

40. WorldCom nevertheless complains that it had problems testing the new release in June in Pennsylvania and New York. Kwapniewski/Lichtenberg Decl. ¶¶ 79-81. Verizon worked closely with WorldCom and other CLECs as they conducted their testing previous to the June release. As prescribed in the CLEC New Release Testing procedures, Verizon conducted bi-weekly status calls with CLECs throughout the month-long test period. Verizon was in regular contact with WorldCom during this period at the working level and executive level to provide extensive support throughout the test process. Verizon does not know what problems WorldCom experienced on its side of the interface. We do, however, know that other CLECs with access to the same documentation, testing and support successfully implemented LSOG 4 before WorldCom. By mid-July, WorldCom was actively using LSOG 4 for its production orders in Pennsylvania.

VIII. Verizon's Help Desk Provides CLECs with the Appropriate Level of Support.

41. WorldCom argues that Verizon's Help Desk, the WCCC is inadequate. WorldCom points to KPMG's findings that it took Verizon more than 28 days to resolve 14% of the critical issues and 22% of the major issues reported. It took between 7 and 27 days to resolve another 16% of critical issues and 22% of major issues. WorldCom Br. at 44; Kwapniewski/Lichtenberg Decl. ¶ 118. According to WorldCom, KPMG's findings are consistent with its own experience. Kwapniewski/Lichtenberg Decl. ¶¶ 120-122. KPMG's evaluation was based on data from September 1999 through April 2000. Since that time, Verizon has consolidated its two separate help desks (one North and one South) and introduced a number of process changes to improve performance. These activities have improved trouble ticket handling and close-out timeliness. Since the consolidation

occurred, the help desk improved its close-out timeliness for tickets open two days or more by 50%. Prior to consolidation, 38% of tickets were open for 2 days or more. After consolidation, that number dropped to 18%.

42. KPMG also noted that there were three primary reasons why trouble tickets remained open longer than seven days. These are: (1) a solution or fix for the issue raised by the trouble ticket is scheduled to be implemented in a future software release; (2) a CLEC does not respond to Verizon's request to close a trouble ticket even though the issue may have been addressed by Verizon; and (3) an issue was traced back to a CLEC originated problem, but the CLEC did not notify Verizon that the CLEC had addressed the issue. KPMG Final Report at 609. Verizon's experiences are consistent with the KPMG findings.

43. WorldCom also complains that Verizon's Help Desk is performing poorly in resolving trouble tickets related to missing notifiers. WorldCom acknowledges that Verizon generally does contact the CLEC within three days of the trouble ticket being submitted to provide the status of the order. Kwapniewski/Lichtenberg Decl. ¶ 123. But then, according to WorldCom, Verizon is poor at following up to provide further status of the order. *Id.*

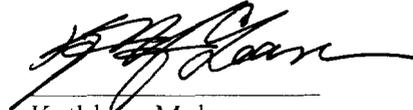
44. Moreover, WorldCom's claims that the Help Desk often takes a long time to reflow a notifier, and when it does, it is often the wrong one. *Id.* ¶ 48. As WorldCom acknowledges, Verizon provides status of PONs reported on PON Exception trouble tickets (missing notifiers) within 3 business days. Further, Verizon reflows the notifier within the same 3 business days, if the notifier *exists*. WorldCom is describing a small percentage of their orders for which they have not received billing completion notifiers

because the Verizon billing system has not yet been updated. In some cases, Verizon may reflow a provisioning completion notifier to notify the CLEC that the order has progressed through provisioning. In other cases, the order may have been cancelled and therefore will never generate a billing completion notice, or may be in jeopardy status awaiting provisioning. As of October 19th, one quarter of one percent (0.25%) of WorldCom's New York orders from June through September, were in the status of "awaiting bill completion." The majority of the orders in question have been cancelled and Verizon and WorldCom must work together to determine the appropriate disposition of these PONs.

45. This concludes our Reply Declaration.

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

Executed on November 2, 2000



Kathleen Mclean

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

Executed on October 31, 2000



Raymond Wierzbicki

JOINT REPLY DECLARATION OF
KATHLEEN McLEAN AND
RAYMOND WIERZBICKI

ATTACHMENT A

Comparison of New York and Massachusetts OSS

Verizon provides CLECs access to the same pre-ordering, ordering, provisioning, maintenance and repair, and billing functions in New York as it does in Massachusetts (and the other New England states). The Verizon OSS for pre-ordering, ordering, provisioning, maintenance and repair and billing are the same systems in New York and Massachusetts (and the other New England states), with two minor sub-system exceptions within the CRIS billing system. The exceptions in the CRIS billing system are in the usage message processing sub-systems (MPS in New England and MCRIS in New York) and the financial sub-systems (CASH in New England and BCRIS in New York). CLECs should not observe any differences even though there are two different usage message processing sub-systems. If there was a difference that affected CLECs, it would be observed in their usage within a jurisdiction. CLECs cannot observe the differences in the financial sub-systems as the components that differ perform internal financial functions. The billing systems were tested by KPMG in both NY and MA and in both cases fully satisfied the test criteria.

