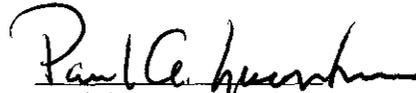


it takes Verizon to complete the repair, regardless of where the trouble is located. This sub-measure is therefore not particularly relevant to customers. Moreover, this sub-measure includes only about 8 percent of the total number of trouble reports on resale lines, which is too few to provide meaningful performance results. Verizon's performance on the remaining trouble reports is significantly better for CLECs. As explained above, Verizon's overall mean time to repair – which the more relevant measure from the customer's perspective – is better for CLECs than the retail comparison group.

79. Finally, Verizon's percent repeat trouble report rate for resold CLEC POTS lines (% Repeat Reports within 30 Days (MR-5-01-2100)) is excellent, when adjusted to exclude trouble reports where Verizon could not obtain access at the customer premises. During December, January and February the percent repeat trouble report rate for CLECs in New Jersey was 16.65 percent and for the retail comparison group was 18.03 percent. *See Attachment 4.*

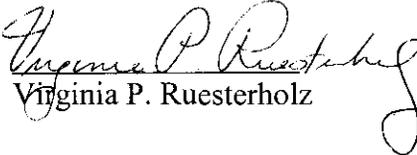
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 18, 2002


Paul A. Lacouture

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

Executed on April __, 2002


Virginia P. Ruesterholz

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

ATTACHMENT 1

REDACTED – FOR PUBLIC INSPECTION

**NEW JERSEY
MR 5-01 % REPEATED REPORTS -- POTS Loops
ROOT CAUSE ANALYSIS
Dec 01 - Feb 02**

	<u>Dec-01</u>	<u>Jan-02</u>	<u>Feb-02</u>	<u>Dec 01 - Feb 02</u>
Verizon Retail % Repeated Reports	18.88%	17.83%	17.22%	18.03%
CLEC UNE POTS Loop % Repeated Reports	26.44%	24.30%	18.08%	23.06%
# UNE POTS Loop Network Troubles	295	284	271	850
# UNE POTS Repeated Reports	78	69	49	196
<u>Root Cause</u>				
Misdirected by CLEC	4	6	6	16
% of Total Repeaters	5%	9%	12%	8%
MR 5-01 Adjusted for Misdirects	25.08%	22.19%	15.87%	21.18%
No Access	16	11	5	32
% of Total Repeaters	21%	16%	10%	16%
MR 5-01 Adjusted for Misdirect & No Access	19.66%	18.31%	14.02%	17.41%

REDACTED – FOR PUBLIC INSPECTION

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

ATTACHMENT 2

REDACTED – FOR PUBLIC INSPECTION

NEW JERSEY - Hot Cut Loops
% Installation Troubles w/in 7 Days
HOT CUTS
DEC 01 - FEB 02

	<u>Dec-01</u>	<u>Jan-02</u>	<u>Feb-02</u>	<u>Dec 01 - Feb 02</u>
# Lines on Hotcut Orders	1988	1724	1511	5223
# Troubles w/in 7 Days	19	21	12	52
% Installation Troubles w/in 7 Days - Hotcut Loops	0.96%	1.22%	0.79%	1.00%

REDACTED – FOR PUBLIC INSPECTION

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

ATTACHMENT 3

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

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

ATTACHMENT 4

REDACTED – FOR PUBLIC INSPECTION

NEW JERSEY
MR 5-01 % REPEATED REPORTS -- Resale POTS
ROOT CAUSE ANALYSIS
Dec 01 - Feb 02

	<u>Dec-01</u>	<u>Jan-02</u>	<u>Feb-02</u>	<u>Dec-Feb 02</u>
Verizon Retail % Repeated Reports	18.88%	17.83%	17.22%	18.03%
CLEC Resale POTS % Repeated Reports	20.75%	20.73%	20.47%	20.66%
# Resale POTS Network Troubles	1576	1867	1529	4972
# Resale POTS Repeated Reports	327	387	313	1027
<u>Root Cause</u>				
No Access	65	76	58	199
% of Total Repeaters	20%	20%	19%	19%
MR 5-01 Adjusted for No Access	16.63%	16.66%	16.68%	16.65%

