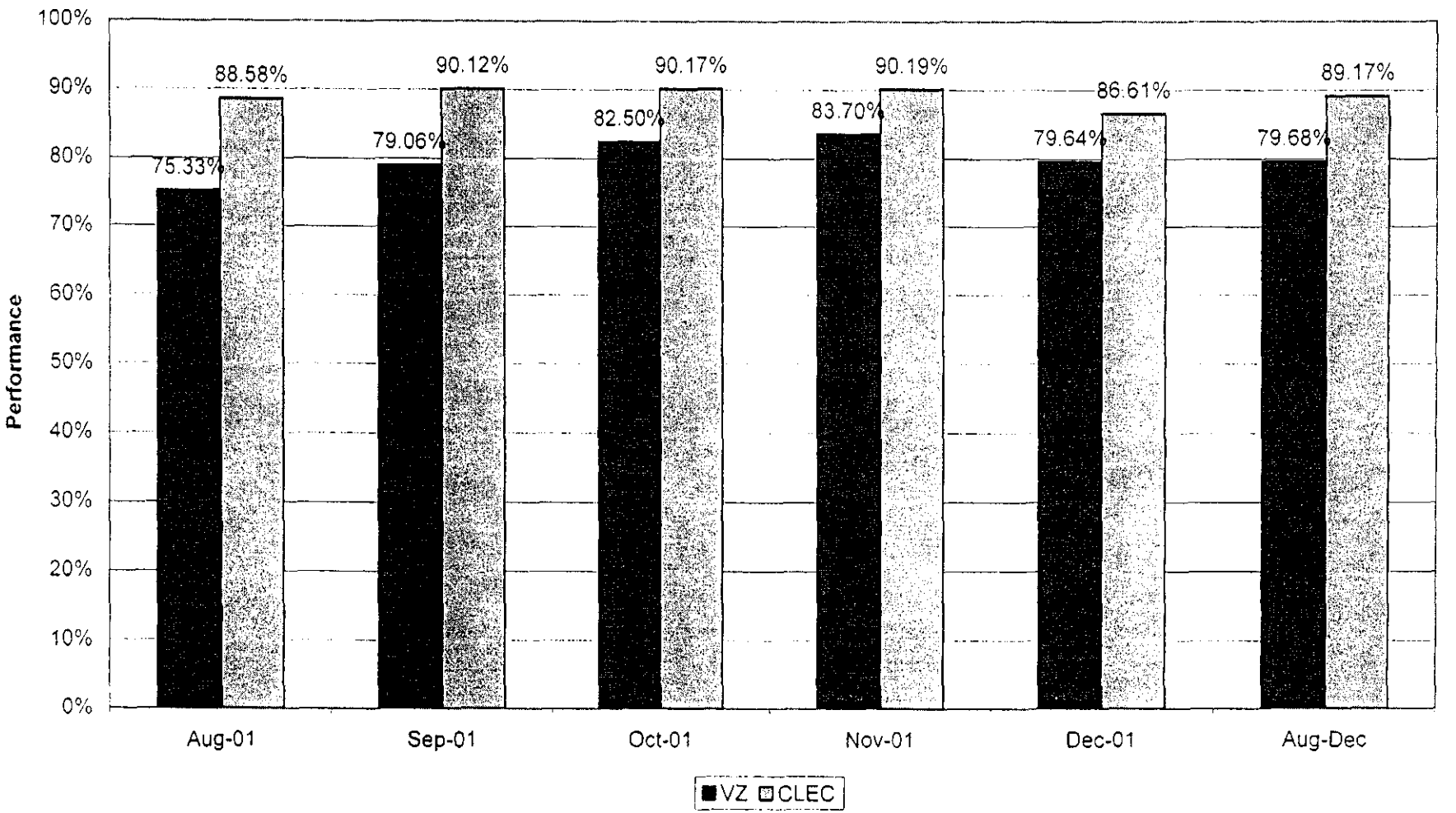
REPLY DECLARATION OF PAUL A. LACOUTURE AND VIRGINIA P. RUESTERHOLZ

ATTACHMENT 19

New Jersey - Resale POTS
Maintenance - % Repair Appointments Met - Loop/Central Office
(Inverse of MR-3-01, MR-3-02)
Aug - Dec 01



