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January 31, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Office of the Secretary
Federal Communications Commission
Room TW-B-204
445 Twelfth Street, S.W.
Washington, D.C. 20544

**REDACTED -
For Public Inspection**

Re: Application by Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), and Verizon Global Networks Inc., for Authorization To Provide In-Region, InterLATA Services in Massachusetts, CC Docket No. 01-9 -
ERRATA FILING

Dear Ms. Salas:

On January 16, 2001, Verizon filed with the Commission its Supplemental Filing in support of the above-captioned Application. Attached to the Supplemental Filing as Appendix A, Tab 1, Verizon submitted the Joint Supplemental Declaration of Paul A. Lacouture and Virginia P. Ruesterholz.

Paragraph 104 of this Supplemental Declaration (pages 44-45) was redacted in part from the public version of the filing. We recently discovered that Verizon inadvertently omitted the confidential version of this paragraph from the confidential version of the filing. In addition, we have discovered one minor error in this paragraph.

Enclosed for filing is a corrected original and seven copies of the public version of pages 44-45 to the Lacouture/Ruesterholz Supplemental Declaration, as well as a corrected original and two copies of the confidential version of these pages.

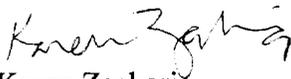
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Ms. Magalie Roman Salas
Page 2

We will separately provide copies of this letter and the revised Attachment to the Common Carrier Bureau, the Department of Justice, the Massachusetts DTE, and to ITS.

Thank you for your assistance in this matter. If you have any questions, please call me at 703-974-4865 or Steven McPherson at 703-974-2808.

Very truly yours,


Karen Zacharia

Enc.

commitment to clear a trouble ticket in 24 hours.” Application, App. B, Tab 233 at 3247. Covad reiterated in July 2000 that it accepts loops it knows do not support DSL service. DTE Reply Comments at 79-80 & n. 263. Mr. Pratte on behalf of another CLEC, Vitts, said, “[o]ur 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.

102. CLECs have also acknowledged in other instances that their use of inexperienced technicians causes post-installation troubles to be reported for problems that should have been discovered during acceptance testing.

103. Verizon does not know exactly why CLECs would accept loops that are not suitable for their service, but there are at least three possibilities. First, CLECs may not be performing as detailed an acceptance test as they should because of either training or equipment limitations. Second, CLECs may be submitting repair requests on the loops in the hopes that Verizon’s repair personnel will take whatever measures are required to condition the loop to make it compatible with the service the CLEC intends to provide to the end user. Third, CLECs may submit trouble reports simply to try to get a somewhat “better” loop than the one they already have that will support higher speeds, even though the provisioned loop is working and meets DSL specifications. In any of these cases, many times the only viable solution to provide service is to reassign the loop to a new facility, if available, or construct new facilities at Verizon’s expense.

104. Another indication of the fact that CLECs are not properly acceptance testing DSL loops is the substantial variation among CLECs in their I-Code trouble report rates. For example, the three-month weighted average I-Code rate for ****

**** is approximately 6.5 percent, and is 10.53 percent for **** and 11.41 for ****. Attachment Z provides the calculations of the individual CLEC I-Code rates and trouble report level detail supporting those calculations.

105. Still another indication of the problems with the CLECs' testing capabilities is the high percentage of trouble reports submitted by CLECs within 30 days of the installation of a DSL loop where no trouble is found. The Carrier-to-Carrier performance reports separately track the rate of trouble reports submitted within thirty days where trouble was found (PR-6-01 - Percent Installation Troubles Reported within 30 days) and where trouble was not found (PR-6-03 - Percent Installation Troubles Reported within 30 days – FOK/TOK/CPE). During September through November 2000, nearly 58 percent of troubles reported within 30 days of the installation of a DSL loop were closed with no trouble found. Attachment BB shows how the percentage of trouble reports where no trouble was found is derived from the Carrier-to-Carrier performance reports.

106. As part of the ongoing efforts to work with CLECs discussed above, Verizon is taking a number of steps to assist in improving the CLECs' acceptance testing processes. First, Verizon managers have made on-site visits to CLEC testing centers to observe the CLECs' testing processes, scripts and results. By viewing the CLECs' testing processes first hand, Verizon may be able to determine ways to improve the process.

107. Second, Verizon is providing detailed maintenance information to the CLECs on their I-Codes so that they can assess the validity of their acceptance testing of