

trunk from Verizon to the WorldCom customer is blocked, than it is to a Verizon customer to be unable to reach a few WorldCom customers, as long as he can still reach all of the other Verizon customers. This problem is particularly acute when the WorldCom customer is a business with a call center, or an ISP, both of which are heavily dependent on inbound calls, and both of which generate tremendous increases in call volume on a trunk group as soon as they are enrolled, without the ramp up that is more typical of other kinds of growth.

20. WorldCom cannot turn up new switches or sell service to new customers unless it is assured of timely and adequate inbound interconnection trunks. Indeed, if WorldCom does promise service to a new customer, but cannot deliver on time because Verizon has not provided the necessary interconnection trunks, WorldCom will likely lose the customer and harm both its own reputation and that of its customer, both of which are critical consequences preventing a new entrant from gaining market share.

21. Despite this reality, however, some current performance measures in the PAP do not adequately measure Verizon's performance in providing these inbound trunks. The performance metrics consider an inbound reciprocal trunk to have been ordered by Verizon, even if the establishment of that trunk was prompted by a CLEC request for additional capacity, and even though CLECs are responsible for forecasting their need for such trunks to Verizon. This leads to results on metrics that not only fail to show the harmful impact of poor inbound trunk performance, but through aggregation with outbound trunk provisioning can even disguise poor performance on the latter.

22. The most egregious example is metric PR-4, measuring Missed Appointments. This metric aggregates results for inbound and outbound trunk orders. Orders of

more than 192 trunks under this metric are subject to a negotiated interval, permitting VZ-MA to pick a delivery date initially for either inbound or outbound trunks that comports with Verizon's convenience. Moreover, under this metric, if the ordering party pushes out the delivery date by placing a supplemental order, then Verizon will be scored to have met the appointment as long as it is ready on the new delivery date. As Verizon's witness testified, what this means is that for all inbound reciprocal trunks, Verizon, which is the one working to deliver the trunk, is also the ordering party and thus can totally control the "appointment" date by issuing a supplemental order for a later date if it will not be able to meet the originally scheduled one. See VZ-MA App. B, Tab 555 (9/1/2000 Tr., at 3525.) In other words, if Verizon staff are alert, Verizon will never report missing a due date on a reciprocal trunk, which comprise the vast majority of trunks.^{7/} Moreover, since these trunks are aggregated with outbound trunk orders, where it is the CLEC who can change the due date, Verizon's apparent on-time performance on inbound trunks can dilute poor results on outbound trunks. WorldCom was surprised to learn that inbound trunk missed appointments are measured by Verizon based on the supplemental due date rather than the negotiated due date and has recently proposed to close this loophole in New York. Until this loophole is closed, however, Verizon's report that it met nearly 100% of trunk due dates is of little import. See Lacouture/Ruesterholz Decl. ¶ 20.

^{7/} In any event, the Missed Appointments (PR-4) metric cannot provide the entire picture of whether disparity exists. While Verizon might have the same number of missed appointments for itself as for CLECs, Verizon might complete missed appointments orders faster for retail than for wholesale customers. That disparity presently goes unchecked by the Critical Measures and provides Verizon with no incentive to improve its performance. In New York, WorldCom has proposed to remedy this problem by adding an Average Delay Days submetric to the PAP to reflect the magnitude of the miss by measuring the average number of days between the committed due date and the actual work completion date.

23. WorldCom has also experienced long delays in receiving responses to requests for inbound trunks. However, these are not captured by the performance metrics. The Massachusetts PAP does not incorporate metric OR-1-19, % On Time Response - Request for Inbound Augment Trunks, a measure added to the C2C guidelines after the adoption of the New York PAP to try to address the problems CLECs were having receiving prompt responses to trunk resizing requests. Verizon delays in providing reciprocal trunks (inbound to CLEC trunks) -- beginning with Verizon's long delays in responding to requests or providing CLECs due dates for such trunks -- force CLECs to delay installing new customers on their networks. Failure to receive prompt responses not only delays WorldCom's ability to provide its customers with adequate capacity for inbound calling, but also jeopardizes its ability to retain customers. Customers frustrated with delays in the processing and provisioning of their orders may cancel those orders. As poor performance in this area has a significant impact on CLECs' business and ability to compete, Verizon should be given a financial incentive to ensure that it promptly responds to CLECs' requests, and thus WorldCom has proposed adding this metric to the New York PAP. In Massachusetts, however, there is no current incentive to prevent future discriminatory behavior in this area.

24. Metric OR-1-19 as it currently exists would also require additional revision to measure the relevant Verizon performance. This metric does not capture WorldCom's requests as it counts only requests for additional inbound trunks placed using an e-mailed Trunk Group Service Request; it must be expanded to include orders placed via fax, or, as it easiest to track and verify, via a CLEC ASR. Moreover, even where an interval is measured from the receipt of an emailed TGSR, the metric requires only that Verizon send some response --

be it an ASR confirming the request, a rejection, or even a query. There are no guidelines governing when VZ-MA may pose a query rather than rendering a substantive response, although a query provides the CLEC with no indication of when or if new trunks will be added and does not permit the CLEC to plan or to communicate with its customers who are to be negatively impacted by a lack of adequate inbound capacity. WorldCom believes that Verizon should be able to request any additional information in plenty of time to render an answer within the specified 10 day interval. Under the current measure, however, Verizon can ensure that it satisfies the benchmark interval by simply submitting a query whenever it is in danger of otherwise missing the interval.

