

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

ATTACHMENT 5

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SOP to BCN - OR 4-09

NJ

Nov 2001 - Jan 2002

New Jersey OR-4-09				
SOP Month	Business Days (SOP to BCN)	Count	Running Total	% of Total
Nov-01	0	186	186	0.79%
	1	10334	10520	44.80%
	2	10409	20929	89.14%
	3	1875	22804	97.12%
	4	259	23063	98.22%
	5	116	23179	98.72%
	6	74	23253	99.03%
	7	46	23299	99.23%
	8	29	23328	99.35%
	9	30	23358	99.48%
	10	21	23379	99.57%
	11	12	23391	99.62%
	12	13	23404	99.68%
	13	6	23410	99.70%
	14	9	23419	99.74%
	15	4	23423	99.76%
	16	5	23428	99.78%
	17	4	23432	99.80%
	18	3	23435	99.81%
	19	3	23438	99.82%
	20	1	23439	99.83%
	21	1	23440	99.83%
	24	1	23441	99.83%
	25	3	23444	99.85%
	26	3	23447	99.86%
	27	1	23448	99.86%
	32	1	23449	99.87%
	33	2	23451	99.88%
	36	2	23453	99.89%
	37	4	23457	99.90%
	38	5	23462	99.92%
	39	1	23463	99.93%
40	1	23464	99.93%	
41	1	23465	99.94%	
42	1	23466	99.94%	
48	1	23467	99.94%	
49	2	23469	99.95%	
51	1	23470	99.96%	
		10	23480	100.00%

SOP to BCN - OR 4-09

NJ

Nov 2001 - Jan 2002

New Jersey OR-4-09					
SOP Month	Business Days (SOP-to-BCN)	Count	Running Total	% of Total	
Dec-01	0	243	243	0.99%	
	1	12310	12553	51.01%	
	2	10233	22786	92.59%	
	3	1028	23814	96.77%	
	4	179	23993	97.49%	
	5	129	24122	98.02%	
	6	63	24185	98.27%	
	7	33	24218	98.41%	
	8	28	24246	98.52%	
	9	26	24272	98.63%	
	10	27	24299	98.74%	
	11	22	24321	98.83%	
	12	16	24337	98.89%	
	13	24	24361	98.99%	
	14	21	24382	99.07%	
	15	20	24402	99.15%	
	16	18	24420	99.23%	
	17	16	24436	99.29%	
	18	11	24447	99.34%	
	19	15	24462	99.40%	
	20	12	24474	99.45%	
	21	10	24484	99.49%	
	22	13	24497	99.54%	
	23	3	24500	99.55%	
	24	7	24507	99.58%	
	25	1	24508	99.59%	
	26	3	24511	99.60%	
	27	12	24523	99.65%	
	28	3	24526	99.66%	
	29	34	24560	99.80%	
	30	9	24569	99.83%	
	31	9	24578	99.87%	
	32	2	24580	99.88%	
	33	5	24585	99.90%	
	34	8	24593	99.93%	
	35	3	24596	99.94%	
	36	3	24599	99.96%	
	39	1	24600	99.96%	
	43	1	24601	99.96%	
			9	24610	100.00%

SOP to BCN - OR 4-09

NJ

Nov 2001 - Jan 2002

New Jersey OR-4-09				
SOP Month	Business Days (SOP-to-BCN)	Count	Running Total	% of Total
Jan-02	0	207	207	0.64%
	1	15526	15733	48.86%
	2	11305	27038	83.96%
	3	4047	31085	96.53%
	4	531	31616	98.18%
	5	238	31854	98.92%
	6	111	31965	99.26%
	7	67	32032	99.47%
	8	38	32070	99.59%
	9	29	32099	99.68%
	10	19	32118	99.74%
	11	9	32127	99.77%
	12	12	32139	99.80%
	13	6	32145	99.82%
	14	6	32151	99.84%
	15	7	32158	99.86%
	16	6	32164	99.88%
	17	2	32166	99.89%
	18	1	32167	99.89%
	19	1	32168	99.89%
	20	1	32169	99.90%
	22	1	32170	99.90%
		32	32202	100.00%
NONE		44634		

