

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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MAY - 3 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Application by Verizon New England )  
Inc., Bell Atlantic Communications, Inc. )  
(d/b/a Verizon Long Distance), NYNEX )  
Long Distance Company (d/b/a Verizon )  
Enterprise Solutions), Verizon Global )  
Networks Inc., and Verizon Select )  
Services Inc., for Authorization To )  
Provide In-Region, InterLATA Services )  
in Maine )

CC Docket No. 02-61

**APPLICATION BY VERIZON NEW ENGLAND  
FOR AUTHORIZATION TO PROVIDE IN-REGION,  
INTERLATA SERVICES IN MAINE**

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**REPLY APPENDIX A**

Reply Declaration of Paul A. Lacouture and Virginia P. Ruesterholz  
(Competitive Checklist)

and

Reply Declaration of Edward B. Dinan,  
Patrick A. Garzillo, and Michael J. Anglin  
(Pricing)

**APPLICATION BY VERIZON NEW ENGLAND  
FOR AUTHORIZATION TO PROVIDE IN-REGION,  
INTERLATA SERVICES IN MAINE**

**CC DOCKET NO. 02-61**

**REPLY APPENDIX A**

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Inc. (d/b/a Verizon Long Distance), )  
NYNEX Long Distance Company ) CC Docket No. 02-61  
(d/b/a Verizon Enterprise Solutions), )  
Verizon Global Networks Inc., and )  
Verizon Select Services Inc., for )  
Authorization To Provide In-Region, )  
InterLATA Services in Maine )

**REPLY DECLARATION OF PAUL A. LACOUTURE**

and

**VIRGINIA P. RUESTERHOLZ**

1. My name is Paul A. Lacouture. I submitted a Declaration with Virginia P. Ruesterholz in this proceeding on March 21, 2002. My qualifications are set forth in that Declaration. I am accountable for our entire reply declaration.

2. My name is Virginia P. Ruesterholz. I submitted a Declaration with Paul A. Lacouture in this proceeding on March 21, 2002. My qualifications are set forth in that Declaration. I am accountable for our entire reply declaration.

I. Purpose of Reply Declaration.

3. The purpose of our reply declaration is to provide updated performance data for several checklist items. As we explained in our declaration, Verizon provides checklist items in Maine using the same processes and procedures as Massachusetts. Therefore, the monthly performance measurement results for February and March for

Maine and Massachusetts are included in Reply App. B, Tabs 6 and 7, respectively.

Reports showing performance trends over the period from August 2001 through March 2002 for Maine and April 2001 through March 2002 for Massachusetts are included in Reply App. B, Tabs 1 and 2, respectively.

II. Verizon Provides Loops.

4. Verizon is providing unbundled loops in commercial volumes in Maine.

As of the end of March, Verizon has in service more than 18,000 unbundled loops to CLECs in Maine, including almost 5,000 that were provided as part of an unbundled network element platform that also included switching and transport.

a. POTS Loops.

5. Verizon is continuing to deliver CLEC stand-alone POTS loops in Maine when CLECs want them. As we explained in our declaration, during November, December and January, Verizon provisioned all CLEC stand-alone POTS loop orders on time (PR-4-04-3113). During February, Verizon's missed installation appointment rate for CLEC stand-alone POTS loop orders in Maine was 1.47 percent, as compared to 7.77 percent for the retail comparison group. During March, Verizon's provisioned all CLEC stand-alone POTS loop orders in Maine on time. See Reply App. B, Tab 1 at 145.

6. Verizon's performance in Massachusetts continues to be strong. As we explained in our declaration, during November, December and January, Verizon missed about 1.00 percent of installation appointments in Massachusetts for CLEC stand-alone POTS loop orders that require a dispatch and 5.09 percent for the retail comparison group (PR-4-04-3113). During February, Verizon's missed appointment rate was 0.40 percent for CLEC stand-alone POTS loops and 4.93 percent for the retail comparison group.

