with LSOG 4. And as the Carrier-to-Carrier reports and the discussion below make clear, Verizon's performance with respect to pre-ordering and ordering has been excellent.

61. AT&T also criticizes KPMG's test because, according to AT&T, KPMG did not evaluate Verizon's OSS on an "end-to-end" basis. AT&T Fawzi/Kirchberger Decl. ¶ 24. AT&T then suggests that it has conducted its own end-to-end test of Verizon's systems, and that the Commission should rely on its test results. *See* AT&T Fawzi/Kirchberger Decl. ¶ 30. AT&T's claims are without merit. KPMG explained that a number of the scenarios that were "used to structure transaction testing of Verizon PA's OSS and related support services" "spanned multiple domains providing and end-to-end test of Verizon PA's systems and processes." KPMG Final Report at 13. Moreover, AT&T's "commercial production test" involved only about 700 test lines and 9000 transactions. *See* AT&T Fawzi/Kirchberger Decl. ¶ 30. As AT&T itself acknowledges, KPMG's volume test of pre-ordering and ordering involved more than seven times the number of transactions AT&T conducted. And AT&T's test transactions are dwarfed by the actual commercial volumes described above that Verizon is handling. AT&T's small scale test cannot undercut Verizon's actual commercial experience.

62. Finally, AT&T suggests that KPMG's test was flawed because it lacked "blindness." *See* Fawzi/Kirchgberber at ¶ 27. KPMG acknowledged that its test could not be completely blind but, as we discussed in our Declaration, KPMG took great care to ensure that its test was representative of the CLEC experience, and the Pennsylvania PUC supervised and closely monitored the test. KPMG Final Report at 14-15.

IV. Other OSS Issues

63. Pre-Ordering: Covad claims that Verizon fails to provide access to loop make-up information in compliance with the *UNE Remand Order*. Covad at 16-17. Covad concedes that it raised the same claim with respect to Verizon's section 271 application for Massachusetts, and that the Commission rejected it there. Covad at 17. Covad also raised the same claim in connection with Verizon's section 271 application for Connecticut, and the Commission again rejected it, reiterating that "Verizon's process for providing competitive LECs access to loop make-up information complies with our requirements," and that it provides "useful, detailed information to competing carriers concerning the ability of loops to support xDSL services, within reasonable time frames." *Connecticut 271 Order*, ¶ 54, *citing Massachusetts 271 Order*, ¶¶ 61-62, 67. Verizon's process for providing access to loop make-up information in Pennsylvania is the same as its process in Massachusetts and Connecticut. In addition, as described in our Declaration, the long term access arrangement that Verizon is currently developing for implementation in October 2001 will apply in all former Bell Atlantic jurisdictions, including Pennsylvania. Verizon is following the Change Management process and remains on track for the October 2001 implementation.

64. In its comments here, Covad cites an audit report from Arthur Andersen which included a finding that Verizon maintained a database with loop make-up information "about a limited number of loops" to which competing carriers did not have electronic access. Covad at 17. The time frame during which Arthur Andersen conducted its review for its report was July through October 2000. Arthur Andersen provided its report to the Commission on January 29, 2001. This was before Verizon

implemented its interim process for access to loop make-up information. As a result, the report provides no basis for changing the Commission's conclusion.

65. A group of CLEC commenters argue that actual Web GUI interface availability is not consistent with reported Carrier-to-Carrier results. Capsule/Covista/US LEC at 12. These CLECs do not present any evidence of their own, but simply report claims that WorldCom made in the state proceeding. Verizon responded to them there, and we addressed them again in our Declaration. WorldCom made several errors in compiling its data. For example, it used the wrong hours and business days in its definition of prime time. In addition, WorldCom included "scheduled outages" which were actually scheduled during non-prime-time hours. It also included outages that were for planned maintenance of back-end systems, which equally affect both wholesale and retail and therefore are excluded from the interface availability metric.

66. Ordering: AT&T argues that the level of ordering flow through in Pennsylvania is inadequate because it is lower than in New York. AT&T at 46-47; AT&T Fawzi/Kirchberger Decl. ¶ 38. AT&T tries to show a gross disparity between Pennsylvania and New York by showing the overall UNE flow through rates in those states. But the overall UNE rate is a combination of both UNE platform orders, which tend to have high levels of flow through, and other UNE orders, which tend to flow through at a lower level. In New York, the ratio of platform orders to other UNE orders is approximately 10:1. In Pennsylvania, the ratio is about 2:1. While the flow through rates for the separate order categories are fairly similar between Pennsylvania and New York, the significantly higher proportion of UNE loop and other non-platform UNE orders in Pennsylvania causes the overall rate to be lower than in New York.

