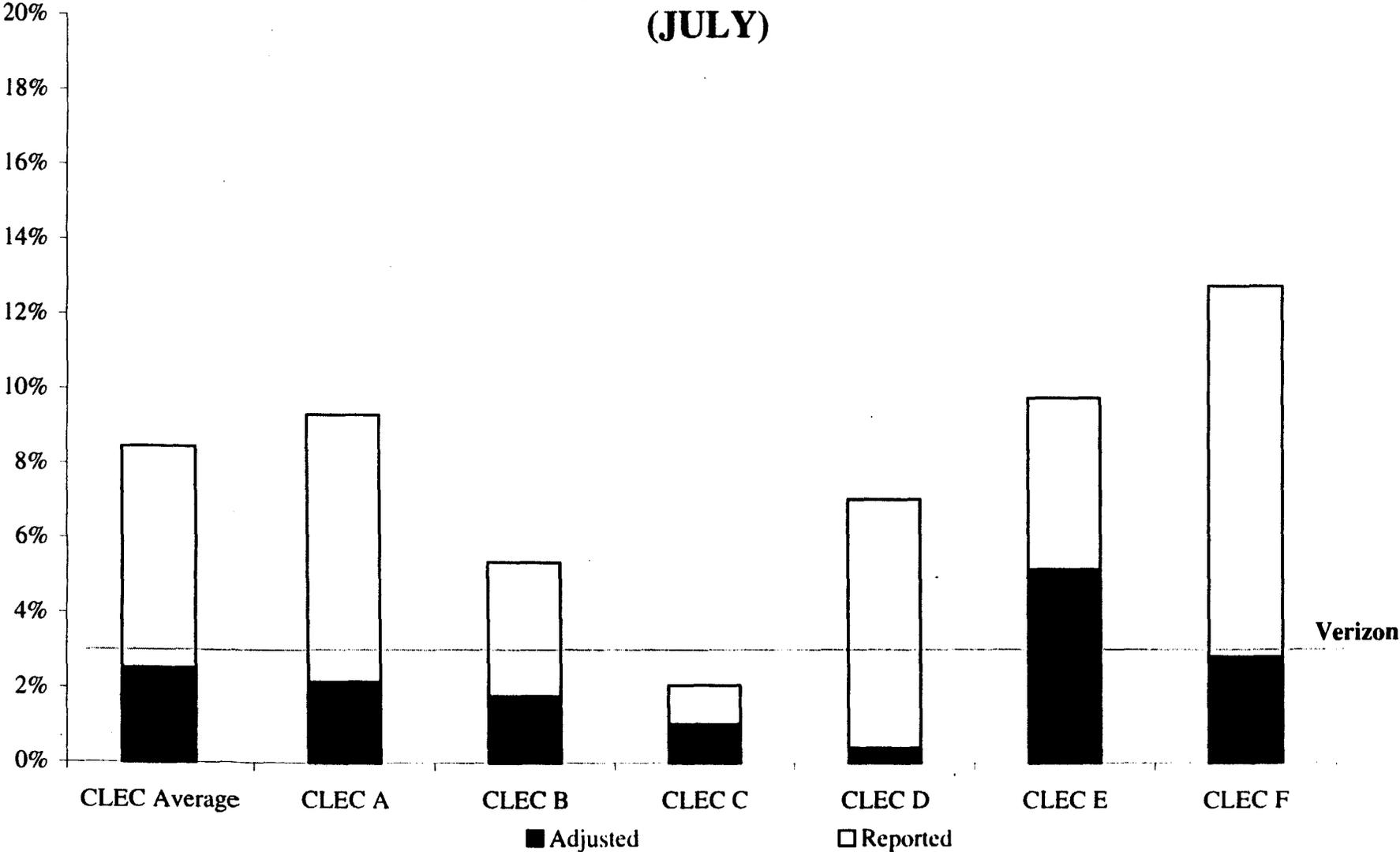


- C. While the reported results for one subset of the overall Trouble Report Rate -- those reported within 30 days of installation -- show a difference between retail and wholesale, these results reflect CLEC behavior.
1. Verizon performs acceptance testing with CLECs, which allows CLECs to test DSL loops at the time of their installation to verify that they are working.
 - a. The CLEC provides Verizon with a serial number at the time the loop is installed to certify that it is working.
 - b. Verizon receives serial numbers for approximately 70% of the loops on which CLECs submit trouble reports within 30 days of installation.
 - c. A properly performed test by the CLEC would have revealed the problem so that it could be corrected at the time of installation.

2. The CLECs are accepting loops that are not suitable for DSL, in many cases intentionally.
 - a. Covad: "The process that Covad experiences, if Bell Atlantic provisions the loop and through Harris testing we discover it has, for example, load coil on it, the way that is dealt with is through a trouble ticket. We have to call Bell Atlantic and open up a trouble ticket. Bell Atlantic has a commitment to clear a trouble ticket in 24 hours." Application, App. B, Tab 233 at 3247.
 - b. Covad reiterated in July that it accepts loops it knows do not support DSL service. DTE Reply Comments at 79-80 & n.263.
 - c. Vitts: "Our approach has been the same manner with the trouble report. They have two or three days' turnaround time repairing those, depending on how many load coils they have and how much work is involved." Application, App. B, Tab 233 at 3248.

3. The DTE concluded that it would “not accord a significant amount of weight to this metric” (PR 6-01) because Verizon’s performance had been skewed by “the conduct of some CLECs in playing an angle in the system.” DTE Eval. at 313-14.
4. Adjusted results show parity.

