average time, in hours, Verizon-MA *estimates* it will take to resolve the trouble. In this sense, receipt to "appointment" is to some extent a misnomer. From the perspective of this chart, the interval is effectively a receipt-to-estimated-clear time. The interval is calculated as the average time between the creation of a trouble report in Verizon's system and the commitment or "appointment" time offered to or chosen by the individual (end user for Retail or CLEC for UNE-P) issuing the trouble report. The commitment offering is set by the local center controlling the field forces. The offered interval is the same for Retail and UNE-P customers, however, requests from a customer for a longer interval are honored (e.g., request Monday repair appointment when a Saturday repair appointment is offered).

- *Receipt-to-Dispatch*: the average time, in hours, between the creation of a trouble report in Verizon's system and the first dispatch, regardless of whether this dispatch was to the Central Office or Field. (Note: In order to clear the trouble prior to the commitment or appointment offered, it is necessary to dispatch prior to the appointment.)

- *Receipt-to-Clear*: the average time, in hours, between the creation of a trouble report in Verizon's system and the resolution of the problem (i.e., completion of the repair work). The goal is to clear the trouble prior to the commitment or appointment time chosen by the customer.

As evidenced by the chart above and data table below, the three intervals for UNE-P are slightly shorter than for Retail, indicating that on average, UNE-P troubles are cleared faster than Retail.

	Receipt to …		
	Appointment	**Dispatch**	**Clear**
Retail Simple	28.82	15.47	19.50
UNE-P	23.17	10.87	14.97
Difference	**-5.65**	**-4.59**	**-4.53**

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Thomas Maguire
Title: Vice President - CLEC Operations

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: August 22, 2000

ITEM: DTE RR 322 Please see page 3 of exhibit 11: Please indicate the percentage of repeat trouble tickets included in the wholesale receipt-to-clear interval located at the bottom of this page.

REPLY: Exhibit 11 was created solely to illustrate that there are intrinsic differences between Retail and Wholesale products when it comes to completing repairs. The purpose of Chart 3 was to portray, in graph format, the major milestones in the life of a trouble ticket. The scale of the bars on that chart were drawn based on the average of April 1 through June 30, 2000 data for Retail and UNE xDSL loop troubles closed to disposition code 4 (cable). The data included both originating (initial) troubles as well as repeat reports.

The following chart summarizes repeat reports performance for all complex services for the period April 1 through July 31, 2000, inclusive of all trouble tickets closed to the Verizon-MA network (disposition codes 3, 4 & 5). Complex service includes both xDSL and ISDN - 2 Wire Digital loops. As seen in the chart, UNE Complex has had consistently lower repeat report rates than Retail Complex.

	Retail Complex	UNE Complex	Difference
Apr-00	16.00	14.40	**-1.60**
May-00	21.60	16.70	**-4.90**
Jun-00	23.00	18.30	**-4.70**
Jul-00	21.10	17.80	**-3.30**
Average	**20.46**	**16.80**	**-3.66**

NET RR# 138

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Thomas Maguire
Title: Vice President - CLEC Operations

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: August 22, 2000

ITEM: DTE RR 323 Please see page 3 of exhibit 11: Please provide the list of metrics used to create this bar chart, the period of time captured by this chart, and the exact numbers for each measurement. In addition, please provide the exact numbers for the no access and multiple dispatch rates, and the duration of the I codes for both retail and wholesale.

REPLY: As explained in Verizon-MA's reply to DTE RR 322, Exhibit 11 was created solely to illustrate that there are intrinsic differences between Retail and Wholesale products when it comes to repair. The function of Chart 3 was to portray, in graph format, the major milestones in the life of a trouble ticket. The scale of the bars on that chart were drawn based on the average of April 1 through June 30, 2000 data for Retail and UNE xDSL loop troubles closed to disposition code 4 (cable).

The milestones depicted in Chart 3 are:

- *Receipt-to-Appointment*: the average time, in hours, Verizon-MA *estimates* it will take to resolve the trouble. The interval is the average time between the creation of a trouble report in Verizon's system and the commitment or "appointment" time offered to or chosen by the individual (end user for Retail or CLEC for UNE-P) issuing the trouble report (i.e., time when the trouble is expected to be cleared). The commitment offering is set by the local center controlling the field forces. The offered interval is the same for Retail and UNE-P customers. This interval is a subset of the overall interval captured in MTTR (MR4-02).

- *Receipt-to-Dispatch*: the average time, in hours, between the creation of a trouble report in Verizon's system and the first dispatch, regardless of whether this dispatch was to the Central Office (in) or the Field (out). This interval is a subset of the

REPLY: DTE RR 323

overall interval captured in MTTR (MR4-02).

- *Receipt-to-Clear*: the average time, in hours, between the creation of a trouble report in Verizon's system and the resolution of the problem (i.e., completion of the repair work). The goal is to clear the trouble prior to the commitment or appointment time chosen by the customer. This interval is captured in the C2C reports as "Mean Time To Restore" (MR 4-02). This interval also impacts the "Missed Repair Appointments" (MR-3-01) measurement where Verizon-MA is unable to clear the trouble by the estimated or appointed time (i.e., the numerator for MRA equals the number of cases where the receipt-to-clear interval is greater than the receipt-to-appointment interval).

