13. As indicated above, Verizon provides two types of completion notifiers to CLECs – notice that the provisioning has been completed (a work or provisioning completion notice) and notice that the billing system and records have been updated (a billing completion notice). The process Verizon uses to provide New Jersey CLECs with completion notifiers is the same as the process used in New York, Massachusetts, Connecticut, Pennsylvania, and Rhode Island. *See, e.g., Massachusetts 271 Order* ¶ 83.

14. A CLEC's order (called a local service request ("LSR")) generates one or more internal service orders within Verizon's systems to accomplish the different steps that need to be done to complete the CLEC's request. When a Verizon technician completes work steps for an order requiring physical work either in the field or in the central office, he or she notifies the administrative system that assigns jobs and manages the work force (called Work Force Administration ("WFA")). For most orders requiring physical work, WFA updates the service order processor to show that the work has been completed. For orders requiring no physical work, such as feature/translation changes, the service order processor is automatically updated by WFA during overnight processing.

15. Similarly, the internal service orders update the billing systems, which then notify the service order processor. The service order processor in turn notifies the gateway system as each order is completed. The gateway system reassembles the internal service orders and associates them with the originating LSR. When the gateway system has been notified that all service orders associated with an LSR have completed, the gateway system creates the completion notifier. Completion notifiers for LSRs submitted

electronically are returned electronically to the CLEC over the same interface that was used to submit the LSR.

16. Verizon also measures the timeliness of returning provisioning and billing completion notices to CLECs for resale and UNE orders under several Carrier-to-Carrier measures approved by the Board and by this Commission. Timeliness is the elapsed time between actual work completion recorded in the Service Order Processor ("SOP") or in the billing systems and distribution of the completion notice to the CLEC. If a single CLEC request generates multiple internal service orders, timeliness is determined by the time that elapses between completion of the last internal order associated with the request and the distribution of the completion notice. The performance standard set by the New Jersey Board is 95 percent of provisioning completion notices returned by the next business day at noon and 97 percent of billing completion notices returned by the next business day at noon.[2]

17. As noted above, Verizon met the established benchmarks for timeliness of work completion notices for both resale (OR-4-05-2000; OR-4-10-2000) and UNE (OR-4-05-3000; OR-4-10-2000) orders each month from June 2001 through February 2002. Supp. App. B, Tab 2 at 55, 56, 151, 152. And overall, for the months April through December 2001, Verizon delivered more than 97 percent of the 241,000 billing completion notices for both UNE and resale orders by noon the next day. *See* Attachment 3.

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[2] These Timeliness of Completion Notification measures are designated as OR-4-05 (Work Completion Notice – Percent On Time) and OR-4-02 ([Billing] Completion Notice – Percent On Time).

18. The two performance measures described above are "backward looking" measures. That is, they count notifiers in the month when they are sent, then look back to see whether the beginning event (in this case, completion in the service order processor or billing system) occurred within the specified time. Verizon also reports "forward looking" measures for provisioning and billing completion notifiers. For these measures, Verizon measures the time from completion in the Service Order Processor to sending of the provisioning or billing completion notice. Under the Carrier-to-Carrier measures, Verizon reports the percent of billing completion notices sent within 3 business days of work completion in SOP and the percent of provisioning completion notices sent within 2 business days of work completion in SOP.[3]

19. Verizon met the established benchmark for timeliness of provisioning completion notices for both resale and UNE orders each month from June 2001 through February 2002. For billing completion notices, the New Jersey Carrier-to-Carrier measures use a 3-business day benchmark. In New Jersey, however, as in Pennsylvania, the standard bill cycle (for both CLECs and retail customers) is 3 business days with

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[3] These Timeliness of Completion Notification measures are designated as OR-4-09 (Percent SOP to Bill Completion within 3 Business Days) and OR-4-10 (Percent SOP to Provisioning Completion within 2 Business Days). Verizon has recently determined that certain OR-4 measures (OR-4-06, OR-4-07, and OR-4-08) were incorrectly calculated from November 2001 through January 2002. In addition, although Verizon had previously excluded two projects that required special handling of CLEC orders from certain ordering measures in January, we had not excluded those projects from the relevant OR-4 measures. Attachment 15 contains ad hoc reports of the corrected CLEC-aggregate and MetTel-specific results for November, December, and January. In addition, because one of the projects in January was the migration of over ****

**** coin telephone lines from Essex to MetTel, Attachment 15 also contains corrected Essex-specific results for January. Finally, Attachment 15 includes MetTel-specific reports for certain performance measures for November, December and January that were prepared in conjunction with the calculation of payments due under the New Jersey incentive plan that became effective in November 2001.

some 4-day cycles. (As this Commission is aware, in New York, where this measure was first developed, the standard bill cycle is 2 business days with some 3-day cycles.) During that processing cycle, CLECs' accounts, as well as Verizon retail accounts, may be in a held/no-update status for up to 3 (and sometimes 4) business days. During that time, updates to the billing system for held accounts cannot be processed for either wholesale or retail customers. Where the billing system cannot be immediately updated, Verizon keeps track of the effective date of the migration of the end user from Verizon to the CLEC. When the billing system is updated the accumulated usage is recycled to the CLEC as of the date of work completion, and credits for recurring charges will be applied to the end user when Verizon renders the final retail bill. As a result, in New Jersey as in Pennsylvania, a more appropriate measure is SOP-to-Billing Completion in four business days. The Commission has determined that this is a reasonable benchmark. *See Pennsylvania 271 Order* ¶ 44.