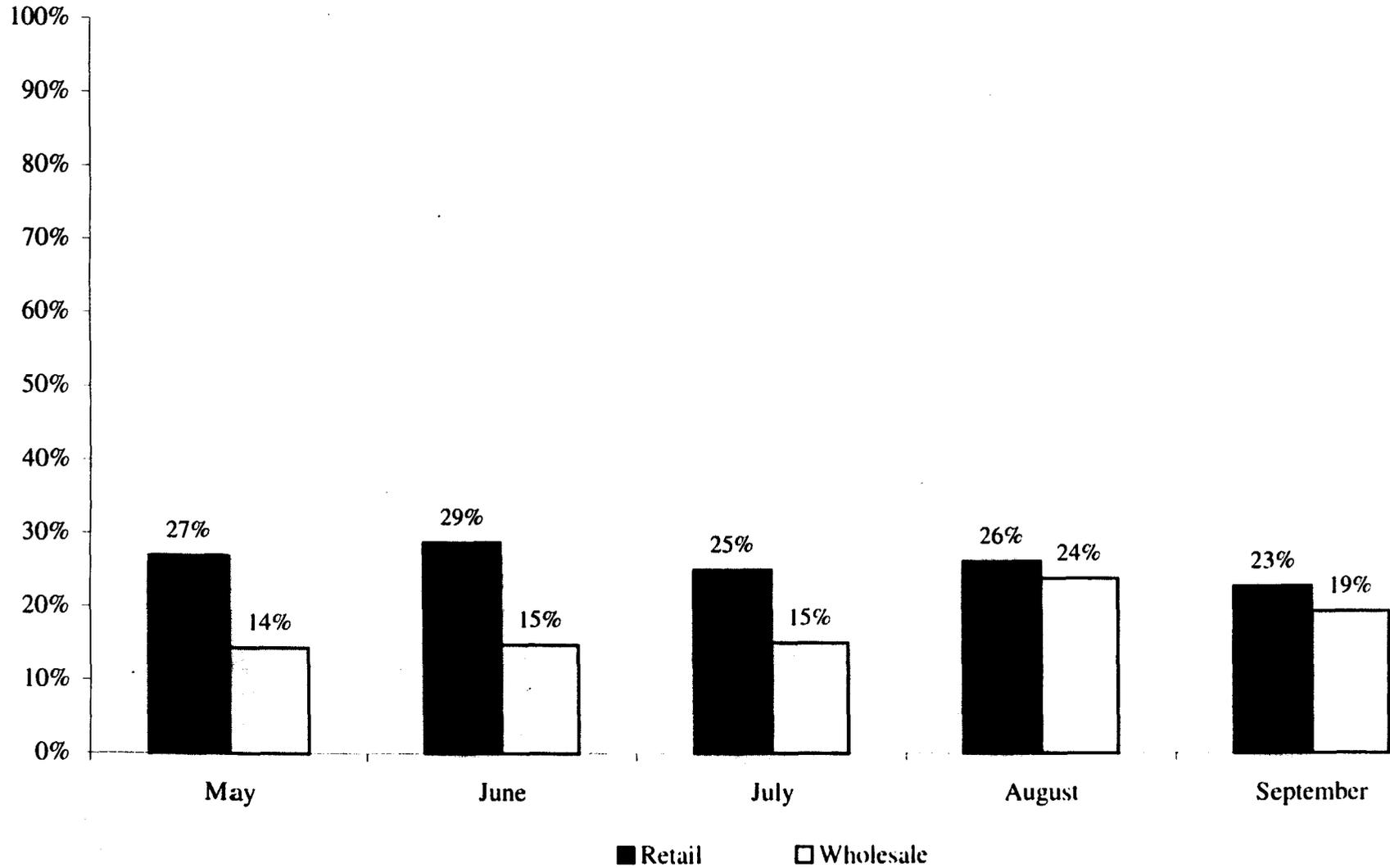
**Installation Trouble Reports
By CLEC, PR 6-01
(JULY)**



D. The rate of repeat trouble reports within 30 days is actually lower for CLECs than for retail.

“This metric demonstrates that once CLECs receive loops that are appropriate for xDSL service, they experience fewer problems than VZ-MA.” DTE Eval. at 321.

