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Dee May
Executive Director
Federal Regulatory



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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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April 3, 2001

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

ORIGINAL

RE: Application by Verizon New England Inc., et al., for Authorization To Provide In-Region, InterLATA Services in Massachusetts, Docket No. 01-9 /

Dear Ms. Salas:

Yesterday, at the request of Mr. Goldstein, Verizon had a conference call with Mr. Goldstein of Commissioner Ness' office. Representing Verizon on the call were M. Glover, V. Ruesterholz, K. Zacharia, G. Evans and I. The subject matter of the call is detailed in the attached. The attachment contains redacted information. A confidential; version of this ex parte is being filed separately.

Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-106.

Sincerely,

cc: E. Einhorn
K. Farroba
R. Beynon
S Whitesell
K. Dixon
J. Goldstein
S. Pie

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April 3, 2001

Jordan Goldstein
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Mr. Goldstein:

In the New York proceeding, Verizon explained that its own business incentives and a variety of protections against "backsliding" provided abundant assurance that it would continue to provide good service to wholesale customers. The Commission agreed.¹ That conclusion has been borne out by experience.

1. Verizon's New York performance improved even further after it received long distance authority. Since receiving authority to provide in-region long distance service in New York, Verizon has continued to provide high quality service to CLECs and has improved its performance in a number of areas. For example, much of the discussion in the New York 271 case focused on unbundled "hot cut" loops and on Verizon's operations support systems (OSS). Indeed, the New York Performance Assurance Plan contains Special Provisions that focus specifically on these areas.

At the time the Commission approved the New York application, it found that Verizon's on-time performance for hot cuts was about 90%, and the percent of loops where customers reported troubles within seven days of installation ("I-codes") was less than 2%.² Since then, Verizon has continued to work with CLECs to improve the hot cut process and provide even better performance.

For the months of November 2000 through February 2001, Verizon's on time performance for hot cuts in New York has been above 96% in each of the four months, and for three of the four months has been above 98% on time. For the same four months, the percent of troubles reported within seven days of installation has been lower than 1% in each month, and for three of the four months has been lower than one-half of one percent (0.5%). In December 2000, Verizon's hot cut process received ISO 9000 certification from the International Organization of Standardization. Clearly, Verizon's hot cut performance in New York has been excellent.

¹ NY 271 Order ¶ 429.

² NY 271 Order ¶¶ 294, 295, 300.

Likewise, Verizon's OSS performance in New York is excellent. Response times for both the pre-ordering interfaces and the maintenance and repair interface are generally better than the established standard. Similarly, Verizon consistently returns confirmation and reject notices in a timely manner, and overall timeliness has improved from about 90% on time at the time of the New York application to more than 95% on time.

Indeed, during the Texas 271 proceeding, AT&T and WorldCom held up Verizon's OSS as models. For example, WorldCom stated that Verizon's OSS were designed to provide parity and to support commercial volumes. It also pointed out flaws it said existed in SBC's OSS and said none were present in Verizon's OSS.³ As with hot cuts, there is no doubt that Verizon's OSS in New York are excellent.

2. Competition increased even further after Verizon received long distance authority. Verizon's continued strong performance for its wholesale customers is reflected vividly in the fact that competition in the local market has boomed since Verizon received authority to enter the long distance market in New York. At the time of Verizon's New York application, CLECs served approximately 1.1 million lines in New York. As of year end 2000, CLECs serve approximately 3 million lines. In other words, the number of lines served by competitors has nearly tripled in just over a year.

Unbundled network elements have shown even greater growth. At the time of Verizon's application, CLECs had about 44,000 stand-alone UNE loops and about 150,000 UNE platforms. By the end of 2000, the number of stand-alone loops had more than quintupled to 239,000, while the number of UNE platforms had increased by 10 times to 1,550,000. And this latter increase occurred with the same prices that are now in effect in Massachusetts.

As these facts make clear, Verizon did not "backslide" after it gained long distance authority in New York. Instead, its performance improved, and competition has continued to flourish.