New Jersey - Resale POTS
Maintenance - % Missed Repair Appointments - Loop/Central Office (MR-3-01, MR-3-02)
Aug - Dec 01

MR-3-01
% Missed Repair Appointments - Loop

	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Aug-Dec
VZ						
Performance	25.88%	21.77%	17.81%	16.52%	19.89%	20.85%
Observations	86414	70576	66264	55511	60276	339041
CLEC						
Performance	11.61%	10.18%	9.41%	8.65%	12.07%	10.43%
Observations	2230	1759	1849	1492	1458	8788

MR-3-02
% Missed Repair Appointments - Central Office

VZ						
Performance	9.17%	11.07%	14.53%	14.50%	23.47%	15.23%
Observations	6725	5970	6813	6753	9117	35378
CLEC						
Performance	8.06%	4.81%	16.13%	24.37%	29.66%	16.81%
Observations	124	104	124	119	118	589

% Missed Repair Appointments - Loop/Central Office

VZ						
Performance	24.67%	20.94%	17.50%	16.30%	20.36%	20.32%
Observations	93139	76546	73077	62264	69393	374419
CLEC						
Performance	11.42%	9.88%	9.83%	9.81%	13.39%	10.83%
Observations	2354	1863	1973	1611	1576	9377

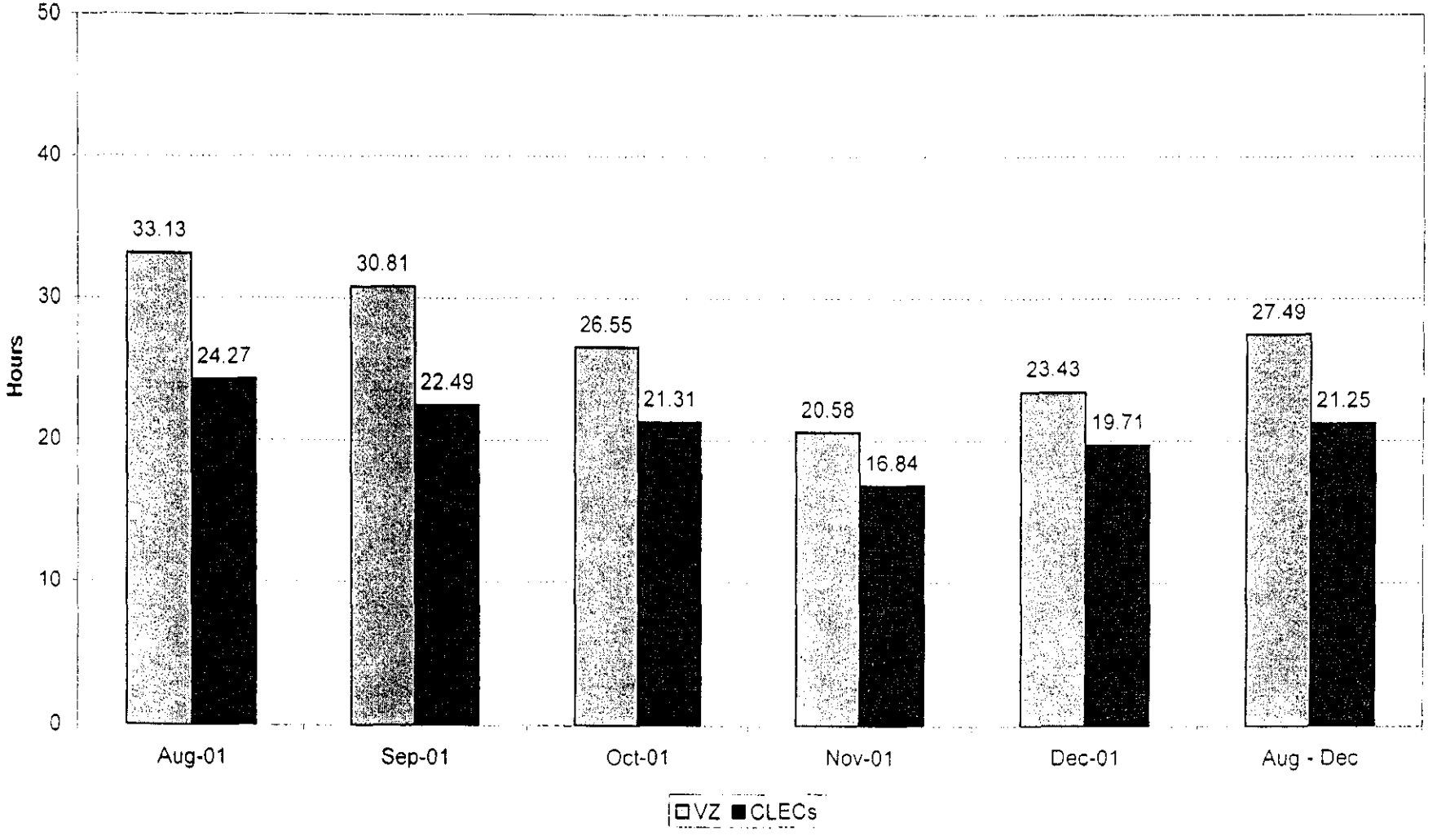
Repair Appointments Met
Inverse of Weighted Average of MR-3-01 and MR-3-02