Percent Repeat Trouble Reports Within 30 Days, MR 5-01



VI. Maintenance and Repair.

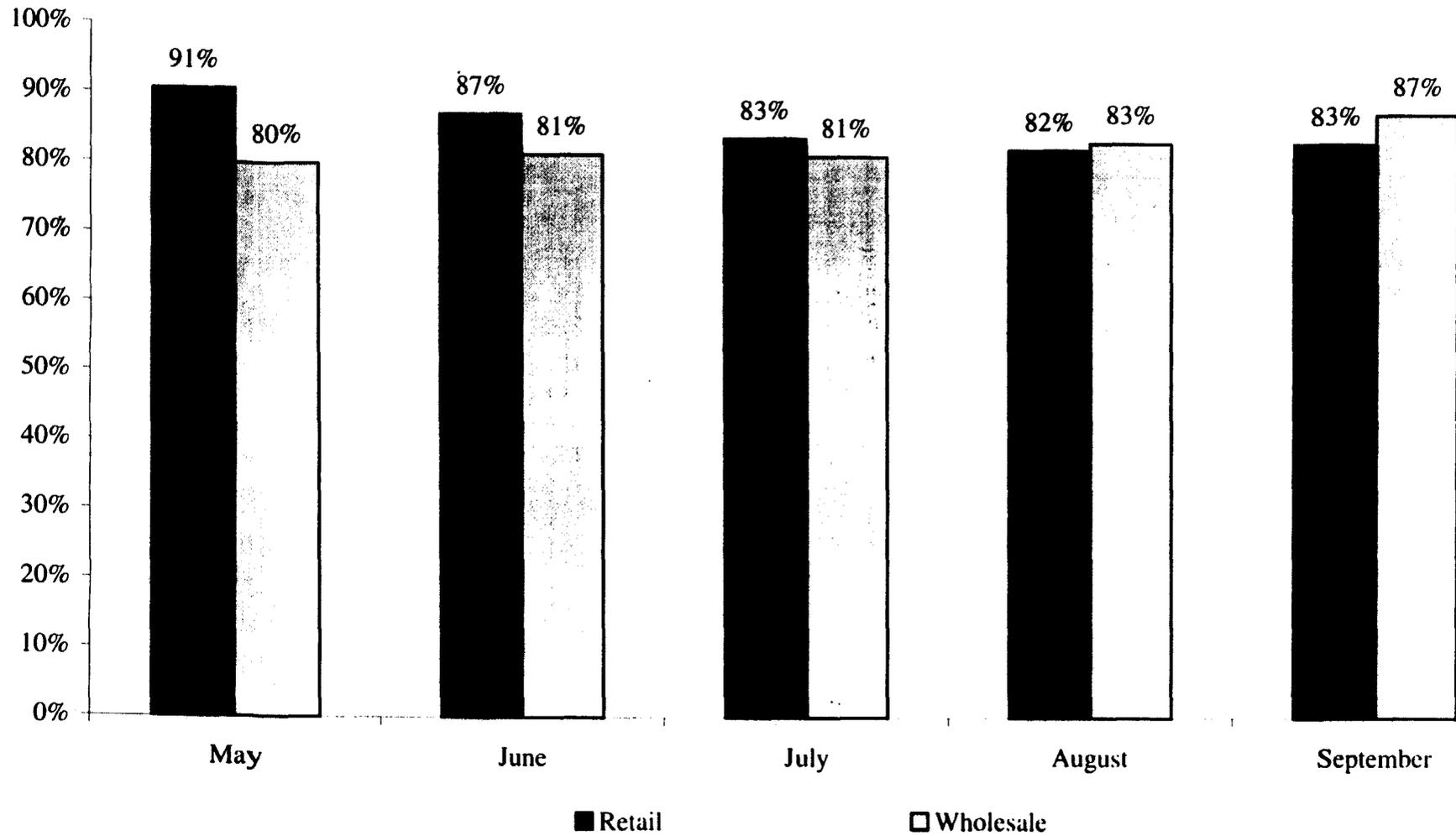
A. The DTE found: “VZ-MA provides maintenance and repair for CLEC xDSL loops in substantially the same time and manner as it does for retail customers.” DTE Eval. at 322.

B. Verizon's on-time repair performance demonstrates parity.

The measure of missed repair appointments shows parity (MR 3-01).