3. Verizon's DSL loop and line sharing performance also is strong. At the time of the New York proceeding, competitors had been ordering DSL loops for a relatively short time, and DSL loops were a small percentage of loop orders.⁴ Since that time, Verizon has worked diligently to provide good service to its wholesale customers, including through countless hours of collaborative proceedings and through individualized contacts with its customers.

Those ongoing efforts have paid off. For example, in New York, Verizon has met more than 91% of its DSL installation appointments in January, and more than 95% of DSL appointments in February. For line sharing, Verizon has met 97% of installation appointments in both January and February. Performance on maintenance and repair has been at parity for both DSL and line sharing in January and February.

³ See MCI WorldCom Comments, January 31, 2000, SWBT Texas 271, pp. xi, 5. See also *id.*, p. 7; MCI WorldCom Reply Comments, February 22, 2000, SWBT Texas 271, pp. 16-17.

⁴ NY 271 Order ¶ 327.

Again, Verizon's good performance is reflected in the dramatic growth in competitors' DSL lines in New York. At the end of 1999, CLECs served about 4,000 DSL loops. One year later, CLECs served more than 10 times that many DSL loops – 44,500.

While Verizon's continued strong performance in New York and the growth of competition in New York demonstrate that any concerns about "backsliding" are unfounded, it is neither necessary nor appropriate to look to New York to judge Verizon's performance with respect to DSL in Massachusetts. Unlike Kansas and Oklahoma, which had low volumes causing the Commission to look to Texas results,⁵ Massachusetts has commercial volumes of DSL loops (both unbundled and line sharing), as it does for all competitive products.

As noted in Verizon's application, through January 2001, Verizon has provisioned 24,000 unbundled DSL loops.⁶ In December and January, Verizon provisioned 3,000 unbundled DSL loops. Overall, competitors serve more than 850,000 lines in Massachusetts, including 112,000 unbundled loops (including new loops, loops as part of an unbundled network element platform, "hot cut" loops, and DSL loops).⁷ Clearly, there are commercial volumes in Massachusetts and, judged on its own terms (as it should be), DSL and line sharing performance there is excellent.

4. Results under the January PAP do not undercut these conclusions. The New York Performance Assurance Plan (NY PAP) is designed to give Verizon an incentive to provide superior performance to the CLECs; it goes well beyond the requirements for 271. For example, the New York PSC noted in adopting the Plan that: "The Performance Assurance Plan holds BA-NY, in a public forum, to 122 standards that collectively require the company to achieve excellent wholesale quality. *This Plan exceeds the Section 271 checklist requirements.*"⁸

The New York PSC also cautioned that: "Like the metric failings themselves, the associated payments are not indicative of Checklist non-compliance because, among other things, they are nearly all attributable to Bell Atlantic-NY's performance on non-critical metrics, on metrics that the parties agree need refinement, *and on stringent absolute targets that relate to NYPSC requirements under the Public Service Law that go beyond Checklist compliance.* They do not suggest discriminatory services pursuant to the Checklist."⁹

⁵ See *Kansas/Oklahoma 271 Order* ¶¶ 36, 180.

⁶ Lacouture/Ruesterholz Supp. Reply Decl. ¶ 7. On a proportionate basis, this is more DSL lines than Verizon has provisioned in New York (New York has 14.1 million access lines, while Massachusetts has 5.4 million access lines).

⁷ *Id.* at ¶ 7; Supplemental Reply Comments at 4.

⁸ Order Adopting the Amended Performance Assurance Plan and Amended Change Control Plan at 31, Nos. 97-C-0271 & 00-C-0949 (NY PSC Nov. 3, 1999) (emphasis added).

⁹ *NY PSC Evaluation*, Executive Summary, p. 8 (emphasis added)

Finally, the New York PSC cautioned against the “facile misuse” of results under the Plan by competitors, noting that “they are not a Checklist report card and, in any event, do *not* support a claim that Bell Atlantic-NY is providing access to Checklist items . . . in a discriminatory manner.”¹⁰

5. Plan Structure and Operation. The Plan has two main components – Mode of Entry and Critical Measures. In addition, as noted above, it contains Special Provisions focusing on hot cuts and on OSS performance. Verizon has not had to pay any remedies under the OSS Special Provisions for EDI or UNE ordering after the first quarter of 2000, and has never had to pay remedies under the Special Provisions for hot cuts.

