# REPLY DECLARATION OF KATHLEEN McLEAN, RAYMOND WIERZBICKI, AND CATHERINE T. WEBSTER

## ATTACHMENT 5

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**To:** Change Control

**Subject:** Verizon Billing Data Tape (BDT) Quality Assurance Process

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**Description**: The purpose of this communication is to advise CLECs and Resellers that Verizon has implemented a quality assurance process which is performed on all Billing Data Tapes (BDTs) in the state of Pennsylvania. This process became effective shortly before Verizon informed Resellers and CLECs that they could choose the BDT as their official bill of record in Pennsylvania.

The quality assurance process involves a manual review and adjustment of the BDT to ensure that it balances internally and matches the paper bill. Manual adjustments, as necessary, will appear in the Other Credit and Charges (OC&C) section of the BDT and can be specifically identified by one or more of the following six phrase codes introduced for this purpose:

- Summary Bill Transfer
- Unknown Usage
- Carrier Usage
- Out of Bill Period Local Service
- Unknown Local Service
- Unknown OC&C

In the event a BDT has been manually adjusted, written notification of the pertinent phrase codes and the dollar adjustment made to the BDT will be provided to the individual CLEC/reseller. Further, as appropriate, Verizon will independently initiate a credit adjustment for these charges; the credit adjustment(s) will appear in the OC&C section of a subsequent bill. In the same notification as cited above, Verizon will inform the CLEC/reseller of the specific credits initiated. Further, the CLEC/reseller will be instructed that the amount due on the manually adjusted BDT should be reduced by the value of the pending adjustment(s), and that it is not necessary for the CLEC/reseller to submit a claim for these charges.

With the exception of the specific instances outlined above, CLECs/resellers should continue to adhere to established procedures for submission of billing

claims. See CLEC Handbook Volume 111, Section 10.4 Claims and Adjustments, also http://128.11.40.241/east/wholesale/customer_docs/master.htm.

Questions regarding this communication should be addressed to your Verizon claims representative.

REPLY DECLARATION OF KATHLEEN McLEAN,
RAYMOND WIERZBICKI, AND CATHERINE T. WEBSTER

ATTACHMENT 6

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

REPLY DECLARATION OF KATHLEEN McLEAN,
RAYMOND WIERZBICKI, AND CATHERINE T. WEBSTER

ATTACHMENT 7

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

REPLY DECLARATION OF KATHLEEN McLEAN,
RAYMOND WIERZBICKI, AND CATHERINE T. WEBSTER

ATTACHMENT 8

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

# REPLY DECLARATION OF KATHLEEN McLEAN, RAYMOND WIERZBICKI, AND CATHERINE T. WEBSTER

## ATTACHMENT 9

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

REPLY DECLARATION OF KATHLEEN McLEAN,
RAYMOND WIERZBICKI, AND CATHERINE T. WEBSTER

ATTACHMENT 10

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

REPLY DECLARATION OF KATHLEEN McLEAN,
RAYMOND WIERZBICKI, AND CATHERINE T. WEBSTER

ATTACHMENT 11

REDACTED – FOR PUBLIC INSPECTION

# TOTAL FLOW THROUGH PERFORMANCE

***April – June 01***
***Pennsylvania[1]***

| | | Pennsylvania April 2001 | Pennsylvania May 2001 | Pennsylvania June 2001 |
|---|---|---|---|---|
| **Resale** | **%** | **56.26%** | **58.80%** | **54.14%** |
| **Resale** | **Volume** | **8873** | **9352** | **8039** |
| | | | | |
| **Total UNE** | **%** | **54.02%** | **64.65%** | **66.54%** |
| **Total UNE** | **Volume** | **92081** | **96845** | **91032** |
| | | | | |
| **UNE Platform** | **%** | **70.07%** | **76.36%** | **80.07%** |
| **UNE Platform** | **Volume** | **59828** | **69029** | **63060** |
| **UNE Other** | **%** | **24.24%** | **35.56%** | **36.03%** |
| **UNE Other** | **Volume** | **32253** | **27816** | **27973** |

[1] Based on reported Carrier-to-Carrier results

REDACTED – FOR PUBLIC INSPECTION

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**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, DC 20554**