67. As we demonstrated in our Declaration, the flow through rates in Pennsylvania at the time we filed this application were comparable to or higher than flow through rates in New York when the application was filed there. Since our filing, flow through rates in Pennsylvania have continued to increase. *See* Attachment 11. Moreover, Verizon's timeliness in returning order confirmations and reject notices remains very strong, and Verizon's accuracy in processing orders is superior to the performance levels that the Commission found acceptable in both the New York and Massachusetts applications. *See* Guerard/Canny/DeVito Reply Decl. Att. 1 (scores range from 92% to 99% in May and from 95% to 99% in June); *New York 271 Order*, ¶ 174, n. 548 (adjusted score of 87%); *Massachusetts 271 Order*, ¶ 81, n. 251 (scores range from 90% to 99% with three exceptions where Verizon's scores were 82.74%, 89.62%, and 88.86%). AT&T's claim that Verizon has unilaterally changed the methodology for reporting OR-6-01, AT&T Fawzi/Kirchberger Decl. ¶ 42, n. 32, is incorrect. Verizon has conducted special studies to show what the result would have been if the metric were corrected for the non-service affecting "errors" measured in the Carrier-to-Carrier results. *See, e.g.*, McLean/Wierzbicki/Webster Decl. ¶ 89 and Att. 23. Verizon has not included these study results in its reported Carrier-to-Carrier results.

68. Finally, AT&T's claim (AT&T at 48; *see also* WorldCom Kinard Decl. ¶ 10) that Verizon has no incentive to improve its flow through level because the Pennsylvania performance assurance plan does not include any remedies associated with flow through is simply wrong. Verizon has strong incentives to improve its flow through rates in order to increase the efficiency of its order processing and reduce its costs. As a result of those incentives, Verizon's flow through rates have continued to increase even

though there are no performance remedies in place. In any event, the performance assurance plan Verizon proposed in the Pennsylvania PUC's current proceeding does contain remedies associated with flow through. *See* Guerard/Canny/DeVito Reply Decl.

69. AT&T claims that Verizon has not adequately explained why it does not flow through supplemental orders. *See* AT&T at 47. AT&T is incorrect. As we explained in our Declaration, CLEC "supplements" changing or cancelling an order that has reached the Service Order Processor do not flow through, but instead are routed to the National Market Center for manual handling to ensure that the CLEC's revised directions – rather than the active service order – are implemented.

70. AT&T claims that Verizon's line loss reports are inaccurate. AT&T Fawzi/Kirchberger Decl. ¶¶ 60-64. WorldCom, in an Ex Parte dated July 31, claimed that Verizon fails to provide line loss reports to CLECs. Both are wrong. Verizon provides a daily Line Loss Report to CLECs and to Verizon's retail operations identifying end user lines that have been migrated to another CLEC or to Verizon. These reports include all of the information specified by the Ordering and Billing Forum guidelines – the working telephone number and the date the end user converted to a new local service provider – as well as additional information identifying the customer type, the billing telephone number, the old local service provider and the new local service provider. Verizon makes the line loss reports available by posting them on an FTP server where the CLECs can download them. Verizon also provides LLRs to CLECs that request them over Connect:Direct and over EDI. The accuracy of these reports is very high – the percent of working telephone numbers reported as missing or incorrect on the report has averaged less than one percent across the entire former Bell Atlantic footprint

for the period of January through June 2001. Even this number overstates the error rate, however. Verizon investigated 1,483 working telephone numbers in Pennsylvania reported on line loss trouble tickets by CLECs. The investigation showed that approximately one third of the lines that the CLECs reported as missing actually appeared on the report. Another third were reported erroneously by the CLECs – in other words, the customer was still the CLEC's customer, the customer had never been the CLEC's customer, or the reported working telephone number did not exist. The remaining third contained some errors, but also included working telephone numbers that had been disconnected by the CLEC which would not appear on the report and other anomalous conditions. It is clear, therefore, that the Line Loss Report is very accurate.

71. Covad asserts that it has had difficulty "getting Verizon to devote sufficient resources" to address issues with its EDI implementation. Covad at 19 and Att. H. This is a puzzling claim: since January of 2001, over 20 CLECs have used EDI to submit over 3 million ordering transactions and over 3 million pre-order transactions to Verizon throughout the former Bell Atlantic footprint. With respect to Covad's implementation of EDI, Verizon's CLEC support teams for CLEC testing and connectivity have worked extensively with Covad and its vendor to ensure that Covad is capable of exchanging transactions with Verizon via EDI. In fact, Covad has been using EDI to submit transactions to Verizon since February 2001. Verizon's CLEC test team assisted Covad and its vendor with the migration from LSOG2 to LSOG 4, and also worked with Covad during CLEC testing for the June 2001 release. Working with the CLEC test team, Covad and its vendor submitted and successfully completed test orders in Pennsylvania.