Starting in January 2001, the Plan for the first time has a separate DSL Mode of Entry that includes some 50 different measures. As is further described below, because of some “quirks” in the Plan, Verizon can pay penalties even when its performance is quite good.

Under the Plan, Verizon receives a score of 0, -1, or -2 for each measure contained in the Plan. A -1 score indicates that there is a question as to whether parity was achieved. Therefore, the Plan provides that any -1 results will be changed to 0 if Verizon obtains a performance score of 0 for the next two months on that measure. Each measurement is given a specified weight that is used as part of the calculation to determine the overall monthly aggregate score for the Mode of Entry. The performance score for each measurement is then multiplied by its assigned weight, and the weighted scores are totaled to produce an overall score for the category. The DSL and Critical Measure portions of the NY PAP for January and February are attached.

Significantly, under the Plan, 0 is the highest score Verizon can achieve. This means that even if Verizon provides better service for CLECs than for retail, it is not reflected in positive scores under the Plan.

In January, Verizon received a performance score of 0 on nearly two-thirds of the measures in the DSL Mode of Entry (32 out of 50 measures). Verizon also received a -1 for four measures, but received a 0 for three of these measures in February. If Verizon’s performance continues to improve, several -1 scores will be eliminated, reducing the penalties to which Verizon is subject.¹¹ Finally, as described above, if the Plan were symmetrical, Verizon would have received positive scores of +1 or +2 on 10 of those measures -- which would offset some of the negative scores.

Moreover, as noted above, because of some quirks in the Plan Verizon may at times be subject to remedy payments even where Verizon is providing very good service. For example, in January, the Network Trouble Report Rate – Central Office (MR-2-03) was extremely low for CLECs. (The report rate measures the number of troubles per 100 lines.)

¹⁰ *NY PSC Evaluation*, p. 2.

¹¹ Moreover, six of the measures with negative scores in January are associated with 2-wire Digital loops (basically ISDN). This product has not been an issue in the Massachusetts 271 proceeding, and none of the 2-wire Digital measures are Critical Measures under the Plan.

Specifically, it was 0.33 for DSL and 0.35 for line sharing. These are both very low trouble rates. The retail rate was 0.20. Although the absolute difference between the retail and DSL/Line Sharing report rates is very small (approximately 0.1), the statistical test contained in the Plan yields a performance score of -2.

Likewise, in January, Verizon met more than 97% of line sharing installation appointments for CLECs on time. Despite the fact that this is excellent service, it received a -2 under the PAP because it met about 99% of installation appointments for VADI. But this small difference in the missed appointment rate is not competitively significant.

The Commission has recognized that this is a danger with statistical tests.¹² Just because a result is “statistically significant” does not mean that it has competitive significance – and that is the case here.

In addition, the PAP measures are subject to refinement through discussions in the Carrier-to-Carrier working group. For example, the Carrier-to-Carrier working group has reached consensus to change the retail analog for ***** in order to provide a more “apples-to-apples” comparison. Using that standard, Verizon’s performance for CLECs is at parity.

In sum, although Verizon will be subject to remedies under the NY PAP for DSL in January, the amount is not yet determined since certain results can change depending on results in the next two months. In addition, as the New York PSC cautioned, the fact of those payments does not indicate that Verizon is not complying with the checklist. Instead, they result from the stringent standards to which Verizon is subject, and from the operation of the Plan.

February performance on the DSL measures under the Plan has improved significantly. Verizon’s performance scores improved on six measures and, as noted above, its performance on key measures is excellent. In addition, Verizon’s actual performance improved in a number of additional areas, but because of the way the Plan works, Verizon’s scores on these measures did not reflect this improvement. Verizon anticipates that March results will show additional improvements.