C. As noted above, the measure of repeat trouble reports shows fewer repeat reports for CLECs (MR 5-01).

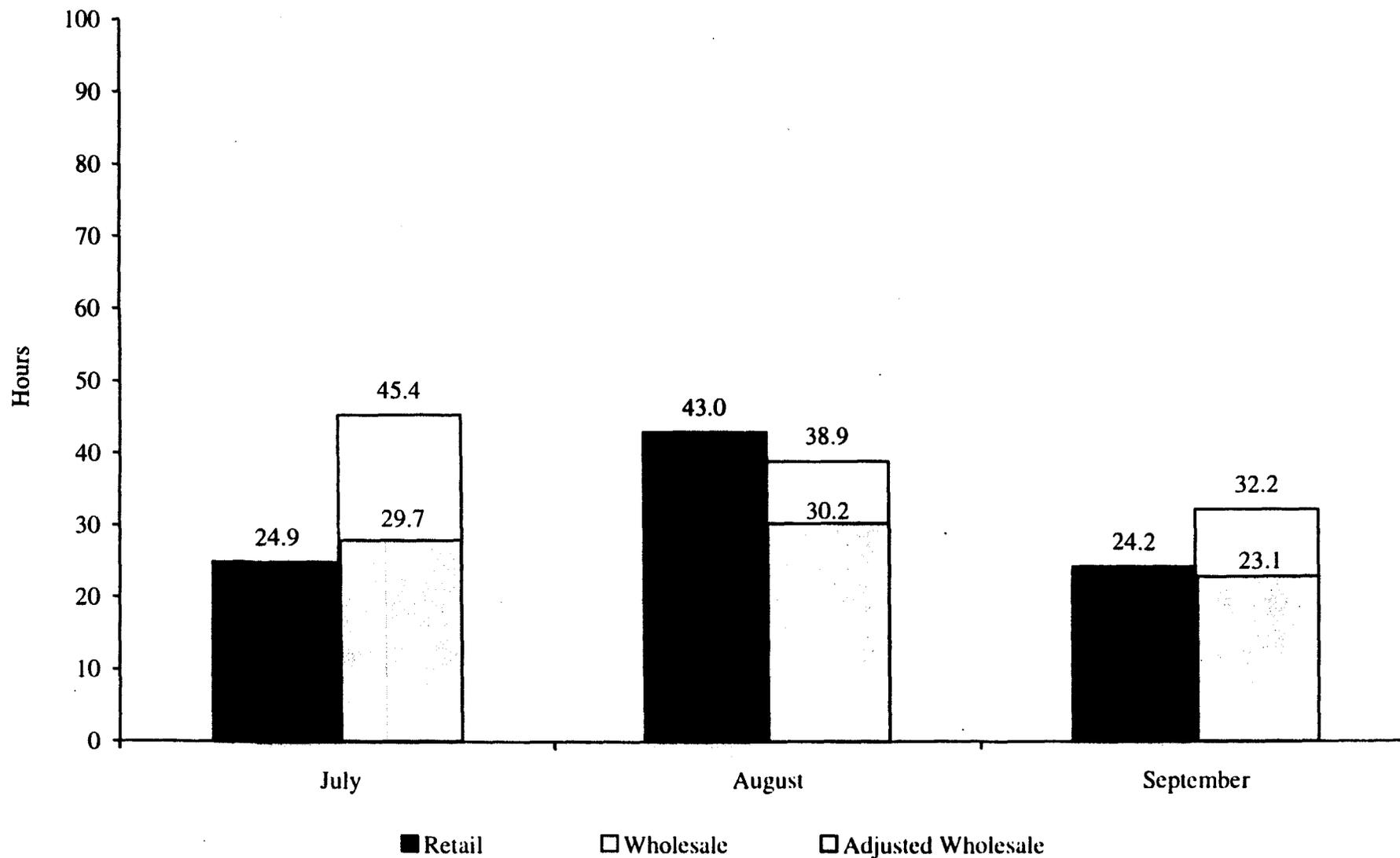
Percent Appointments Met* Loop Troubles



* Inverse of MR 3-01

- D. Interval measures such as mean time to repair are affected by CLEC behavior (MR 4-01).**
- 1. The DTE found that “VZ-MA’s maintenance and repair performance is hindered by” CLEC practices:**
 - a. “CLECs’ inability to identify the source of the trouble.”**
 - b. “[T]he propensity of some CLECs to accept loops they concede are unable to support xDSL service absent additional work by VZ-MA technicians.”**
 - c. “[T]he preference for Monday and not weekend repair appointments.” DTE Eval. at 320.**
 - 2. The DTE found: “[A]scribing the consequence of a CLEC business decision to a purported VZ-MA failure appears unwarranted.” DTE Reply Comments at 80.**
 - 3. Adjusting for just the latter two factors shows parity.**

Mean Time to Repair, MR 4-01



VII. Conclusion: Verizon meets the checklist.

- A. The DTE found: “VZ-MA is performing as a wholesale provider should. It gives CLEC customers the service they request.” DTE Eval. at 306.
 - 1. The DTE replicated Verizon’s DSL measures:
 - a. Its “results matched VZ-MA’s reported performance exactly in all but four instances. . . . [T]he differences in these four cases are the result of rounding error and not misreporting on the part of VZ-MA.” DTE Reply Comments at 22-23.
 - 2. The DTE evaluated Verizon’s explanations:
 - a. “With the exception of one VZ-MA study related to longer provisioning intervals . . . all of VZ-MA’s justifications for its performance data were addressed in its May and August, 2000, filings and during the August technical sessions.” DTE Reply Comments at 61-62.

B. Verizon will continue to provide good service.

1. Verizon has a strong business incentive to provide good wholesale service to avoid losing customers to facilities-based cable providers.
2. The PAP approved by the DTE includes key measures of DSL performance.
3. Once the Performance Assurance Plan is effective, Verizon will follow the Plan (including, if appropriate, seeking a waiver for certain measures) in providing bill credits to CLECs, even if particular measures are flawed.
4. The first annual review of the New York PAP is underway, and modifications adopted there will also apply to Massachusetts.
 - a. The DTE already has decided to make DSL a separate mode of entry which will put dollars at risk based just on Verizon's *overall* DSL performance for CLECs.
 - b. Verizon has proposed to substantially increase the number of DSL-specific measures included in the PAP.
 - c. The Massachusetts DTE has stated that its approach going forward, "Without limiting our right to evaluate potential changes or additions to the adopted metrics, is to incorporate into the Massachusetts PAP whatever new metrics, if any, the New York PSC adopts for the New York PAP." DTE 99-271, *Order adopting Performance Assurance Plan* at 26 (App. B, Tab 559).

- C. **Verizon's Separate Data Affiliate is now fully operational in Massachusetts, more than a month before it is required to be by the merger order.**

As the FCC has concluded, the Separate Data Affiliate will ensure continued non-discriminatory performance in the future: Establishment of separate data affiliate provides "further assurance that competing carriers . . . will have nondiscriminatory access to xDSL-capable loops. . . ." New York Order ¶¶ 330-331

DSL MEASURES

MEASURES	PERFORMANCE
<p>Pre-Order</p> <p>1) Pre-Qualification – Mechanized (PO-1-06) 2) Pre-Qualification – Manual</p>	<p>1) Parity 2) 96 to 98%</p>
<p>Order Processing</p> <p>3) Order Confirmation Timeliness (OR-1-04) 4) Reject Timeliness (OR-2-04)</p>	<p>3) 97% or better 4) 97% or better</p>
<p>Installation Timeliness</p> <p>5) PAP % Completed On-Time 6) C2C % Completed On-Time</p> <p>7) % Missed Appointments – VZ – Dispatch (PR-4-04) 8) % Missed Appointments – VZ – No Dispatch (PR-4-05) 9) Avg. Interval Completed – No Dispatch (PR-2-01) 10) Avg. Interval Completed – Dispatch (PR-2-02) 11) % Completed in 6 Days (PR-3-10)</p>	<p>5) 95% or better in June and July 6) 92% or better in June and July; August and September data impacted by strike 7) Three month average shows 3% missed appointments; August and September data impacted by strike 8) Low CLEC Volumes 9) Three and five month weighted averages demonstrate parity 10) Three and five month weighted averages demonstrate parity 11) Flawed measure further skewed by CLEC behavior</p>
<p>Loop Quality</p> <p>12) Total Troubles (DSL to DSL) 13) % Installation Troubles Reported w/in 30 Days (PR-6-01) 14) % Repeat Reports w/in 30 Days (MR-5-01)</p>	<p>12) June through September average demonstrates parity 13) CLEC behavior skews results; adjusted performance good 14) Repeat troubles lower for CLECs every month between May and September</p>
<p>Maintenance and Repair</p> <p>15) % Missed Repair Appointment – Loop (MR-3-01) 16) Mean Time to Repair - Total (MR-4-01)</p>	<p>15) Performance good May through September 16) CLEC behavior skews results; CLEC MTTR has decreased substantially since May; adjusted performance good</p>

