



Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
)  
Application of Verizon New England, Inc., )  
Bell Atlantic Communications, Inc. )  
(d/b/a/ Verizon Long Distance), NYNEX )  
Long Distance Company (d/b/a/ Verizon )  
Enterprise Solutions), and Verizon Global )  
Network, Inc. (collectively “Verizon”) for )  
Authorization To Provide In-Region, )  
InterLATA Services in the State of )  
Massachusetts )

Docket No. 00-176

**DECLARATION OF ROBERT WILLIAMS  
IN SUPPORT OF THE COMMENTS OF RHYTHMS NETCONNECTIONS INC.  
AND RHYTHMS LINKS, INC. IN OPPOSITION TO VERIZON’S APPLICATION  
FOR 271 AUTHORITY IN THE STATE OF MASSACHUSETTS**

**REDACTED—FOR PUBLIC INSPECTION**

1. My name is Robert Williams. I am employed by Rhythms Links, Inc. (“Rhythms”) as the Vice President and Director of Regulatory Affairs and Deployment, Eastern Region. My business address is 8605 Westwood Center Drive, Suite 300 Vienna, Virginia 22182.
2. I am responsible for negotiation, management, and execution of interconnection agreements and associated issues between Rhythms and incumbent local exchange companies (“ILECs”) in the Eastern Region of the United States. I am also responsible for all physical collocation issues between Rhythms and ILECs, including filing collocation applications, scheduling collocation, exchanges of information, billing and turn-over of collocation from ILECs to Rhythms.
3. I am also responsible for methods and procedures for ordering, provisioning, delivery, and maintenance of unbundled network element loops between Rhythms and ILECs.  
  
Specifically, I handle all of these matters for Rhythms in dealing with Verizon, Bell South,

and Sprint. I have seventeen years of business and operations experience, mostly telecommunications, working as an Officer in the United States Navy, as well as for regulated telephone companies. On August 23, 1999, I began working for Rhythms. My qualifications and prior business experiences include:

- Jan. 1999 – Aug. 1999: Senior Manager, Data Network Implementation, Global One, Reston, VA
- Dec. 1996 – Dec. 1998: Senior Manager, Local Network Implementation, MCI, Reston, VA
- Dec. 1995 – Dec. 1996: Manager, Global Project Implementation, MCI, Reston, VA
- Feb. 1994 – Dec. 1995: Project Manager, Global Project Implementation, MCI, Reston, VA
- June 1991 – Feb. 1994: Project Manager, Pfizer Inc., Parsippany, NJ
- Dec. 1983 – June 1991: Officer, United States Navy

#### **Purpose**

4. The purpose of my Declaration is to provide factual support for the Comments of Rhythms concerning Verizon's September 22, 2000 Application to provide interLATA services in the State of Massachusetts. Specifically, my Declaration addresses Verizon's collocation offerings and how they do not meet the standards of section 271; deficiencies with Verizon's OSS; xDSL metrics and the Massachusetts PAP; problems that Rhythms is experiencing with line sharing across the Verizon region; loop acceptance testing; and loop pre-qualification.

#### **Background**

5. In its Application and supporting Declarations filed with the Commission, Verizon claims that it has satisfied its 271 checklist obligations. From Rhythms assessment, this is simply not the case. In terms of the provision of advanced data services, Verizon has not met its obligations in some important respects.

6. Rhythms provides residential and business customer with access to a national, high bandwidth digital IP network that utilizes local loops from the network of the incumbent local exchange carriers (“ILECS”) for the “last mile” to the end user. Since 1997, Rhythms has deployed competitive DSL services in 58 markets or 95 metropolitan serving areas throughout the United States by collocating equipment at the premises of every ILEC and purchasing unbundled loops served for those premises.
7. In order to provide competitive DSL services to consumers across the nation and in Massachusetts, Rhythms requires access to UNEs and interconnection from Verizon and other ILECs. First, Rhythms must lease clean copper loops (*i.e.*, loops without load coils or other interferors) to provide xDSL services. In addition, Rhythms requires the ability to line share so that it can provide xDSL services to consumers in the most cost effective manner. In order to provide these services, Rhythms must be able to collocate its equipment where Verizon’s copper facilities terminate. In some instances, Rhythms also must lease transport facilities from Verizon.