In sum, there is no evidence of “backsliding” in New York, and Verizon’s performance in Massachusetts is excellent.

Please let me know if you have any questions. The twenty page limit does not apply as set forth in DA 01-106.

Sincerely,

¹² See *Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, RM-9101, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 at Appendix B, ¶ 7 and note 10 (1998). See also *Kansas/Oklahoma 271 Order* ¶ 32.

January 2001		Verizon New York CRITICAL MEASURES		Resale		UNE		Trunks		Collocation		DSL		Total	
				%	\$	%	\$	%	\$	%	\$	%	\$	\$	
PRE-ORDERING															
1	metric	OSS Interface		8%	14,103	8%	35,256					0%	0	49,359	
	PO-1-01	Customer Service Record - EDI		X	-	X	-								
	PO-1-01	Customer Service Record - CORBA		X	-	X	-								
	PO-1-01	Customer Service Record - WEB GUI		X	-	X	-								
	PO-1-06	Facility Availability (Loop Qualification) - EDI										X	-		
	PO-1-06	Facility Availability (Loop Qualification) - WEB GUI										X	-		
	PO-2-02	OSS Interface Availability - Prime - EDI		X	-	X	-								
	PO-2-02	OSS Interface Availability - Prime - CORBA		X	-	X	-								
	PO-2-02	OSS Interface Availability - Prime - WEB GUI		X	14,103	X	35,256								
ORDERING															
2		% On Time Ordering Notification		0%	0	0%	0					0%	0	0	
	OR-1-02	% On Time LSRC - Flow Through - POTS - 2hrs		X	-	X	-								
	OR-1-04	% OT LSRC/ASRC-No Facil Ck (E.-No FT)-POTS		X	-	X	-								
	OR-1-04	% OT LSRC/ASRC-No Facil Ck(E.-No FT)-2Wire xDSL										X	-		
	OR-1-04	% OT LSRC/ASRC-No Facil Ck(E.-No FT)-Line Share										X	-		
	OR-1-06	% OT LSRC /ASRC-Facil Ck (Electronic) - POTS		X	-	X	-								
	OR-2-02	% On Time LSR Reject - Flow Through - POTS		X	-	X	-								
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No Flow Through)-POTS		X	-	X	-								
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No FT)-2 Wire xDSL										X	-		
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No FT)-Line Share										X	-		
	OR-2-06	% OT LSR/ASR Reject -Facil Ck(Electronic) - POTS		X	-	X	-								
	OR-4-09	% SOP to Bill Completion Sent w/in 3 Bus. Days		X	-	X	-								
POST-ORDERING															
3		% Completed										100%	119,048	119,048	
	PR-3-07	% Comp. w/in 4 Days (1-5 lines) Tot. - Line Share										X	59,524		
	PR-3-10	% Comp. w/in 6 Days (1-5 lines) Tot. - 2Wire xDSL										X	59,524		
4a	PR-4-01	% Missed Appointment - VZ - Total - EEL					0							0	