20. Attachment 4 provides the results of a special study of this measure for resale and UNE orders combined using the 4-day standard used by the Commission in approving the Pennsylvania 271 application for both New Jersey and Pennsylvania, in order to provide an apples-to-apples comparison. *See id.* Verizon's timeliness in sending billing completion notices in Pennsylvania and New Jersey is comparable. Verizon exceeded the standard in both states for the months of July 2001 through January 2002.

21. Verizon also conducted a special study of billing completion notices for MetTel using the most readily available data which are the months of November 2001, December 2001 and January 2002.[4] Verizon used the measurement points of the

[4] This study includes completion notices for the project PONs. *See* note 3, above.

"forward looking" measure for billing completion notices.[5] Verizon determined that 95 percent of MetTel's billing completion notices were generated within 5 business days in November, within 5 business days in December and within 4 business days in January. *See* Attachment 5. The supporting detail is provided in Attachment D to Verizon's ex parte dated February 25, 2002. The extra one day for MetTel over the CLEC-aggregate performance in November and December was attributable to late notices for 8 orders in November and 9 orders in December (out of **** **** orders in November and **** **** in December). *See* Attachment 5. In short, Verizon provides billing completion notices on a timely basis.

22. MetTel raised a number of concerns that it claims result from the "late" billing completion notices. These concerns are incorrect or overstated. First, MetTel claims that the lack of a billing completion notice means that end user usage is not properly accrued and transmitted and a line loss report is not generated, leading to possible double billing and inordinately high end user bills as a result of "held" usage. MetTel February Ex Parte, Slide 7; MetTel March Ex Parte, Att. B. MetTel is incorrect, and its claims are theoretical. End user usage begins to accrue based on provisioning completion, which is reflected on the provisioning completion notice. MetTel is correct that the usage is transmitted to a CLEC when the billing system is updated, as reflected by the billing completion notice. "Double billing," however, is a rare occurrence and, if it does occur, is temporary and self-correcting.

23. "Double billing" could occur if an order to migrate a customer from Verizon to a CLEC does not complete in Verizon's billing system prior to the end user's

[5] OR-4-09-2000, OR-4-09-3000.

next bill period and the CLEC chooses to bill its end user prior to the receipt of the billing completion notice, which signals to the CLEC that Verizon has ceased billing the end user. Even in this circumstance, Verizon would only bill the end customer for monthly recurring charges, not for usage-based charges, since the usage will be accruing to the CLEC's account effective with work completion. When Verizon does subsequently update the billing system, the system will automatically calculate and issue credits due to the end user for monthly recurring charges back to the effective date of work completion. As shown above, over 95 percent of billing completion notices are sent in 4 business days. Since the standard practice in the industry is to render end user bills on a monthly basis (*i.e.*, once every 30 days), it is the prevailing experience in the marketplace that the billing completion notice (plus the accrued usage) is issued to the CLEC before the end user's next bill period, and the situation MetTel describes, if and when it occurs, is by far the exception and not the norm. Indeed, none of Mettel's billing completion notices took longer than 30 days in November, December, or January. *See* Attachment 5.

24. For similar reasons, "inordinately high usage" would occur (if at all) very rarely. The amount of usage on an end user's bill would be out of the ordinary only if it had been held for more than a month (since billing occurs monthly, a normal bill will contain a full month's usage). But even if the update to the billing system is delayed, the amount of usage held is likely to be less than one month of usage. Verizon reports its timeliness in sending usage to the CLECs under another of the approved Carrier-to-Carrier performance measures.[6] This measure shows that, in January, Verizon delivered

[6] This measure is the Timeliness of Daily Usage Feed ("DUF"). The Daily Usage Feed is the means by which Verizon transmits to CLECs the usage records of each of the CLEC's end users, so that the CLEC can bill its end users for any billable calls made.

**** **** percent of MetTel's usage within 4 days, and **** **** percent within 8 business days.[7] Therefore, bills rendered on a monthly basis will capture virtually all usage for the month, making instances of the "inordinately high" end user bills that MetTel fears extremely rare.

25. MetTel also claims that without a billing completion notice, it cannot engage in subsequent transactions on the account. MetTel February Ex Parte, Slide 8, MetTel March Ex Parte, Att. B. But the situation for MetTel (and other CLECs) is equivalent to the situation with Verizon's retail end users. For Verizon's systems to process subsequent transactions to change products and services on an account, the billing system must be updated (which is reflected for CLECs on the billing completion notice). This situation is the same for both retail and wholesale accounts, and is the same process in New Jersey as exists in New York, Connecticut, Massachusetts, Pennsylvania, and Rhode Island. CLECs (including MetTel) can, however, submit trouble tickets to repair a newly migrated line even before the billing system is updated.

V. Verizon Provides Accurate Notifiers

26. MetTel claims that Verizon's completion notifiers are inaccurate. MetTel's claim is based on its "analysis of expected results" in two areas. First, MetTel "expects" that a newly migrated line should show usage within 3 days of the work completion date shown on the completion notifier. MetTel February Ex Parte, Slide 12;

There are four sub-measures which are designated BI-1-01 (Percent DUF in 3 Business Days); BI-1-02 (Percent DUF in 4 Business Days); BI-1-03 (Percent DUF in 5 Business Days); and BI-1-04 (Percent DUF in 8 Business Days). The Carrier-to-Carrier Guidelines set a standard of 95 percent of DUF records transmitted in 4 business days.