25. In addition to the flaws with individual trunking metrics, the entire structure of the PAP with respect to interconnection is ineffective in preventing discriminatory behavior because of its aggregate scoring. Indeed, in general, the minimum -X scoring system used by the PAP is inherently arbitrary and improperly permits Verizon to provide below-parity and substandard service without sanction. This effect is very significant for the trunking metrics in the Mode of Entry category, despite their critical importance to competitors. Exhibit A to WorldCom's recent filing on the New York PAP, found at Attachment 3 to this declaration, demonstrates that, using the minimum -X scoring, Verizon can fail two trunking submetrics, one weighed at 15 and the other weighed at 10 and both having performance scores of -2, without incurring penalties. This means that Verizon can repeatedly fail to meet the performance standards for those metrics and escape remedies because they may have been the only metrics missed during a particular month. Having escaped any remedies, Verizon has no incentive to improve its performance in those problem areas. Since all of the trunking measures play an

integral role in CLECs' plans to launch facilities-based services and to keep capacity commensurate with customer requirements, Verizon's failure to meet any of the metrics stifles facilities-based competition and negatively impacts consumers.

26. Other metrics: Verizon's comments on a number of selected measures also require some explanations of the metrics.

27. At paragraph 36 of the Guerard/Canny declaration, Verizon discusses its performance on PO-3-01, Average Speed of Answering, and PO-3-02, Percent Answered within 30 seconds. In WorldCom's experience, the more relevant and trouble-prone area is not getting a Verizon representative to answer the phone, but rather, the amount of time that it takes for Verizon to close the trouble ticket. The Massachusetts metrics do not include a measure of this performance, nor is there a set performance benchmark.

28. Verizon blames discrepancies in performance on PR-1, Average Interval Offered, and PR-2, Average Interval Completed, on differences in order mix and on CLEC requests for longer intervals, despite the fact that Verizon excludes from its calculations instances where CLECs requested longer intervals. Guerard/Canny Decl. ¶¶ 68-70. Verizon instituted automatic coding of exclusions ("X coding") under LSOG 4 to correct a prior problem of miscoding by CLECs and Verizon's employees. If, as Verizon intimates, only this automatic X coding under LSOG 4 is truly accurate, Verizon should disaggregate its results collected under that interface and prove to this Commission that those results demonstrate parity, rather than hiding behind claims of inaccuracy. Likewise, Verizon should disaggregate its reporting by product type so that a comparison can be made between intervals for products with a less than one day, one day, and two day interval. This would demonstrate true parity, if it exists. Without

such a disaggregation, Verizon will continue to benefit from its own claims that the metrics do not accurately reflect performance, without showing that a more accurate reflection demonstrates parity.

29. In a similar fashion, Verizon should disaggregate the results of metric MR-4, Trouble Duration, by DS0, DS1 and DS3 and above, so that this reveals a true mean time to restore for high-capacity products sold to large customers.

III. The Remedy Provisions of the PAP are insufficient

30. In addition to the problems with the performance metrics, the remedy provisions of the Massachusetts PAP are insufficient to prevent backsliding. Massachusetts has not achieved the strengths of the New York PAP, although it continues to suffer the flaws of that plan.

31. While Massachusetts purports to set its remedial caps at levels proportionate to New York, it has failed to do so. First, in setting the overall cap at 36% of ARMIS-reported local profits, it did not take into account a pro rata equivalent to the \$24 million in additional penalties added in New York with the new EDI Measures, which raises the PAP remedies there to about 44% of ARMIS profits.^{8/} As a result, the Massachusetts PAP carries less of a deterrent effect than the New York plan. If the missing EDI Measures discussed above are eventually brought into the Massachusetts PAP without adding funds, it will make the situation worse. Not only will the plan offer insufficient penalties to encourage Verizon to fix the missing

^{8/} By contrast, the Georgia Public Service Commission voted October 3, 2000, to set the remedy plan cap for BellSouth at 44% of net local return based on testimony on the raising of the New York cap after 271 approval.

notifier issue, but also the added measures will actually dilute the overall effectiveness of the PAP by lowering the amount of money available to address other areas of performance.^{9/}

32. This diminution is particularly important because in Massachusetts, the Department has expressly held that remedies under the PAP are alternative to remedies available under the Consolidated Arbitrations – the proceeding that set the contractual remedies available for most CLECs for poor performance suffered individually. By contrast, in New York, PAP remedies are cumulative with liquidated damages available to individual CLECs under interconnection agreements, and the New York PSC still found it necessary to increase the overall amount of money available under the PAP when faced with the severe missing notice issue. In Massachusetts, however, the additional deterrent from the cumulative effects of liquidated contract damages and PAP remedies is missing. For this reason, as well, Verizon in Massachusetts is not subject to a financial incentive for good performance equivalent to that in place in New York.

33. Offsetting contract remedies with PAP remedies presents other problems. The Consolidated Arbitration remedies are paid to individual CLECs to remedy poor performance they have suffered individually, while the PAP remedies are predominantly linked

^{9/} Similarly, any dollars placed at risk for a DSL mode of entry category, as proposed by WorldCom, must be in addition to the existing dollars at risk in the PAP. Otherwise, if the total amount at risk under the Plan remains constant, increasing the amount at risk for DSL performance would necessarily decrease the amount at risk for traditional analog voice service. This would severely diminish Verizon's incentive to provide voice services or voice related UNEs at appropriate levels. In fact, the result of reallocating dollars at risk instead of adding new dollars for the new DSL metrics could easily be that in both instances -- for voice and data services -- the amount of bill credits at risk will be far too low to motivate Verizon to ensure that its delivery of services and unbundled network elements will promote competition.

to aggregate performance results. VZ-MA's compliance filing suggests that it will pay only the higher of the PAP or the consolidated remedies due the CLEC without regard to what the remedy covers. See Guerard/Canny Decl., Att. C, at 24-25 (indicating that VZ-MA will compare “total credits assessed under the Massachusetts PAP” with those paid under Consolidated Arbitrations) (emphasis added). But VZ-MA should not, for example, be able to offset loop installation remedies available to a single CLEC in the Consolidated Arbitrations because it paid more in flow-through remedies from the PAP. WorldCom is preparing to ask the DTE to clarify that if there must be an offset, it would only be for remedies paid for the same performance differences and not total remedies.