The processing performed by the OSS is the same across New York and the New England states (including Massachusetts). There are some variances due to product, rate and tax differences that are principally determined by the various state regulatory commissions. These differences are implemented in the data underlying the systems. There is, however, one set of Business Rules and interface specifications that cover both New York and New England (including Massachusetts).

For the systems described below, Verizon develops and maintains the application as a single set of source code (also called "software"). It is compiled once and may be distributed to one or more computers to provide sufficient computing capacity to support the workload (the Verizon Capacity Management process was reviewed by KPMG and the Massachusetts DTE). Although there are cases where there are separate system configurations for New York and New England, the class of machines in the respective configurations are the same. When there is more than one copy of an application, the data underlying the application may be segmented (divided into separate databases). For example, one copy of the application may operate on New York data, and another copy may operate on New England data (which includes Massachusetts). Software replication and distribution with data segmentation are common data processing constructs for managing large volumes of data and processing. The system configurations are designed, monitored and managed by Verizon to deliver consistent performance to CLECs and internal users across jurisdictions. Due to the distributed nature of the architecture, however, there can be instances where the *availability* of a computer impacts only New York, only New England or both.

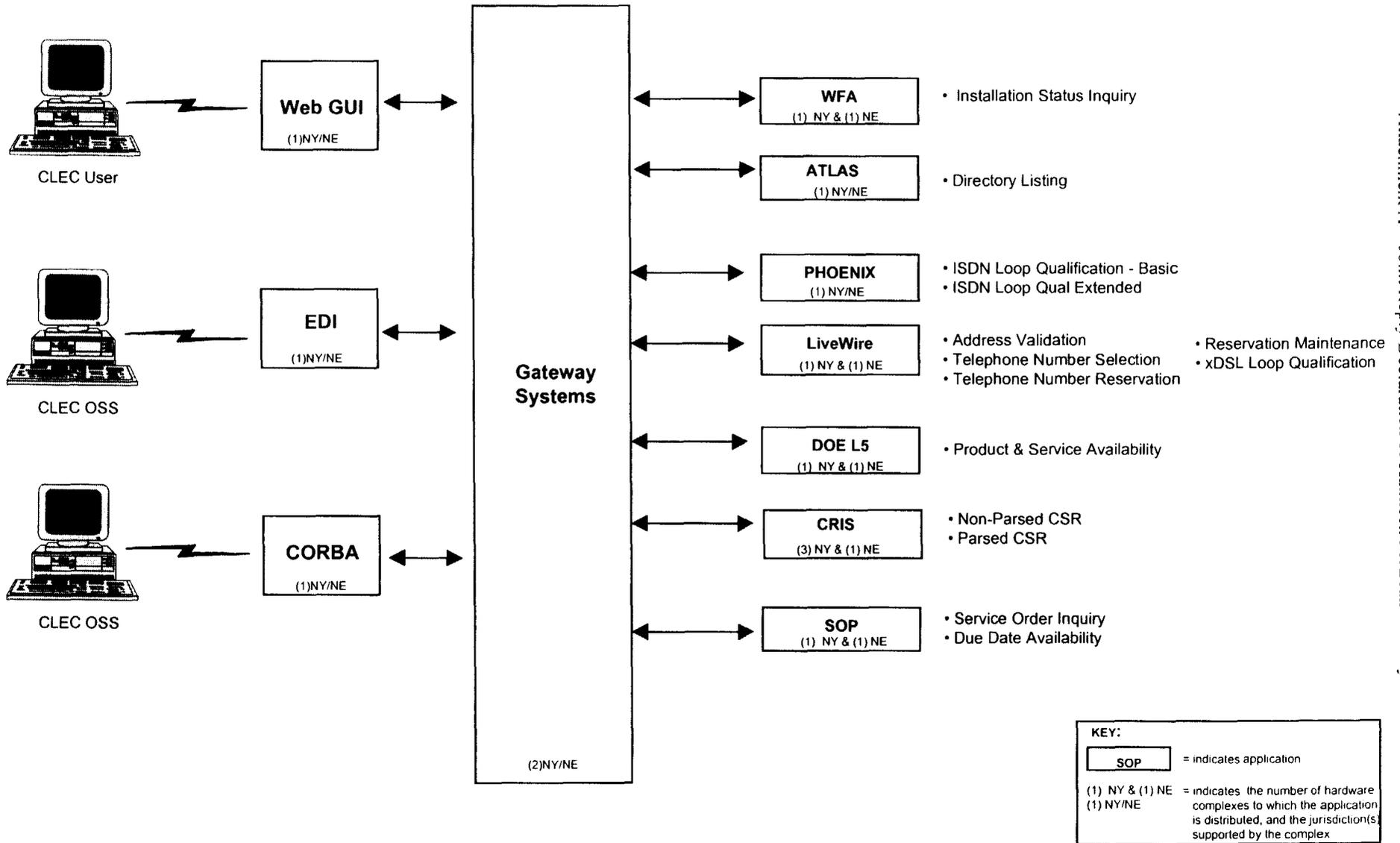
Additional information by system is provided in the following table and in the attached flow diagrams.