STAMP & RETURN

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December 1, 2000

RECEIVED

DEC 1 2000

Honorable William E Kennard
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RECEIVED

DEC 1 2000

FCC MAIL ROOM

Dear Chairman Kennard:

Verizon's checklist performance in Massachusetts is excellent, and our application to provide long distance should be approved.

As the record here makes clear, there is no serious dispute that Verizon satisfies at least 13 and one-half points of the 14 point checklist. The principal debate in this proceeding has been whether Verizon's performance on one subset of one checklist item -- unbundled loops used to provide xDSL service -- also satisfies the checklist. It does.

To put the issue in context, DSL loops are a minority of the unbundled loops that our carrier-customers have purchased in Massachusetts, and a minority of the unbundled loops that are being added on a monthly basis.¹ This does not mean that we don't take seriously our obligation to provide excellent service to customers who purchase DSL loops. We do. But it does highlight the limited scope of the debate.

In any event, Verizon's performance on this final subset of loops that are used to provide DSL is strong. This is precisely the conclusion of the Massachusetts DTE based on its own exhaustive review: "VZ-MA is performing as a wholesale provider should. It gives CLEC customers the service they request."² It also is the conclusion echoed by our carrier-customers outside of regulatory forums. As the CEO of Covad publicly acknowledged, his company was "getting great results" from Verizon: "I

¹ Verizon Application, Lacouture/Ruesterholz Decl. ¶¶ 66, 95; November 17, 2000 letter to Ms. Salas from Ms. May.

² DTE Eval. at 306.

will give [Verizon] a lot of credit. They have done a wonderful job. I would highly commend Ivan Seidenberg's organization for really stepping up."³

The record here shows that those conclusions are abundantly justified. As the evidence considered by the DTE and timely filed in this proceeding demonstrates,⁴ Verizon's DSL loop performance in each of the areas that the Commission has examined in its previous orders is strong.

A. Pre-Order Timeliness

In Massachusetts, Verizon provides carriers with the same access to loop pre-qualification information that the Commission concluded satisfied the checklist in its *New York Order*, and does so in a timely manner.⁵ In fact, as we demonstrated in our application, Verizon responds to queries to our electronic pre-qualification database well within the parity standard established by the DTE of plus or minus four seconds.⁶ And Verizon responds to requests to perform manual loop pre-qualifications within the time frame established by the DTE more than 96 percent of the time.⁷

Moreover, although we do not believe we are required to do so, we also have voluntarily offered to provide other carriers with electronic access to back office inventory systems that contain limited additional loop information, provided only that they reimburse the developmental costs we incur from the third party vendor. To date, however, none of the carriers has indicated whether it wants us to proceed.⁸

A. Order Processing Timeliness

³ Transcript of Covad's 2000 First Quarter Earnings Release Conference Call at 29-30 (Apr. 18, 2000); Interview with Robert Knowling Jr. on RadioWallStreet.Com at 6 (Oct. 6, 2000).

⁴ Some parties have claimed that the DSL data upon which we urge the Commission to rely was not timely filed in this proceeding. As the cites throughout this document indicate, the DSL performance data upon which we rely were timely filed, either in our initial application or in response to comments.

⁵ Verizon Application, Lacouture/Ruesterholz Decl. ¶¶ 96, 108-110.

⁶ Verizon Application, Guerard/Canny Decl. Att. G.; Verizon Reply, Guerard/Canny Reply Decl. Att D.

⁷ Verizon Application, Guerard/Canny Decl. Att. G.

⁸ Verizon Reply, Lacouture/Ruesterholz Reply Decl. ¶ 83.

Verizon's performance in processing DSL orders submitted by our carrier-customers is excellent. In fact, as we demonstrated in our application, Verizon's timeliness of returning firm order confirmations consistently is 97 percent or better. And Verizon's timeliness of returning reject notices consistently is more than 96 percent.⁹

B. Installation Timeliness

Verizon also installs unbundled DSL loops on time, as demonstrated by several different measures of our performance that have been validated by the Massachusetts DTE. Based on this extensive evidence, the DTE has confirmed that Verizon "gives CLEC customers the service they request."¹⁰

First, as demonstrated in our application, the on-time measurements adopted by the DTE for use in the Performance Assurance Plan (PAP) show that Verizon installs more than 95 percent of new DSL loops on time under normal operating conditions.¹¹ The PAP measures are the best measure of Verizon's on-time performance for two reasons. First, the PAP measures focus specifically on Verizon's performance installing new DSL loops. Second, the PAP measures exclude orders that are missed because of a lack of facilities. Both the Massachusetts and New York commissions have concluded that these orders should be excluded so that Verizon can try to find or free up other facilities in order to accommodate its carrier-customers rather than simply reject the orders as it is entitled to do.¹²

Second, Verizon's strong performance is confirmed by the on-time measures included in the carrier-to-carrier reports. Unlike the PAP measures, the carrier-to-carrier measures do not exclude orders missed for facilities reasons. As demonstrated in the application, Verizon nonetheless completed 92 percent or more of DSL loop orders on time under this alternative measure.¹³

⁹ Verizon Application, Guerard/Canny Decl., Att. E; Verizon Reply, Guerard/Canny Reply Decl. Att. D.