#### **Collocation at Remote Terminal**

8. Verizon’s tariff offering for collocation at remote terminals does not provide Rhythms and other CLECs with a realistic opportunity to collocate equipment and serve customers out of remote terminals. When the Massachusetts Department of Telecommunications and Energy (“DTE”) first issued its decision back in March, 2000, indicating that Verizon had to allow CLECs to collocate at its remote terminals, Rhythms repeatedly asked Verizon for the methods and procedures with which Rhythms could collocate its DSLAM equipment at Verizon’s remote terminals. Rhythms made these requests to Verizon on more than one

occasion throughout the spring of 2000. Despite these repeated requests, Verizon never provided the methods and procedures we asked for.

9. Instead, in May, 2000, Verizon filed its proposed tariff on collocation at remote terminals with the DTE. That tariff offering did not provide for collocation of Rhythms' DSLAM equipment, but provided a very complicated and costly method by which CLECs technically could interconnect at Verizon's remote terminals. As a practical matter, this tariff offering was meaningless. Verizon's tariff provided only for CLECs to build separate facilities near Verizon's remote terminals on rights of way that the CLEC would need to separately negotiate. Rhythms would then need to purchase cross connections from our separate unit to the remote terminals. Moreover, because Verizon has narrowly defined the subloops that Rhythms may lease to include just metallic distribution facilities, Rhythms is unable to lease a subloop to route its traffic back to its collocation arrangement in Verizon's central office.
10. This proposal by Verizon does not offer CLECs a reasonable solution for providing service to customers served by remote terminals. Rhythms already has invested substantial sums of money – well over **\*\*BEGIN PROPRIETARY \*\*\*\*\* END PROPRIETARY\*\*** dollars -- collocating in **\*\*BEGIN PROPRIETARY \*\* END PROPRIETARY\*\*** central offices in Massachusetts. A central office, however, serves far more homes and businesses than a remote terminal, which in some instances can serve fewer than 100 customers. To require Rhythms to build facilities to separately interconnect at each of the remote terminals in Massachusetts would be prohibitively expensive. Because of this huge up-front investment that Verizon's tariff requires, Rhythms would have to forgo offering its xDSL products to customers in Massachusetts where the enduser is served out of a remote terminal.

11. A far less costly solution, and one that the Massachusetts DTE recently ordered, is to permit CLECs to plug line cards into DSLAM equipment that is located at remote terminals.<sup>1</sup> Verizon has been ordered to revise its tariff accordingly, but again, the methods and procedures by which Verizon will fulfill this obligation are still unknown.

**In-Place Conversions from Virtual to Physical Collocation**

12. In *New York*, Verizon has a tariffed offering for converting in-place virtual collocation arrangements to cageless collocation arrangements. An in-place conversion allows CLECs to convert existing virtual arrangements to physical arrangements via a paper transfer. Without the ability to perform an in-place conversion, CLECs are forced to convert using Verizon's standard procedures for establishing a collocation arrangement. Verizon's current *Massachusetts* tariff offering does not provide for in-place conversion, but instead forces a CLEC to: (1) place an application for collocation with Verizon and wait the standard interval, (2) incur the costs of purchasing redundant equipment to install in the new area to flash cut service from one collocation to another, and (3) disrupt customer service while the conversion occurs. As a result, transferring a collocation arrangement consistent with Verizon's *Massachusetts* tariff requires the time-consuming process of moving it from one place in the central office to another, with CLECs incurring unnecessarily cost and the very real potential for customer service disruption.
13. In *Massachusetts*, Verizon repeatedly has refused and thwarted Rhythms requests and efforts to perform in-place conversions at the two central offices in *Massachusetts* where Rhythms has virtual collocation arrangements – Westborough and Westford. In fact,

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<sup>1</sup> Investigation by the Department on its own motion as to the propriety of the rates and charges set forth in *Massachusetts D.T.E. No. 17*, filed with the Department by Verizon New England, d/b/a Verizon *Massachusetts*, on May 5, and June 15, 2000 to become effective October 2, 2000 in *D.T.E. 98-58-Phase III* (rel. Sept. 29, 2000) at 86-89.

Rhythms litigated this issue in the Department's examination of Verizon's collocation tariff offering and the Department agreed with Rhythms and initially ordered Verizon to implement such conversions. Verizon appealed that decision, which was ultimately stayed pending further rulemaking by the Commission on its collocation rules.