During March, Verizon's missed appointment rate was 0.87 percent for CLEC stand-alone POTS loops and 5.36 percent for the retail comparison group. *See Reply App. B, Tab 2 at 169.* In other words, Verizon is installing over 99 percent of CLEC stand-alone POTS loops on time in Massachusetts.

7. Verizon is installing CLEC stand-alone POTS loops with a high degree of quality. During November, December and January, Verizon's rate of installation trouble reports within 30 days (the "I-Code" rate) in Maine was 1.34 percent for CLEC stand-alone POTS loops, compared with 2.32 percent for the retail comparison group (PR-6-01-3112). During February, Verizon's I-Code rate in Maine was 1.67 percent for CLEC stand-alone POTS loops, compared with 2.13 percent for the retail comparison group. During March, Verizon's I-Code rate in Maine was 1.01 percent for CLEC stand-alone POTS loops, compared with 2.28 percent for the retail comparison group. *See Reply App. B, Tab 1 at 150.*

8. Verizon's installation quality performance in Massachusetts also continues to be strong. As we explained in our declaration, during November, December and January, 1.89 percent of CLEC stand-alone POTS loops in Massachusetts had troubles reported within 30 days, as compared to more than 2.93 percent for the retail comparison group (PR-6-01-3112). During February, Verizon's I-Code rate in Massachusetts was 1.84 percent for CLEC stand-alone POTS loops, compared with 2.89 percent for the retail comparison group. During March, Verizon's I-Code rate in Massachusetts was 2.28 percent for CLEC stand-alone POTS loops, compared with 2.75 percent for the retail comparison group. *See Reply App. B, Tab 2 at 174.*

9. Verizon's performance for repairing and maintaining CLEC stand-alone POTS loops is strong. As we explained in our declaration, during November, December and January, 0.35 percent of CLEC stand-alone POTS loops in Maine had reported troubles found in either the outside plant or the central office, compared to 0.89 percent for the retail comparison group (MR-2-02-3550 and MR-2-03-3550). During February, 0.43 percent of CLEC stand-alone POTS loops in Maine had reported troubles found in either the outside plant or the central office, compared to 0.67 percent for the retail comparison group. During March, 0.42 percent of CLEC stand-alone POTS Loops in Maine had troubles found in either the outside plant or the central office, as compared to 0.84 percent for the retail comparison group. *See Reply App. B, Tab 1 at 191.*

10. Verizon's performance in Massachusetts under these measures also continues to be strong. As we explained in our declaration, during November, December and January, 0.55 percent of CLEC stand-alone POTS loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 0.94 percent for the retail comparison group (MR-2-02-3550 and MR-2-03-3550). During February, 0.46 percent of CLEC stand-alone POTS loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 0.84 percent for the retail comparison group. During March, 0.61 percent of CLEC stand-alone POTS loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 1.03 percent for the retail comparison group. *See Reply App. B, Tab 2 at 221.*

11. Another measure of Verizon's maintenance performance is the missed repair appointment rate. As we explained in our declaration, during November,

December and January, Verizon missed 7.26 percent of repair appointments in Maine for CLEC stand-alone POTS loops, compared to 18.36 for the retail comparison group (MR-3-01-3550 and MR-3-02-3550). During February, Verizon missed 5.66 percent of trouble reports in Maine for CLEC stand-alone POTS loops, as compared to 9.90 percent for the retail comparison group. During March, Verizon missed 11.11 percent of trouble reports in Maine for CLEC stand-alone POTS loops, as compared to 11.91 percent for the retail comparison group. *See Reply App. B, Tab 1 at 192.*

12. Verizon's performance in Massachusetts under this measure has continued to be strong. As we explained in our declaration, during November, December and January, Verizon's average missed repair appointment rate in Massachusetts for CLEC stand-alone POTS loops was 3.81 percent and for the retail comparison group was 8.83 percent (MR-3-01-3550 and MR-3-02-3550). During February, Verizon's missed repair appointment rate for CLEC stand-alone POTS loops in Massachusetts was 3.24 percent and for the retail comparison group was 9.14 percent. During March, Verizon's missed repair appointment rate for CLEC stand-alone POTS loops in Massachusetts was 5.29 percent and for the retail comparison group was 11.27 percent. *See Reply App. B, Tab 2 at 222.* This means that Verizon is meeting over 95 percent of repair appointments for CLEC stand-alone POTS loops in Massachusetts for the period November through March.