¹⁰ DTE Eval. at 306.

¹¹ Verizon Application, Lacouture/Ruesterholz Decl. ¶ 96; Verizon Application, Guerard/Canny Decl. Att. M.

¹² Verizon Application, Lacouture/Ruesterholz Decl. ¶ 96-98; Verizon Reply, Lacouture/Ruesterholz Reply Decl. ¶ 57.

¹³ Verizon Application, Guerard/Canny Decl., Att. E.

Third, Verizon's strong performance is further confirmed by the missed installation appointment measure included in the carrier-to-carrier reports. The reports included in our application demonstrated that Verizon meets approximately 96 percent of our installation appointments for dispatch orders, which make up the overwhelming majority of the orders submitted by our carrier-customers.¹⁴ This is a broad measure of Verizon's on-time performance because it is not limited just to new loops, but includes all DSL-related orders (such as disconnects and port changes).

Fourth, the performance reports in Verizon's application demonstrated that the weighted average completion intervals for unbundled DSL loops are virtually identical to the same interval for Verizon's retail DSL service. In fact, the intervals are essentially the same when dispatch orders are compared to dispatch orders (7.26 days versus 7.29 days). And the intervals for wholesale orders are actually shorter when non-dispatch orders are compared to non-dispatch orders (4.89 days versus 5.6 days).¹⁵

In its application here, Verizon demonstrated that the reported results for these measures showed that Verizon installs loops on time under normal operating conditions. Of course, the reported performance results for August and September -- which post-date the application because they were not yet available at the time of the filing -- necessarily were affected by the work stoppage that occurred in August and the related recovery period. In particular, Verizon suspended installation work requiring a dispatch, and instead focused available work forces on maintenance and repair for existing customers, both wholesale and retail. As a result, the work stoppage had the largest impact on installation measures for dispatch orders.¹⁶

The work stoppage had a disproportionately large impact on the reported results for wholesale orders in the month of August. Ironically, the reason for this is that Verizon went to great lengths to provide our carrier-customers with *better* service during the recovery period than we provided for our retail customers. We did so by completing *more* strike-delayed wholesale orders in the last two weeks of August than we did retail orders. Because these orders are recorded as misses in the month that they are completed, the fact that we completed the strike-affected wholesale orders faster actually caused the reported results for August to include more misses and

¹⁴ Verizon Application, Gueard/ Canny Decl. Att. E; Verizon Reply, Lacouture/Ruesterholz Reply Decl. ¶¶ 58-59;

¹⁵ Verizon Application, Lacouture/Ruesterholz Decl. ¶ 99; Verizon Application, Gueard/ Canny Decl. Att. E.

¹⁶ Verizon Application, Lacouture/Ruesterholz Decl. ¶311; Verizon Reply, Lacouture/Ruesterholz Reply Decl. ¶¶ 176, 182-186.

appear worse.¹⁷ By September, however, the reported rate of missed wholesale and retail orders already were once again roughly comparable, though at slightly elevated levels as remaining strike-affected orders worked through the system.¹⁸ Based on Verizon's strong performance during the strike and the subsequent recovery period, Covad's CEO publicly acknowledged: "I will give them a lot of credit. They have done a wonderful job. . . . And it has been surprising how well they have rebounded in terms of meeting service expectation for me."¹⁹

Finally, one interval measure that Verizon was required to report for the first time in July is fundamentally flawed and does not accurately reflect Verizon's installation performance. This measure was intended to reflect the percentage of DSL loop orders completed within 6 days. In practice, however, the measure was defined in such a way that it included only a small subset of DSL loop orders, included orders that had not been pre-qualified (and that have an installation interval of 9 days rather than 6 days), included orders missed for facilities reasons, and the reported results included orders for which our carrier-customers had requested an interval of longer than 6 days. It also compared Verizon's performance on unbundled DSL loops to a retail analog (second POTS lines) that frequently has an installation interval of only 5 days.²⁰

These are precisely the types of factors that the Commission previously has held should be taken into account in evaluating reported results, and caused it to recognize that interval measures such as this one can be "flawed" because they are affected by "factors outside of [Verizon's] control and unrelated to the timeliness and quality of [Verizon's] provisioning."²¹ And it is because of these same problems that the CLECs participating in the carrier-to-carrier collaborative have now agreed to recommend that this measure be fundamentally changed in an effort to more accurately reflect Verizon's performance.

C. Loop Quality

¹⁷ Verizon Reply, Lacouture/Ruesterholz Reply Decl. ¶ 191; Verizon Reply, Guerard/Canny Reply Decl. ¶ 17-20; Verizon Reply, Guerard/Canny Reply Decl. Atts. B, D.

¹⁸ Verizon Reply, Guerard/Canny Reply Decl. ¶ 21; Verizon Reply, Guerard/Canny Reply Decl. Atts. B, D.

¹⁹ Interview with Robert Knowling Jr. on RadioWallStreet.Com at 6 (Oct. 6, 2000).

²⁰ Verizon Application, Lacouture/Ruesterholz Decl. ¶ 100; Verizon Reply, Lacouture/Ruesterholz Reply Decl. ¶¶ 61-65.

²¹ New York Order ¶ 202.