4b		% Missed Appointment		0%	0	50%	208,333	0%	0			83%	99,206	307,540	
	PR-4-01	% Missed Appointment - VZ - Total - Specials		X	-	X	208,333								
	PR-4-01	% Missed Appointment - VZ - Total - Trunks						X	-						
	PR-4-02	Average Delay Days - Total - 2Wire xDSL										X	19,841		
	PR-4-02	Average Delay Days - Total - DSL Line Share										X	-		
	PR-4-04	% Missed Appointment - VZ - Total - Dispatch - POTS		X	-										
	PR-4-04	% Missed Appt. - VZ - Total - Dispatch - New Loops				X	-								
	PR-4-04	% Missed Appointment - Dispatch - 2Wire xDSL										X	39,683		
	PR-4-05	% Missed Appt. - VZ - Total - No Dispatch - POTS		X	-										
	PR-4-05	% Missed Appt. - No Disp. - DSL Line Share										X	39,683		
5	PR-4-05	% Missed Appt. - VZ - No Disp. - Platform				0%	0							0	
6		Hot Cut Performance				0%	0							0	
	PR-9-01	% OT - 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	
REPAIR															
8		Missed Repair Appts.										0%	0	0	
	MR-3-01	% Missed Repair Appt. (Loop) - 2Wire xDSL										X	-		
	MR-3-01	% Missed Repair Appt. (Loop) - DSL Line Share										X	-		
9		Mean Time To Repair		0%	0	0%	0	0%	0			0%	0	0	
	MR-4-01	Mean Time To Repair - Specials		X	-	X	-								
	MR-4-01	Mean Time To Repair - Trunks						X	-						
	MR-4-02	Mean Time To Repair - Loop - 2Wire xDSL										X	-		
	MR-4-02	Mean Time To Repair - Loop - Line Share										X	-		
	MR-4-02	Mean Time To Repair - Loop Trouble		X	-	X	-								
	MR-4-03	Mean Time To Repair - Central Office		X	-	X	-								
	MR-4-08	% Out Of Service > 24 Hours - POTS		X	-	X	-								
10		% Repeat Reports within 30 Days		50%	83,333	50%	208,333					0%	0	291,667	
	MR-5-01	% Repeat Reports w/in 30 Days - POTS		X	83,333	X	208,333								
	MR-5-01	% Repeat Reports w/in 30 Days - Specials		X	-	X	-								
	MR-5-01	% Repeat Reports w/in 30 Days - Total - 2Wire xDSL										X	-		
	MR-5-01	% Repeat Reports w/in 30 Days - Tot. - Line Share										X	-		
NETWORK															
11		Final Trunk Groups Blocked						0%	0					0	
	NP-1-03	Blocked 2 months						X	-						
	NP-1-04	Blocked 3 months						X	-						
12		Collocation								1%	4,126			4,126	
	NP-2-01/2	% On Time Response to Request for Collocation								X	-				
	NP-2-05/6	% On Time - Collocation								X	-				
	NP-2-07/8	Average Delay Days								X	4,126				
# of full share measures in category				Total	5	97,436	8	451,923	4	0	1	4,126	7	218,254	771,739