14. Rhythms has a very real business need for in-place conversions from virtual to cageless collocation. Having real-time, full access to Rhythms' collocated equipment is a necessary prerequisite to offering quality xDSL services to Massachusetts consumers. Without such access, Rhythms' ability to effectively and efficiently service its customers is jeopardized. For instance, during July, 2000, Rhythms experienced problems with its virtually collocated equipment at Westborough and Westford, which Verizon was unable to fix because their technicians could not isolate and resolve the problems. Rhythms had provided the necessary training for Verizon's technicians on the maintenance and repair of its virtually collocated equipment, but these technicians were nonetheless, unable to service the equipment properly. Following several days of customer outages, Verizon agreed to allow a Rhythms' technician to come into its central office and replace the equipment that was causing the problems in a matter of hours.
15. During the time-frame when this equipment was down, Rhythms had over 50 trouble tickets reported from its customers at these two central offices. At least 20 of those trouble tickets can be directly traced to the problems with the equipment in the virtual collocation arrangement, and the remaining troubles may also have been associated with these equipment problems. Attachment A to my Declaration are the two trouble tickets (with customer specific information removed) that became the master trouble tickets for these problems and detail the effort that was expended to resolve the equipment problems.

16. The damage to the Rhythms brand is significant. Because of the nature of marketing xDSL services, these outages will be felt more broadly than with just the existing customers served out of Westborough and Westford. We have found residential consumers often purchase DSL services based on the recommendations of their friends and neighbors. If Rhythms' existing customers in Westford and Westborough are not satisfied with their DSL service, Rhythms' ability to continue to grow its presence in these central offices as well as the broader market is hampered.

### **Collocation Power**

17. Rhythms is being harmed in a very real and substantial way by Verizon's charges for collocation power. Instead of charging Rhythms for the power that its equipment actually can use, Verizon charges Rhythms and other CLECs for the power that it makes available to CLECs, but is never used.
18. By the manufacturers design specifications, Rhythms collocation equipment can use no more than 40 amps of power. To use more power than 40 amps would place the equipment out of manufacturer specification and jeopardize its performance. Thus, Rhythms consistently requests only 40 amps of power to run this equipment.
19. It is standard industry practice for ILECs to fuse additional power to CLECs to run their collocation equipment. Thus, generally ILECs will fuse 60 amps when a CLEC requests 40 amps. Most ILECs, however, will charge CLECs for just the 40 amps that is ordered.
20. In addition to charging for fused power instead of the amount of power ordered by the CLEC, Verizon also charges CLECS for redundant power. Power is available to CLECs on two separate tracks or "feeds" -- an "A" feed and a "B" feed -- to provide for redundancy in the case of a power failure. It is standard industry practice to provide for redundant power

feeds. Rhythms does not disagree with the need for these redundant feeds (in fact, in some cases, Rhythms has requested redundancies in excess of those described). Verizon, however, charges CLECs for the power on the redundant feed. It is Verizon's policy to charge CLECs for the 60 amps that are fused on both the "A" feed and the "B" feed as well as any redundant feeds. As a result, with Rhythms additional redundancies, Verizon charges Rhythms for 240 amps of power when its equipment only requires – and can only use – 40 amps of power.

### OSS

21. Rhythms uses both Verizon's web GUI and EDI interfaces in Massachusetts for critical OSS functions, including pre-ordering and line sharing. Verizon's GUI does not function properly on a regular basis. Verizon regularly will send e-mails out notifying users that the GUI is down or operating at a slower rate due to overloads. These GUI problems directly affect Rhythms' ability to effectively and efficiently serve its own customers by unnecessarily delaying orders.
22. Rhythms also experiences difficulties with Verizon's EDI. Files have been erroneously deposited into Rhythms VAN mailbox. When questioned, Verizon told Rhythms to ignore these erroneous messages. Rhythms orders also continue to be rejected by EDI, this time for defective characters. Trouble tickets were opened by Rhythms on this issue in, but Verizon has yet to perform a root-cause analysis to isolate the cause of these problems.
23. Rhythms' experience reveals that the systems for both DSL and line sharing are still very much manual. While Verizon may claim otherwise, the DSL provisioning process is manual. The OSS functions for line sharing will not be automated until some time during the first half of 2001. Verizon continues to work with Telecordia to automate its line sharing OSS, and through the arbitration process, Rhythms has received commitments from Verizon that will

enable it to review the Telecordia contract, thus providing Rhythms necessary information about Verizon's future OSS and allowing Rhythms to therefore plan for its own system enhancements. Together, Verizon and Rhythms have developed an implementation schedule for automated OSS in key Verizon states, however, none of these OSS will be ready for launch until the end of the first quarter, or even second quarter, of 2001.