	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Aug-Dec
VZ	75.33%	79.06%	82.50%	83.70%	79.64%	79.68%
CLEC	88.58%	90.12%	90.17%	90.19%	86.61%	89.17%

REPLY DECLARATION OF PAUL A. LACOUTURE AND VIRGINIA P. RUESTERHOLZ

ATTACHMENT 20

New Jersey - Resale POTS
Maintenance - Mean Time to Repair - Total - (MR-4-01)
Aug - Dec 01



New Jersey - Resale POTS
Maintenance - Mean Time to Repair - Total - (MR-4-01)
Aug - Dec 01

MR-4-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Aug - Dec
VZ						
Performance	33.13	30.81	26.55	20.58	23.43	27.49
Observations	93139	76546	73077	62264	69393	374419
CLEC						
Performance	24.27	22.49	21.31	16.84	19.71	21.25
Observations	2354	1863	1973	1611	1576	9377

REPLY DECLARATION OF PAUL A. LACOUTURE AND VIRGINIA P. RUESTERHOLZ

ATTACHMENT 21

REDACTED – FOR PUBLIC INSPECTION

NEW JERSEY
MR 5-01 % REPEATED REPORTS -- Resale POTS
ROOT CAUSE ANALYSIS
Aug - Dec 01

	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Nov - Dec
Verizon Retail % Repeated Reports	18.54%	19.12%	18.46%	17.82%	18.88%	18.38%
CLEC Resale POTS % Repeated Reports	20.22%	19.27%	21.34%	20.48%	20.75%	20.61%
# Resale POTS Network Troubles	2354	1863	1,973	1611	1,576	3187
# Resale POTS Repeated Reports	476	359	421	330	327	657
Root Cause						
No Access	78	69	75	76	65	141
% of Total Repeaters	16%	19%	18%	23%	20%	21%
MR 5-01 Adjusted for No Access	16.91%	15.57%	17.54%	15.76%	16.63%	16.19%
Difference from CLEC Resale POTS % Repeated Reports	3.31%	3.70%	3.80%	4.72%	4.12%	4.42%
Difference from Verizon Resale POTS % Repeated Reports	-1.63%	-3.55%	-0.92%	-2.06%	-2.25%	-2.19%

REDACTED – FOR PUBLIC INSPECTION

B

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Application by Verizon New Jersey	)	
Inc., Bell Atlantic Communications,	)	
Inc. (d/b/a Verizon Long Distance),	)	
NYNEX Long Distance Company	)	CC Docket No. 01-347
(d/b/a Verizon Enterprise Solutions),	)	
Verizon Global Networks Inc., and	)	
Verizon Select Services Inc., for	)	
Authorization To Provide In-Region,	)	
InterLATA Services in New Jersey	)	

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

1. My name is Kathleen McLean. I am Senior Vice President, Operations Support Systems ("OSS") Policy and Performance Assurance within the Information Technology organization for Verizon. I submitted a Declaration jointly with Raymond Wierzbicki and Catherine T. Webster as part of Verizon New Jersey Inc.'s ("Verizon's") above-captioned Application to provide in-region, interLATA services in New Jersey. My qualifications are set forth in that Declaration. I am accountable for the entire Reply Declaration.