Under the provisions of the Plan, -1 performance scores are subject to adjustment based on the next two month's performance.

February 2001		Verizon New York		Resale		UNE		Trunks		Collocation		DSL		Total
		CRITICAL MEASURES		%	\$	%	\$	%	\$	%	\$	%	\$	\$
PRE-ORDERING														
1	metric	OSS Interface	0%	0	0%	0						0%	0	0
	PO-1-01	Customer Service Record - EDI	X	-	X	-								
	PO-1-01	Customer Service Record - CORBA	X	-	X	-								
	PO-1-01	Customer Service Record - WEB GUI	X	-	X	-								
	PO-1-06	Facility Availability (Loop Qualification) - EDI										X	-	
	PO-1-06	Facility Availability (Loop Qualification) - WEB GUI										X	-	
	PO-2-02	OSS Interface Availability - Prime - EDI	X	-	X	-								
	PO-2-02	OSS Interface Availability - Prime - CORBA	X	-	X	-								
	PO-2-02	OSS Interface Availability - Prime - WEB GUI	X	-	X	-								
ORDERING														
2		% On Time Ordering Notification	0%	0	0%	0						0%	0	0
	OR-1-02	% On Time LSRC - Flow Through - POTS - 2hrs	X	-	X	-								
	OR-1-04	% OT LSRC/ASRC-No Facil Ck (E.-No FT)-POTS	X	-	X	-								
	OR-1-04	% OT LSRC/ASRC-No Facil Ck(E.-No FT)-2Wire xDSL										X	-	
	OR-1-04	% OT LSRC/ASRC-No Facil Ck(E.-No FT)-Line Share										X	-	
	OR-1-06	% OT LSRC /ASRC-Facil Ck (Electronic) - POTS	X	-	X	-								
	OR-2-02	% On Time LSR Reject - Flow Through - POTS	X	-	X	-								
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No Flow Through)-POTS	X	-	X	-								
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No FT)-2 Wire xDSL										X	-	
	OR-2-04	% OT LSR/ASR Rej. (Elec.-No FT)-Line Share										X	-	
	OR-2-06	% OT LSR/ASR Reject -Facil Ck(Electronic) - POTS	X	-	X	-								
	OR-4-09	% SOP to B#l Completion Sent w/in 3 Bus. Days	X	-	X	-								
PROVISIONING														
3		% Completed										43%	50,595	50,595
	PR-3-07	% Comp. w/in 4 Days (1-5 lines) Tot. - Line Share										X	-	
	PR-3-10	% Comp. w/in 6 Days (1-5 lines) Tot. - 2Wire xDSL										X	50,595	
4a	PR-4-01	% Missed Appointment - VZ - Total - EEL				0								0
4b		% Missed Appointment	0%	0	50%	208,333	0%	0				83%	59,524	267,857
	PR-4-01	% Missed Appointment - VZ - Total - Specials	X	-	X	208,333								
	PR-4-01	% Missed Appointment - VZ - Total - Trunks					X	-						
	PR-4-02	Average Delay Days - Total - 2Wire xDSL										X	-	
	PR-4-02	Average Delay Days - Total - DSL Line Share										X	19,841	
	PR-4-04	% Missed Appointment - VZ - Total - Dispatch - POTS	X	-										
	PR-4-04	% Missed Appt. - VZ - Total - Dispatch - New Loops			X	-								
	PR-4-04	% Missed Appointment- Dispatch - 2Wire xDSL										X	-	
	PR-4-05	% Missed Appt. - VZ - Total - No Dispatch - POTS	X	-										
	PR-4-05	% Missed Appt. - No Disp. - DSL Line Share										X	39,683	
5	PR-4-05	% Missed Appt. - VZ - No Disp.- Platform			0%	0								0
6		Hot Cut Performance			0%	0								0
	PR-9-01	% OT - 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		Missed Repair Appts.										0%	0	0
	MR-3-01	% Missed Repair Appt. (Loop) - 2Wire xDSL										X	-	
	MR-3-01	% Missed Repair Appt. (Loop) - DSL Line Share										X	-	
9		Mean Time To Repair	28%	47,222	0%	0	0%	0				0%	0	47,222
	MR-4-01	Mean Time To Repair - Specials	X	47,222	X	-								
	MR-4-01	Mean Time To Repair - Trunks					X	-						
	MR-4-02	Mean Time To Repair - Loop - 2Wire xDSL										X	-	
	MR-4-02	Mean Time To Repair - Loop - Line Share										X	-	
	MR-4-02	Mean Time To Repair - Loop Trouble	X	-	X	-								
	MR-4-03	Mean Time To Repair - Central Office	X	-	X	-								
	MR-4-08	% Out Of Service > 24 Hours - POTS	X	-	X	-								
10		% Repeat Reports within 30 Days	0%	0	50%	208,333						50%	59,524	267,857
	MR-5-01	% Repeat Reports w/in 30 Days - POTS	X	-	X	208,333								
	MR-5-01	% Repeat Reports w/in 30 Days - Specials	X	-	X	-								
	MR-5-01	% Repeat Reports w/in 30 Days - Total - 2Wire xDSL										X	59,524	
	MR-5-01	% Repeat Reports w/in 30 Days - Tot. - Line Share										X	-	
NETWORK PERFORMANCE														
11		Final Trunk Groups Blocked					0%	0						0
	NP-1-03	Blocked 2 months					X	-						
	NP-1-04	Blocked 3 months					X	-						
12		Collocation								2%	6,387			6,387
	NP-2-01/2	% On Time Response to Request for Collocation								X	-			
	NP-2-05/6	% On Time - Collocation								X	-			
	NP-2-07/8	Average Delay Days								X	6,387			
# of full share measures in category			Total	\$	47,222	\$	416,667	\$	0	\$	6,387	\$	169,643	639,919

Under the provisions of the Plan, -1 performance scores are subject to adjustment based on the next two month's performance.

