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1722 EYE STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE 202 736 8000
FACSIMILE 202 736 8711
www.sidley.com
FOUNDED 1866

BEIJING
HONG KONG
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WRITER'S DIRECT NUMBER
(202) 736-8164

WRITER'S E-MAIL ADDRESS
ryoung@sidley.com

July 20, 2001

RECEIVED

JUL 20 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Erratum

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
TW-B204
Washington, D.C. 20554

Re: Erratum To Comments of AT&T Corp. In Opposition To Verizon
Pennsylvania's Section 271 Application For Pennsylvania, CC Docket No.
01-138

Dear Ms. Salas:

This erratum provides revisions to material filed on July 11, 2001, with the above-referenced Comments of AT&T Corp.

Paragraph 75 of the Declaration of Joseph Bloss and E. Christopher Nurse states that an itemized list of Verizon's provisioning and metrics failures is attached to the Declaration as Exhibit "D." The exhibit in question, however, should have been described as Exhibit "G." Because another document had also been described in the declaration as Exhibit D (*see* Bloss/Nurse Declaration, ¶ 67 n.68), the itemized list described in Paragraph 75 was inadvertently omitted from AT&T's filing.

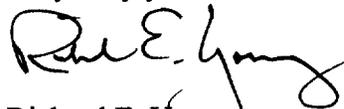
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Magalie Roman Salas
July 20, 2001
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Accordingly, AT&T is submitting herewith as Exhibit G the document referred to in Paragraph 75 of the Bloss/Nurse Declaration, as well as a revised page 38 of the Declaration that reflects the change in the lettering of the Exhibit.

Very truly yours,



Richard E. Young

Enclosures

**ANALYSIS OF VERIZON PERFORMANCE FAILURES
PROVISIONING AND MAINTENANCE
MAY 2001**

	May Results				
	CLEC	CLEC Vol.	Vz	Vz. Volume	Z-Score
POTS Provisioning					
PR-2-01, Average Interval Completed-Total-No Dispatch-Hot Cut Loop	6.64	937	0.90	163,869	-113.03
PR-3-01, % Completed Within 1 Day -(1-5 Lines-No Dispatch)	24.44	17,024	69.88	132,198	-121.64
PR-3-01, % Completed Within 3 Days -(1-5 Lines-Dispatch)	54.61	152	61.65	12,734	-1.77
PR-5-01, % Missed Appointments-Verizon Facilities-Loop	1.48	1,482	0.28	440,496	-8.73
PR-6-01, % Installation Troubles Reported Within 30 Days-Loop	2.97	10,696	1.86	477,106	-8.46
PR-6-02, % Installation Troubles Reported Within 7 Days-Loop	1.73	10,696	1.19	477,106	-5.06
Complex Services-2 Wire Digital					
PR-1-01, Average Interval Offered-Total Dispatch	5.79	14	2.70	586	-3.58
PR-5-01, % Missed Appointment-Verizon-Facilities	8.46	201	4.02	722	-2.83
PR-6-01, % Installation Troubles Reported Within 30 Days	8.29	217	3.39	738	-3.51
Complex Services-2 Wire xDSL Loops					
PR-6-01, % Installation Troubles Reported Within 30 Days	5.25	638	1.86	not publicly reported- confidential	
POTS & Complex Aggregate					
PR-1-10, Average Interval Offered-Disconnects-No Dispatch	0.75	8,566	0.34	34,119	-70.86
PR-2-10, Average Interval Completed-Disconnects-No Dispatch	0.81	7,705	0.35	32,981	-60.59
Special Services-Provisioning					
PR-5-01, % Missed Appointment-Verizon-Facilities	12.08	331	0.70	710	-20.51
PR-5-02, % Orders Held for Facilities > 15 Days	3.32	331	0.14	710	-12.78
POTS-Maintenance					
MR-2-02, Network Trouble Report Rate-Platform	1.08	202,094	0.92	5,691,023	-7.77
MR-2-03, Network Trouble Report Rate-Central Office	0.18	202,094	0.11	5,691,023	-10.15
MR-5-01, % Repeat Troubles Within 30 Days-Loop	20.21	1,128	14.06	58,538	-5.89
Complex Services-2 Wire Digital Maintenance					
MR-2-02, Network Trouble Report Rate-Loop	1.08	3,137	0.34	42,791	-6.93
MR-2-03, Network Trouble Report Rate-Central Office	0.32	3,137	0.12	42,791	-3.06

discriminatory wholesale service in spite of the fact that the PAP has been in effect for over a year.