2. My name is Raymond Wierzbicki. I am Group President-Wholesale Unbundled and Resale Services for Verizon Services Group. I submitted a Declaration jointly with Kathleen McLean and Catherine T. Webster as part of Verizon's above-captioned Application to provide in-region, interLATA services in New Jersey. My

qualifications are set forth in that Declaration. I am accountable for the entire Reply Declaration.

3. My name is Catherine T. Webster. I am Vice President-Network Services Finance for Verizon Services Corp. I submitted a Declaration jointly with Kathleen McLean and Raymond Wierzbicki as part of Verizon's above-captioned Application to provide in-region interLATA services in New Jersey. My qualifications are set forth in that Declaration. I am accountable for Section IV of our Reply Declaration.

I. PURPOSE

4. The purpose of our statement is to respond to certain inaccurate or misleading statements concerning Verizon's OSS that are contained in the Comments and supporting Declarations filed in this proceeding by a few of the commenters. None of the claims by Verizon's competitors demonstrates that Verizon fails to provide nondiscriminatory service to Competitive Local Exchange Carriers ("CLECs") or that Verizon has failed to meet the requirements of the Telecommunications Act of 1996 ("1996 Act"). Indeed, virtually all of the claims were raised in the state proceedings and rejected by the New Jersey Board of Public Utilities ("BPU").

5. In our Declaration, we demonstrated that the Verizon interfaces, gateway systems, and underlying OSS for pre-ordering, ordering, provisioning, maintenance and repair, and billing are handling substantial commercial volumes. In addition, as discussed in our Declaration (App. A, Tab B to the initial Application) and addressed further below, the interfaces and OSS serving New Jersey have been subject to a comprehensive third-party evaluation by KPMG Consulting ("KPMG") and Hewlett-Packard Consulting ("HPC") under the supervision of the New Jersey BPU. The

Department of Justice ("DOJ") concluded that "thorough, independent testing of virtually all aspects of [Verizon's] OSS in New Jersey demonstrated them to be highly satisfactory." DOJ Eval. at 6. Based on its review of the record, including testimony, cross-examination, and the KPMG test, the New Jersey BPU found "sufficient evidence of satisfactory OSS performance" and determined that Verizon's OSS met the Commission's requirements. BPU Report at 30, 43.

II. KPMG TEST

6. AT&T makes a variety of claims attacking the independent third party OSS testing conducted by KPMG in New Jersey. AT&T at 17-20; Kirchberger/Nurse/Kamal Decl. ¶¶ 17-62. The KPMG test in New Jersey was modeled after substantially similar tests in New York, Massachusetts, and Pennsylvania, which the Commission has found constituted "persuasive evidence of Verizon's OSS readiness" in those states. *Application of Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, Memorandum Opinion and Order, 15 FCC Rcd 3953 , ¶100 (1999) ("*NY 271 Order*"); *see also Application of Verizon New England et al. for Authorization to Provide In-Region, InterLATA Services in Massachusetts*, Memorandum Opinion and Order, 16 FCC Rcd 8988, ¶ 46 (2001) ("*MA 271 Order*"). As DOJ noted, "The New Jersey BPU's review of Verizon's state Section 271 filing included a comprehensive, independent third-party test by KPMG Consulting 'of the readiness of Verizon NJ's OSS [operations support systems], interfaces, documentation, and processes to support local market entry.' Verizon achieved a perfect score on the test, which evaluated more than 500 aspects of its systems." DOJ Eval. at 3 (footnotes omitted).