Verizon NY 271 Backslide Report

February 2001

Pre-Ordering		VZ	CLEC	DSL				Diff.	Perf. Score	Wgt.	Wgt. Score
PO-1-06-6020	Facility Available/Loop Qualification - EDI	11.00	2.41					-8.58	0	5	0.000
PO-1-06-6040	Facility Available/Loop Qualification - WEBGUI	11.00	5.65					-5.35	0	5	0.000
PO-8-01-2000	Avg. Response Time - Manual Loop Qualification	UD	UD					0	0	0	0.000
PO-8-02-2000	Avg. Response Time - Engineering Record Request	UD	UD					0	0	0	0.000
OR		Ordering		CLEC							
OR-1-04-3341	% On Time LSRC /ASRC- No Facil Ck (Elec. -No FT)-2 Wire Digital	100.00		29				0	2	0.000	
OR-1-04-3342	% On Time LSRC/ASRC- NoFacil Ck(E-No FT)-2Wire xDSL	98.03		1,268				0	10	0.000	
OR-1-04-3343	% On Time LSRC/ASRC- NoFacil Ck(E-No FT)-Line Share	NA						0	0	0.000	
OR-1-06-3341	% On Time LSRC /ASRC- Facility Check(Electronic) -2Wire Digital	NA						0	0	0.000	
OR-1-06-3342	% On Time LSRC/ASRC- Facility Check(Electronic) -2Wire xDSL	NA						0	0	0.000	
OR-1-06-3343	% On Time LSRC/ASRC- Facility Check(Electronic) -Line Share	NA						0	0	0.000	
OR-2-04-3341	% On Time LSR/ASR Rej. - No Facil Ck(E. - No FT) -2Wire Digital	100.00		25				0	2	0.000	
OR-2-04-3342	% OT LSR/ASR Rej. - No Facil Ck(E- No FT)-2Wire xDSL	98.08		469				0	10	0.000	
OR-2-04-3343	% OT LSR/ASR Rej. - No Facil Ck(E- No FT)- Line Share	NA						0	0	0.000	
OR-2-06-3341	% On Time LSR/ASR Rej. - Facility Check(Electronic)-2Wire Digital	NA						0	0	0.000	
OR-2-06-3342	% On Time LSR/ASR Rej. - Facility Check(Electronic)-2Wire xDSL	NA						0	0	0.000	
OR-2-06-3343	% On Time LSR/ASR Rej. - Facility Check(Electronic)- Line Share	NA						0	0	0.000	
PR		Provisioning		VZ							
PR-3-07-3343	% Comp. w/in 4 Days (1-5 lines) Tot. - Line Share	95.61		387							
PR-3-07-3343	% Comp. w/in 4 Days (1-5 lines) Tot. - Line Share*	97.47	95.61	387		1.48	-0.78	0	10	0.000	
PR-3-10-3342	% Comp. w/in 6 Days (1-5 lines) Tot. - 2Wire xDSL	91.32		680				-1	10	-0.031	
PR-4-02-3341	Average Delay Days - Total - 2Wire Digital	9.67	8.37	92	46	27.72	0.01	0.26	0	2	0.000
PR-4-02-3342	Average Delay Days - Total - 2Wire xDSL	9.55	7.72	11	362	17.26	0.26	0.35	0	10	0.000
PR-4-02-3343	Average Delay Days - Total - Line Share	5.71	10.17		29	7.48	1.58	-2.06	-2	10	-0.063
PR-4-04-3341	% Missed Appointment - Dispatch - 2Wire Digital	5.34	0.50	1,011	202		1.73	2.78	0	2	0.000
PR-4-04-3342	% Missed Appointment- Dispatch - 2 Wire xDSL		4.33		1,942				0	20	0.000
PR-4-04-3343	% Missed Appointment - Dispatch - DSL Line Share	0.00	0.00		3		0.00		0	5	0.000
PR-4-05-3343	% Missed Appt. - No Disp. - Line Share	0.88	3.34		839		0.33	-7.38	-2	20	-0.125
PR-6-01-3341	% Installation Troubles w/in 30 Days - 2Wire Digital	1.63	12.84	4,550	218		0.98	-12.78	-2	2	-0.013