34. The Massachusetts PAP also allows Verizon to delay remedy payments through the fundamentally flawed “waiver” process. First, the Massachusetts PAP waiver procedures contain no required time line for resolution. See Guerard/Canny Decl., Att. C, at 27 (setting deadline only for filing of waiver request). This will allow Verizon to delay payments, as it never indicates that it will make PAP payments on a disputed issue during the pendency of a waiver adjudication. Second, to prevent “waiver” from eviscerating the self-executing nature of the PAP, waiver opportunities must be narrowly defined. The Massachusetts DTE ordered VZ-MA to strike or better define the “CLEC action” waiver category in its PAP compliance filing. Verizon’s “clarification,” however, only emphasizes its opportunities to derail the self-executing nature of the PAP. For example, among the “examples” of CLEC behavior that might merit a waiver, in Verizon’s view, are “poor order quality, such as missing codes, incorrect codes or misspelled directory listings.” Guerard/Canny Decl., Att. C, at 26. However, these factors would not effect Verizon liability. Missing or incorrect codes should result in the rejection of a CLEC

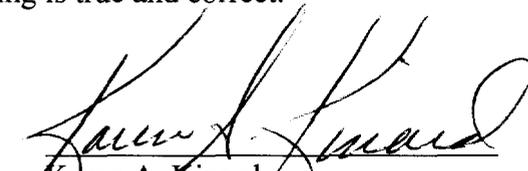
order, and the metric regarding percentages of rejects is a diagnostic measure that does not carry penalties. Likewise, the metric on order accuracy measures only whether Verizon's representatives accurately type in what CLECs order; occasions on which the CLECs original order was incorrect should not be captured in this metric at all, nor should incorrect directory listings that result from CLEC error. Another of Verizon's "examples" of CLEC-caused delay is "inadequate testing" – a standard obviously subject to interpretation and not otherwise defined. And indeed, that all of these are just "examples" indicates that Verizon still reserves the ability to institute waiver proceedings and thus put off payment of penalties essentially at will.

35. Finally, like the New York PAP, the use of arbitrary remedy caps and subcaps, particularly monthly caps, undermines the deterrent effect of the Massachusetts PAP by permitting Verizon easily to calculate the costs of retaining its dominant market share by further discrimination. Uncertainty as to its maximum liability for discriminatory performance is a deterrent in and of itself. In addition, caps on remedies for "Mode of Entry" provisions mean that gross failures of performance would result in only limited remedies. For example, even a complete cessation of collocation would cause VZ-MA to pay a maximum of \$1,420,690 annually under these provisions. See Guerard/Canny Decl., Att. C, Ex. 1, at 13. Moreover, as explained above in relation to the trunking metrics, and in Attachment 3 to this declaration, the elaborate scoring mechanism and aggregation features of the PAP dilute the effect of poor performance for individual CLECs and allow even industry-wide discriminatory behavior on isolated measures to go unremedied. This lack of remedies for individual measures except those selected as "critical" and the lack of a mechanism to increase punishment for severe or repeated deficient performance further defeat the deterrent power of the PAP.

36. This concludes my declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 13, 2000.



Karen A. Kinard

DECLARATION OF KAREN A. KINARD

ATTACHMENT 1

Verizon New York Inc.
1095 Avenue of the Americas
Room 3733
New York, NY 10036
Tel 212 395-6495
Fax 212 768-7568

William D. Smith
Senior Regulatory Counsel



September 25, 2000

BY HAND

Honorable Janet H. Deixler
Secretary
New York Public Service Commission
Three Empire State Plaza
Albany, New York 12223

**Re: Cases 97-C-0271 and 99-C-0949 – Performance Assurance Plan – August 2000
Monthly Report and Final June 2000 Monthly Report**

Dear Secretary Deixler:

Verizon New York Inc. (“Verizon”) hereby submits its eighth monthly report to the Public Service Commission (the “Commission”) under Section II(F) of the Performance Assurance Plan for Bell Atlantic - New York (the “Plan”).¹ In addition, annexed hereto are the final performance reports for June 2000.²

¹ Section II(F) provides that each month Verizon will provide a report on its performance on the measures included in the Plan and the amount, if any, of bill credits due to wholesale customers for unsatisfactory performance under the Plan.

² The June Reports have been adjusted pursuant to Section II(C) and Section II(D) of the Plan, which provide that any -1 performance score for a metric in the Mode of Entry (“MOE”) or Critical Measures Sections will be converted to a score of 0, if Verizon records a performance score of 0 in the two subsequent months for the metric.

The August Report can be summarized as follows:

	C2C Score	C2C Market Adjustment
MOE:		
Resale	-0.271	\$305,921
UNE	-0.400	\$2,013,158
Trunks	0	\$0
Collocation	-1.200	\$208,333
Critical Measures		\$1,517,014
Special Provisions		\$2,000,000
Change Control		\$0
Total		\$6,044,426

A copy of the August Report is attached as Exhibit 1. Please be advised that the recent work stoppage influenced the August results and that, pursuant to Section II(J) of the Plan, Verizon will file for a waiver of these results.

Copies of the final June reports, reflecting the effects of subsequent performance on -1 scores are attached as Exhibit 2. Based upon Verizon's performance in July and August, four MOE metric (two UNE and two Resale) and three Critical measure metric scores were converted from -1 scores to 0 scores in these reports. The June metrics that have been adjusted from -1 scores to 0 scores are as follows:

UNE:

OR-1-04: % OT LSRC < 10 Lines - Specials

OR-1-06: % OT LSRC >= 10 Lines – POTS (**Also Critical Measure**)

Resale:

MR-4-01: Mean Time to Repair - Specials (**Also Critical Measure**)

MR-4-08: % Out of Service > 24 Hours - POTS (**Also Critical Measure**)

Verizon has also provided CLEC-specific information, which has been designated as confidential, that details the amount of bill credits each CLEC is entitled to receive under the June Report.³ The aggregate amount of bill credits Verizon has agreed to provide CLECs for June performance is \$4,136,222. Each CLEC will be provided with CLEC-specific reports that indicate the amount of bill credits the CLEC is entitled to receive. Pursuant to Section II(G) of the Plan, the October 2000 bills will reflect any bill credits that Verizon has agreed to provide to the respective CLECs for June performance.