72. Covad also claims that it is not receiving electronic jeopardy reports from Verizon. Covad at 19. Verizon did not find any trouble tickets in Pennsylvania that Covad had submitted on this issue. As explained in our Declaration, Verizon has two methods by which it informs CLECs of orders that are in jeopardy. The first, Open Query System ("OQS") reports is the same as the process in place in Massachusetts and New York at the time of Verizon's section 271 applications for those states. The Commission concluded that Verizon makes order status and jeopardy information available to CLECs in a nondiscriminatory manner in New York and Massachusetts. *See New York 271 Order*, ¶ 184; *Massachusetts 271 Order*, ¶ 85. OQS reports are generated by the Work Force Administration ("WFA") system for both provisioning and maintenance, to notify CLECs that an order (or maintenance) appointment may be in jeopardy. Verizon posts OQS reports three times each day. Verizon retains the reports for approximately 30 days so that CLECs can check on earlier reports if desired. The OQS reports Verizon provides to CLECs were agreed to in negotiations during collaborative proceedings in New York. Verizon now provides the same reports throughout the former Bell Atlantic footprint, including Pennsylvania. In addition, Verizon implemented the Electronic Jeopardy Notification in accordance with the OBF industry guidelines for Electronic Jeopardy Notifications that were introduced with LSOG 4. Several CLECs informed Verizon that they wanted to take advantage of this functionality even though they had not yet implemented the LSOG 4 version of the industry guidelines. Verizon accommodated these CLECs by implementing a method for CLECs using LSOG 2 to receive an Electronic Jeopardy Notification also. If Covad had

concerns with receiving electronic jeopardies via EDI, it should open a trouble ticket with the Wholesale Customer Care Help Desk.

73. WorldCom reiterates its claim that Verizon incorrectly processed LSRs with multiple blocking options. WorldCom at 27. In our Declaration we explained that WorldCom opened a trouble ticket for this issue on January 12, 2001 and Verizon implemented the fix on February 3. Verizon also identified affected LSRs and accounts requiring correction, and then created and processed corrective LSRs through the end of June. The approach and recovery timeline was shared with WorldCom. Throughout the recovery process, Verizon provided WorldCom with weekly status reports of correction orders completed. The corrective activity has now been completed.

74. Notifiers: Several CLECs claim that Verizon is not timely in providing electronic completion notifiers. *E.g.*, AT&T at 49; WorldCom at 26; CompTel at 19. These claims are old and have been answered repeatedly. For example, AT&T claims that "Verizon's own data show performance is sub-standard," AT&T at 49, when in fact Verizon's performance on the Carrier-to-Carrier measure for Completion Notices – 97% in 2 hours (OR-4-02) – was 100% for January through May 2001. As we explained in our Declaration, this measure covers provisioning completion notices ("PCNs"). Because there are no measures in place in the Pennsylvania Carrier-to-Carrier Guidelines with respect to billing completion notices ("BCNs"), Verizon has offered to report a BCN timeliness metric similar to one that is included in the New York Performance Assurance Plan, which is based on the March 9, 2000 Consent Decree. The New York measure is "SOP to BCN within 3 business days." Because the billing cycles in Pennsylvania were 3 and sometimes 4 days, Verizon performed a special study in Pennsylvania to calculate

this metric using a 4 day standard. For May and June 2001, Verizon's performance was 98.01% and 98.55% respectively.

75. WorldCom raises the specter of "root cause" claiming that "Verizon has never provided adequate root cause analysis" of a system problem that occurred in February 2001 and caused some WorldCom billing completion notices to be delayed. WorldCom at 26, 28. In fact, root cause for that specific incident was provided in the state proceedings and had been shared with WorldCom in regular business-to-business discussions. In addition, Verizon provides WorldCom with weekly "root cause" reports for any purchase order numbers ("PONs") reported on missing notifier trouble tickets that are not resolved by re-flowing the requested notifier.