24. Because Verizon's DSL and line sharing OSSs are not automated, Rhythms is more reliant on the Verizon TISOC than it would otherwise be if orders flowed through the system. Covad specifically requested that the hours of the TISOC be expanded to accommodate the increased volumes that Covad expected as a result of the implementation of line sharing. Rhythms likewise raised this issue during the technical sessions. Verizon, however, has steadfastly refused to expand the TISOC's hours.
25. This refusal by Verizon can severely impede Rhythms' ability to provide service to its customers. If Rhythms submits an order on a given morning and the TISOC queries back to Rhythms that afternoon (which it is very likely to do, in Rhythms' experience), if Rhythms is unable to return that call by 4:00 Denver time, Verizon's TISOC will be closed and the issue will not be resolved until the following day. Verizon's TISOC is only open from 8:00am to 6:00pm, Eastern Standard Time. Rhythms and its customers, however, operate well beyond those hours.
26. The Verizon Helpdesk recently was transformed to the Wholesale Helpdesk. With this transformation, however, Rhythms has seen no improvements in the overall operations of Verizon's Helpdesk. In Rhythms' experience, Verizon's Helpdesk is inadequately staffed. Information is often reported incorrectly by Helpdesk personnel, returned calls are infrequent, and trouble ticket information often is input incorrectly. In short, Verizon's

Helpdesk needs some help. Additional training is required along with an overall commitment to providing quality service to its wholesale customers. Since the transition from Helpdesk to Wholesale Helpdesk, Rhythms continues to experience problems receiving callbacks in a timely manner and when it has escalated the issue within Verizon, has not received a root-cause analysis of the problems.

27. Since commencing line sharing, Rhythms also has found that Verizon's representatives in its CLEC centers (the TISOCs, RCMC, and RCCC) require training on line sharing issues. When Rhythms recently submitted a trouble report on one line shared order in the Verizon South region, Rhythms was told by a Verizon representative, that line sharing would not be available in Verizon south until December, 2000.
28. The problems that Rhythms is experiencing with Verizon's OSS may not appear to be substantial taken alone, but each issue impedes Rhythms ability to service its customers effectively and efficiently. Collectively, these issues, some of which have been occurring for some time, provide a clear picture of Verizon's overall lack of commitment to the wholesale area. Some of these issues could easily be resolved, enabling Verizon's wholesale customers to more effectively serve its own customers. Verizon's refusal to remedy the problem, therefore, is rather telling. If Verizon were not likewise competing to provide xDSL services to the same customers that Rhythms is, one has to wonder if Verizon's responses to Rhythms' and other data CLECs' problems would be more proactive.

#### **DSL Metrics**

29. I understand that this will be the first application in which Verizon's xDSL performance will be evaluated by the Commission. Since that application was approved last year, specific performance metrics for provisioning xDSL-capable loops have been established in New

York through the New York collaborative proceeding. The Massachusetts DTE adopted the xDSL and other metrics that were developed in the New York collaborative for use in Massachusetts.

30. I have personally been involved in the New York collaborative proceeding since its inception in August, 1999, and am knowledgeable about the development of the xDSL metrics because of the importance of these measures to Rhythms' ability to successfully operate in the Verizon region. I realize that in its Application and supporting Declarations, Verizon attempts to explain some of its poor performance by placing blame with how the metric is measured, or what is (or is not) excluded from it. The Commission must not give credence to these assertions.
31. Verizon representatives were intimately involved in the development of all the metrics (and for Verizon, not just the xDSL metrics) during the New York collaborative proceeding. Just as I was concerned about how the metrics would impact Rhythms' ability to operate effectively, you can be assured that Verizon was equally concerned about its own operations and ability to secure 271 approval based on those metrics. In fact, it was incumbent upon Verizon to initially propose the metrics that the collaborative participants then discussed and evaluated prior to their adoption in New York and then Massachusetts. For Verizon now to claim that these very metrics – the same ones it proposed -- are not appropriate to measure its xDSL performance is disingenuous at best.

#### **The Massachusetts PAP**

32. After Verizon received 271 approval in New York, its performance declined. It failed to fulfill certain obligations consistent with the Telecommunications Act as articulated by this Commission. Verizon failed to send its CLEC customers many order acknowledgments,

Firm Order Confirmations and Notices of Completion. As a result, Rhythms and other CLECs were left without critical information to process their customer orders. Without this vital information, Rhythms and other CLEC's ability to compete with the service offerings of Verizon-NY was threatened.