Looking at more comprehensive Complex (xDSL and ISDN – 2 Wire Digital) results for the period April 1 through July 31, inclusive of all trouble tickets closed to the Verizon-MA network (disposition codes 3, 4 & 5), shows that there is a 3.4 hour difference in Receipt-to-Appointment results and a 4 hour difference in Receipt-to-Dispatch results. These slight differences should be expected because on average CLECs request longer intervals more frequently than retail customers (e.g. request Monday appointments when a Saturday appointment is offered). *Choosing a Monday appointment when a Saturday appointment is offered adds 36-48 hours to the overall MTTR.* Please see Verizon-MA's Supplemental Checklist Affidavit, dated August 4, 2000, paragraphs 134-139 for a more detailed explanation of this and other intrinsic factors that drive longer repair intervals and higher missed appointment results for UNEs.

	Receipt to Appointment	**Receipt to Dispatch**	**Receipt to Clear**
Retail Complex	23.4	16.6	25.3
UNE Complex	26.8	20.6	45.4
Difference	**3.4**	**4.0**	**20.1**

More significantly, there is a 20.1 hour gap between Retail and UNE Receipt-to-Clear results. Looking specifically at the drivers highlighted on Chart 3 of Exhibit 11 for the same period shows that there is a major dissimilarity between I Code MTTR (12.3 hours on average) and the No Access rates (actually more than a ten-fold increase in the No Access

REPLY: DTE RR 323 rate for the period in question.) for UNE and retail. One of the main causes of the long I-code MTTRs for xDSL loops appears to be the CLEC's acceptance during the provisioning process of loops that cannot support the CLEC's xDSL service. More specifically, CLECs are accepting loops with preexisting cable problems and then, within a few days or weeks of accepting a "bad" loop, issuing a trouble ticket to get the loop "fixed" - knowing that Verizon will make every effort to expeditously "correct" the trouble condition, in most instances, prior to the date when the CLEC plans to provide the loop to its end user customer. While Verizon is unsure why CLECs would accept loops that immediately require maintenance work, this phenomenon may occur for one or more of the following reasons. First, a CLEC may fail to detect that the loop does not meet specifications when it conducts its acceptance testing. Second, a CLEC may choose to accept a loop that doesn't meet specifications (with the expectation that they will have to issue a trouble ticket), rather than cancel the initial order and submit a new order with the chance of running into a no-facilities situation.

Verizon analyzed DSL loop troubles reported in the month of July that had recent Service Order activity (i.e. the loop was provisioned during the June or July time frame). A total of 594 DSL loop troubles were determined to have had recent Service Order activity. The majority (59.4% or 353) of the troubles (that had recent Service Order activity) were closed to No Trouble Found codes, and thus are excluded from the metrics. Of the remainder, the vast majority of "found" trouble conditions (33% of the total troubles) were closed to cable conditions, despite the fact that over 75% of these had recent acceptance testing (and serial numbers provided) by the CLEC. In many cases, the only viable solution available to restore these types of major cable facilities problems is to reassign the loop to a new facility or, if no spare facilities are available, build new facilities. Such "maintenance" activities are unlike traditional repair work and require considerable effort and time to reengineer.

Given the fact that these troubles were reported so close to the turn-up date, and considering the extremely high percentage of cable troubles, there is very little likelihood that these types of problems had occurred subsequent to installation. (Indeed, the overall incidence of monthly trouble reports shows that in-service failure is very limited.) Rather, such loops never should have been accepted by the CLEC during the joint acceptance testing, which is the first opportunity for either Verizon or the CLEC to determine that there is a problem with the cable

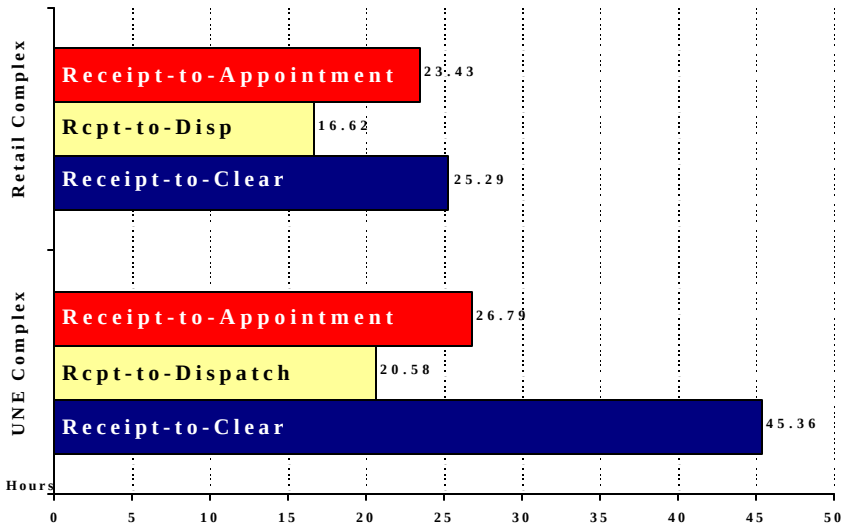
REPLY: DTE RR 323

assignment. Thus, the longer duration of CLEC repairs stems directly back to their failure to perform adequate acceptance testing during the loop acceptance process.