If you have any questions regarding these reports, please contact me at the above number.

Respectfully submitted,

William D. Smith

cc: Peter M. McGowan, Esq. (Confidential and Public Versions)
Robert T. Mulig, Esq. (Confidential and Public Versions)
All Active Parties (Public Version)

³ Pursuant to Section II(C) and Section II(D), the August Report is subject to further adjustment.

Verizon NY 271 Backslide Report

June 2000

UNE

Pre-Ordering		VZ	CLEC					Diff.	Perf. Score	Wgt.	Wgt. Score
PO-1-01-6020	Customer Service Record	2.73	4.03					1.31	0	15	0.000
PO-1-02-6020	Due Date Availability	0.18	2.95					2.77	0	5	0.000
PO-1-03-6020	Address Validation	5.43	3.90					-1.53	0	5	0.000
PO-1-04-6020	Product and Service Availability	0.12	3.21					3.09	0	5	0.000
PO-1-05-6020	Telephone Number Availability and Reservation	6.92	5.62					-1.30	0	5	0.000
PO-1-06-6020	Facility Availability (Loop Qualification)	UD	UD					0	0	0	0.000
PO-2-02-6020	OSS Interface Availability - Prime		99.71					0	20	0.000	
PO-3-02-3000	% Answered within 30 Seconds - Ordering		83.95					0	10	0.000	
PO-3-04-3000	% Answered within 30 Seconds - Repair		85.29					0	10	0.000	
OR		Ordering		Observations							
OR-1-02-3320	% On Time LSRC - Flow Through - POTS - 2hrs	98.31		198,250			0	40	0.000		
OR-1-04-3100	% OT LSRC<10 Lines (Elec.-No Flow Through)-POTS	97.03		61,082			0	10	0.000		
OR-1-04-3200	% OT LSRC<10 Lines (Elec.-No Flow Through)-Specials *	90.45		419			0	5	0.000		
OR-1-04-3300	% OT LSRC<10 Lines (Elec.-No Flow Through)-Complex	93.58		15,652			0	0	0.000		
OR-1-06-3320	% On Time LSRC >=10 Lines (Electronic) - POTS *	94.69		811			0	10	0.000		
OR-1-06-3200	% On Time LSRC >=10 Lines (Electronic) - Specials	NA					0	0	0.000		
OR-1-06-3300	% On Time LSRC >=10 Lines (Electronic) - Complex	NA					0	0	0.000		
OR-2-02-3320	% On Time LSR Reject - Flow Through - POTS	97.47		32,289			0	30	0.000		
OR-2-04-3320	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-POTS	97.14		23,217			0	30	0.000		
OR-2-04-3200	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-Specials	87.87		33			-2	5	-0.016		
OR-2-04-3300	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-Complex	98.23		5,544			0	0	0.000		
OR-2-06-3320	% On Time LSR Reject >= 10 Lines (Electronic) - POTS	98.78		413			0	10	0.000		
OR-2-06-3200	% On Time LSR Reject >= 10 Lines (Electronic) - Specials	100.00		1			0	5	0.000		
OR-2-06-3300	% On Time LSR Reject >= 10 Lines (Electronic) - Complex	NA					0	0	0.000		
OR-4-09-3000	% SOP to Bill Completion Sent w/in 3 Business Days	98.73		201,073			0	30	0.000		
OR-5-03-3112	% Flow Through - Achieved - POTS & Specials	78.06		245,966			-2	20	-0.065		
OR-6-03-3000	% OT Accuracy LSRC	97.04		849			0	10	0.000		
PR		Provisioning									
PR-3-08-3142	% Completed w/in 5 Days (1-5 lines-No Dispatch)-UNE-P/OT	96.03	96.48	283,892	23,341		0.13	3.38	0	10	0.000
PR-3-09-3142	% Completed w/in 5 Days (1-5 lines-Dispatch)-UNE-P/Other	66.59	84.33	37,122	1,219		1.37	12.92	0	5	0.000
PR-4-01-3200	% Missed Appointment - VZ - Total - Specials	8.71	5.93	3,974	118		2.63	1.06	0	10	0.000
PR-4-01-3510	% Missed Appointment - VZ - Total - EEL	UD					0	0	0	0	0.000
PR-4-01-3530	% Missed Appointment - VZ - Total - IOF	8.71	24.04	3,974	287		1.72	-8.89	-2	10	-0.032