[7] As discussed below, Verizon has discovered that certain usage records were not transmitted to CLECs from February 5 through March 12. This issue did not affect the January Carrier-to-Carrier results.

MetTel March Ex Parte, Att. B. Second, MetTel "expects" that the first long distance call after the work completion date for an order requesting a PIC change should show the carrier code of the newly designated PIC. MetTel February Ex Parte, Slide 13; MetTel March Ex Parte, Att. B. According to MetTel, in cases where its "expected results" do not occur, the completion notifier must have been in error. This is simply not true. The generation of the billing completion notifier indicates that the billing system has been updated. Updating the billing system does not, however, guarantee that the end user will actually use the line to place calls. It is entirely possible that some lines do not have usage to record. Furthermore, in a number of the cases where MetTel claims "no usage" Verizon has, in fact, found that the line is being used and provided the usage to MetTel. MetTel is the only CLEC that is raising this concern with the accuracy of Verizon's completion notifiers, and it has done so using the fundamentally flawed premise that a lack of usage means the notifier was inaccurate.

27. There are several situations in which usage might not appear on a line for 3 days after Verizon has completed the migration of a line to a CLEC. The most obvious is that the end user did not make outbound calls from the line immediately following the migration. This is entirely plausible, for example, for an individual line within a multi-line account, or in the case of a business account that is migrated on a Friday.

28. Verizon conducted a detailed analysis of MetTel's January 2002 platform migration orders from Verizon retail, consisting of **** **** orders. (CLEC orders are designated by a unique purchase order number, or "PON" assigned by the CLEC. Verizon generally uses "PON" interchangeably with local service request – a CLEC order.) On **** **** of the orders, usage began on the working telephone number

within 3 days of work completion. For the lines with no usage or usage beginning after 3 days, **** **** were additional lines on a multiple line business or residence account and likely not the primary line for outgoing calls; **** **** were "low usage" accounts (accounts with 50 or fewer calls for the entire month; for example **** ****); **** **** was a distinctive ring number which can not make outgoing calls and the related billing telephone number showed usage. There were only **** **** lines (1.77 percent) where usage started more than 3 days after the work was completed and Verizon could not determine the reason. These lines may have fallen into the scenario described above where the customers simply did not make any calls until that time. *See* Attachment 6.

29. Furthermore, Verizon has been working with MetTel on a business-to-business basis to investigate and resolve trouble tickets submitted to Verizon's Wholesale Customer Care Center for which MetTel claims there is no usage on a particular line. MetTel has submitted trouble tickets with this issue in New York and New Jersey. Verizon and MetTel began the investigation in New York. Of the **** **** billing telephone numbers ("BTNs") investigated thus far for which MetTel claimed there was no usage, **** **** or 77 percent either did have usage (as shown by the Daily Usage File sent to MetTel), were not MetTel's account, or MetTel agreed that no usage was appropriate. In less than 1 percent of the BTNs investigated (**** **** BTNs) either an ordering issue was identified or a trouble was found on the line. In the remaining cases, no usage was found and MetTel had agreed to contact the customer to ascertain if outbound calls are being made from the lines, and if so, the type of call and

dates. An additional **** **** BTNs are under investigation in New York. *See* Attachment 7.

30. For those telephone numbers where Verizon confirmed that no usage had been recorded by the switch, Verizon suggested that MetTel contact its customers to determine whether the phone was being used. In the meantime, Verizon itself undertook a special field investigation of 33 of the telephone numbers in question on MetTel's trouble tickets to check whether the lines were in service.

31. Verizon investigated **** **** accounts, and found that:

- **** **** had NO BUILDING at the address, or NO PHONE at the location
- **** **** phones were broken
- **** **** locations were private residences, so Verizon did not investigate further
- **** **** had working phones, but Verizon could not identify if they were MetTel's

See Attachment 8. It is obvious that a majority of these lines could not have usage. Verizon did not issue "inaccurate" notifiers.

32. Verizon and MetTel then turned to New Jersey. In New Jersey, Verizon has investigated **** **** telephone numbers submitted by MetTel and found that in over 74 percent of the cases that MetTel submitted, either usage for the line appeared on the Daily Usage File sent to MetTel, or MetTel agreed that usage was not due for that line. In only **** **** instances (0.2 percent) did Verizon identify an ordering issue. In **** **** instances, MetTel must contact its customer to obtain call logs to determine whether the customer is making outbound calls on the line. A substantial number of these accounts are coin telephone lines. As Verizon has demonstrated by its field investigation in New York, MetTel should not assume that every coin line it has

acquired is in service, let alone generating usage. MetTel should undertake its own verification to determine if a phone exists at the location, whether it is in service, and whether any outbound calls have been made from it. Verizon continues to investigate the remaining **** **** BTNs at MetTel's request. *See* Attachment 9.

33. MetTel also claims that its examination of the Daily Usage File showed that Verizon provisioned the wrong PIC on MetTel's orders. MetTel February Ex Parte, Slide 13; MetTel March Ex Parte, Att. B. Again, MetTel's analysis is flawed. According to MetTel, it "verifies the PIC change by examining Cat 11 (Carrier Access Usage) records to test that the terminating IXC is the selected one." MetTel February Ex Parte, Slide 13. In other words, MetTel looks at the code of the carrier that carries the first call the end user makes after the provisioning completion date to see if it matches the code of the carrier to whom the PIC was changed. However, there are a number of circumstances where Category 11 records will appropriately show a Carrier ID other than the one MetTel (or the end user) designated as its PIC. These include: Calls to 800/888 numbers (shows ID of carrier that provides the 800 service); Casually Dialed Numbers, also known as dial-arounds such as 10-10-xxx (shows Carrier ID specified by the dialer); Terminating Usage (the Daily Usage Feed contains terminating access records for UNE port and platform products so that the CLEC can recover access charges; shows the carrier ID associated with the line originating the call).

