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July 18, 2001

**Ex Parte**

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

*RE: Application by Verizon New York Inc. for Authorization To Provide In-Region,  
InterLATA Services in State of Connecticut, Docket No. 01-100*

Dear Ms. Salas:

In response to requests from Commissioner Martin, Verizon is providing the enclosed. Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-1063.

Sincerely,

A handwritten signature in cursive script that reads "Dee May".

Enclosures

cc: C. Pabo  
S. Feder  
K. Farroba  
D. Attwood  
B. Olson  
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July 18, 2001

Commissioner Kevin Martin  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W. – Portals  
Washington, DC 20554

*RE: Application by Verizon New York Inc. for Authorization To Provide In-Region,  
InterLATA Services in State of Connecticut, Docket No. 01-100*

Dear Commissioner Martin:

As you requested at the meeting held on July 13 I have attached a paper that addresses the improved New York performance that has occurred since the FCC granted Verizon's application for long distance in 1999.

If you have any questions, please do not hesitate to call.

Sincerely,

  
DAM

Attachment

cc: C. Pabo  
S. Feder  
K. Farroba  
D. Attwood  
B. Olson  
M. Carey  
A. Johns  
S. Pie

### Verizon's Checklist Performance Continues to Improve

Verizon filed its first application to provide long distance service in New York in the fall of 1999. At that time, the Commission determined that Verizon's performance in New York met checklist requirements. Since then, Verizon has filed three additional states (including one for Massachusetts that was approved earlier this year), both Verizon and the CLECs have obtained more experience providing and using the various checklist items, and performance measures have continued to be refined through ongoing collaborative processes. As a result of all this, Verizon's reported performance has continued to improve, including in those areas that were the subject of dispute in prior applications.

In fact, Verizon's current performance in New York (which is part of the record in the Connecticut proceeding) and in Pennsylvania is in many cases better than it was at the time it filed its New York application. A few examples of current performance with respect to matters that were heavily disputed in the context of the New York application make the point:

First, Verizon's current hot cut performance has improved since the time Verizon filed its New York application. In New York, Verizon completed over 98.6 percent hot cuts on during time during March and April 2001. *See Lacouture/Ruesterholz Connecticut Reply Declaration, Attachment 3.* In Pennsylvania, Verizon completed, on average, 96.85 percent of its hot cut orders on time during February, March, and April 2001. *See Lacouture/Ruesterholz Pennsylvania Declaration, Attachment 25.* In fact, Verizon's hot cut process received ISO 9000 certification from the International Organization of Standardization in December 2000. This independent certification demonstrates that Verizon has put in place quality processes and systems to handle CLEC requests for voice grade hot cuts.

By contrast, the Commission found Verizon's New York on time performance for hot cuts was 90.79 percent for July 1999 and 91.54 percent for August 1999. *See New York Order* ¶¶ 294-295. Based on these findings, the Commission made "the independent judgment that on-time hot cut performance at a level of 90 percent or greater is sufficient to permit carriers to enter and compete in a meaningful way in the New York local exchange market." *See New York Order* ¶ 298.

Verizon has also improved its installation quality performance for hot cuts. In New York and Pennsylvania, less than one-third of one percent of hot cut lines in had installation troubles during March and April 2001. *See Lacouture/Ruesterholz Connecticut Reply Declaration, Attachment 4; Lacouture/Ruesterholz Pennsylvania Declaration, Attachment 26.* By contrast, the Commission found that in New York from July through September 1999, competitors in New York reported installation troubles on less than two percent of the lines provisioned through hot cut loops. *See New York Order* ¶ 300.

Second, Verizon has also improved its performance in repairing and maintaining POTS loops. In New York, Verizon met more than 93 percent of repair appointments for POTS loops during March and April 2001. *See Lacouture/Ruesterholz Connecticut*

Reply Declaration, Attachment 9. In Pennsylvania, Verizon's average met more than 92 percent of repair appointments for POTS loops during February, March, and April 2001. *See* Lacouture/Ruesterholz Pennsylvania Declaration, Attachment 20. By contrast, the Commission found that in New York Verizon missed 16 percent of loop repair appointments in July 1999 and 14 percent in August 1999. *See New York Order* ¶ 311.

Third, Verizon has improved its DSL loop performance. In fact, in May 2001, Verizon had no penalties under DSL Mode of Entry measures of the New York Performance Assurance Plan.

In New York, Verizon met more than 97 percent and 99 percent of its installation appointments on DSL loop dispatch orders for CLECs during March and April 2001. *See* Lacouture/Ruesterholz Connecticut Reply Declaration, Attachment 2. In Pennsylvania, Verizon's met more than 97 percent of its installation appointments on DSL loop dispatch orders was 2.84 percent during February through April 2001. *See* Lacouture/Ruesterholz Pennsylvania Declaration, Attachment 37. By contrast, at the time of the New York application, there were no approved performance measures and Verizon's performance was hotly contested. *See New York Order* ¶ 323.

In addition, in New York, Verizon's average completion interval for DSL loops that required a dispatch was 6.69 days and 5.58 days, respectively, during March and April 2001. *See* Lacouture/Ruesterholz Connecticut Reply Declaration, Attachment 2. In Pennsylvania, Verizon's average completion interval to provision DSL loops where a dispatch was required was 5.71 days during February through April 2001. *See* Lacouture/Ruesterholz Pennsylvania Declaration, Attachment 38. Again, at the time of the New York application, there were no approved performance measures and Verizon's performance was heavily contested. *See New York Order* ¶ 324.

Verizon's current trunk performance is just as strong as it was when Verizon filed its long distance application for New York. In March and April 2001, Verizon completed 98.5 percent of CLEC trunk orders in New York. *See* Lacouture/Ruesterholz Connecticut Reply Declaration, Attachment 39. In Pennsylvania, Verizon completed about 99 percent of CLEC trunk orders on time during February, March, and April 2001. *See* Lacouture/Ruesterholz Pennsylvania Declaration, Attachment 2. This is virtually the same trunking performance as Verizon reported when it filed its New York application. *See New York Order* ¶ 70 n.142.

Finally, since the New York Application was filed, Verizon has, in compliance with the Commission's orders, introduced line sharing. Verizon's line sharing performance has been excellent in both New York and Pennsylvania. In New York, Verizon has met 99 percent and 98 percent of its installation appointments for CLECs' no dispatch line sharing orders during March and April 2000. *See* Lacouture/Ruesterholz Connecticut Reply Declaration, Attachment 31. In Pennsylvania, Verizon's met more than 96 percent of its installation appointments for CLEC no-dispatch line sharing orders during February through April 2001. *See* Lacouture/Ruesterholz Pennsylvania Declaration, Attachment 55.