PR-4-02-3100	Average Delay Days - Total - POTS	4.90	6.16	12,931	387	7.91	0.41	-3.09	-2	10	-0.032
PR-4-02-3200	Average Delay Days - Total - Specials	7.22	5.43	209	7	10.12	3.89	0.46	0	10	0.000
PR-4-02-3300	Average Delay Days - Total - Complex	9.23	8.64	213	437	10.16	0.85	-1.90	-2	10	-0.032
PR-4-04-3140	% Missed Appointment - VZ - Dispatch - Platform	11.88	2.45	103,399	13,470		0.30	31.82	0	10	0.000
PR-4-04-3113	% Missed Appointment - VZ - Dispatch - New Loop	11.88	4.72	103,399	615		1.31	5.47	0	10	0.000
PR-4-04-3300	% Missed Appointment - VZ - Dispatch - Complex	6.38	7.06	3,113	5,704		0.54	-2.39	-2	10	-0.032
PR-4-05-3140	% Missed Appointment- VZ - No Dispatch - Platform	0.13	0.31	511,707	207,222		0.01	12.79	0	20	0.000
PR-4-05-3300	% Missed Appointment- VZ - No Dispatch - Complex	0.21	NA	7,004				NA	0	0	0.000
PR-5-01-3100	% Missed Appointment - Facilities - POTS	0.59	0.06	615,106	222,018		0.02	27.95	0	10	0.000
PR-5-01-3200	% Missed Appointment - Facilities - Specials	2.52	0.00	3,974	118		1.46	1.72	0	10	0.000
PR-5-02-3100	% Orders Held for Facilities > 15 days - POTS	0.11	0.01	615,106	222,018		0.01	12.18	0	5	0.000
PR-5-02-3200	% Orders Held for Facilities > 15 days - Specials	0.08	0.00	11,227	118		0.26	0.31	0	5	0.000
PR-6-01-3121	% Installation Troubles within 30 days - POTS Other	5.01	1.61	553,614	202,538		0.06	60.41	0	15	0.000
PR-6-01-3200	% Installation Troubles within 30 days - Specials	1.80	0.00	12,277	105		1.32	1.40	0	15	0.000
PR-6-02-3520	% Installation Troubles within 7 days - Hot Cut		0.16		14,532				0	15	0.000
PR-9-01-3520	% On Time Performance - Hot Cut	98.94		6,512					0	20	0.000
MR		Maintenance & Repair									
MR-1-01-2000	Average Response Time - Create Trouble	8.58	6.77					Diff.			
MR-1-03-2000	Average Response Time - Modify Trouble	8.58	6.88					-1.81 0 5 0.000			
MR-1-04-2000	Average Response Time - Request Cancellation of Trouble	9.79	8.07					-1.72 0 5 0.000			
MR-1-06-2000	Average Response Time - Test Trouble (POTS only)	68.59	55.48					-11.11 0 5 0.000			
								Stat. Score			
MR-2-01-3200	Network Trouble Report Rate - Specials	0.96	0.00	390,778	1,303		0.27	3.55	0	10	0.000
MR-2-02-3112	Network Trouble Report Rate - Loop (POTS)	1.75	1.36	10,151,679	1,191,929		0.01	30.80	0	10	0.000
MR-3-01-3112	% Missed Repair Appointments - Loop	11.14	10.11	178,109	16,245		0.26	3.99	0	20	0.000
MR-3-02-3100	% Missed Repair Appointments - Central Office	6.25	5.22	19,084	2,029		0.57	1.82	0	5	0.000
MR-4-01-3200	Mean Time to Repair - Specials	7.10	NA	3,764		9.83		NA	0	0	0.000
MR-4-02-3112	Mean Time to Repair - Loop Trouble	26.65	24.53	178,109	16,245	29.67	0.24	8.71	0	15	0.000
MR-4-03-3100	Mean Time to Repair - CO Trouble	11.43	11.15	19,084	2,029	18.13	0.42	0.67	0	5	0.000
MR-4-08-3100	% Out of Service > 24 Hours - POTS	27.65	25.87	159,959	14,871		0.38	4.64	0	20	0.000
MR-4-08-3200	% Out of Service > 24 Hours - Specials	3.78	NA	3,731				NA	0	0	0.000
MR-5-01-3100	% Repeat Reports w/in 30 days - POTS	20.92	22.00	187,193	18,274		0.31	-3.43	-2	15	-0.048
MR-5-01-3200	% Repeat Reports w/in 30 days - Specials	26.35	NA	3,764				NA	0	0	0.000
BI		Billing									
BI-1-02-2030	% DUF in 4 Business Days		99.72								
								Totals			
								-14 620 -0.258			