34. In our review of MetTel's January 2002 orders, Verizon found that 12.4 percent of MetTel's migration orders did not request MetTel's usual carrier as the PIC. In addition, 76.8 percent of the MetTel category 11 usage records in January for the telephone numbers associated with these migration orders appropriately contained carrier

IDs other than the pre-subscribed carrier ID specified by MetTel (of **** **** records, **** **** were toll-free, **** **** were casually dialed, **** **** were terminating usage). *See* Attachment 10. The details for each of these telephone numbers were provided with Verizon's ex parte dated February 25, 2002.

35. Verizon also reviewed CLEC trouble tickets for UNE platform lines submitted between December 1, 2001 and February 28, 2002 that were determined to be switch translation problems. This category would include any claims that an incorrect carrier was assigned as the PIC on the line, but would also include claims such as a requested feature not being on the line. In this three-month period, Verizon provisioned over 25,000 platform lines, and received approximately 145 trouble reports that were determined to be switch translation problems, a trouble rate of less than six-tenths of one percent. Of the switch translation trouble reports, the narrative information mentioned a PIC or LPIC problem on only seven (a trouble rate of less than three-hundredths of one percent). *See* Attachment 11.

VI. Verizon Provides Timely and Accurate Resolution for Missing Notifier Trouble Tickets.

36. MetTel claims that Verizon fails to resolve trouble tickets for missing or delayed order status notifiers on a timely basis, and that in certain cases, the information provided in response to a trouble ticket is inaccurate. MetTel February Ex Parte, Slide 14; MetTel March Ex Parte, Att. B. MetTel is wrong. Verizon consistently clears trouble tickets within 3 business days, in accordance with the performance measure developed at the time of the March 9, 2000 Consent Decree and the Commission's interpretation of that measure.

37. Overall, in 2001, CLECs submitted approximately 490,000 orders in New Jersey, and submitted trouble tickets on 454 of those orders (less than one-tenth of one percent). Only three CLECs submitted missing notifier trouble tickets – MetTel (402 orders on trouble tickets out of **** **** orders); AT&T (38 orders on trouble tickets out of **** **** orders); and Network Plus (14 orders on trouble tickets out of **** **** orders). *See* Attachment 12. It is clear, therefore, that Verizon does not have a "notifier issue."

38. The Wholesale Customer Care Center's process for handling trouble tickets concerning a CLEC report that it has not received status notifiers it expected to see was developed for EDI-transmitted orders in New York and extended to the other former Bell Atlantic service areas. If a CLEC believes a status notifier is delayed or missing, the CLEC calls the Wholesale Customer Care Center to open a trouble ticket and then submits a file containing specified information about the relevant orders to the Center. In response to the itemized list of orders from the CLEC, Verizon provides the CLEC with the status of each order, and if the requested notifier or a later notifier has been generated, resends the notifier to the CLEC. When the status has been provided and the notifier, if it exists, has been resent, the ticket is considered cleared.

39. During the normal course of operations, there will be circumstances when a CLEC is expecting to receive a status notifier and it does not. For example, the CLEC may expect to receive a provisioning completion notifier, but the order is in a jeopardy status and has not yet been provisioned. If the status notifier that the CLEC is seeking has not been produced because the order has not reached the stage in the business process that would produce that notifier, Verizon determines if corrective action is required,

either by Verizon or the CLEC, to move the order further in the business process and subsequently produce the requested notifier. When Verizon is the party that must take the corrective action and Verizon has done so, the order is resolved. Similarly, if the CLEC must take the corrective action (for example, correcting an error on a order which Verizon queried) and Verizon has communicated that to the CLEC, the order is resolved.

40. Verizon consistently clears 95 percent of PON Exception trouble tickets within three business days. Contrary to MetTel's claim, this is consistent with the calculation of the performance measure accepted by the Commission at the time of the March 9, 2000 Consent Decree. At that time, several CLECs challenged the fact that Verizon calculated the Consent Decree measure by counting orders that were cleared by providing a status without the requested notifier. As a result, the Commission asked Verizon for information about the calculation of the measure. In response, Verizon set out in detail six categories where an order on a trouble ticket could be cleared without providing the requested notifier. After consideration, the Commission directed Verizon to recalculate the measure excluding one of the six categories (this category concerned orders submitted to the old EDI software that has since been replaced – in this instance, Verizon had provided a "received" status, but had not sent the acknowledgement notifier). The Commission did not require Verizon to exclude any other categories from the measure, including situations such as those MetTel complains about here. Based on the recalculated results, the Commission determined that Verizon had satisfied the Consent Decree. *See* Attachment 13.

41. In 2001, Verizon resolved MetTel's PON Exception trouble tickets on average in four and one-half business days. This includes the three days to clear the

orders on the trouble ticket plus any additional investigation Verizon undertook to determine whether action is required by the CLEC or Verizon and communicate that with the CLEC or take the action as described above. *See* Attachment 12. The New Jersey BPU found this performance to be satisfactory. Consultative Report of the New Jersey Board of Public Utilities at 42, *Application of Verizon New Jersey, et al., for Authorization to Provide In-Region, InterLATA Services in New Jersey,* CC Docket No. 01-347 (FCC filed Jan. 14, 2002).