76. The number of PONs reported by CLECs as having delayed or missing notifiers is very small in Pennsylvania. In May and June, Verizon received over 362,000 PONs, while only 2.5% were reported as having a delayed or missing notifier ("PON Exceptions"). Further, Verizon's track record for clearing and resolving PON Exceptions is outstanding – 99.99% were cleared within three business days either by re-flowing a notifier or by providing a status if the PON has not reached the business state to generate the requested notifier. In the latter case, Verizon will determine if corrective action is required, either by Verizon or the CLEC, to move the PON further in the business process and subsequently to produce the requested notifier. If the corrective action is Verizon's, Verizon completes the action and communicates that it has done so to the CLEC. If the action is the CLEC's (for example, the CLEC must submit a supplemental order in response to a query so that confirmation can be generated), Verizon will inform the CLEC of the corrective action required on its part. *All* PONs reported on PON

Exception trouble tickets in Pennsylvania through the end of June have been resolved. Contrary to AT&T's and WorldCom's suggestions that future performance cannot be assured without a measure for billing completion notices, AT&T at 49-50; WorldCom at 26, Verizon has performed well in Pennsylvania even without a measure in place.

77. CompTel repeats several claims concerning notifier timeliness and status accuracy made by MetTel during the state proceedings. CompTel at 19. These claims were exhaustively analyzed and answered by Verizon in the state hearings. Verizon's analysis indicated that the status provided by Verizon to MetTel was accurate and notifiers were provided timely. Verizon's analysis of MetTel's data indicated that MetTel was often using date/time stamps different from those in Verizon's records (a difference that was sometimes as great as 137 days), and that MetTel was determining what it viewed as the "correct" status based on assumptions that were inconsistent with the actual design and operation of Verizon's OSS. In any event, the PONs submitted by MetTel on PON Exception trouble tickets for late or missing completion notifiers (PCNs and/or BCNs) represent a small percentage of their total PONs submitted to Verizon, and of those, the majority are resolved with the requested notifier being delivered in a timely manner. From November 2000 through May 2001 (the period represented in their claim), MetTel submitted ****   **** PONs on trouble tickets for late or missing completion notifiers (PCN and/or BCN). This represented only ****   **** unique PONs or 2.84% of MetTel's total PONs submitted in Pennsylvania during this time.

78. <u>Change Management</u>: AT&T and WorldCom argue that Verizon is making software fixes to improve the BOS BDT bill without notifying CLECs through Change Management. AT&T Fawzi/Kirchberger Decl. ¶¶ 78, 80, nn. 63, 64; WorldCom

Lichtenberg Decl. ¶ 16. These types of changes are not required to be announced through Change Management because they are changes to back-end OSS that do not change the CLEC interface. The fixes are generally either to prevent incorrect records from being created in Verizon's database or to bring the software into synchronization with the interface documentation. If a software fix to a back-end OSS resolves an issue on a CLEC's trouble ticket, then Verizon will explain this when resolving and closing the trouble ticket with the CLEC.

79. CompTel claims that "unlike Verizon desired system changes, CLEC proposals languish." in Change Management. CompTel Goldberg Decl. ¶ 21. CompTel is wrong, and it ignores the many ways that CLECs influence the work that Verizon is mandated to perform. In addition to bringing "type 5" (CLEC-initiated) change requests to Change Management, CLECs seek interface and software changes and new performance measures or standards, which can require software changes, through the regulatory process; they participate in Carrier to Carrier working groups to develop performance measures and standards; they are on committees and forums that develop industry standards and guidelines; and they participate in other collaboratives, such as the New York DSL Collaborative, that can result in requirements to make changes to Verizon's OSS. The majority of the development effort expended by Verizon in the February and June 2001 releases was for non-discretionary items. The work effort was distributed across six general categories: 1) industry standards, 2) flowthrough, 3) hardware/software maintenance, 4) legal/regulatory obligations, 5) CLEC-initiated changes and 6) Verizon-initiated changes.

V. Conclusion

80. Verizon provides nondiscriminatory access to its billing functions. It provides CLECs with complete and accurate reports on the service usage of their customers in substantially the same time and manner as Verizon provides such information to itself for its own retail customers. It also provides accurate wholesale bills to the CLECs for the products and services Verizon has sold to them in a manner that gives CLECs a meaningful opportunity to compete. For all its OSS, Verizon is presently handling actual commercial volumes of CLEC transactions with excellent performance. As a result, Verizon provides CLECs with nondiscriminatory access to its OSS, allowing them to offer local service in substantially the same time and manner as Verizon.

81. This concludes our Declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 3, 2001

Kathleen McLean

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 7, 2001

Raymond Wierzbicki

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 7, 2001

Catherine T. Webster

Catherine T. Webster