

**State of Rhode Island and Providence Plantations
Public Utilities Commission**

May 17, 2001

**Evaluation of Verizon-Rhode Island Operations Support Systems -
Approval of Amended Master Test Plan**

On March 1, 2001, the Rhode Island Public Utilities Commission (“Commission”) approved a final Master Test Plan (“MTP”) to govern KPMG’s testing of Verizon’s Operations Support Systems (“OSS”). On March 6, 2001, Verizon suspended further participation with KPMG’s OSS testing.¹ On April 16, 2001, the FCC issued an order approving Verizon’s application to provide long distance service in Massachusetts. On April 24, 2001, Verizon filed with the Commission a request for reconsideration regarding the Commission’s decision to issue a final MTP that included metrics replication testing. On the basis of the FCC’s approval of Verizon’s Massachusetts 271 application, Verizon argued that the Commission should re-engage KPMG to complete the OSS testing, but that the MTP should be amended to exclude metrics replication testing.² In addition, Verizon renewed its offer to develop an expedited dispute resolution process and to have a sample of Rhode Island’s metrics be audited when the Massachusetts DTE initiates its audit of Massachusetts metrics.³ Also, on April 24, 2001, the Rhode Island Senate passed a Resolution calling upon this Commission to enhance

¹ Verizon letter dated 3/6/01.

² Verizon Request for Reconsideration., p. 2.

³ Id., p. 3.

“the prospect of a successful application” by Verizon to the FCC to provide long distance service in Rhode Island “so that the resulting benefits may soon be realized by Rhode Island consumers.”⁴

On April 27, 2001, Verizon’s request for reconsideration was sent to the active parties for comment. Conversant, AT&T, and WorldCom filed comments in opposition to Verizon’s request. The Division of Public Utilities and Carriers filed a statement indicating support for Verizon’s request. Verizon also filed responses to the objections of Conversant, AT&T, and WorldCom.

The Commission is aware that it is a creature of statute and that ultimately, Rhode Island’s regulatory policy is determined by the state legislature. Therefore, the Commission gives great weight to policy directives of the Rhode Island General Assembly. In this instance, the Rhode Island Senate has urged this Commission to move forward with Verizon’s 271 application for Rhode Island. Also, on May 10, 2001, Verizon finally filed its aggregate Carrier to Carrier (“C2C”) performance reports for January through March 2001 with the Commission, indicating that Verizon will make carrier-specific reports available to CLECs on individual basis upon request. These reports will enable CLECs to monitor Verizon’s carrier-to-carrier performance to ensure that

⁴ R.I. Senate Resolution 01-S918, p. 2. On May 4, 2001, House Majority Leader Gerard Martineau filed a letter with the Commission indicating his support for allowing Verizon to provide long distance service in Rhode Island by stating that “consumers in Rhode Island” must be offered “the same benefit that consumers in Massachusetts have for long distance choice”. Martineau’s letter dated 5/4/01.

CLECs are obtaining parity of access to Verizon's OSS.⁵ Lastly, the Commission accepts Verizon's offer to develop an expedited dispute resolution process for CLECs and to conduct a sample audit of Rhode Island metrics when the Massachusetts' DTE performs its own initial metrics audit. The Commission intends to continue its oversight of Verizon's performance in these areas to ensure that adequate safeguards are established for CLECs to compete in the local telephone service market.

Accordingly, the Commission hereby directs KPMG to submit an amended final Master Test Plan for the Verizon-Rhode Island OSS Test that excludes metrics report validation and data integrity validation.⁶

Elia Germani, Chairman

Kate F. Racine, Commissioner

Brenda K. Gaynor, Commissioner

⁵ Traditionally, Verizon's Performance Assurance Plan incorporates various C2C metrics.

⁶ With the exception of data integrity and metrics replication testing, the provisions of the MTP approved on March 1, 2001, as well as the scope of the stand-alone testing of line-sharing, remains unchanged.