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SOP to BCN - OR 4-09

PA

Nov 2001 - Jan 2002

Pennsylvania OR-4-09				
SOP Month	Business Days (SOP-to-BCN)	Count	Running Total	% of Total
Nov-01	0	8328	8328	11.70%
	1	28687	37015	52.00%
	2	27145	64160	90.14%
	3	4775	68935	96.85%
	4	850	69785	98.04%
	5	445	70230	98.67%
	6	248	70478	99.02%
	7	148	70626	99.22%
	8	97	70723	99.36%
	9	56	70779	99.44%
	10	45	70824	99.50%
	11	43	70867	99.56%
	12	26	70893	99.60%
	13	15	70908	99.62%
	14	15	70923	99.64%
	15	5	70928	99.65%
	16	10	70938	99.66%
	17	6	70944	99.67%
	18	2	70946	99.67%
	19	3	70949	99.68%
	20	6	70955	99.69%
	21	3	70958	99.69%
	22	1	70959	99.69%
	23	1	70960	99.69%
	24	2	70962	99.70%
	26	1	70963	99.70%
	30	1	70964	99.70%
	31	1	70965	99.70%
	35	1	70966	99.70%
	40	2	70968	99.70%
	41	1	70969	99.71%
	43	7	70976	99.72%
	44	8	70984	99.73%
	45	8	70992	99.74%
	46	4	70996	99.74%
	47	10	71006	99.76%
	48	7	71013	99.77%
	49	4	71017	99.77%
	50	9	71026	99.79%
	51	4	71030	99.79%
	52	3	71033	99.80%
	53	2	71035	99.80%
	54	7	71042	99.81%
	55	8	71050	99.82%
	56	6	71056	99.83%
	57	3	71059	99.83%

SOP to BCN - OR 4-09

PA

Nov 2001 - Jan 2002

Pennsylvania OR-4-09					
SOP_Month	Business Days (SOP-to-BCN)	Count	Running Total	% of Total	
		58	10	71069	99.85%
		59	3	71072	99.85%
		60	1	71073	99.85%
		61	2	71075	99.86%
		62	5	71080	99.86%
			98	71178	100.00%

SOP to BCN - OR 4-09

PA

Nov 2001 - Jan 2002

Pennsylvania OR-4-09				
SOP Month	Business Days (SOP to BCN)	Count	Running Total	% of Total
Dec-01	0	6598	6598	9.70%
	1	25464	32062	47.14%
	2	29515	61577	90.53%
	3	3587	65164	95.81%
	4	850	66014	97.06%
	5	394	66408	97.64%
	6	245	66653	98.00%
	7	158	66811	98.23%
	8	112	66923	98.39%
	9	79	67002	98.51%
	10	78	67080	98.63%
	11	55	67135	98.71%
	12	35	67170	98.76%
	13	483	67653	99.47%
	14	47	67700	99.54%
	15	22	67722	99.57%
	16	25	67747	99.61%
	17	25	67772	99.64%
	18	11	67783	99.66%
	19	14	67797	99.68%
	20	14	67811	99.70%
	21	6	67817	99.71%
	22	2	67819	99.71%
	23	3	67822	99.72%
	24	2	67824	99.72%
	25	4	67828	99.73%
	26	4	67832	99.73%
	27	5	67837	99.74%
	28	2	67839	99.74%
	29	6	67845	99.75%
	30	5	67850	99.76%
	31	12	67862	99.78%
	32	5	67867	99.78%
	33	8	67875	99.79%
	34	8	67883	99.81%
	35	12	67895	99.82%
	36	7	67902	99.83%
	37	5	67907	99.84%
	38	8	67915	99.85%
	39	8	67923	99.86%
	40	8	67931	99.88%
	41	8	67939	99.89%
	42	4	67943	99.89%
	43	3	67946	99.90%
	44	3	67949	99.90%
45	1	67950	99.90%	

SOP to BCN - OR 4-09

PA

Nov 2001 - Jan 2002

Pennsylvania OR-4-09				
SOP Month	Business Days (SOP-to-BCN)	Count	Running Total	% of Total
		65	68015	100.00%

SOP to BCN - OR 4-09

PA

Nov 2001 - Jan 2002

Pennsylvania OR-4-09				
SOP Month	Business Days (SOP-to-BCN)	Count	Running Total	% of Total
Jan-02	0	5628	5628	7.56%
	1	30403	36031	48.40%
	2	33081	69112	92.83%
	3	3400	72512	97.40%
	4	676	73188	98.30%
	5	379	73567	98.81%
	6	221	73788	99.11%
	7	108	73896	99.25%
	8	63	73959	99.34%
	9	37	73996	99.39%
	10	21	74017	99.42%
	11	13	74030	99.43%
	12	23	74053	99.47%
	13	8	74061	99.48%
	14	21	74082	99.50%
	15	9	74091	99.52%
	16	12	74103	99.53%
	17	6	74109	99.54%
	18	9	74118	99.55%
	19	4	74122	99.56%
	20	7	74129	99.57%
	21	3	74132	99.57%
	22	6	74138	99.58%
	23	2	74140	99.58%
	24	1	74141	99.58%
	25	1	74142	99.58%
		309	74451	100.00%
NONE		122457		

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ATTACHMENT 6

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ATTACHMENT 7

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80000 SERIES
30% P.C.W.