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)	WC Docket No. 02-67
(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)	

**SUPPLEMENTAL 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 Supplemental Declaration jointly with Raymond Wierzbicki, Catherine T. Webster, and Julie A. Canny as part of Verizon New Jersey Inc.’s (“Verizon’s”) above-captioned Supplemental Application to provide in-region, interLATA services in New Jersey. My qualifications are set forth in that Declaration. I am accountable for the entire Supplemental 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, Catherine T. Webster, and Julie A. Canny as part of Verizon’s above-captioned Supplemental Application to provide in-region, interLATA

services in New Jersey. My qualifications are set forth in that Declaration. I am accountable for the entire Supplemental 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, Raymond Wierzbicki, and Julie A. Canny as part of Verizon's above-captioned Supplemental 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 Supplemental Reply Declaration.

I. PURPOSE

4. The purpose of our statement is to respond to certain inaccurate or misleading statements concerning Verizon's OSS raised by AT&T, MetTel, MetroTeleconnect, and the National ALEC Association in their comments on Verizon's Supplemental Application, and by ATX in an ex parte letter filed on March 6 in connection with Verizon's initial application ("ATX Ex Parte"). None of their claims 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, the evidence demonstrates that Verizon continues to provide nondiscriminatory access to its OSS and excellent service overall to its wholesale customers.

II. ORDERING

5. Flow Through and Reject Rates: AT&T again claims that Verizon's OSS in New Jersey are "inadequate," pointing to the flow through and reject rates for UNE orders. AT&T at 27. As we have previously explained, in New Jersey, the largest order

volumes have been resale orders, and those orders flow through at a high rate.

McLean/Wierzbicki/Webster Reply Decl. ¶ 21 (Reply App., Tab B); Letter from Clint E. Odom, Verizon, to William Caton, Acting Secretary, FCC, CC Docket No. 01-347 (Feb. 27, 2002) (“Feb. 27 Ex Parte”). Indeed, the “total” flow through of resale orders has averaged approximately 80 percent for the months of November 2001 through February 2002. *See* Carrier-to-Carrier Trend Reports at 57 (OR-5-01-2000) (Supp. App. B, Tab 2). AT&T ignores resale – the predominant mode of entry – and focuses on UNE. The drop in the January UNE flow through rate is attributable to the special project involving the migration of more than **** coin telephones to MetTel from another CLEC. *See* Guerard/Canny/DeVito Decl. ¶ 30. Without those orders, the January flow through rate for UNE would have been 49.94 percent, in line with December and February. *See* Attachment 1.

6. AT&T contrasts New Jersey’s UNE flow through rate with reported rates for other states including Pennsylvania. As we have previously explained, business orders constitute a much higher proportion of UNE orders in New Jersey than they do in Pennsylvania. McLean/Wierzbicki/Webster Reply Decl. ¶ 24. 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 may not be eligible to flow through due to their complexity, which results in a lower Total Flow Through rate. *Id.* ¶ 25. In addition, for those complex order scenarios that are designed to flow through, the editing process described in our Declaration is relatively more complex, resulting in more opportunities for an edit failure. As a result, this could lower Achieved Flow Through rates as well Total Flow Through

rates. *See* McLean/Wierzbicki/Webster Decl. ¶¶ 63-64 (App. A, Tab B); *see also* Feb. 27 Ex Parte.

7. As we have previously explained, the same types of order scenarios and products are designed to flow through in New Jersey and in Pennsylvania. *See* Feb. 27 Ex Parte. KPMG's OSS evaluation in New Jersey tested Verizon's flow through capabilities and confirmed that properly prepared orders for those order types that are designed to flow through do in fact flow through. *See* McLean/Wierzbicki/Webster Decl. ¶ 66; KPMG Verizon New Jersey Inc. OSS Evaluation Project, Final Report at 158-159, Version 2.0 (Oct. 12, 2001) ("KPMG Final Report") (App. C, Tab 4). The flow through documentation provided to CLECs (which was included as Attachments B, C, D to the Feb. 27 Ex Parte) is the same documentation that KPMG used to determine the order types that are designed to flow through when it conducted its flow through test for New Jersey. KPMG Final Report at 156. It is clear, therefore, that Verizon is prepared to handle the same types of mass market UNE orders in New Jersey that CLECs submit in high volumes in other states such as New York, Massachusetts, and Pennsylvania, as well as the high volume of resale orders it is currently processing in New Jersey. *See* McLean/Wierzbicki/Webster Reply Decl. ¶ 22; Feb. 27 Ex Parte.