* Adjusted to 0 based on July / August performance.

RESALE

Pre-Ordering		VZ	CLEC				Diff.	Perf. Score	Wgt.	Wgtd. Score	
PO-1-01-6020	Customer Service Record	2.73	4.03				1.31	0	15	0.000	
PO-1-02-6020	Due Date Availability	0.18	2.95				2.77	0	5	0.000	
PO-1-03-6020	Address Validation	5.43	3.90				-1.53	0	5	0.000	
PO-1-04-6020	Product and Service Availability	0.12	3.21				3.09	0	5	0.000	
PO-1-05-6020	Telephone Number Availability and Reservation	6.92	5.62				-1.30	0	5	0.000	
PO-1-06-6020	Facility Availability (Loop Qualification)	UD	UD				0	0	0	0.000	
PO-2-02-6020	OSS Interface Availability - Prime		99.71				0	0	20	0.000	
PO-3-02-2000	% Answered within 30 Seconds - Ordering		90.13				0	0	10	0.000	
PO-3-04-2000	% Answered within 30 Seconds - Repair		88.29				0	0	10	0.000	
OR Ordering				Observations							
OR-1-02-2320	% On Time LSRC - Flow Through - POTS - 2hrs		98.70			9,988	0	40	0.000		
OR-1-04-2100	% OT LSRC <10 Lines (Elec.- No Flow Through) - POTS		96.96			12,409	0	10	0.000		
OR-1-04-2200	% OT LSRC <10 Lines (Elec.- No Flow Through) - Specials		91.84			282	-1	5	-0.008		
OR-1-06-2320	% On Time LSRC >= 10 Lines (Electronic) - POTS		95.52			67	0	10	0.000		
OR-1-06-2200	% On Time LSRC >= 10 Lines (Electronic) - Specials		100.00			1	0	5	0.000		
OR-2-02-2320	% On Time LSR Reject - Flow Through - POTS		99.21			6,226	0	30	0.000		
OR-2-04-2320	% OT LSR Rej.<10 Lines (Elec.-No Flow Through)-POTS		95.21			6,225	0	30	0.000		
OR-2-04-2200	% OT LSR Rej.<10 Lines (Elec.-No Flow Through)-Specials		98.07			52	0	5	0.000		
OR-2-06-2320	% On Time LSR Reject >=10 Lines (Electronic) - POTS		100.00			1	0	10	0.000		
OR-2-06-2200	% On Time LSR Reject >=10 Lines (Electronic) - Specials		NA				0	0	0.000		
OR-4-09-2000	% SOP to Bill Completion Sent w/in 3 Business Days		98.73			201,073	0	30	0.000		
OR-5-03-2000	% Flow Through - Achieved - POTS & Specials		70.34			13,944	0	20	-0.068		
OR-6-03-2000	% Accuracy - LSRC		85.97			442	-2	10	-0.034		
PR Provisioning		VZ	CLEC	VZ	CLEC	VZ	Standard Deviation	Sampling Error	Stat. Score		
PR-3-08-2100	% Completed w/in 5 Days (1-5 lines - No Dispatch) - POTS	96.03	98.97	283,892	3,691		0.32	9.09	0	10	0.000
PR-3-09-2100	% Completed w/in 5 Days (1-5 lines - Dispatch) - POTS	66.59	76.72	37,122	885		1.60	6.31	0	5	0.000
PR-4-01-2200	% Missed Appointment - VZ - Total - Specials	8.71	0.33	3,974	304		1.68	4.99	0	10	0.000
PR-4-02-2100	Average Delay Days - Total - POTS	4.90	4.89	12,931	148	7.91	0.65	0.02	0	10	0.000
PR-4-02-2200	Average Delay Days - Total - Specials	7.22	4.00	209	1	10.12	10.14	0.32	0	10	0.000
PR-4-04-2100	% Missed Appointment - VZ - Dispatch - POTS	11.88	5.23	103,399	2,677		0.63	10.50	0	10	0.000
PR-4-05-2100	% Missed Appointment - VZ - No Dispatch - POTS	0.13	0.04	511,707	20,645		0.03	3.52	0	20	0.000
PR-5-01-2100	% Missed Appointment - Facilities - POTS	0.59	0.27	615,106	23,322		0.05	6.26	0	10	0.000
PR-5-01-2200	% Missed Appointment - Facilities - Specials	2.52	0.00	3,974	304		0.93	2.70	0	10	0.000
PR-5-02-2100	% Orders Held for Facilities > 15 days - POTS	0.11	0.03	615,106	23,322		0.02	3.62	0	5	0.000
PR-5-02-2200	% Orders Held for Facilities > 15 days - Specials	0.08	0.00	11,227	304		0.16	0.49	0	5	0.000
PR-6-01-2100	% Installation Troubles within 30 days - POTS	5.01	2.19	583,614	39,571		0.11	24.93	0	15	0.000
PR-6-01-2200	% Installation Troubles within 30 days - Specials	1.86	0.40	12,277	1,010		0.44	3.31	0	15	0.000
MR Maintenance & Repair							Diff.				
MR-1-01-2000	Average Response Time - Create Trouble	8.58	6.77				-1.81	0	5	0.000	
MR-1-03-2000	Average Response Time - Modify Trouble	8.58	6.88				-1.70	0	5	0.000	
MR-1-04-2000	Average Response Time - Request Cancellation of Trouble	9.79	8.07				-1.72	0	5	0.000	
MR-1-06-2000	Average Response Time - Test Trouble (POTS only)	66.59	55.48				-11.11	0	5	0.000	
							Stat. Score				
MR-2-01-2200	Network Trouble Report Rate - Specials	0.96	1.75	390,778	3,779		0.16	-4.91	-2	10	-0.034
MR-2-02-2100	Network Trouble Report Rate - Loop (POTS)	1.75	0.84	10,151,679	####		0.02	46.98	0	10	0.000
MR-3-01-2100	% Missed Repair Appointments - Loop	11.14	9.25	178,109	3,958		0.51	3.74	0	20	0.000
MR-3-02-2100	% Missed Repair Appointments - Central Office	6.25	5.58	19,084	894		0.83	0.80	0	5	0.000
MR-4-01-2200	Mean Time to Repair - Specials *	7.10	8.27	3,764	66	9.83	1.22	-0.96	0	20	0.000
MR-4-02-2100	Mean Time to Repair - Loop Trouble	26.65	25.32	178,109	3,958	29.67	0.48	2.80	0	15	0.000
MR-4-03-2100	Mean Time to Repair - CO Trouble	11.43	13.32	19,084	894	18.13	0.62	-3.04	-2	5	-0.017
MR-4-08-2100	% Out of Service > 24 Hours - POTS *	27.65	28.57	159,959	3,752		0.74	-1.25	0	20	0.000
MR-4-08-2200	% Out of Service > 24 Hours - Specials	3.78	4.69	3,731	64		2.40	-0.38	0	10	0.000
MR-5-01-2100	% Repeat Reports w/in 30 days - POTS	20.92	21.45	197,193	4,850		0.59	-0.91	-1	15	-0.025
MR-5-01-2200	% Repeat Reports w/in 30 days - Specials	26.35	19.73	3,764	66		5.47	1.22	0	15	0.000
BI Billing											
BI-1-02-2030	% DUF in 4 Business Days		99.72				0	0	10	0.000	
							Totals				
							-10		590 -0.186		

* Adjusted to 0 based on July / August performance.