33. Under the New York PAP, upon which the Massachusetts PAP is based, Verizon's wholesale performance with regard to DSL services is measured by only four metrics, all contained within the Critical Measures subgroup. These measures are: "PO-8-01: Manual Loop Qualification Response Time," "PO-8-02: Engineering Record Request Response Time," "PR-4-14 through PR-4-18: Missed Appointment metrics for DSL Services," and "PR-6-01: Installation Troubles for DSL capable loops reported within 30 days." For the first two of these metrics, Manual Loop Qualification Response Time and Engineering Record Request Response Time, Verizon has not even started to report performance for them. The New York PAP currently contains no line sharing metrics, and thus the Massachusetts PAP is similarly lacking.

34. DSL is the fastest growing sector of the telecommunications market and line sharing promises to expedite that growth even further. Without DSL as a separate MOE category to the Massachusetts PAP, DSL and line sharing issues will not be adequately protected following Verizon's 271 approval in the state. Likewise, without adding additional Critical Measures for DSL and line sharing, the Massachusetts PAP will be unable to protect against backsliding by Verizon in these critically important areas following its entry into long distance in Massachusetts

### Line Sharing

35. Simply stated, Verizon is not ready for line sharing! The FCC's June 6<sup>th</sup> deadline came and went, and now, over four months after that deadline, Verizon *still* is not ready for line sharing. Verizon's section 271 Application should not be approved by the Commission without proof that Verizon is indeed prepared to offer line sharing to CLECs in Massachusetts. In Rhythms' estimation, this evidence is wholly lacking.
36. Following issuance of the Commission's *Line Sharing Order* and as part of the New York collaborative proceeding, Verizon and various CLECs established an implementation schedule to prepare central offices throughout the Verizon region for line sharing. That implementation schedule is attached hereto as Attachment. B. The pre-wiring work that is entailed with preparing central offices for line sharing is not insubstantial, but Rhythms pays Verizon to perform this pre-wiring and Verizon committed, consistent with this Commission's *Line Sharing Order*, that the work would be complete in Massachusetts by June 6<sup>th</sup>.<sup>2</sup>
37. In addition to the pre-wiring work, however, in order to offer line sharing, Verizon's cable and pair inventory system must be updated once the pre-wiring work is complete to reflect that those cables and pairs are available for line sharing.
38. As Rhythms recently began to offer line sharing across the Verizon region, it learned that Verizon's central office pre-wiring was not complete. In some cases it appears that the

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<sup>2</sup> Central office pre-wiring work entails re-terminating existing cables and pairs between Verizon's MDF and, because Rhythms has chosen to place splitters in the collocation arrangement, the splitter in Rhythms cage. The work effort itself is not extensive, but because of the number of CLECs and central offices involved, the implementation plan was established. Attached hereto as Attachment C is a diagram that Rhythms has used in various state arbitrations to demonstrate the network configuration for line sharing when the splitter is contained in the CLEC's cage. The green line from the ILEC MDF to the CLEC's splitter allows both voice and data traffic coming from the Verizon's network to be routed to the CLEC splitter. The voice traffic is then split off from the data traffic and is sent back to the ILEC MDF for further routing. Rhythms can then proceed to route the data traffic that remains.

wiring work was never done, while in others it may have been done incorrectly or the cable and pair inventory was not updated appropriately. For instance, Rhythms had five orders for the Brighton, Massachusetts central office. Four of these order were rejected or had troubles reported, because the Brighton, central office was not wired as Verizon had promised. On the afternoon of October 10, Verizon reported that the central office pre-wiring work was complete for Massachusetts, but that New York was not yet complete and that many states in the Verizon footprint were no better than 70% complete.

39. Rhythms also recently learned that Verizon's inventory system has not been populated with all of the latest cable and pair assignment information. As a result, even if the wiring was done correctly, if this inventory has not been populated, Rhythms can not order line sharing, because the cable and pair that have been pre-wired to its splitter can not be located, and therefore, do not indicate that they support line sharing.
40. In addition Rhythms has experienced problems with line sharing OSS. Rhythms receives multiple firm order confirmations (FOCs) on its orders and due dates well beyond the standard interval.
41. The combination of these issues drove Rhythms to commence regular telephone conferences with Verizon to address the multitude of problems we have been having with Verizon's line shared orders. Attached hereto as Attachment D are the minutes from a recent telephone conference Rhythms had with Verizon on these issues. Verizon has worked cooperatively to resolve these issues, but its cooperation appears to be motivated, at least in part, by its 's pending 271 application. In fact, Rhythms learned that Verizon is putting all of its resources towards addressing line sharing issues in Massachusetts, resulting in even worse performance and readiness in other Verizon states, including New York.