8. Verizon has also previously explained that the "reject rate" in New Jersey is actually calculated as a ratio and not as a percentage, thereby substantially overstating the rate at which CLECs' orders are rejected. *See* Guerard/Canny/DeVito Decl. ¶ 60 (App. A, Tab C). In other states where the Carrier-to-Carrier measures are based on the New York guidelines, the reject rate is calculated as a percentage. As a result, it is not surprising that the reported rates in other Verizon states appear lower than the reported

rates in New Jersey. As we have explained in detail before, Verizon has undertaken substantial educational efforts to assist CLECs in reducing errors and increasing their flow through performance, and those workshops continue. *See* McLean/Wierzbicki/Webster Decl. ¶¶ 71-72. Attachment 2 provides the CLEC-specific flow through and reject rates for resale, UNE platform, and other UNE orders in New Jersey for January and February 2002. These rates continue to show substantial variation from CLEC to CLEC.

9. As-Is Ordering for Centrex: ATX's claim that Verizon does not provide for "as is" conversions for Custo-Pak (Centrex), ATX Ex Parte at 4-7, is incorrect. Attachment 3 is a copy of a Change Control notice issued to CLECs that makes clear that Centrex migrations can be ordered on an "as-is" or "as-specified" basis. For "as-is" orders, CLECs do not need to submit any additional forms or information. For "as-specified" orders, CLECs now have the option of faxing a supplemental form or providing the required supplemental information in the "remarks" section of the LSR.

10. Restorals: MetTel complains that it cannot provision restoral orders with weekend due dates, even though it had requested the ability to do so. Letter from Elliot M. Goldberg, MetTel, to William Caton, Acting Secretary, FCC, CC Docket No. 02-67, at 2 (April 15, 2002) ("Apr. 15, 2002"). Verizon's overall performance in providing resold lines and UNE-P loops is excellent and nondiscriminatory. *See* Lacouture/Ruesterholz Decl. ¶¶ 179-187, 340-351; Lacouture/Ruesterholz Supplemental Reply Decl. ¶¶ 19-26, 70-79. Restoral orders accounted for less than 3 percent of all of MetTel's Local Service Requests ("LSRs") for resold lines and UNE-P loops during December, January and February. Nonetheless, to address MetTel's concerns, Verizon

will modify its procedures to provide weekend restorals during the hours that its OSS are available. Verizon will make these modified procedures available for a pilot with interested CLECs in New Jersey by May 4, 2002. If this pilot is successful, Verizon will make these modified procedures generally available by May 11, 2002, to enable CLECs in New Jersey to restore their customers' service on weekends.

III. NOTIFIERS

11. MetTel again argues that Verizon's performance in providing confirmation and reject notices, and provisioning and completion notifiers, is inadequate. MetTel Goldberg Decl. ¶¶ 7-8; MetTel at 5. As Verizon has demonstrated, however, Verizon's OSS performance, as reported in the Carrier-to-Carrier measures, is excellent. MetTel's claims arise because MetTel does not understand the performance measures or because MetTel wants different performance measures. But this proceeding is not the appropriate forum such arguments.

12. Timeliness of Confirmation and Reject Notices: Verizon measures the timeliness of the confirmation and reject notices that it sends to CLECs in accordance with certain Carrier-to-Carrier measures that have been defined in collaborative discussions with CLECs and approved by the New Jersey Board of Public Utilities ("BPU"). The confirmation measures are designated as OR-1-02-2320, OR-1-04-2320, and OR-1-06-2320 (for resale), and OR-1-02-3140, OR-1-04-3140, and OR-1-06-3140 (for UNE platform). The reject measures are designated as OR-2-02-2320, OR-2-04-2320, and OR-2-06-2320 (for resale), and OR-2-02-3140, OR-2-04-3140, and OR-2-06-3140 (for UNE platform). These measures, which are calculated on a monthly basis,