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| Application by Verizon Pennsylvania Inc., | ) | |
| Verizon Long Distance, Verizon Enterprise | ) | |
| Solutions, Verizon Global Networks Inc., | ) | CC Docket No. 01-138 |
| and Verizon Select Services Inc., for | ) | |
| Authorization To Provide In-Region, | ) | |
| InterLATA Services in Pennsylvania | ) | |

**JOINT REPLY DECLARATION OF**
**CATHERINE BLUVOL AND SAMMY KUMAR**

## I. QUALIFICATIONS

1. My name is Catherine (Kate) Bluvol. I submitted a Declaration jointly with Sammy Kumar as part of Verizon Pennsylvania Inc.'s ("Verizon's") above-captioned Application to provide in-region interLATA services in Pennsylvania. My qualifications are set forth in that Declaration.

2. My name is Sammy Kumar. I submitted a Declaration jointly with Catherine Bluvol as part of Verizon Pennsylvania Inc.'s ("Verizon's") above-captioned Application to provide in-region interLATA services in Pennsylvania. My qualifications are set forth in that Declaration.

## II. PURPOSE OF TESTIMONY

3. We have been asked by Verizon to address statements made in the Comments and supporting Declarations filed in this proceeding regarding the work that PwC had performed in six (6) areas around the Pennsylvania BOS BDT:

   - the comparability of the BOS BDT to the Paper Bill in terms of the level of detail and summarization points;
   - the comparability of the BOS BDT to the Paper Bill in terms of billing values for each level of detail and summarization points;
   - the ability of the BOS BDT to be recalculated by a third party;
   - the internal consistency of the BOS BDT;
   - Verizon's BOS BDT throughput (i.e. how many BOS BDTs were released to CLECs during the period June 1 to June 15, 2001); and,
   - Manual Adjustments as a percentage of Current Charges in the period April 20 to May 13, 2001 as compared to the period May 20 to June 13, 2001.

4. The standards and scope of our work are detailed in our original declaration (See Bluvol/Kumar Decl.) which covers the first 5 items above and Verizon's Ex Parte dated July 3, 2001 which covers the last item. This reply should be read in conjunction with that information and solely in relation to the matter above.

## III. RESPONSE TO CLEC COMMENTS ON PENNSYVANIA BOS BDT

5. Certain CLECs (*e.g.*, AT&T, Covad, WorldCom, and Z-Tel) have commented on Verizon's section 271 application in Pennsylvania. Below we have outlined and responded to the comments of these CLECs that specifically relate to the work we have performed surrounding the Pennsylvania BOS BDT.

6. Certain CLECs (*e.g.*, AT&T at 53; Z-Tel at 9) commented that commercial data was not used by PwC to perform the attestation engagements of Verizon management's six (6) assertions around the BOS BDT or that PwC performed a cursory review. PwC's sample of 29 bills selected to test management's assertions 1-4 (included in the report filed with the FCC on June 21, 2000) was composed of **actual** CLEC BOS BDTs and related actual paper bills in the April 20 to May 13 bill periods. The sample was selected by PwC and was designed to cover both large and small BOS BDT files and all bill types (UNE Loop, UNE Platform, Resale and Transport) during that time period. It is our professional judgment that the sample size and composition is adequate to support our conclusions on the fairness of management's assertions 1-4 as applied to the entire population of BDTs. Our findings indicated that except in certain areas (that Verizon management indicated in its assertions) the total amount on the BOS BDT (after adjustment) matches the total amount on the paper bill, and that the level of detail on the BOS BDT is consistent with or more than the Paper Bill and has the same dollar values as the Paper Bill at key summarization points and billing elements. Such detailed elements matched included, but were not limited

to, recurring, non-recurring and fractional charges, MOUs, Date, Time, Length of Call and Class of Service (all key elements at the account level detail). Furthermore, the PwC findings also indicate that, except in certain areas (that Verizon management indicated in its assertions), the BOS BDT is able to be recalculated by a third party, has enough detail (including such information as originating minutes quantity, rate and amount, as well as other information included in Bluvol/Kumar Decl. Att. 1 at Exh. C) to be verified by a third party and is internally consistent in accordance with established criteria (see Bluvol/Kumar Decl. Att. 1 at Exh. D). As we noted in our initial declaration, Verizon did not require us to review the completeness or accuracy of the billing information since Verizon had already completed a third-party test of the Paper Bill. See Bluvol/Kumar Decl. ¶ 14.