7. AT&T claims that KPMG did not conduct an end-to-end test of Verizon's systems, but instead evaluated each OSS function or domain separately without evaluating how these functions operate on an integrated basis. AT&T at 17-18. KPMG used two types of testing in its evaluation – transaction testing and volume testing. KPMG explained that "[o]ne of the goals of transaction-driven testing was to live the CLEC experience. The fundamental idea was to establish a pseudo-CLEC, and to build and submit both pre-order and order transactions using Verizon NJ's electronic interfaces – much like a real CLEC would do." KPMG Verizon New Jersey Inc. OSS Evaluation Project, Final Report at 18, Version 2.0 (Oct. 12, 2001) ("KPMG Final Report") (App. C, Tab 4 to the initial Application). "Transaction-driven system testing was used extensively in the Pre-Order and Order, Provisioning, M&R, and Billing domains." KPMG Final Report at 18.

8. KPMG submitted pre-order transactions to obtain necessary ordering information. KPMG then submitted orders, verified that the appropriate status notifiers were returned, verified that the orders were correctly provisioned, and verified that Verizon correctly billed KPMG for the products and services it ordered. KPMG also verified that Verizon's maintenance and repair systems and processes functioned properly by submitting trouble tickets if there was a provisioning problem and by introducing troubles on its lines and then submitting trouble tickets for those troubles. In sum, KPMG did test Verizon's systems and processes end-to-end. *See* KPMG Final Report at 18.

9. KPMG also used volume testing in its evaluation. As a result, AT&T's claim that Verizon has not demonstrated that the New Jersey service order processor

("SOP") can support high volume UNE-based entry is wrong. AT&T at 19. KPMG conducted a volume test in New Jersey that was designed to evaluate the relevant systems, processes and other operational elements associated with Verizon's pre-order and order processes from the submission of transactions to the creation of service orders in the SOP and return of an order confirmation. KPMG Final Report at 129, 133-134. KPMG used regional volume forecasts to project "normal" volumes for six months in the future. KPMG also conducted a "peak" volume test at 150 percent of normal volumes and a "stress" level test at 150 percent to 250 percent of normal volume. The New Jersey SOP successfully processed not only the projected New Jersey volume, but the regional volume. In fact, the "normal" volume tested by KPMG was the equivalent of submitting 1.3 million orders per month into the New Jersey SOP. Compared to actual November 2001 combined retail and wholesale volume of 570,000 orders, it is clear that the New Jersey SOP can handle the projected transaction load.

10. AT&T also claims that the test was limited in scope. AT&T at 17, 20. AT&T is incorrect. The scope of KPMG's test in New Jersey was controlled by the New Jersey BPU, and was as broad or broader than KPMG's tests in New York, Massachusetts, and Pennsylvania. In determining the scope of the test, KPMG considered "all stages of the CLEC-ILEC relationship" and all "current service delivery methods (i.e. resale, UNE, and UNE-P)." KPMG Final Report at 16. As KPMG noted, "Significant input from the NJ BPU, Verizon NJ, and various CLECs was solicited, received, and considered during the MTP [Master Test Plan] development period. Verizon NJ and CLEC business plans and projections were also reviewed during the construction of the MTP." *Id.* at 16. Moreover, "[d]uring the conduct of the test, the

scope was expanded several times from that contemplated by the draft MTP in response to evolution in the industry, experience gained in preceding state tests, or regulatory emphasis by the DOJ and FCC. These included a DSL Line Sharing test, Line Migration test, Line Loss Report test, and a Metrics Change Control test." *Id.* at 17.

11. Finally, AT&T claims that there was inadequate CLEC participation in the test. Kirchberger/Nurse/Kamal Decl. ¶¶ 58-59. Again, KPMG's Final Report refutes AT&T's claim:

- "Significant input from the NJ BPU, Verizon NJ, and various CLECs was solicited, received, and considered during the MTP [Master Test Plan] development period. Verizon NJ and CLEC business plans and projections were also reviewed during the construction of the MTP." KPMG Final Report at 16.
- "In formulating our approach to testing, KPMG Consulting solicited input from both the NJ BPU and the CLECs. It was important to understand the types of activities that had either previously presented problems, or were currently the greatest concern." *Id.* at 18.
- "Live CLEC test cases provided an alternative test method for transactions that were not practical in our test environment. ... Moreover, live CLEC test cases facilitated a different perspective on actual production. Live CLEC production was also monitored during the test period to assess the performance and service levels experienced by CLECs during the test." *Id.*
- "A weekly conference call, which included the CLECs, the NJ BPU and KPMG Consulting, was established to allow CLECs to obtain information concerning test progress and for them to communicate issues of concern about the test." *Id.* at 20.