SUPPLEMENTAL DECLARATION OF KATHLEEN McLEAN,
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ATTACHMENT 8

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RECYCLED

80000 SERIES
30% P.C.W.

SUPPLEMENTAL DECLARATION OF KATHLEEN McLEAN,
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ATTACHMENT 9

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80000 SERIES
30% P.C.M.

SUPPLEMENTAL DECLARATION OF KATHLEEN McLEAN,
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ATTACHMENT 10

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SUPPLEMENTAL DECLARATION OF KATHLEEN McLEAN,
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ATTACHMENT 11

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New Jersey

Platform 12/1/01 - 2/28/02	NJ
Service Orders Provisioned	25,616
Total-Switch Translation Trouble Codes	146
Switch Translation Trouble with PIC in Narrative	7
Trouble Rate-Switch Translation Trouble	0.57%
Trouble Rate - PICs	0.027%

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SUPPLEMENTAL DECLARATION OF KATHLEEN McLEAN,
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ATTACHMENT 12

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SUPPLEMENTAL DECLARATION OF KATHLEEN McLEAN,
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ATTACHMENT 13

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Federal Communications Commission
Washington, D.C. 20554

April 20, 2000

**VIA FIRST CLASS MAIL
AND FACSIMILE (703/ 974-8261)**

Edward D. Young, III
Senior Vice-President -Regulatory
Bell Atlantic Corporation
1320 N. Courthouse Road
Arlington, Virginia 22201

Re: Bell Atlantic-New York Consent Decree: Trouble Ticket Analysis

Dear Mr. Young:

The Enforcement Bureau has received information indicating that Bell Atlantic may have cleared missing notifier trouble ticket PONs submitted by competitive local exchange carriers (CLECs) at a percentage rate below that set forth in one or more of the weekly reports submitted to the Commission pursuant to the March 9, 2000 Consent Decree ("Decree").

As you know, the Decree contains three core performance measurements ("metrics") that Bell Atlantic must satisfy at various levels in order to avoid additional payments and to terminate monitoring under the Decree. The first core metric is the percentage of "missing notifier trouble ticket PONs cleared within three business days." The Decree states that a trouble ticket may be considered cleared when Bell Atlantic has either (1) "requested the CLEC to resubmit the PON" or (2) "communicated the current status of the PON and provided the delayed status notifier to the CLEC." While Bell Atlantic's self-reported performance has exceeded 99 percent on this metric for each of the first four reporting weeks under the Decree, certain CLECs have brought information to our attention which calls into question the accuracy of the reported results.

In order to assist the Commission in evaluating this information, we hereby direct Bell Atlantic, pursuant to sections 4(i), 218, 271 and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 218, 271 and 403, to submit sworn, written responses to the following interrogatories not later than April 27, 2000.

1. For each of the first four reporting weeks under the Decree, please state the number of "missing notifier trouble ticket PONs" that Bell Atlantic has received for each CLEC and the number of such PONs that Bell Atlantic has "cleared" for each CLEC.

2. For each of the first four reporting weeks under the Decree, and for each CLEC, state the different methods that Bell Atlantic used to clear missing notifier trouble ticket PONs, and how many PONs were reported as cleared under each such method (e.g., the number of PONs cleared by requesting that the PONs be resent, and the number of PONs cleared by providing its current status along with the status notifier).

Mr. Edward D. Young, III
April 20, 2000
Page 2 of 2

3. With respect to its first four weekly reports under the Decree, state whether Bell Atlantic reported having cleared any missing notifier trouble ticket PONs solely on the basis of having communicated to the CLEC the current status of the PON (without providing the status notifier). If so, for each of the first four reporting weeks under the Decree, and for each CLEC, state the total number of PONs that was reported as having been so cleared. In addition, state the basis for Bell Atlantic's belief that the PON (or the category of PONs) was properly reported as having been cleared.