13. Verizon's mean time to repair CLEC stand-alone POTS loops in Maine continues to be in parity. As we explained in our declaration, during November, December and January, Verizon's mean time to repair CLEC stand-alone POTS loops in Maine was, on average, 12.21 hours for CLECs and 20.90 hours for the retail comparison

group (MR-4-01-3550). During February, Verizon's mean time to repair CLEC stand-alone POTS loops in Maine was 14.81 hours and 14.49 hours for the retail comparison group. During March, Verizon's mean time to repair CLEC stand-alone POTS loops in Maine was 16.79 hours and 15.93 hours for the retail comparison group. *See* Reply App. B, Tab 1 at 194.

14. Verizon's mean time to repair CLEC stand-alone POTS loops in Massachusetts continues to be in parity. As we explained in our declaration, during November, December and January, Verizon's mean time to repair CLEC stand-alone POTS loops was, on average, 13.06 hours in Massachusetts and 17.42 hours for Verizon's retail customers (MR-4-01-3550). During February, Verizon's mean time to repair CLEC stand-alone POTS loops in Massachusetts was 13.48 hours and 18.04 hours for the retail comparison group. During March, Verizon's mean time to repair CLEC stand-alone POTS loops in Massachusetts was 13.49 hours and 19.04 hours for the retail comparison group. *See* Reply App. B, Tab 2 at 224.

15. As we explained in our declaration, Verizon's repeat trouble report rates for CLEC stand-alone POTS loops (MR-5-01-3550) in Maine are in parity. During November, December and January, Verizon's repeat trouble report rate in Maine was 10.49 percent for CLECs and 11.13 percent for the retail comparison group. During February, Verizon's repeat trouble report rate was 9.43 percent for CLEC stand-alone POTS loops in Maine and 13.69 percent for the retail comparison group. During March, Verizon's repeat trouble report rate was 20.37 percent for CLEC stand-alone POTS loops in Maine and 12.15 percent for the retail comparison group. *See* Reply App. B, Tab 1 at 196. Verizon met the parity standard for this measure in all but one month.

16. Verizon's repeat trouble report rate in Massachusetts is likewise in parity. During November, December and January, Verizon's repeat trouble report rate for CLEC stand-alone POTS loops in Massachusetts was 17.16 percent and 17.89 percent for the retail comparison group (MR-5-01-3550). During February, Verizon's repeat trouble report rate for CLEC stand-alone POTS loops in Massachusetts was 15.38 percent and 18.64 percent for the retail comparison group. During March, Verizon's repeat trouble report rate for CLEC stand-alone POTS loops in Massachusetts was 11.35 percent and 17.92 percent for the retail comparison group. *See* Reply App. B, Tab 2 at 226.

b. Hot Cut Loops.

17. In our declaration, we demonstrated that Verizon uses the same hot cut process in Maine and Massachusetts and that its hot cut performance is excellent. During February and March, Verizon is continuing to provide hot cuts in Maine and Massachusetts with excellent performance.

18. During November, December and January, Verizon completed on average, 99.50 percent of its hot cut orders in Maine on time (PR-9-01-3520). During February and March, Verizon completed 100 percent of hot cut orders in Maine on time. *See* Reply App. B, Tab 1 at 152.

19. During November, December and January, Verizon completed, on average, 98.79 percent of its Massachusetts hot cut orders on time (PR-9-01-3520). During February, Verizon's hot cut on time completion rate in Massachusetts was 99.67 percent. During March, Verizon's hot cut on time completion rate in Massachusetts was 99.51 percent. *See* Reply App. B, Tab 2 at 177.