12. As the New Jersey BPU noted, "CLEC participation was solicited and there has been ample participation." BPU Report at 30. KPMG's test of Verizon's OSS in New Jersey was "comprehensive [and] independent," DOJ Eval at 3, and, together with the actual commercial usage of Verizon's systems, provides substantial evidence of Verizon's OSS readiness.

III. ORDERING

A. Ordering Process

13. XO claims that Verizon will not accept its orders for "high capacity" loops in New Jersey and that Verizon has insisted on testing and reviewing test orders before it will accept such orders. XO at 14. XO is simply wrong. Verizon has not refused to handle these orders. At an executive level meeting between Verizon and XO in January 2001, XO stated that it had been experiencing difficulty in placing UNE DS1 orders in the former Bell Atlantic South areas. At this meeting, Verizon explained to XO that its orders were being rejected because the Access Service Requests ("ASRs") it submitted included incorrect codes and omitted necessary information in some of the fields. In an effort to resolve this issue, Verizon and XO agreed that XO would submit several test orders and that Verizon would analyze the test orders, identify all errors on the ASR, and conduct a follow-up meeting with XO in order to help XO submit correct ASRs. XO never submitted the test orders and did not respond to numerous Verizon attempts to follow up on the issue. *See* Attachment 1. In spite of XO's failure to avail itself of the assistance Verizon offered, Verizon is not refusing to accept high capacity loop orders from XO. XO raised the same issue in the state proceeding, and the New Jersey BPU agreed with Verizon. BPU Report at 33. XO has offered no new evidence here.

14. XO also claims that Verizon requires it to contact the National Market Center ("NMC") to initiate a "project" when XO wants to migrate a customer from another CLEC which, according to XO, creates unnecessary obstacles. XO at 26-27. According to XO, Verizon should be required to implement the CLEC-to-CLEC migration procedures being developed in New York that do not require a "project" in order to accomplish such a migration. *Id.* at 27. Verizon already uses the same processes for CLEC-to-CLEC migrations in New Jersey as it does in New York. In addition, Verizon is participating in the industry process under the auspices of the New York Public Service Commission to develop CLEC-to-CLEC migration guidelines and will implement processes that are developed by the industry in New Jersey as well as in New York. XO raised the same issue in the state 271 proceeding, and has offered no new arguments here. The New Jersey BPU agreed with Verizon, concluding that "Verizon has adopted an appropriate approach of working with the CLECs in industry forums towards solutions and then implementing those solutions that are adopted. We encourage XO's involvement in those forums. At this time, however, there is no evidence to indicate that Verizon NJ is impeding any CLEC's opportunity to compete for the customers of other CLECs." BPU Report at 33-34.

15. ATX again raises its claim that Verizon failed to make certain features available via network element platforms during the conversion of its customer base from resold services to network element platforms. ATX at 15-19. As Mr. Lacouture and Ms. Ruesterholz explained in their Declaration (App. A, Tab A to the initial Application), Verizon worked expeditiously to design, develop and implement these features after receiving requests from ATX and certain other CLECs at the beginning of last year. The

"assume Dial-9" feature ATX requested became available in October 2001 and the other two features ATX requested – remote call forwarding and analog PBX trunk ports – became available on December 17, 2001. *See* http://128.11.40.241/east/wholesale/resources/master.htm.

16. ATX now complains that its orders for Centrex CustoPak are "not consistently successful," and in many cases its "as is" orders are rejected. ATX at 17-18. ATX did not provide any information about the orders that were rejected, so Verizon is unable to determine what the cause might be. As we explained in our Declaration, however, there are numerous reasons why an order might be rejected, and Verizon has taken a number of steps to assist CLECs in reducing their error rates.