Verizon also provides unbundled loops to our carrier-customers that are equal in quality to the loops we use for our retail services. The best measure of overall DSL loop quality is the total trouble report rate on unbundled DSL loops compared to Verizon's own DSL service. The record here shows that the total trouble report rate for wholesale and retail DSL over a four-month period is virtually identical (3.27 versus 3.3 trouble reports per month for each 100 lines in service).²²

While the reported results for one subset of total trouble reports – those reported within 30 days of installation (so-called “I-codes”) – reflect a difference between wholesale and retail, we demonstrated before the DTE and in our application here that these reported results do not reflect Verizon's performance.²³ This measure was originally intended as an indicator of Verizon's ability to deliver working loops. But it no longer serves that purpose. On the contrary, the vast majority of DSL loops on which carriers submit I-codes – some 70 percent or more – have undergone cooperative acceptance testing during which our carrier-customer tested the loop itself and provided a serial number to Verizon certifying that the loop was working.²⁴

As a result, this measurement now serves as a measure of the accuracy of the acceptance testing performed by our customer, rather than a measure of Verizon's performance. And because the types of troubles that are being reported as I-codes are ones that properly performed acceptance testing would have revealed, what this measure shows is that carriers are accepting loops that are not suitable for DSL service. Indeed, carriers conceded in their testimony before the DTE that they are doing so intentionally in many cases to take advantage of the fact that Verizon will undertake Herculean efforts to rebuild or replace even loops that are not suitable for DSL in order to accommodate our customers.²⁵ And these carriers have acknowledged that, in other instances, their use of inexperienced technicians causes post-installation troubles to be reported for problems that should have been discovered during acceptance testing.

²² November 14, 2000 letter to Ms. Salas from Ms. May; December 1, 2000 letter to Ms. Salas from Ms. May.

²³ Verizon Application, App. B. Tab 565, at 5634; Verizon Application, App. B. Tab 520, at 2553-2555; Verizon Application, Lacouture/Ruesterholz Decl. ¶ 104 & Att. L; Verizon Reply, Lacouture/Ruesterholz Reply Decl. ¶ 66 & Att. F; Verizon Reply, Gertner/Bamberger Reply Decl. ¶ 25.

²⁴ Verizon Application, Lacouture/Ruesterholz Decl ¶ 104 & Att. L.

²⁵ Verizon Application, App. B. Tab 233, at 3247; Verizon Application, App. B. Tab 462, at Szafraniec/Katzman Decl ¶ 65; Verizon Application, App. B. Tab 233, at 3248.

Consequently, based on its own record on the subject, the DTE concluded that it could "not accord a significant amount of weight to this metric."²⁶ As we demonstrated, however, adjusting the reported results merely by excluding those loops that experience problems that clearly should have been revealed during acceptance testing produces I-code rates that are virtually identical for wholesale and retail orders.²⁷

Finally, the record before the DTE and here demonstrates that the rate of repeat trouble reports within 30 days consistently is lower for our wholesale customers than for retail.²⁸ As the DTE concluded based upon its review, "[t]his metric demonstrates that once CLECs receive loops that are appropriate for xDSL service, they experience fewer problems than VZ-MA."²⁹

D. Maintenance and Repair

As the DTE concluded, Verizon also "provides maintenance and repair for CLEC xDSL loops in substantially the same time and manner as it does for its retail customers."³⁰

The best indicator of Verizon's maintenance and repair performance is its timeliness in meeting its repair appointments. As the reported results in the record here demonstrate, Verizon's performance in meeting repair appointments for our wholesale customers is in parity with retail, and is better than retail in recent months.³¹

In contrast, reported results for the comparative intervals to complete repairs, such as the mean time to repair measure, are influenced by a number of aspects of CLECs' own behavior. This is no different from the types of factors that the

²⁶ DTE Eval. at 313-314.

²⁷ Verizon Reply, Lacouture/Ruesterholz Reply Decl. & 66.

²⁸ Verizon Application, App. B, Tab 446; Verizon Application, App. B, Tab 537; Verizon Application, Guerard/Canny Decl. Att. E.

²⁹ DTE Eval. at 321.

³⁰ DTE Eval. at 322.

³¹ Verizon Application, Guerard/Canny Decl. Att. E; Verizon Reply, Guerard/Canny Reply Decl. Att. D.

Commission has found must be taken into account in evaluating other interval measures. For example, based on its own investigation, the DTE found that Verizon's "maintenance and repair performance is hindered by" factors such as the "CLECs' inability to identify the source of the trouble," "the propensity of some CLECs to accept loops they concede are unable to support xDSL service, absent additional work by VZ-MA technicians," and "the preference for Monday and not weekend repair appointments."³² Significantly, the record here demonstrates that adjusting for just the latter two factors identified by the DTE shows that the average mean time to repair for our wholesale customers is in parity with retail.³³ And this adjustment is necessary because, as the DTE explained, "ascribing the consequence of a CLEC business decision to a purported VZ-MA failure appears unwarranted."³⁴

Further, Verizon has been working diligently with our carrier-customers to help them understand the impact of their own business practices and to ensure that we provide excellent performance to these customers. For example, by doing so, Verizon has succeeded in consistently reducing the mean time to repair for our wholesale customers, and has reduced the interval by some 30 percent since the beginning of the summer.³⁵

³² DTE Eval. at 320.

³³ Verizon Reply, Lacouture/Ruesterholz Reply Decl. ¶ 73.

³⁴ DTE Reply at 80.

³⁵ Verizon Application, Guerard/Canny Decl. Att. E; November 30, 2000 letter to Ms. Salas from Ms. May.

Conclusion

The overwhelming weight of the evidence here demonstrates that Verizon satisfies its obligations with respect to unbundled DSL loops. As summarized in the list attached:

The record before the DTE and here shows that Verizon's performance under normal operating conditions is seriously disputed with respect to only 3 of 16 separate measures in the substantive areas that the Commission previously examined for unbundled DSL loops.