System	Configuration	NY/MA Comparison - Significance to CLECs
Interfaces		
Web GUI	Software: one application Hardware: servers located in Blue Hill NY, supports both NY/NE.	One set of software/hardware supports NY/NE. No differences to CLECs.
EDI – Netlink	Software: one application Hardware: servers located in Blue Hill NY, supports both NY/NE	One set of software/hardware supports NY/NE. No differences to CLECs.
Corba	Software: one application Hardware: servers located in Blue Hill NY; supports both NY/NE	One set of software/hardware supports NY/NE. No differences to CLECs.
EBI	Software: one application Hardware: servers located in Fairland MD; supports both NY/NE	One set of software/hardware supports NY/NE. No differences to CLECs.

Gateways		
DCAS (LSOG2)	Software: one application Hardware: servers located in Blue Hill NY and Burlington MA, each site supports both NY/NE.	One set of software distributed to two hardware complexes. Both complexes serve both NY/NE. No differences to CLECs.
Request Manager (LSOG4)	Software: one application Hardware: servers located in Freehold NJ and Fairland MD, each site supports both NY/NE.	One set of software distributed to two hardware complexes. Both complexes serve both NY/NE. No differences to CLECs.
RETAS	Software: one application Hardware: servers located in Blue Hill NY and Burlington MA, each site supports both NY/NE.	One set of software distributed to two hardware complexes. Both complexes serve both NY/NE. No differences to CLECs.
Back-end OSSs		
DOE L5	Software: one application Hardware: mainframe-based: Blue Hill NY supports NY and Burlington MA supports NE	One set of software distributed to two hardware complexes. NY complex supports NY and MA complex supports NE. Could have availability difference.
LiveWire	Software: one application Hardware: servers located in Fairland MD support NY and in Freehold NJ support NE.	One set of software distributed to two hardware complexes. MD complex supports NY, NJ complex supports NE. Could have availability difference.
Phoenix	Software: one application Hardware: servers located in Blue Hill NY support both NY/NE.	One set of software/hardware supports NY/NE. No differences to CLECs.
ATLAS	Software: one application Hardware: mainframe-based: Blue Hill NY supports both NY/NE	One set of software/hardware supports NY/NE. No differences to CLECs.
SOP	Software: one application Hardware: mainframe-based: Blue Hill NY supports NY and Burlington MA supports NE	One set of software distributed to two hardware complexes. NY complex supports NY and MA complex supports NE. Could have availability difference.
CRIS	Software: one application with the following exceptions: usage message processing sub-system NE=MPS, NY=MCRIS payment processing sub-system NE=CASH, NY=MCRIS Hardware: mainframe-based: Blue Hill NY supports NY and Burlington MA supports NE	One set of software distributed to four hardware complexes. 3 NY complexes support NY and 1 MA complex supports NE. Could have availability difference. Different usage message processing sub-systems could result in usage being guided differently. Different payment processing sub-systems do not impact CLECs.
CABS	Software: one application Hardware: mainframe-based: Blue Hill NY supports both NY/NE	One set of software/hardware supports NY/NE. No differences to CLECs.
LFACS/SOAC	Software: one application Hardware: mainframe-based in Andover MA supports both NY/NE	One set of software distributed to two hardware complexes in MA. One supports NY and one supports NE. Not accessed by CLECs.
SWITCH	Software: one application Hardware: mainframe-based: Blue Hill NY supports both NY/NE	One set of software/hardware supports NY/NE. Not accessed by CLECs.
TIRKS	Software: one application Hardware: mainframe-based: Blue Hill NY supports NY and Burlington MA supports NE	One set of software distributed to six hardware complexes. 3 NY complexes support NY and 3 MA complexes support NE. Not accessed by CLECs..
WFA	Software: one application Hardware: mainframe-based: Blue Hill NY supports NY and Burlington MA supports NE	One set of software distributed to two hardware complexes. NY complex supports NY and MA complex supports NE. Could have availability difference.
MARCH	Software: one application Hardware: mainframe-based: Blue Hill NY supports both NY/NE	One set of software/hardware supports NY/NE. Not accessed by CLECs.
LMOS	Software: one application Hardware: mainframe-based: Blue Hill NY supports NY and Burlington MA supports NE	One set of software distributed to two hardware complexes. NY complex supports NY and MA complex supports NE. Could have availability difference.
MLT	Software: one application Hardware: servers located in Blue Hill NY support NY and in Burlington MA support NY/NE.	One set of software distributed to three hardware complexes. NY complex supports NY, one MA complex supports NY and one MA complex supports NE. Could have availability difference.
DELPHI	Software: one application Hardware: servers located in Blue Hill NY support NY and in Burlington MA support NE.	One set of software distributed to two hardware complexes. NY complex supports NY, MA complex supports NE. Could have availability difference.
StarMEM	Software: one application Hardware: servers located in Blue Hill NY support NY and in Burlington MA support NE.	One set of software distributed to two hardware complexes. NY complex supports NY, MA complex supports NE. Could have availability difference.
SARTS	Software: one application Hardware: servers located in Blue Hill NY support NY and in Burlington MA support NE.	One set of software distributed to two hardware complexes. NY complex supports NY, MA complex supports NE. Could have availability difference.