42. Attachment 14 shows Verizon's performance in resolving PONs on trouble tickets from August 2001 through February 2002. For the entire period, Verizon resolved 95.97 percent of MetTel's PONs in 5 business days. The time to resolve 95 percent of PONs improved from 15 days in August 2001 to 3 days in January 2002. Over 99 percent of PONs were resolved in 13 days for the entire period.

43. "Closing" PON Exception trouble tickets requires CLEC action after the PONs have been resolved by Verizon. Under the current Wholesale Customer Care process, each CLEC receives a file that indicates which PONs have been resolved. The CLECs review this information and when every PON on a ticket has been resolved, they indicate that a ticket can be closed. The time required to "close" a ticket depends on the resolution of the last PON on the ticket and on the time the CLEC takes to review the information provided by Verizon and indicate affirmatively that the ticket can be closed. Verizon cannot be held accountable for the time taken by the CLEC to complete this review. In several cases, MetTel has held tickets open for months while it discusses and reviews a very small number of PONs . Attachment 14 shows that from August 2001 through February 2002, 95 percent of MetTel tickets were "closed" in 30 days.

VII. Billing Issues

44. MetTel claims that it has received retail bills for some accounts after receiving a billing completion notice. MetTel March Ex Parte, Att. B. MetTel has provided Verizon with four accounts in New Jersey where this occurred. These accounts involved migrations to MetTel over the period from September 2000 through January 2002. Verizon's investigation of these accounts showed that these resulted from errors made by representatives in writing the orders to perform the migrations. These are isolated errors and there is no systemic problem with Verizon's systems or processes. During this time, Verizon processed over **** **** local service requests for MetTel in New Jersey.

45. The February Carrier-to-Carrier report includes results for the two new electronic billing measures required by the New Jersey Board. As shown there, Verizon issued all electronic bills on time.[8] The new "billing accuracy" measure shows 8.42 percent of charges on BOS BDT bills (which were the bill of record) were adjusted in February. This resulted from an adjustment made by Verizon in January, which was credited to the incorrect CLEC. On discovering the error, Verizon issued the credit to the correct CLEC in February. That CLEC has selected the BOS BDT electronic bill as its bill of record. Because the number of CLECs that have selected the BOS BDT as their bill of record – and, therefore, the total charges appearing on BOS BDTs that are the bill

[8] This new electronic billing measure is designated as BI-2-02-2030 (Timeliness of Carrier Bill – Electronic Bills – BOS BDT format). Verizon recently discovered that CABS paper bills appear to have been omitted from the observations for performance measure BI-2-01-2030 for part of January and for February. Verizon is in the process of determining the correct observations and will provide the information when it is available.

of record – is a subset of the total, the denominator for this measure is much smaller than the total of all CLEC bills in New Jersey, making the adjustment percentage appear large.

46. Moreover, as Verizon has explained before, this measure is flawed. The numerator is the total amount of dollars credited to CLECs as a result of billing errors in the reporting month, regardless of when the CLEC submitted the claim for the error or what month(s) the error occurred in. The denominator is the current charges billed to CLECs in the reporting month. This means that the credits reported in a month do not relate to the charges billed in that month and could, in fact, relate to multiple months being compared against a single month's charges, or to an error from several months ago that has already been corrected.

47. As a result of three trouble tickets submitted to Verizon's Wholesale Customer Care Center, Verizon has determined that Daily Usage Files ("DUF") containing access records were not sent to CLECs that use the UNE platform to serve customers from February 5, 2002 until March 12, 2002. The error occurred because, in processing usage records, Verizon tracks records as they move from one application in the billing system to the next by invoice sequencing numbers. On February 5, the program that sends the access records to New Jersey produced a gap in the invoice sequencing numbers. The downstream program that distributes the DUF will not process records out of sequence. As a result, records behind the "gap" were not distributed. The access records that were not sent are still in the billing system and Verizon is distributing them to CLECs. Verizon has instituted a monitoring process that will alert appropriate personnel if such an issue were to occur in the future.

48. This issue did not affect the CLECs' ability to bill their end user customers, but may temporarily have affected their ability to bill access to interexchange carriers for the completion of long distance calls. To the extent that a CLEC is the long distance provider for its customers or has negotiated an arrangement with an interexchange carrier to act as its underlying network provider, it is possible that no access charges are assessed. Verizon has quantified the potential dollar impact of this delayed usage on 16 CLECs affected to be a total of approximately $200,000 (assuming an access charge of $0.015 per minute of use, and assuming that access charges would be assessed for all records). As indicated above Verizon has the delayed DUF records and expects that CLECs will be able to use these records to bill and recover the access charges that are assessed to interexchange carriers.

VIII. Conclusion

49. The foregoing demonstrates that, in New Jersey, Verizon provides timely and accurate notifiers to CLECs generally and to MetTel specifically. In addition, in those few instances where a CLEC submits a trouble ticket for a notifier it expects but has not yet seen, Verizon resolves those orders on a timely basis. Verizon has clearly demonstrated that it provides parity of access to its OSS. The performance of the OSS in New Jersey meets the standards established by the New Jersey Board and are today supporting commercial volumes for competitive local exchange carriers in the same manner Verizon provides access in New York, Connecticut, Massachusetts, Pennsylvania, and Rhode Island.