42. These line sharing problems have an adverse impact on Rhythms ability to meet some of its direct customers' needs. For instance, Rhythms works with Internet Service Providers ("ISPs") partners who have a direct relationship with the enduser in many instances. ISPs have been eagerly awaiting the promises of line sharing to bring less expensive and more quickly provisioned DSL service to consumers. With the repeated failures of Verizon to process and install Rhythms' line sharing orders in a timely manner, Rhythms' ISP partners (many of whom partner with different DSL providers, including potentially Verizon, itself) have yet to be convinced that line sharing with Verizon is a realistic opportunity

#### **Acceptance Testing**

43. In its Application, and previously during the technical sessions in Massachusetts, Verizon alleged that data CLECs are inappropriately accepting loops that cannot support line sharing, and then opening up trouble tickets on these orders. When Rhythms learned of this allegation, it immediately verified with its internal business people that it performs acceptance testing on all loops that it accepts from Verizon and does not accept loops that are not working properly. Once Rhythms verified this information with its internal business people, we confirmed it with Verizon as well. Verizon verified that Rhythms was not one of the CLECs that it alleges accepts bad loops.

44. As a result, Rhythms can state unequivocally that it does not accept bad loops. As to Verizon's allegations concerning other CLECs, without carrier-specific reports, Rhythms has no means of testing these assertions.

45. If Verizon calls Rhythms to engage in cooperative testing and Rhythms does not respond immediately, it is my understanding that Verizon technicians will contact Verizon's RCCC and close the order with Rhythms as complete. If Rhythms then tests that loop and if the test

is successful, we proceed with the installation. If, however, the test is not successful, Rhythms has no other recourse than to open a trouble ticket on that loop.

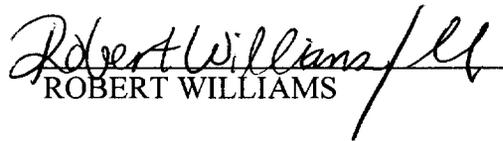
### **Loop Qualification**

46. In its Application, Verizon makes some allegations relating to loop qualification that must be clarified. Verizon's mechanized database, which CLECs can use for loop pre-qualification, was developed for Verizon's retail ADSL offering. Verizon's ADSL product is available only on loops up to 15,000 feet. The mechanized database originally was not very robust, but as more and more CLECs perform manual loop qualification, and this information is added to the mechanized database, it has become a more useful tool. Nonetheless, it does not contain all of the loops in Verizon's network. As a result, a negative result from the mechanized database could mean that the loop is not yet in the database or that the loop is longer than 15,000.
47. For Rhythms, which offers xDSL services on loops up to 18,000 feet, a negative response or "red light," from the mechanized loop database does not necessarily mean that it can not serve that customer. In order to perform a manual query, however, to determine whether the "red light" from the mechanized database resulted merely because the loop was not contained in the database or because it was over 15,000 feet, Rhythms must perform either a manual loop query or an engineering query.
48. Because Verizon has not yet developed pre-ordering systems for loop qualification, Rhythms must submit an LSR for start either the manual or engineering query. The manual loop query therefore will add two days to the standard interval, and the engineering query will add three days. Generally, Rhythms does not perform any engineering queries due to their high cost. Rhythms pays approximately \$0.11 per month for the mechanized loop

qualification (which is performed on every loop order we submit to Verizon). The charges for manual loop qualifications vary slightly by state but in general it is a non-recurring or one time charge of \$12.11 per loop. The engineering query is much more expensive at \$123.00 per query.<sup>3</sup>

49. Verizon's allegations about the extension of the standard interval as a result of CLECs requesting manual loop qualification must be taken in this context. If Verizon had developed the necessary pre-ordering functions, the interval would not be adversely affected.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
ROBERT WILLIAMS

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<sup>3</sup> The Massachusetts DTE's recent line sharing decision ordered that charges for loop qualification be set at zero. Rhythms expects that Verizon will appeal that determination.