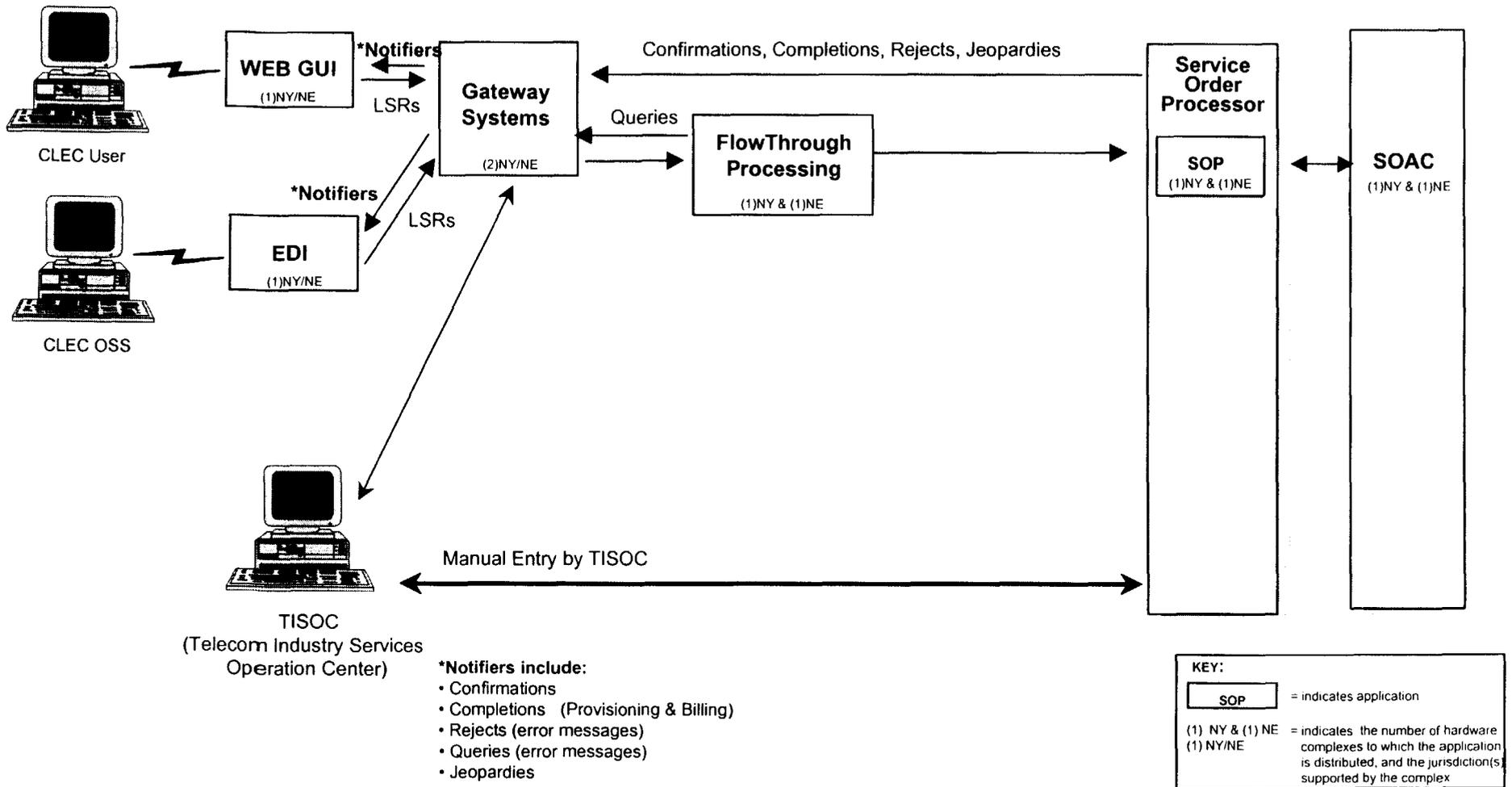


North Pre-Order Process Flow



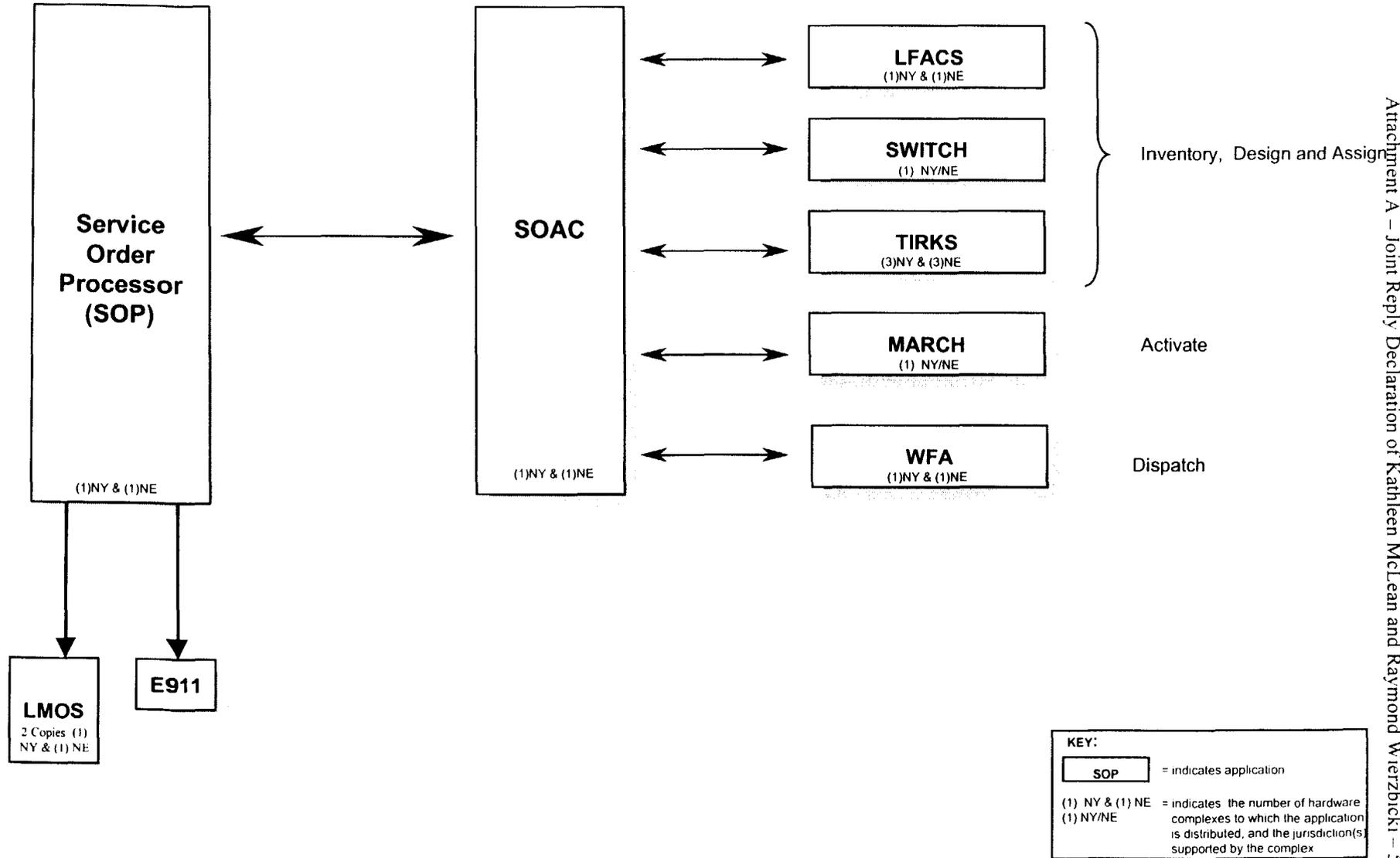


North Order Process Flow



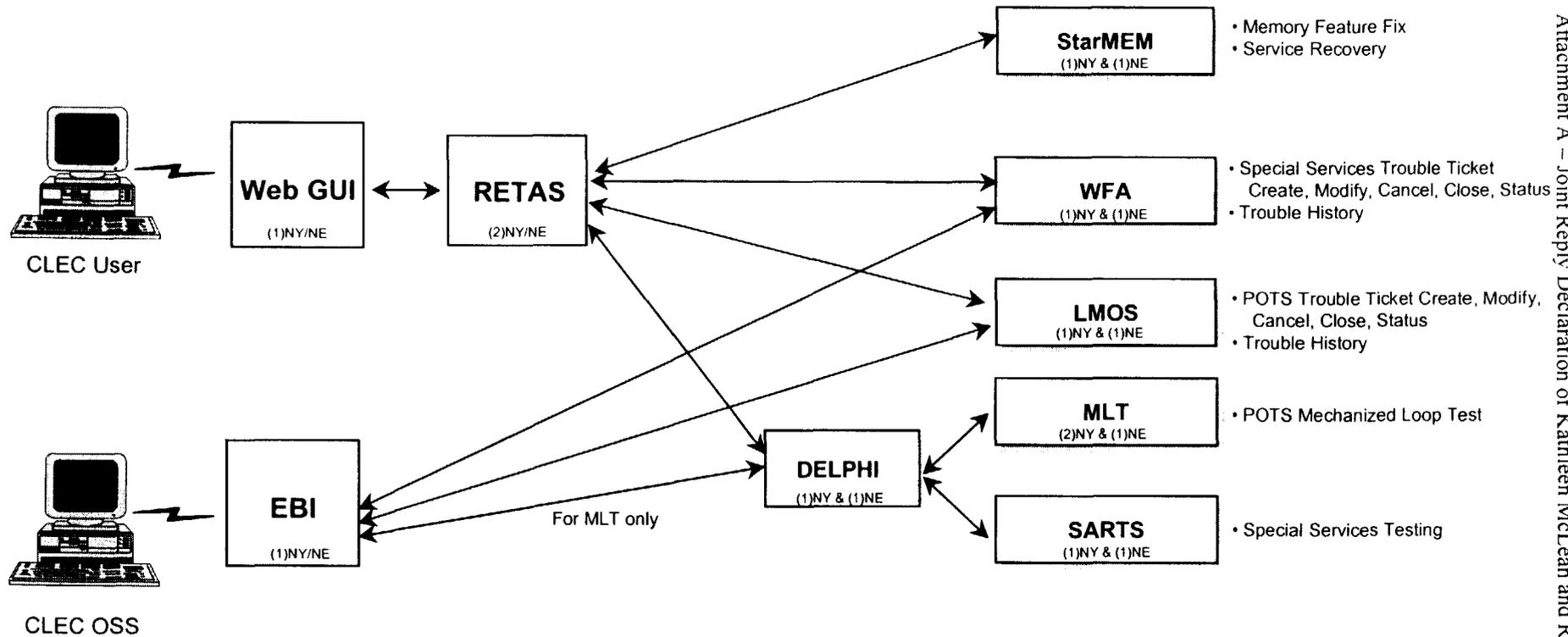


North Provisioning Process Flow





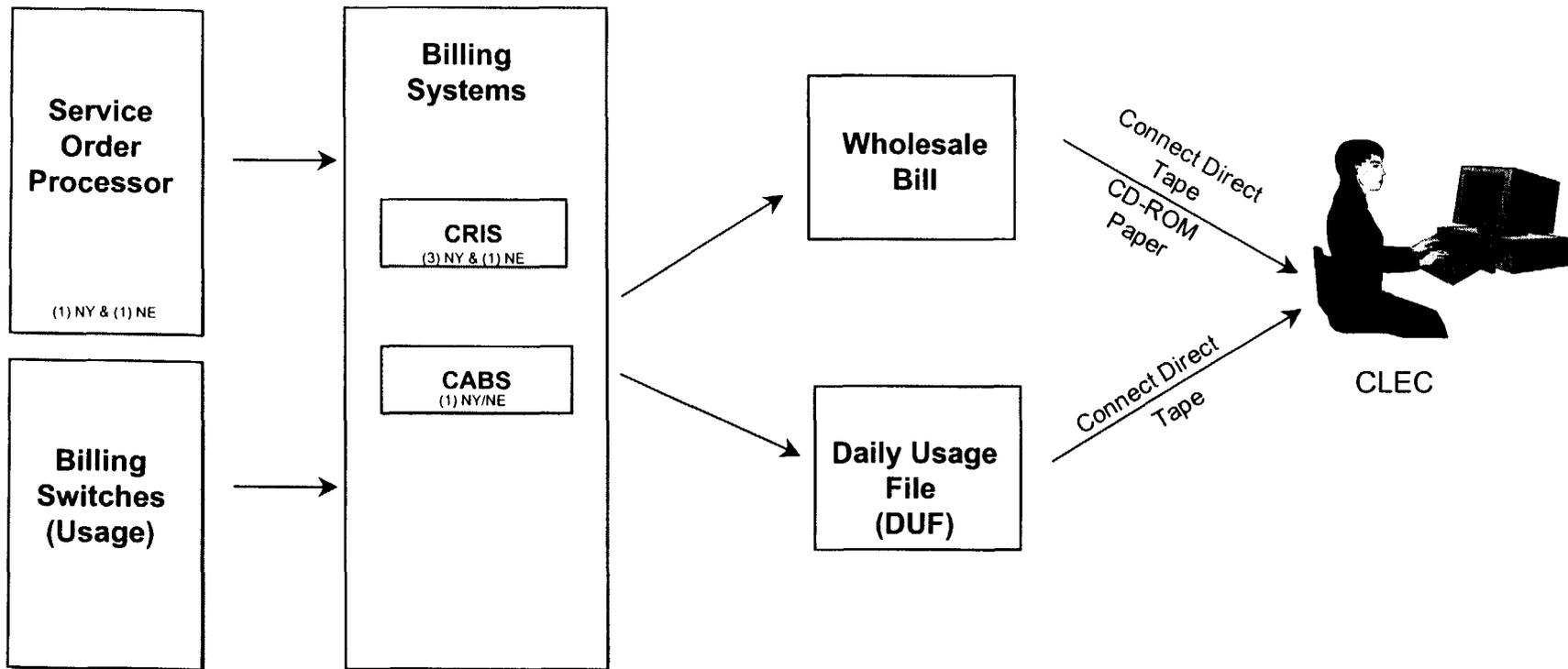
North Maintenance & Repair Process Flow



KEY:	
SOP	= indicates application
(1) NY & (1) NE	= indicates the number of hardware complexes to which the application is distributed, and the jurisdiction(s) supported by the complex
(1) NY/NE	



North Billing Process Flow



KEY:
SOP = indicates application
(1) NY & (1) NE = indicates the number of hardware complexes to which the application is distributed, and the jurisdiction(s) supported by the complex
(1) NY/NE

JOINT REPLY DECLARATION OF
KATHLEEN McLEAN AND
RAYMOND WIERZBICKI

ATTACHMENT B

Line Loss Trouble Tickets

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	26	976	332,182	0.3%
September	116	2,646	432,762	0.6%
TOTAL	197	13,267	2,320,840	0.6%