One of those three measures is flawed and consensus has been reached through the carrier-to-carrier collaborative process that it should be revamped in an effort to more accurately reflect actual performance.

The reported results for the final 2 measures are affected by the CLECs' own business practices, as the DTE confirmed based on its review of "VZ-MA's justifications for its performance data [that] were addressed in its May and August, 2000, filings and during the August technical sessions."³⁶ And the adjusted results for these final two measures also demonstrate parity.

In addition, Verizon's separate data affiliate is now fully operational in Massachusetts, well ahead of the schedule that it is required to be. As the Commission has concluded, this will provide still "further assurance that competing carriers . . . will [continue] to have non-discriminatory access to xDSL-capable loops." It also will help to resolve the problem created by the fact that existing performance measures do not provide an apples-to-apples comparison. This is true because unbundled loops are fundamentally different from Verizon's retail DSL service (which is really line sharing), and are technically and operationally more complicated to provide. But the fact that, going forward, both Verizon's separate data affiliate and other carriers will be submitting line sharing orders (and use the same systems to do so) will, for the first time, permit a direct apples to apples comparison.

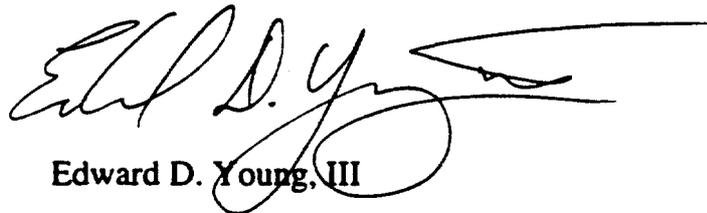
Finally, Verizon will continue to provide excellent service going forward. As an initial matter, it is strongly in our business interest to do so in order to avoid losing wholesale revenues if consumers were to switch to cable modem providers. Moreover, the Performance Assurance Plan adopted by the DTE provides

³⁶ DTE Reply at 61-62.

additional incentives to continue to provide excellent performance on DSL loops. Indeed, the Plan already includes DSL loop measures. Additional DSL measures are being added in the ongoing review by the New York PSC, and the DTE has said it will incorporate additional measures adopted there into the Massachusetts Plan. The DTE also has decided to make DSL a separate mode of entry under the Massachusetts Plan. Each of these changes will further increase the amount of dollars at risk specifically because of DSL performance.

For all these reasons, our application should be granted now.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward D. Young, III". The signature is fluid and cursive, with a large loop at the end of the last name. It is positioned above the printed name.

Edward D. Young, III

INDEX TO DSL EVIDENCE

<i>What VZ demonstrated to the DTE</i>	<i>What the DTE found</i>	<i>What VZ demonstrated to the FCC</i>
A. Installation Timeliness		
1. Verizon demonstrated that it is providing xDSL loops to CLECs on time.		
<p>Verizon demonstrated that, in first quarter 2000, its on-time performance for xDSL loops reached 96 percent for completed orders (i.e., excluding no-access and no-facilities situations) using data that was collected following the same parameters as are used in the Performance Assurance Plan (PAP). App. B, Tab 423, at Checklist Aff. ¶ 103.</p> <p>Verizon demonstrated that, from March through June 2000, its on-time performance exceeded 96 percent for completed orders using data that was collected following the same parameters as are used in the PAP. App. B, Tab 494, at Checklist Aff. ¶ 96.</p> <p>Verizon demonstrated that this strong on-time performance continued in July 2000. App. B, Tab 552.</p>	<p>"VZ-MA is performing as a wholesale provider should. It gives CLEC customers the service they request." DTE Eval. at 306.</p> <p>"The more experience VZ-MA gains, the better its performance becomes." DTE Eval. at 305.</p> <p>"[Verizon's] provisioning intervals, for both its retail ADSL service and the service it provides to CLECs, are decreasing, as are the percentage of missed installation appointments." DTE Eval. at 305.</p> <p>"We affirm our findings contained in our Evaluation: VZ-MA provisions xDSL loops to CLECs when CLECs request them." DTE Reply at 74.</p>	<p>Verizon demonstrated in its application that, during June and July, its on-time performance for DSL loops met or exceeded 95 percent in each of the separate reporting categories included in the PAP. Application at 18; L/R ¶ 96; G/C Att. M.</p> <p>Verizon submitted C2C reports demonstrating that, from May through July, Verizon met between 96 and 97 percent of its appointments for all xDSL loop orders. G/C Att. E.</p> <p>Verizon again pointed to this strong on-time performance in its Reply Comments. Reply Comments at 6; L/R Reply ¶ 57.</p> <p>Verizon also filed with its application all the evidence that was included in the state record.</p>
<p>Verizon demonstrated that it provides CLECs with the due dates they request. Verizon conducted a study of approximately 3,000 June orders for two-wire digital and DSL loops and found that almost all of these orders received the date that was requested or that is set forth in the C2C guidelines. App. B, Tab 520, at 2527-2528 (old numbering); App. B, Tab 565, at 5632 (old numbering).</p>	<p>"CLECs receive their requested xDSL provisioning interval approximately 99 percent of the time." DTE Eval. at 306.</p>	<p>Verizon demonstrated in its application that, in June 2000, the average interval offered for pre-qualified wholesale xDSL orders was at parity with retail. It also demonstrated that, in July, there was less than one-third of a day difference, which is smaller than the half-day difference the Commission found was not competitively significant in New York. Verizon further demonstrated that the average intervals offered for loops that required qualification in June and July were well within the 9-day interval for such loops. G/C ¶¶ 79, 81 & Att. K.</p>