7. AT&T claimed the BOS BDT cannot be verified. AT&T at 53. PwC reviewed Verizon's BOS BDT bills and the Manual Adjustment process by which the bills are reviewed and, if necessary, adjusted before release. PwC found that charges contained on the bill, except for the records inserted as part of the Manual Adjustment process and other specific items (that Verizon management indicated in its assertion), could be recalculated and contained enough information for the CLEC to verify the validity of the charges. Although the records inserted in the BDT as part of the Manual Adjustment process do not, in most instances, contain enough information to validate, PwC noted that the Manual Adjustments on the

BOS BDT were on average, less than 1% of the Current Charges on the bills with bill dates during the May 20 to June 13, 2001 time period.

8. CompTel claimed that the BOS BDT could not be read in its entirety. CompTel at 6-7. Our experience was the opposite. While the PwC exam did not report on assertions surrounding the conformance of Verizon's Pennsylvania BOS BDT with the BOS BDT industry standard, we were able to read the bill using a commercially available software package (Microsoft Access) and note that the level of detail on the BOS BDT is consistent or more than the Paper Bill and has the same dollar values as the Paper Bill at key summarization points and billing elements, except in certain areas (that Verizon management identified in its assertions). The PwC findings also indicate that, except in certain areas (that Verizon management indicated in its assertions), the BOS BDT is able to be recalculated by a third party and is internally consistent in accordance with established criteria.

9. Z-Tel claims that management' s assertion included in its July 3 Ex Parte is wrong since Verizon informed Z-Tel "that its electronic bill was out of balance by more than five percent (5%)". Z-Tel at 9. PwC's examination of such Verizon management assertion found the assertion to be fairly stated, in all material respects. As Verizon explains in the reply declaration of Ms. McLean, Mr. Wierzbicki, and Ms. Webster, the letter that Verizon sent to Z-Tel on July 11, 2001 explains that Verizon was putting certain charges "under investigation" and, therefore, that Z-Tel does not have to pay those charges. The charges that are

"under investigation" are unrelated to whether the BDT was in balance or whether the BDT initially (before adjustment) agreed with the Paper Bill.

10. Z-Tel, in its July 3, 2001 Ex Parte presentation made before the FCC, indicated that the total amount of its April 28, 2001 BOS BDT did not equal the paper summary bill. As part of the PwC testing, we examined the two Z-Tel Pennsylvania Platform BOS BDT files for the April 28th bill cycle and noted that the Total of both of the BOS BDT files (after the Manual Review and Adjustment process) and the related Paper bills did in fact match. Furthermore, we assessed the Manual Review and Adjustment process used by Verizon to ensure that the BOS BDT matched the Paper Bill and noted that the process was operating effectively. In order to ensure that the process was operating effectively we reviewed with Verizon personnel the processes and controls in place and performed test of these controls. Such controls consisted of, but were not limited to, key communications and sign-off points, access by only authorized personnel, and completion of a spreadsheet to track adjustments.

11. The Department of Justice comments that each of Verizon's assertions were clarified by exceptions to account for known discrepancies. DOJ Eval. at 10, n. 37. Paragraphs 143 to 152 of the Declaration of Ms. McLean, Mr. Wierzbicki, and Ms. Webster explain these exceptions. For example, management's first assertion is that the "BOS BDT electronic billing medium used by Verizon to bill certain of its CLEC customers in Pennsylvania contains all of the key summarization points and key billing elements currently available on the Paper

Bill . . ." except in limited cases. See Bluvol/Kumar Decl. ¶ 24. Those cases where the BDT contains fewer summarization points and key billing elements than this paper bill are consistent with the BDT Guidelines or Verizon's Plan of Record. As we noted in our initial declaration and our report dated June 19, 2001, based on the results of our procedures (as explained in Bluvol/Kumar Decl. ¶¶ 14-48), in our opinion, Verizon's assertions (as included in Bluvol/Kumar Decl. Att. 1), are fairly stated, in all material respects, as of the dates included in the related PwC report.

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

Catherine Bluvol

Catherine Bluvol

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

Sameer Kumar