C



JOINT REPLY DECLARATION OF
KATHLEEN McLEAN AND
RAYMOND WIERZBICKI

ATTACHMENT C

Event Date	(P)lanned / (U)nplanned or (S)lowdown		Verizon Agree/ Disagree	Notification Date	Notification Reference	Process Impacted	Jurisdiction Impacted	System Interfaces Impacted	Transactions Impacted	Verizon Duration	Comments
	MCI Claim	Verizon									
08/07/2000	U	S	Disagree	08/07/2000	ADV38668	Pre-order, Order, Trouble Maintenance, Billing	North, South	Web GUI	All		Outage Log and Trivolt ticket indicated slow response. MCI reported slow response duration that did not match Verizon's. Verizon reported 1 hour and 23 minutes against MCI's 10 hours and 14 minutes. Root cause: A CLEC using robot order entry thus leaving open cursor.
08/08/2000	U	U	Disagree	08/08/2000	ADV38902	Pre-order, Order, Trouble Maintenance, Billing	North, South	Web GUI	All	Tues 8/8/00 from 11:34AM - 12:09PM (36 minutes as measured in Enview)	No ticket number provided by MCI. Verizon investigation produced possible ticket ADV38902 which indicated multiple CLECs reporting slow response to Web GUI or users being knocked out of system. Enview measured 36 minutes for this outage while MCI reported 8 minutes of outage. Root cause: Hardware Failure - Web Server. Resolution: CPU replaced by Sun.
08/24/2000	U	U	Disagree	08/24/2000	ADV49616	Pre-order, Order, Trouble Maintenance, Billing	North, South	Web GUI	All	Thurs 8/24/00 from 3:58PM - 5:48PM (1 hour 48 minutes)	No ticket number provided by MCI. Verizon investigation produced possible ticket ADV49616. CLEC reported inability to log-on to Web GUI, slow response time and time-outs. Verizon disagrees with the duration MCI reported. Verizon reported 1 hour 48 minutes of outage while MCI had 10 hours and 13 minutes. Root Cause: problem with database connections to the applications.
09/01/2000	U	S	Disagree	09/01/2000	ADV57759	Pre-order, Order, Trouble Maintenance, Billing	North, South	Web GUI	All		No ticket number provided by MCI. Verizon investigation produced possible ticket ADV57759. Multiple CLECs reporting slow response in the GUI.
09/16/2000	P	P	Agree	Forecast is posted on the Web	Verizon North and South System Availability Forecast (September, 2000 Exceptions)	Pre-Order, Order, Trouble Maintenance	South	Web GUI, EDI, Corba	Address Validator/ TN Selection/ TN Reservation, Due Date Availability, Loop Qualification XDSL, Product and Service Availability/Allowability and TN Reservation Maintenance	Sat 9/16/00 from 6:00AM - 9:10PM (15 hours and 10 minutes)	Scheduled Release
								EDI, Corba	Parsed and Unparsed CSR	Sat 9/16/00 from 9:00PM - 10:00PM (1 hour)	Scheduled Release
								Web GUI	Installation Status Inquiry and Trouble Administration: Create, Modify, Inquire, Close, Repair, Test, History (POTS)	Sat 9/16/00 9:00PM - Midnight (3 hours)	Scheduled Release