Though the UNE xDSL multiple dispatch rate alone is significantly higher than Retail xDSL (30.6% versus 18.6%), the total Complex average is only 6% higher in the UNE world.

	I Code MTTR	No Access Rate	Multi Dispatch Rate
Retail Complex	25.7	3.2	29.3
UNE Complex	38.0	58.9	31.1
Difference	**12.3**	**55.7**	**1.8**

Taking the more comprehensive April through July 2000 data and putting it into the format of Chart 3 yields the following:



NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Richard Sampson
Title: Director
Respondent: R. Michael Toothman
Title Director – CLEC Communications

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: August 23, 2000

ITEM: DTE RR 338 How many trouble tickets were opened from April to the present for line-loss report problems. Please indicate how many tickets were opened per month and how many telephone numbers were involved.

REPLY: The following chart identifies how many tickets were opened per month and how many telephone numbers were involved:

Month	# Trouble Tickets	# WTNs Involved	# Lines Reported on Line Loss Report	% WTNs Reported as Missing or Incorrect
April	8	5,215	370,941	1.4%
May	16	822	365,458	0.2%
June	19	2,565	412,859	0.6%
July	12	1,043	406,638	0.3%
August (8/1 to 8/25)	17	280	269,023	0.1%
TOTAL	**72**	**9925**	**1,824,919**	**0.5%**

From April to August, the number of working telephone lines ("WTNs") reported by the CLECs as allegedly missing or incorrect on the Line Loss Report ("LLR") was 9,925. This represents 0.5% of the total lines reported for this same period.

Verizon conducted an investigation of a large subset (approx. 1/3) of the 9,925 WTNs reported from April to August and found that 45% of the lines were actually provided on the LLR (see chart below). Of the other 55%, two issues were identified as causing the majority of the errors. One of these items has already been corrected through a systems change on April

24, 2000, and the other will be corrected through a systems change scheduled for September 29, 2000.

The last category on the chart (which comprises 3% of WTNs reported and which are under investigation) accounts for less than 0.02% of the more than 1.8 million lines reported on the Verizon LLR from April to August. This includes errors identified by WorldCom (10 cases) where data was mistakenly sent to the wrong CLEC. This was due to human error on a service order.

The breakdown of WTNs reported by type and current status is summarized below:

Type of Error	Status	# WTNs Involved	% of WTNs Reported
1) Reported, no error:			**45.0%**
Loss was provided on the LLR	N/A	4466	45.0
2) Reported, identified error:			**52.0%**
Billing system not providing some service order information required for the LLR.	System Change 4/24/00	4094	41.2
Not processing orders correctly when Ringmate or additional line service is being added or dropped at the time of the migration.	System Change scheduled for 9/29/00	1038	10.5
3) Reported, under investigation:			**3.0%**
Miscellaneous	TBD	327	3.3
		9925	**100.0%**

CLECs can report any troubles associated with the LLR to Verizon by calling the Wholesale Customer Care Center ("WCCC") and choosing Option 5. The WCCC logs the reported trouble and directs the associated information to a Line Loss Specialist for investigation. If a software defect is identified, a repair is scheduled as soon as possible.

When changes are going to be made to the LLR, an electronic bulletin describing the scheduled change(s) is sent out through Verizon Change Management to provide advance notification to the CLEC community.

The status of outstanding troubles and the progress being made to improve the accuracy of the Verizon LLR is discussed each month in the Industry Change Control Meetings with the entire CLEC community. In addition to these meetings, there have also been conference calls with individual CLECs to review LLR issues. On these calls, Verizon works to better understand the nature of the LLR issues identified by a CLEC. From that point forward, on-going communication (telephone and/or emails) takes place until resolution is reached.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kathleen McLean
Title: Vice President

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: August 23, 2000

ITEM: DTE RR 343 Please provide any documented presentation provided by the vendor conducting an assessment of Verizon's compliance with Software Engineering Institute Capability Maturity Model (or SEI CMM) practices (see Tr. at 2960-2962).

REPLY: At the Technical Session, Ms. McLean referred to the application of the SEI/CMM process to the development and delivery of software, of which the business rules and EDI documentation are a part. As reported at the Technical Session, the vendor, PSINet (formerly PCI/Metamor), delivered a presentation providing an overview of the SEI/CMM Level 2 assessment process to Verizon. A copy of the slides presented by the vendor are attached to this response. Following the vendor presentation, there was no further external evaluation of the process surrounding the development of business rules and EDI documentation. As stated on page 2961 of the transcript, these documents were reviewed as part of an internal assessment.

NET RR# 157