50. This concludes our supplemental 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 March 26, 2002

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 March 25, 2002

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 March 25 2002

CTWebster

Catherine T. Webster

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

Executed on March 25, 2002

Julie A. Canny

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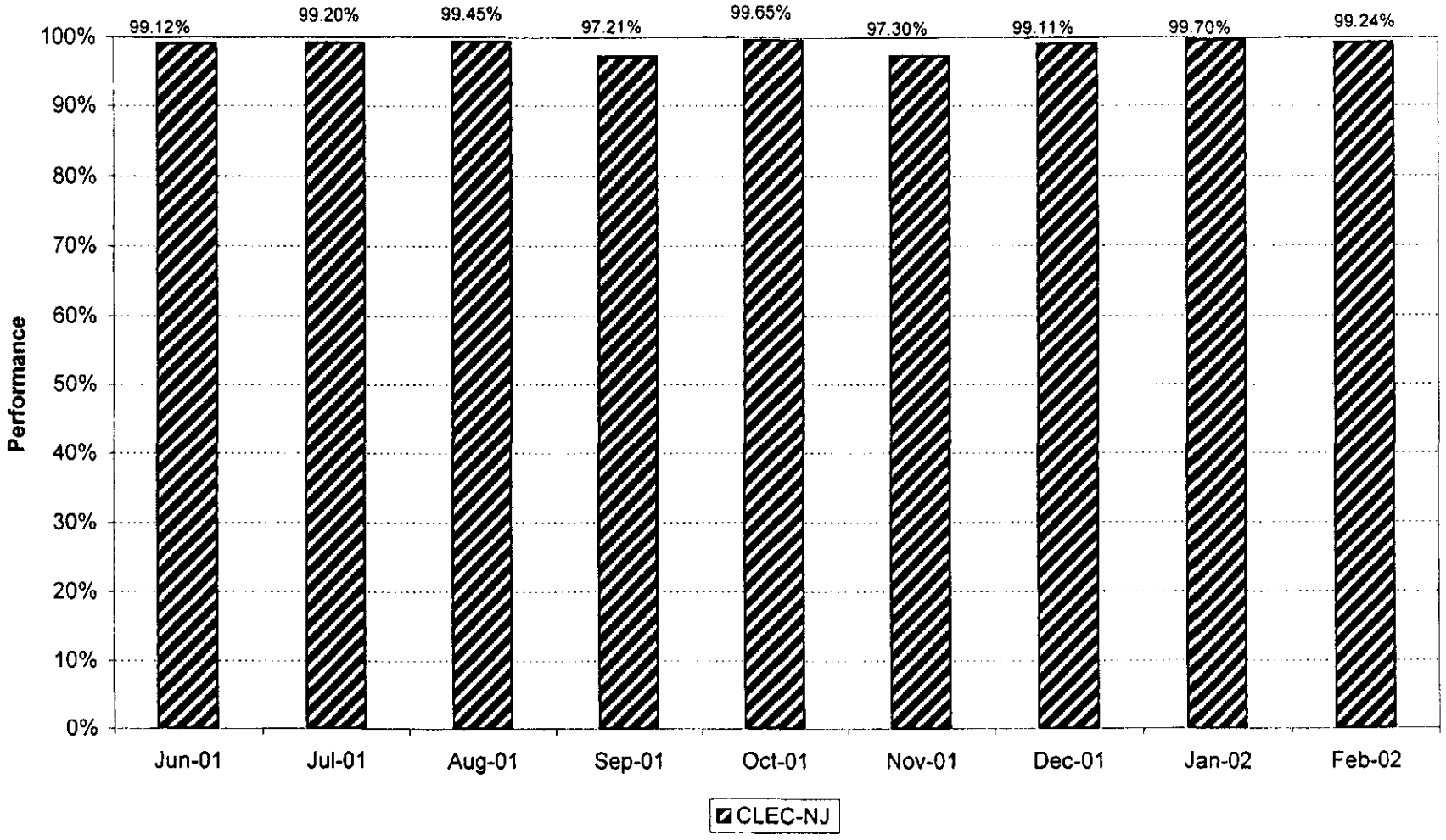
SUPPLEMENTAL DECLARATION OF KATHLEEN McLEAN, RAYMOND WIERZBICKI, CATHERINE T. WEBSTER, AND JULIE A. CANNY