20. Verizon's installation quality performance for hot cuts in Maine is excellent. During November, December and January, 0.17 percent of CLEC hot cuts in Maine had reported troubles within 7 days of installation (PR-6-02-3520). During February, 0.19 percent of CLEC hot cuts in Maine had reported troubles within 7 days of installation. During March, 0.22 percent of CLEC hot cuts in Maine had reported troubles within 7 days of installation. *See Reply App. B, Tab 1 at 151.*

21. Verizon's installation quality performance for hot cuts in Massachusetts also continues to be strong. During November, December and January, 0.54 percent of CLEC hot cuts in Massachusetts had reported troubles within 7 days of installation (PR-6-02-3520). During February, 0.40 percent of CLEC hot cuts in Massachusetts had reported troubles within 7 days of installation. During March, 0.81 percent of CLEC hot cuts in Massachusetts had reported troubles within 7 days of installation. *See Reply App. B, Tab 2 at 176.*

c. High Capacity Loops.

22. Verizon offers CLECs unbundled access to high capacity (DS-1 and DS-3) loops in Maine in the same manner as in Massachusetts. As of the end of March, Verizon has in service about 210 high capacity DS-1 loops in Maine, and only two high capacity DS-3 loops in Maine.

23. As we explained in our declaration, Verizon is provisioning very few high capacity loops. During November, December and January, Verizon provisioned only 52 DS-1 loops in Maine. With so few orders, Verizon's monthly reported performance is subject to significant variations. Nonetheless, Verizon's performance in provisioning high capacity DS-1 loops in Maine is strong. During November, December and January,

Verizon missed only one installation appointment in Maine for high capacity DS-1 loops (PR-4-01-3211). This means that Verizon completed on time 98.08 percent of CLEC high capacity DS-1 loop orders. During February, Verizon provisioned five DS-1 loops in Maine and met all installation appointments. During March, Verizon provisioned 17 DS-1 loops in Maine and met all installation appointments. *See Reply App. B, Tab 1 at 183.*

24. Verizon's on time performance for high capacity DS-1 loops in Massachusetts is also strong. During November, December and January, Verizon missed only 1.46 percent of high capacity DS-1 loop orders for CLECs in Massachusetts, as compared to 13.94 percent for the retail comparison group (PR-4-01-3211). During February, Verizon missed only 6.73 percent of high capacity DS-1 loop orders for CLECs in Massachusetts, as compared to 7.19 percent for the retail comparison group. During March, Verizon missed only 3.16 percent of high capacity DS-1 loop orders for CLECs in Massachusetts, as compared to 12.66 percent for the retail comparison group. *See Reply App. B, Tab 2 at 211.*

25. As we explained in our declaration, the Commission should not rely on the installation quality measure (PR-6-01-3200) as reported because the retail comparison group is not appropriate. On the one hand, over 90 percent of the orders in the retail comparison group are for DS-0 services and feature changes, which are very simple to perform. On the other hand, virtually all of the wholesale performance group is comprised of DS-1 and DS-3 loops, which are significantly more difficult to provision. It is therefore more likely for the wholesale group to experience installation troubles than the retail comparison group.

26. Because Verizon has provided a relatively small number of high capacity loops in Maine, it has continued to receive a very limited number of installation trouble reports. As we explained in our declaration, although Verizon's installation quality in Maine is not reported separately for DS-1 loops, Verizon had received only one installation trouble reported for high capacity loops and interoffice facilities during November, four in December and four in January (PR-6-01-3200). During February, Verizon received only one installation trouble report for high capacity loops and interoffice facilities. During March, Verizon received only two installation trouble reports for high capacity loops and interoffice facilities. *See Reply App. B, Tab 1 at 187.*

27. Finally, Verizon is maintaining high capacity loops on a non-discriminatory basis. As we explained in our declaration, during November, December and January, the trouble report rate in Maine on high capacity loops and interoffice facilities provided to CLECs and the retail comparison group was less than two percent (MR-2-01-3200). During February, the trouble report rate in Maine on high capacity loops and interoffice facilities was again less than two percent and in March, was slightly more than two percent. *See Reply App. B, Tab 1 at 225.*