								Web GUI, EDI, Corba	Loop Qualification - Basic	Sat 9/16/00 10AM - 5:00PM (7 hours)	Scheduled Release
								Web GUI, EDI, Corba	Service order/LSR	Sat 9/16/00 7:00AM - 9:00PM (14 hours)	Scheduled Release
09/22/2000	U	n/a	Disagree	09/22/2000	ADV76545	Pre-order, Order, Trouble Maintenance, Billing	North, South	None	None	No ticket number provided by MCI. Verizon investigation produced possible ticket ADV76545. CLECs report no access available to Phase III Web GUI. WCCC was able to log on to Phase III Web GUI. MCI reported 25 minutes of outage. Verizon disagrees to this outage.	
09/23/2000	P	P	Agree	09/20/2000	CR1722	Pre-order, Order	MD, CD, VA, WV	EDI, Corba	Parsed CSR	Sat 9/23/00 from 12:01AM - 6:00AM (6 hours)	Scheduled Release
09/27/2000	U	S	Disagree	09/27/2000	ADV80146	Pre-order, Order, Trouble Maintenance, Billing	North, South	Web GUI	All		No ticket number provided by MCI. Verizon investigation produced possible ticket ADV80146. CLECs reporting slow response in the Phase III Web GUI after successfully logging on. Root Cause: A CLEC was impacting overall Web response submitting unqualified queries to the system. Verizon reported 5 hours 55 minutes of slow response while MCI had 17 hours and 23 minutes.

JOINT REPLY DECLARATION OF
KATHLEEN McLEAN AND
RAYMOND WIERZBICKI

ATTACHMENT D

TOTAL FLOW THROUGH PERFORMANCE

Massachusetts				
		July 2000	August 2000	September 2000
Resale	%	42.41%	50.63%	47.14%
Resale	Volume	12122	11821	12280
UNE Platform	%	73.06%	74.28%	81.68%
UNE Platform	Volume	3526	2322	4340
UNE Loop	%	33.17%	38.09%	44.44%
UNE Loop	Volume	19949	22647	22582

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Application by Verizon New England Inc.,)
Bell Atlantic Communications, Inc. (d/b/a)
Verizon Long Distance), NYNEX Long) CC Docket No. 00-176
Distance Company (d/b/a Verizon)
Enterprise Solutions), and Verizon Global)
Networks Inc., for Authorization To)
Provide In-Region, InterLATA Services in)
Massachusetts)
)

**JOINT REPLY DECLARATION OF
ELAINE M. GUERARD AND JULIE A. CANNY**

I. Introduction

1. My name is Elaine M. Guerard. I am Vice President – Wholesale Performance Assurance for Verizon Services Group. I submitted a Declaration jointly with Julie A. Canny as part of Verizon New England Inc.’s (“Verizon’s”) above-captioned Application to provide in-region interLATA services in Massachusetts. My qualifications are set forth in that Declaration.

2. My name is Julie A. Canny. I am Executive Director - Regulatory Support for Wholesale Performance Assurance for Verizon Services Group. I submitted a Declaration jointly with Elaine M. Guerard as part of Verizon New England Inc.’s (“Verizon’s”) above-captioned Application to provide in-region interLATA services in Massachusetts. My qualifications are set forth in that Declaration.