INTERCONNECTION (TRUNKS)

OR Ordering		CLEC	Obs.	Perf. Score	Wgt.	Wgtd. Score
OR-1-12-5020	% On Time Firm Order Confirmations	95.65	46	0	15	0.000
OR-1-13-5020	% On Time Design Layout Record	99.44	178	0	10	0.000
OR-2-12-5000	% On Time Trunk ASR Reject	100.00	9	0	10	0.000

PR Provisioning		VZ	VZ	CLEC	Observations	VZ Standard Deviation	Sampling Error	Stat. Score	Perf. Score	Wgt.	Wgtd. Score
PR-4-01-5000	% Missed Appointment - VZ - Total	0.39	0.13	12,201	18,402		0.07	3.57	0	20	0.000
PR-4-02-5000	Average Delay Days - Total	44.00	1.00	48	24	0.00	0.00		0	10	0.000
PR-4-07-3540	% On Time Performance - LNP only		99.96		7,590				0	20	0.000
PR-5-01-5000	% Missed Appointment - Facilities	0.00	0.00	12,201	7,691		0.00		0	10	0.000
PR-5-02-5000	% Orders Held for Facilities > 15 Days	0.00	0.00	12,201	7,691		0.00		0	10	0.000
PR-6-01-5000	% Installation Troubles w/in 30 Days	0.02	0.01	12,201	18,402		0.01	0.73	0	15	0.000

MR Maintenance & Repair		VZ	VZ	CLEC	Observations	VZ Standard Deviation	Sampling Error	Stat. Score	Perf. Score	Wgt.	Wgtd. Score
MR-4-01-5000	Mean Time to Repair - Total	2.32	1.77	39	52	2.34	0.50	1.11	0	20	0.000
MR-5-01-5000	% Repeat Reports w/in 30 Days	20.51	17.31	39	52		6.55	0.37	0	10	0.000

NP Network Performance		CLEC	Obs.	Perf. Score	Wgt.	Wgtd. Score
NP-1-03-5000	# of Final Trunk Groups Blocked 2 Months	0.00	255	0	10	0.000
NP-1-04-5000	# of Final Trunk Groups Blocked 3 Months	0.00	255	0	20	0.000
Totals				0	180	0.000

Collocation

NP Network Performance		CLEC	Obs.	Perf. Score	Wgt.	Wgtd. Score
NP-2-01-2000	% OT Response to Request for Physical Collocation	100	117	0	10	0.000
NP-2-02-2000	% OT Response to Request for Virtual Collocation	100	1	0	10	0.000
NP-2-05-2000	% On Time - Physical Location	95	280	0	20	0.000
NP-2-06-2000	% On Time - Virtual Location	100	2	0	20	0.000
NP-2-07-2000	Average Delay Days - Physical	6	14	0	20	0.000
NP-2-08-2000	Average Delay Days - Virtual	NA		0	20	0.000
Totals				0	100	0.000

xDSL Performance Report (Critical Measure 12)

	VZ	CLEC	VZ	CLEC	Sampling Error	Stat. Score
PO-8-01		UD				
PO-8-02		UD				
PR-4-14		90.99		2,585		
PR-4-15		93.46		2,585		
PR-4-16		91.73		1,355		
PR-4-17		90.86		186		
PR-4-18		NA				
PR-6-01-3300	5.01	4.51	583,614	4,413	0.33	1.53

"NA" - no activity "UD" - under development

June 2000		Verizon New York CRITICAL MEASURES - Backslide Report		Resale		UNE		Trunks		Collocation		Total
		%	\$	%	\$	%	\$	%	\$	%	\$	\$
PRE-ORDERING												
1	metric	Response Time OSS Interface		0.0%	0	0.0%	0					0
	PO-1-01	Customer Service Record		X	-	X	-					
	PO-1-02	Due Date availability		X	-	X	-					
	PO-1-03	Address Validation		X	-	X	-					
	PO-1-04	Product and Service Availability		X	-	X	-					
	PO-1-05	Telephone Number Availability and Reservation		X	-	X	-					
	PO-1-06	Facility Availability (Loop Qualification)		X	-	X	-					
2	PO-2-02	OSS Interface Availability - Prime		0%	0	0%	0					0
ORDERING												
3	metric	% On Time Ordering Notification				0%	ADJ					0
	OR-1-02	% On Time LSRC - Flow Through - POTS - 2hrs				X	-					
	OR-1-04	% OT LSRC<10 Lines (Elec.-No Flow Through)-POTS				X	-					
	OR-1-06	% OT LSRC >=10 Lines (Electronic) - POTS				X	ADJ					
	OR-2-02	% On Time LSR Reject - Flow Through - POTS				X	-					
	OR-2-04	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-POTS				X	-					
	OR-2-06	% On Time LSR Reject >= 10 Lines (Electronic) - POTS				X	-					
	OR-4-09	% SOP to Bill Completion Sent w/in 3 Business Days				X	-					
PROVISIONING												
4a	PR-4-01	% Missed Appointment - VZ - Total - EEL					0					0
4b		% Missed Appointment		0%	0	0%	0	0%	0			0
	PR-4-01	% Missed Appointment - VZ - Total - Specials		X	-	X	-					
	PR-4-01	% Missed Appointment - VZ - Total - Trunks						X				
	PR-4-04	% Missed Appointment - VZ - Total - Dispatch - POTS		X	-		-					
	PR-4-04	% Missed Appointment - VZ - Total - Dispatch - New Loops				X	-					
	PR-4-05	% Missed Appointment - VZ - Total - No Dispatch - POTS		X	-		-					
5	PR-4-05	% Missed Appt. - VZ - No dispatch - Platform				0%	0					0
6		Hot Cut Performance				0%	0					0
	PR-9-01	% On Time - Hot Cut (adj. for missed appts. due to late LSRC)				X						
	PR-6-02	% Troubles within 7 Days - Hot Cut				X						
7	PR-4-07	% On Time Performance - UNE LNP						0%	0			0
MAINTENANCE												
8		Mean Time To Repair		8%	12,587	0%	0	0%	0			12,587
	MR-4-01	Mean Time To Repair - Specials		X	ADJ	X	-			X		
	MR-4-01	Mean Time To Repair - Trunks										
	MR-4-02	Mean Time To Repair - Loop Trouble		X	-	X	-					
	MR-4-03	Mean Time To Repair - Central Office		X	12,587	X	-					
	MR-4-08	% Out Of Service > 24 Hours - POTS		X	ADJ	X	-					
9		% Repeat Reports within 30 Days		28%	41,536	100%	354,167					395,703
	MR-5-01	% Repeat Reports w/in 30 days - POTS		X	41,536	X	354,167					
	MR-5-01	% Repeat Reports w/in 30 days - Specials		X	-	X	-					
NETWORK PERFORMANCE												
10		Final Trunk Group Blocked										
	NP-1-03	Blocked 2 Months						0				0
	NP-1-04	Blocked 3 Months						0				0
11		Collocation								0%	0	0
	NP-2-05/6	% On Time - Physical & Virtual								X	-	
	NP-2-07/8	Average Delay Days - Physical & Virtual								X	-	
Digital Subscriber Line Services												
12		xDSL				0%	0					0
	PO-8-01	Avg. Response Time - Manual Loop Qualification				X	-					
	PO-8-02	Avg. Response Time - Engineering Record Request				X	-					
	PR-4-14	% Completed on Time				X	-					
	PR-4-15	% Completed on Time				X	-					
	PR-4-16	% Completed on Time				X	-					
	PR-4-17	% Completed on Time				X	-					
	PR-4-18	% Completed on Time				X	-					
	PR-6-01	% Installation Troubles - xDSL Loops				X	-					
		# of full share measures in category Total		5	54,123	10	354,167	4	0	1	0	\$ 408,290