17. ATX also complains that to order analog PBX trunks it must complete an electronic LSR and must fax a supplemental questionnaire with additional information for each order. ATX at 20. The questionnaire requests additional detailed information that Verizon needs in provisioning analog PBX trunks as unbundled network elements ("UNEs") that currently cannot be accommodated on the LSR. As a result, the detailed information must be supplied by the CLEC through the supplemental fax. Verizon is working with ATX to develop alternatives.

18. ATX takes issue with the fact that Verizon does not provide for "as is" ordering for certain complex services (ISDN PRI/BRI, Foreign Exhange ("FX") Platform). ATX at 20-21. As we explained in our Declaration, all of the desired services can be ordered using Verizon's interfaces and OSS. Moreover, Verizon's OSS allow "as is" migrations to ISDN PRI, as the LSOG 4 and LSOG 5 business rules clearly state. ATX is simply wrong when it says orders for ISDN PRI can only be submitted

"manually" – such orders can be submitted using either of Verizon's electronic ordering interfaces, EDI or the Web GUI.

19. "As specified" migrations are required for ISDN BRI and FX Platform because of the greater complexity of these services. ATX is incorrect when it suggests that the conversion from a resale service to a UNE platform is a simple records change for Verizon. *Id.* at 22. In converting from resale of a retail service to UNE products, the end user's records must be completely respecified with the correct inventory of UNE facilities. Subsequent changes and repair activities will be impeded if the customer's current configuration is not mapped correctly. Verizon retail records are not designed for this purpose and in its wholesale role, Verizon does not contact the end user for additional or confirming information.

20. Moreover, in converting to UNE Platform service, Verizon must provision the correct AIN triggers to ensure that the resulting UNEs perform as requested and provide the CLEC with the appropriate billing records. For these reasons, Verizon asks the CLEC requesting the conversion to specify the necessary details concerning how its end user's account should be established and provisioned. This is more than a matter of CLEC or Verizon convenience. It is a matter of correct provisioning. ATX raised this issue in the state proceeding and the New Jersey BPU concluded that Verizon's use of "as specified" ordering in these circumstances was not contrary to its Section 271 obligations. BPU Report at 33.

B. Flow Through

21. AT&T argues that the rate at which orders flow through in New Jersey is too low, and that Verizon will therefore be unable to handle the order volumes AT&T

claims will occur in the future. AT&T at 18. AT&T focuses only on Verizon's flow through rate for UNEs. But as we explained in our Declaration, in New Jersey, the largest order volumes have been resale orders, and those orders flow through at a high rate. Indeed, the "total" flow through of resale orders has increased to approximately 80 percent for the months of November and December. *See* Attachment 2.

22. In addition, Verizon is prepared to handle the type of mass market entry that AT&T is predicting. The same types of mass market UNE orders that CLECs submit in high volumes in other states such as New York, Massachusetts, and Pennsylvania are designed to flow through in New Jersey as well. As a result, if CLECs do begin to submit high volumes of such orders in New Jersey, they will flow through and the UNE flow through rate in New Jersey will increase. As discussed below, however, at the present time the mix of UNE orders, including UNE platform orders, that is being submitted in New Jersey includes a higher proportion of complex orders and a lower proportion of mass market orders than is true in these other states.

23. Moreover, Verizon's timeliness in returning order confirmations and reject notices remains very strong, and Verizon's accuracy in processing both resale and UNE orders met or bettered the Carrier-to-Carrier standards for all three Order Accuracy measures (OR-6-01 - % Accuracy Orders; OR-6-02 - % Accuracy Opportunities; OR-6-03 - % Accuracy LSRC) in both November and December. *See* Guerard/Canny/DeVito Reply Decl., Att. 1.

24. AT&T also argues that the difference in flow through and reject rates between New Jersey and Pennsylvania suggests that there may be a problem with the New Jersey systems. AT&T at 20-21. The reported performance measurement results

are not related to any software or other technical reason. The differences exist due to the volume and mix of orders being placed in each of the jurisdictions and to the individual CLEC experience. The chart below shows the difference in order mix between residential and business accounts, the differences in volume, and the difference in the percentage of orders that are eligible to flow through in New Jersey and Pennsylvania.