4. With respect to the general category of missing notifier trouble ticket PONs that Bell Atlantic reported having cleared solely on the basis of having communicated to the CLEC the current status of the PON (without providing the status notifier), provide a revised calculation of Bell Atlantic's performance on the relevant metric for each of the first four reporting weeks and for each CLEC, treating all such PONs as *not* having been properly cleared under the Decree. If there are discrete subcategories of PONs that fall into this general category, identify each such subcategory and provide a revised calculation for each which treats that particular subcategory of PONs (but not other subcategories) as having been improperly cleared.

Please deliver Bell Atlantic's interrogatory responses, to my attention, by fax and hand delivery, no later than Thursday, April 27, 2000.

Sincerely,



David H. Solomon
Chief, Enforcement Bureau

Edward D. Young, III
Sr. Vice President – Regulatory

April 27, 2000

BY HAND

Mr. David H. Solomon
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Bell Atlantic-New York Consent Decree; Trouble Ticket Analysis

Dear Mr. Solomon:

Attached are Bell Atlantic's responses to the Interrogatories in your letter to me dated April 20, 2000. Attached is a public version of the Attachments. We are submitting a separate confidential version of the submission.

The Consent Decree measurements were intended to address problems in Bell Atlantic's systems that were causing status notifiers to be lost or delayed. As the weekly performance data and the attached responses demonstrate, Bell Atlantic systems are functioning properly and the earlier problems that were the focus of the March 9 Consent Decree have been resolved. The attached responses demonstrate that, in a number of instances Bell Atlantic properly cleared "missing notifier trouble ticket PONs" by providing the status of the PONs without an electronic notifier. This was appropriate because there are a variety of business situations where a requested notifier simply does not exist at the time a trouble ticket is submitted and therefore cannot be sent back to the CLEC.

The "Percent Missing Notifier Trouble Ticket PONs Cleared within 3 Business Days" measurement was focused on the Bell Atlantic system problems that caused delayed or missing notifiers, and on Bell Atlantic's response to CLECs seeking information about their orders. Trouble tickets, however, generally reflect all problems that CLECs perceive with the status of their PONs or orders. These perceived problems actually have many causes. In the past, many were related to Bell Atlantic system issues. Some were related to provisioning or other business reasons, some to CLEC system problems, and some to CLEC

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Mr. David H. Solomon
April 27, 2000
Page 2

process issues; as Bell Atlantic has resolved its system issues, the majority of trouble tickets (and certainly those concerning recent PONs) reflect these other causes. As a result, as the attached responses show, this measurement captures many issues that are beyond Bell Atlantic's control, are not related to Bell Atlantic's systems performance, and therefore should not prevent Bell Atlantic from clearing trouble tickets under this metric.

If you have any questions, please do not hesitate to call me.

Very truly yours,

Attachments

ATTACHMENT

1. For each of the first four reporting weeks under the Decree, please state the number of “missing notifier trouble ticket PONs” that Bell Atlantic has received for each CLEC and the number of such PONs that Bell Atlantic has “cleared” for each CLEC.

Response: Attachment A provides the requested information for Weeks 1 – 4 under the Consent Decree. The totals for each week match the data Bell Atlantic provided in the weekly reports submitted to the Commission. The trouble ticket PONs included are those for which the CLEC claimed a notifier was missing. In researching the status of PONs in order to respond to these trouble tickets, however, Bell Atlantic discovered that many of the notifiers were not, in fact, missing. Instead, they did not exist for a number of business reasons that are described in detail in response to Questions 2 and 3.

In these situations, Bell Atlantic provided the status of the PON to the CLEC by electronic mail and cleared the trouble ticket PON. This was appropriate because there are a variety of business situations where a requested notifier simply does not exist at the time a trouble ticket is submitted and therefore cannot be sent back to the CLEC. It would make no sense for the metric designed to measure Bell Atlantic’s performance in clearing trouble tickets to create a situation where Bell Atlantic was unable to clear a trouble ticket PON.

Instead of treating these PONs as cleared, Bell Atlantic could have excluded them from both the numerator and denominator of the metric because they are not “missing” notifier trouble ticket PONs. Bell Atlantic has recalculated metric 1 for Weeks 1 – 4 with these trouble ticket PONs excluded. Those results are presented in Attachment E.

Finally, the reported results include trouble ticket PONs for which Bell Atlantic has provided the status, but has delayed sending the notifier at the request of the CLEC or because of CLEC system capacity or availability. Although this situation is listed in Metric 1 as an exclusion, the wording of the exclusion states that such PONs shall be considered to be timely cleared. Bell Atlantic therefore included them in the count of trouble ticket PONs cleared. *See also* Response to Questions 2 and 3.