ATTACHMENT 1

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

Order Confirmation % Timeliness
CLEC Aggregate - New Jersey
Jun 01 - Feb 02

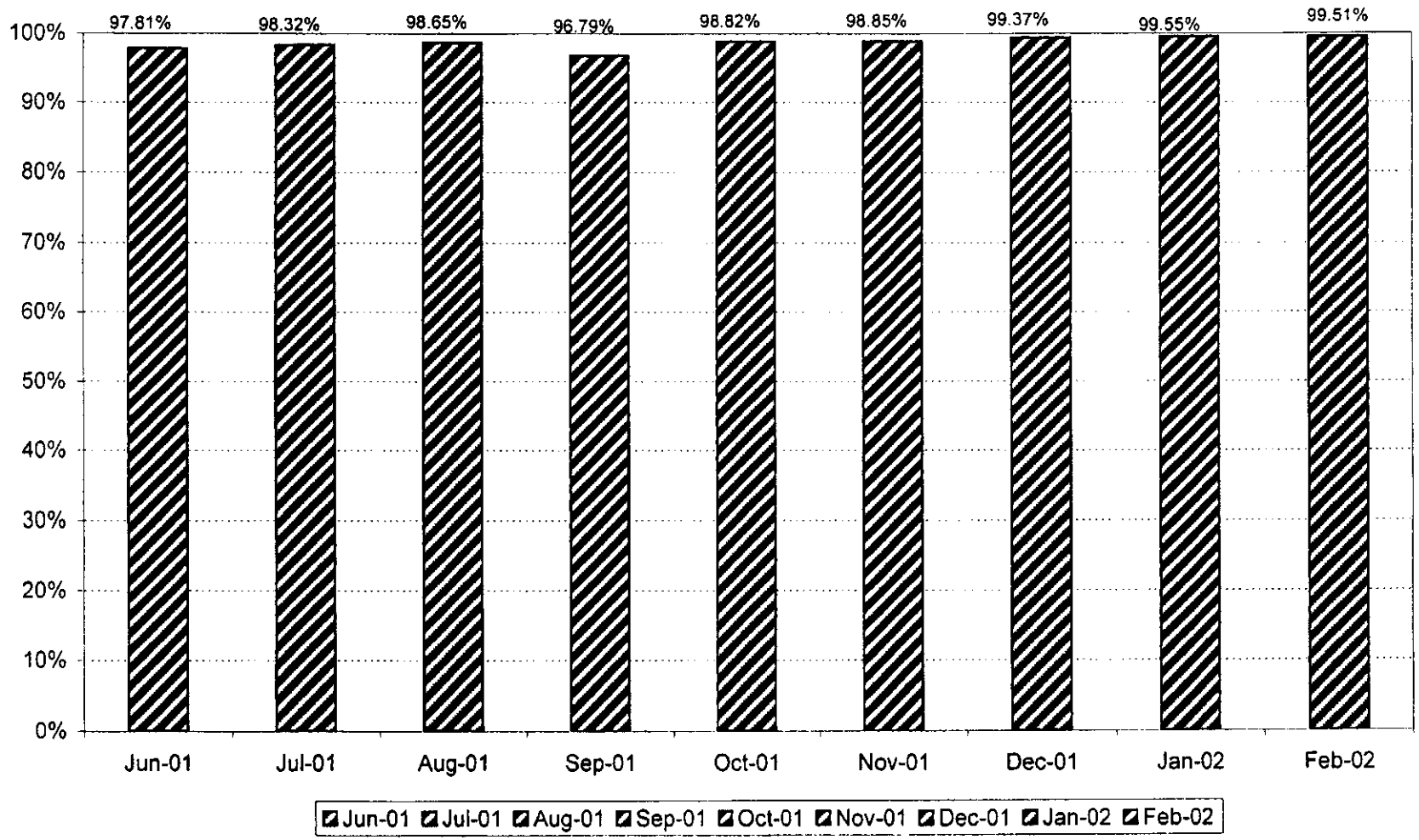


Order Confirmation % Timeliness
CLEC Aggregate - New Jersey
Jun 01 - Feb 02

CLEC Aggregate - New Jersey
Ordering Confirmation Timeliness

			Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02
RESALE											
OR-1-02-2320	% On Time LSRC - Flow-Through	%	99.88%	99.36%	99.60%	96.80%	99.95%	96.88%	99.33%	99.99%	99.47%
		Obs.	15193	12457	16456	14239	15493	18209	15591	21554	16245
OR-1-04-2320	% On Time LSRC < 6 Lines - Electronic - No Flow-Through	%	97.82%	99.26%	99.24%	97.84%	99.12%	97.98%	98.17%	98.59%	98.40%
		Obs.	8731	10260	8518	4991	7165	3917	3553	4033	3681
OR-1-06-2320	% On Time LSRC >=6 Lines - Electronic - No Flow-Through	%	98.21%	100.00%	99.33%	98.14%	99.28%	99.67%	98.74%	99.74%	99.60%
		Obs.	336	262	297	215	279	305	318	387	290
OR-1-08-2320	% On Time LSRC < 6 Lines - Fax	%	100.00%	NA	NA	NA	NA	NA	NA	NA	NA
		Obs.	1								
OR-1-10-2320	% On Time LSRC >= 6 Lines - Fax	%	NA	NA	NA	NA	NA	NA	NA	NA	NA
		Obs.									
UNE											
OR-1-02-3140	% On Time LSRC - Flow-Through	%	99.82%	95.71%	99.09%	99.38%	99.83%	99.50%	99.44%	100.00%	99.56%
		Obs.	554	700	657	651	1196	1413	1801	2002	1838
OR-1-04-3140	% On Time LSRC < 6 Lines - Electronic - No Flow-Through	%	98.13%	98.34%	98.71%	98.02%	98.84%	97.58%	98.64%	98.16%	98.03%
		Obs.	374	481	622	1063	1208	1242	1320	1580	1218
OR-1-06-3140	% On Time LSRC >=6 Lines - Electronic - No Flow-Through	%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	99.64%	100.00%	100.00%
		Obs.	16	29	55	96	258	290	276	458	324
OR-1-08-3140	% On Time LSRC < 6 Lines - Fax	%	NA	NA	NA	NA	NA	NA	NA	NA	NA
		Obs.									
OR-1-10-3140	% On Time LSRC >= 6 Lines - Fax	%	NA	NA	NA	NA	NA	NA	NA	NA	NA
		Obs.									
Combined RESALE and UNE - Weighted Average for OR-1 - % Timeliness		%	99.12%	99.20%	99.45%	97.21%	99.65%	97.30%	99.11%	99.70%	99.24%
		Obs.	25205	24189	26605	21255	25599	25376	22859	30014	23596