UNE LSRs – November 2001

	NJ	PA
% of Business LSRs	84%	14%
Volume of Business LSRs	6,600	13,000
% of Residence LSRs	16%	86%
Volume of Residence LSRs	1,300	80,000
% of Total UNE orders Eligible to Flow-through	58%	84%

25. As the chart shows, where there are more business accounts, the number of LSRs eligible to flow through is less than where there are more residential accounts. Business accounts by their very nature are more complex because they are often multi-line accounts, may have Centrex, require hunting, and/or be associated with specific pricing/term agreements. These types of service are not eligible to flow through due to their complexity. In addition, the more complex the type of service being ordered, the more likely information on the initial LSR requires clarification causing more rejects/queries which results in a higher reject rate (OR-3-01). Mass market entry, however, will be largely residential customers, since that is where the volumes are. As discussed above, Verizon is prepared to handle such mass market entry.

26. XO claims that Verizon fails to provide directory listings at parity with the manner in which Verizon provides directory listing for retail customers because some orders for directory listings do not flow through. According to XO, this increases the

possibility of error. XO at 9-13. As the Commission has previously found, flow-through rates are used "not as a 'conclusive measure of nondiscriminatory access to ordering functions,' but as one indicium among many of the performance of Verizon's OSS." *MA 271 Order* ¶ 77. As discussed above, Verizon's accuracy in processing orders is very high. In addition, KPMG, in its third-party test, confirmed that Verizon accurately provisions the directory database. KPMG Final Report at 229. Finally, XO raised the same issue in the state proceeding. There, as here, XO did not provide any evidence of an error in Verizon's white pages. The New Jersey BPU rejected XO's allegations, found that there was "no credible evidence to suggest that Verizon NJ's methods for provisioning white page listings for CLEC customers is discriminatory," and found that Verizon met the requirements of Checklist Item 8. BPU Report at 64.

C. Notifiers

27. AT&T argues that Verizon failed to meet the New Jersey Carrier-to-Carrier standard of returning 97 percent of Billing Completion Notifiers ("BCNs") by noon the next day and that this indicates a problem with Verizon's systems. AT&T at 22. AT&T again focuses only on UNE orders and ignores resale orders, which constitute the large majority of orders processed by Verizon's systems in New Jersey. Overall, for the months April through December 2001, more than 97 percent of the 241,000 BCNs for both UNE and resale orders were delivered by noon the next day. *See* Attachment 3. In addition, for resale orders, Verizon met or exceeded the 97 percent benchmark every month from August through December, with the exception of October. As we explained in our Declaration, the October results were affected by the clean-up activity in preparation for the retirement of LSOG 2.

28. In conjunction with that retirement, Verizon initiated a review of LSOG 2 pipeline orders (*i.e.*, orders still being processed) to ensure that all such orders were identified, and that their status was communicated to the CLECs that had submitted the orders. As part of ongoing internal quality reviews, Verizon also decided to include LSOG 4 orders in this review. In the course of this review, Verizon uncovered some orders that had been completed, but for which the chain of notifiers – Acknowledgement, Confirmation, Provisioning Completion, and Billing Completion – was incomplete. Approximately 75 percent of the affected orders were Web GUI orders. When the affected orders were identified, completion notifiers for these orders were created for the CLECs. Performance measure OR-4-02 (like a number of other measures in the Carrier-to-Carrier reports) is a "backward looking" measure. That is, it counts notifiers in the month when they are sent, then looks back to see whether the beginning event (in this case, completion in the billing system) occurred within the specified time. If it did not, as was the case for these clean-up notifiers, the notifiers were scored as performance standard "misses" in the month in which they were created (October in this case).

29. AT&T claims that, in many cases, Verizon fails to return a completion notifier at all, pointing to the October results. AT&T at 22. As we explained in our Declaration, approximately 4,000 BCNs resulted from the activity discussed above and were counted in October along with current production BCNs. The related orders had been received by Verizon during the period from January 2000 through October 2001, a period during which CLECs submitted approximately 840,000 orders in New Jersey. The activity discussed above thus impacted less than one half of one percent of order activity in New Jersey over this time frame. Verizon has calculated October results for OR-4-02