PR-6-01-3342	% Installation Troubles w/in 30 Days - 2Wire xDSL	4.28	8.45	524,482	2,001		0.45	-9.17	-2	10	-0.063
PR-6-01-3343	% Installation Troubles w/in 30 Days - Line Share	0.87	0.95		843		0.33	-0.25	0	10	0.000
MR		Maintenance & Repair		Standard Deviation							
MR-2-02-3341	Network Trouble Report Rate - Loop - 2Wire Digital	0.34	1.79	113,760	4,477		0.69	-16.21	-2	2	-0.013
MR-2-02-3342	Network Trouble Report Rate - Loop - 2Wire xDSL	0.06	1.38		42,296		0.01	-93.90	-2	5	-0.031
MR-2-02-3343	Network Trouble Report Rate - Loop - Line Share	0.06	0.03		3,905		0.04	0.89	0	5	0.000
MR-2-03-3341	Network Trouble Report Rate - CO - 2Wire Digital	0.25	0.65	113,760	4,477		0.08	-5.23	-2	2	-0.013
MR-2-03-3342	Network Trouble Report Rate - CO - 2Wire xDSL	0.11	0.27		42,296		0.02	-8.06	-2	5	-0.031
MR-2-03-3343	Network Trouble Report Rate - CO - Line Share	0.11	0.23		3,905		0.05	-2.18	-2	5	-0.031
MR-3-01-3341	% Missed Repair Appt. - Loop - 2Wire Digital	24.87	12.50	390	80		5.31	2.38	0	2	0.000
MR-3-01-3342	% Missed Repair Appt. - Loop - 2Wire xDSL	34.44	12.35		729		5.31	4.16	0	20	0.000
MR-3-01-3343	% Missed Repair Appt. - Loop - Line Share	34.44	0.00		2		33.97	1.01	0	20	0.000
MR-3-02-3341	% Missed Repair Appt. - CO - 2Wire Digital	26.48	17.24	287	29		8.80	1.07	0	2	0.000
MR-3-02-3342	% Missed Repair Appt. - CO - 2Wire xDSL	6.87	6.52		138		2.72	0.13	0	10	0.000
MR-3-02-3343	% Missed Repair Appt. - CO - Line Share	6.87	12.50		16		6.54	-0.45	0	10	0.000
MR-4-02-3341	Mean Time To Repair - Loop - 2Wire Digital	37.63	27.60	390	80	40.92	5.02	2.00	0	2	0.000
MR-4-02-3342	Mean Time To Repair - Loop - 2Wire xDSL	34.52	24.28		729	25.72	2.87	3.56	0	20	0.000
MR-4-02-3343	Mean Time To Repair - Loop - Line Share	34.52	10.65		2	25.72	18.39	1.30	0	20	0.000
MR-4-03-3341	Mean Time To Repair - CO - 2Wire Digital	24.28	15.55	287	29	31.57	6.15	1.42	0	2	0.000
MR-4-03-3342	Mean Time To Repair - CO - 2Wire xDSL	12.32	11.88		138	21.37	2.30	0.19	0	10	0.000
MR-4-03-3343	Mean Time To Repair - CO - Line Share	12.32	20.38		16	21.37	5.52	-1.48	-1	10	-0.031
MR-5-01-3341	% Repeat Reports w/in 30 Days - 2Wire Digital	20.09	43.12	677	109		4.14	-5.57	-2	2	-0.013
MR-5-01-3342	% Repeat Reports w/in 30 Days - 2Wire xDSL	29.41	36.33		867		2.97	-2.33	-2	10	-0.063
MR-5-01-3343	% Repeat Reports w/in 30 Days - Line Share	29.41	22.22		18		11.03	0.65	0	10	0.000
								Totals	-24	319	-0.520

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

Under the provisions of the Plan, the -1 performance scores are subject to adjustment based on the next two month's performance.

* Performance score determined through permutation test.