73. Although the Plan has been in effect for over a year, Verizon still does not provide nondiscriminatory service to CLECs. There is no better evidence of the insufficiency of the Plan. Verizon already has conceded that it routinely misses 23% of its monthly metrics and the metrics that it misses vary by month.⁷² By definition, this means that Verizon fails to provide competitors with nondiscriminatory service 23% of the time, and that Verizon mishandles nearly 1 out of every 4 CLEC-initiated transactions. Indeed, that 77% figure overstates the quality of Verizon's wholesale performance, given that proper accounting of all of the metrics for which Verizon's routinely makes inaccurate reports would likely result in an even lower percentage.⁷³

74. For example, as discussed above, in the March 2001 C2C reports, Verizon noted 10 categories of reporting problems affecting *all* provisioning and maintenance and repair metrics, in addition to 14 specifically identified metrics. The problems were just as bad – if not worse -- in its April 2001 C2C reports. Of the 17 noted problem categories in the April 2001 reports, 14 were *new* problems that had not been identified in earlier months.

75. Verizon's May 2001 CLEC aggregate monthly performance reports also reveal numerous instances of discriminatory treatment of CLECs in provisioning their orders and providing maintenance and support of those orders. An itemized list of Verizon's provisioning and maintenance metrics failures is attached as Exhibit "G." This Exhibit, developed from the data set forth in Verizon's performance measurements July 3, 2001 *ex parte* submission,

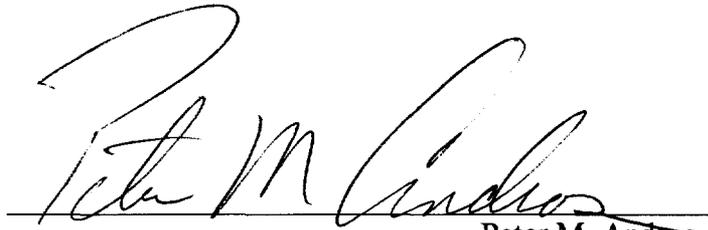
⁷² *En Banc* Hearing Tr. at 622-24 (M-00001435, April 27, 2001).

⁷³ In addition, Verizon already has built-in 5% performance leeway on each of the numerous benchmark performance standards that only require 95% performance.

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of July, 2001, I caused true and correct copies of the forgoing Erratum To Comments of AT&T Corp. to be served on all parties by mailing, postage prepaid, to their addresses listed on the attached service list.

Dated: July 20, 2001
Washington, D.C.


Peter M. Andros

SERVICE LIST

Magalie R. Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-B204
Washington, D.C. 20554

Kelly Trainor
U.S. Department of Justice
Antitrust Division
Telecommunications Task Force
1401 H Street, NW
Suite 8000
Washington, D.C. 20005

Janice Myles
Common Carrier Bureau
445 12th Street, SW
Room 5-C327
Washington, D.C. 20554

ITS
445 12th Street, SW
Washington, D.C. 20554

Mark L. Evans
Evan T. Leo
Scott H. Angstreich
Kellogg, Huber, Hansen, Todd & Evans
1615 M Street, N.W., Suite 400
Washington, D.C. 20036

Michael E. Glover
Karen Zacharia
Leslie A. Vial
Donna M. Epps
Joseph DiBella
Verizon
1320 North Court House Road, 8th Floor
Arlington, VA 22201

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120