ADJ = Adjusted to 0 based on July / August performance.

Special Provision - UNE Ordering

June 2000

		% On Time	Observations	Market Adj.
OR-1-04-3100	% OT LSRC<10 Lines (Elec.-No Flow Through)-POTS	97.03	61,082	\$ -
OR-1-06-3320	% On Time LSRC >=10 Lines (Electronic) - POTS	94.69	811	\$ -
OR-2-04-3320	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-POTS	97.14	23,217	\$ -
OR-2-06-3320	% On Time LSR Reject >= 10 Lines (Elec.) - POTS	98.78	413	\$ -

Total Market Adj.* \$ -

* For allocation, any UNE Ordering market adjustment is combined with the MOE UNE market adjustment allocation.

Special Provision - UNE Flow Through

PR-5-01-3000 % Flow Through - Total - POTS & Specials				OR-5-03-3112 % Flow Through - Achieved - POTS & Specials			
Month	%	Observations		Month	%	Observations	
		Gross #	Flow-thru			Gross #	Flow-thru
Apr-00	70.50	278,012	195,998	Apr-00	90.10	213,796	192,630
May-00	74.81	282,717	211,501	May-00	83.69	251,295	210,309
Jun-00	71.77	276,215	198,240	Jun-00	78.06	245,966	192,001
Overall	72.38	836,944	605,739	Overall	83.67	711,057	594,940

Market Adjustment * \$ 2,500,000

* For allocation, any Flow Through market adjustment is combined with the MOE UNE market adjustment allocation.

Special Provision - Hot Cut - Loop Performance

		% On Time Current Mo.	Observations	% On Time Prior Month	Observations
PR-9-01-3520	% On Time Performance - Hot Cut	98.94	6512	98.91	7905
		%Troubles			
PR-6-02-3520	% Installation Troubles within 7 days - Hot Cut	0.16	14532	0.04	17955

Tier I (2 mo) Tier II (1 mo) Total

Market Adjustment * \$ - \$ - \$ -

* For allocation purposes, any Hot Cut market adjustment is combined with the Critical measure market adjustment allocation.

Special Provision - Electronic Data Interface Measures

		% On Time	Observations
PO-9-01	% Missing Notifier Trouble Ticket PONS Cleared within 3 Bus. Days	99.44	7359
		% Reject	Observations
OR-3-02	% Resubmission Rejection	-	55

Market Adjustment \$ -

		% On Time	Observations	Market Adj.
OR-7-01	% Order Confirmation/Rejects Sent within 3 Business Days	99.85	256,702	\$ -

		% On Time	Observations	Market Adj.
OR-4-09	% SOP to Bill Completion within 3 Business Days	98.73	201,073	\$ -

Total Market Adj.* \$ -

* For allocation, any EDI market adjustment is allocated to all CLEC's using the EDI interface based on the number of lines in service.

Verizon New York

PAP/CCAP Market Adjustment Summary

June 2000

	Weighted Score	Market Adjustment	
MODE OF ENTRY			
Resale	-0.186	\$ -	
Unbundled Network Elements	-0.258	1,065,789	
Trunks	0.000	-	
Collocation	0.000	-	
Mode of Entry Total			1,065,789
# CRITICAL MEASURES			
1	Response Time OSS Interface	\$ -	
2	OSS Interface Availability - Prime	-	
3	% On Time Ordering Notification	-	
4a	% Missed Appointment - VZ - Total - EEL	-	
4b	% Missed Appointment	-	
5	% Missed Appt. - VZ - No dispatch - Platform	-	
6	Hot Cut Performance	-	
7	% On Time Performance - UNE LNP	-	
8	Mean Time To Repair	12,587	
9	% Repeat Reports within 30 Days	395,703	
10	Final Trunk Group Blocked	-	
11	Collocation	-	
12	xDSL	-	
Critical Measure Total			408,290
SPECIAL PROVISIONS			
	UNE Ordering	-	
	UNE Flow Through	2,500,000	
	UNE Hot Cut Loop	-	
	EDI Measures	-	
Special Provision Total			2,500,000
CHANGE CONTROL			
			-
CRITICAL MEASURES - Individual			
			162,143
Grand Total			\$ 4,136,222



DECLARATION OF KAREN A. KINARD

ATTACHMENT 2