REDACTED – FOR PUBLIC INSPECTION


% Reject Timeliness
CLEC Aggregate - New Jersey
Jun 01 - Feb 02
97.81%
98.32%
98.65%
96.79%
98.82%
98.85%
99.37%
99.55%
99.51%
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
Jun-01
Jul-01
Aug-01
Sep-01
Oct-01
Nov-01
Dec-01
Jan-02
Feb-02
Jun-01 Jul-01 Aug-01 Sep-01 Oct-01 Nov-01 Dec-01 Jan-02 Feb-02

% Reject Timeliness
CLEC Aggregate - New Jersey
June 01 - Feb 02

CLEC Aggregate - New Jersey
Reject Timeliness

			Jun-01	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02
RESALE											
OR-2-02-2320	% On Time LSR Reject - Flow-Through	%	99.62%	98.56%	98.75%	97.27%	99.31%	98.36%	99.72%	99.93%	99.95%
		Obs.	2353	2496	2889	2307	2478	2799	2168	2724	2434
OR-2-04-2320	% On Time LSR Reject < 6 Lines - Electronic - No Flow-Through	%	96.09%	98.01%	98.28%	95.96%	98.18%	99.23%	98.92%	99.45%	99.66%
		Obs.	2993	2561	2852	2251	2643	2603	1853	1998	1759
OR-2-06-2320	% On Time LSR Reject >= 6 Lines - Electronic - No Flow-Through	%	100.00%	100.00%	100.00%	100.00%	100.00%	99.65%	100.00%	100.00%	99.68%
		Obs.	12	10	11	5	132	287	261	361	308
OR-2-08-2320	% On Time LSR Reject < 6 Lines - Fax	%	100.00%	NA	NA	NA	NA	NA	NA	NA	NA
		Obs.	1								
OR-2-10-2320	% On Time LSR Reject >=6 Lines - Fax	%	NA	NA	NA	NA	NA	NA	NA	NA	NA
		Obs.									
UNE											
OR-2-02-3140	% On Time LSR Reject - Flow-Through	%	100.00%	100.00%	100.00%	100.00%	100.00%	98.72%	100.00%	100.00%	98.10%
		Obs.	207	407	365	379	490	627	549	696	525
OR-2-04-3140	% On Time LSR Reject < 6 Lines - Electronic - No Flow-Through	%	98.78%	97.39%	99.02%	96.30%	98.61%	98.88%	99.00%	98.71%	98.68%
		Obs.	327	537	712	972	1579	1430	1395	1631	831
OR-2-06-3140	% On Time LSR Reject >= 6 Lines - Electronic - No Flow-Through	%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	99.66%	100.00%
		Obs.	4	1	2	2	39	171	146	290	140
OR-2-08-3140	% On Time LSR Reject < 6 Lines - Fax	%	NA	NA	NA	NA	NA	NA	NA	NA	NA
		Obs.									
OR-2-10-3140	% On Time LSR Reject >=6 Lines - Fax	%	NA	NA	NA	NA	NA	NA	NA	NA	NA
		Obs.									
Combined RESALE and UNE - Weighted Average for OR-1 - % Timeliness		%	97.81%	98.32%	98.65%	96.79%	98.82%	98.85%	99.37%	99.55%	99.51%
		Obs.	5897	6012	6831	5916	7361	7917	6372	7700	5997

RECYCLED
80000 SERIES
30% P.C.W.

SUPPLEMENTAL DECLARATION OF KATHLEEN McLEAN, RAYMOND WIERZBICKI, CATHERINE T. WEBSTER, AND JULIE A. CANNY

ATTACHMENT 2

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

RECYCLED 30% P.C.W.

SUPPLEMENTAL DECLARATION OF KATHLEEN McLEAN, RAYMOND WIERZBICKI, CATHERINE T. WEBSTER, AND JULIE A. CANNY

ATTACHMENT 3

New Jersey
Completion Notice - % on Time - (OR-4-02)

OR-4-02	Apr		May		June		July		August	
	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.
UNE	99.00%	4,627	99.46%	4,800	97.89%	3,891	96.02%	4,584	94.31%	6,015
Resale	99.52%	20,410	99.69%	21,844	99.17%	21,977	99.22%	22,083	99.11%	22,926
Total	99.42%	25,037	99.65%	26,644	98.98%	25,868	98.67%	26,667	98.11%	28,941

OR-4-02	Sept		Oct		Nov		Dec		TOTAL	
	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.	Perf.	Obs.
UNE	96.41%	5,346	75.91%	9,474	95.24%	5,961	97.30%	6,820	92.97%	51,518
Resale	99.04%	19,056	91.34%	23,234	97.38%	19,123	99.05%	19,203	98.10%	189,856
Total	98.46%	24,402	86.87%	32,708	96.87%	25,084	98.59%	26,023	97.01%	241,374

KLEER-FAX
RECYCLED
80000 SERIES
30% P.C.W.

SUPPLEMENTAL DECLARATION OF KATHLEEN McLEAN, RAYMOND WIERZBICKI, CATHERINE T. WEBSTER, AND JULIE A. CANNY

ATTACHMENT 4

BCN Timeliness
NJ & PA

OR-4-09 Special Study (SOP to BCN in 4 business days)

	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02
NJ	98.36	98.49	98.54	98.03	99.10	98.26	98.62
PA	98.65	98.78	99.15	99.10	98.09	96.78	98.37

RECYCLED
80000 SERIES
30% P.C.W.