28. Verizon's performance in maintaining high capacity loops in Massachusetts also continues to be strong. As we explained in our declaration, during November, December and January, the trouble report rate in Massachusetts on high capacity loops and interoffice facilities provided to CLECs and the retail comparison group was less than two percent (MR-2-01-3200). During February and March, the trouble report rate in Massachusetts on high capacity loops and interoffice facilities was less than two percent. *See Reply App. B, Tab 2 at 258.*

29. As we previously explained, Verizon has received very few trouble reports for high capacity loops in Maine. During November, December and January, Verizon received a total of only 17 trouble reports for high capacity loops and interoffice facilities. As the Commission has noted, a handful of observations “can cause seemingly large variations” in the monthly performance measures. *Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) and Verizon Global Networks Inc., for Authorization To Provide In-Region, InterLATA Services in Massachusetts*, Memorandum Opinion and Order, 16 FCC Rcd 8988, ¶ 93 n.296 (2001). Nevertheless, Verizon’s mean time to repair performance in Maine is strong. During November, December and January, Verizon’s mean time to repair CLEC high capacity loops and other wholesale special services was on average 4.78 hours, as compared to 4.43 hours for the retail comparison group (MR-4-01-3217). During February, Verizon’s mean time to repair CLEC high capacity loops and other wholesale special services in Maine was on average 3.43 hours, as compared to 4.71 hours for the retail comparison group. During March, Verizon’s mean time to repair CLEC high capacity loops and other wholesale special services in Maine was on average 4.13 hours, as compared to 6.37 hours for the retail comparison group. *See Reply App. B, Tab 1 at 226.*

30. Verizon’s mean time to repair performance in Massachusetts continues to be strong. During November, December and January, the mean time to repair CLEC high capacity loops and other wholesale special services was on average 6.85 hours, as compared to 6.53 hours for the retail comparison group (MR-4-01-3217). During February, Verizon’s mean time to repair CLEC high capacity loops and other wholesale

special services in Massachusetts was on average 6.43 hours, as compared to 6.38 hours for the retail comparison group. During March, Verizon's mean time to repair CLEC high capacity loops and other wholesale special services in Massachusetts was on average 6.66 hours, as compared to 7.98 hours for the retail comparison group. *See Reply App. B, Tab 2 at 259.*

d. DSL Loops.

31. As we demonstrated in our declaration, Verizon is more than capable of providing commercial volumes of DSL loops. Through the end of March, Verizon has in service about 440 DSL loops in Maine.

32. In addition, we demonstrated that Verizon satisfied all checklist requirements for DSL loops. During February and March, Verizon's DSL loop performance continues to be excellent.

33. Verizon is continuing to provision DSL loops when CLECs want them. As we explained in our declaration, during November, December and January, Verizon did not miss any installation appointments on DSL loop dispatch orders for CLECs in Maine (PR-4-04-3342). During February and March, Verizon missed only one installation appointment on dispatch orders for CLECs in Maine. *See Reply App. B, Tab 1 at 163.* This means that Verizon is installing nearly 100 percent of CLEC DSL loop orders on time in Maine.

34. Verizon's performance in provisioning DSL loops in Massachusetts also continues to be excellent. During November, December and January, the missed installation appointment rate on DSL loop dispatch orders for CLECs in Massachusetts was 0.38 percent (PR-4-04-3342). During February, Verizon's missed installation

appointment rate on DSL loop dispatch orders for CLECs in Massachusetts was 0.25 percent. During March, Verizon's missed installation appointment rate on DSL loop dispatch orders for CLECs in Massachusetts was 0.20 percent. *See Reply App. B, Tab 2 at 188.* This means that Verizon is installing over 99 percent of DSL loop orders on time in Massachusetts.

35. One provisioning measure that the Commission has not relied on in prior applications is PR-3-10-3342, which shows the percentage of DSL loop orders (1-5 lines) completed within 6 days. Although there is no reason for the Commission to consider this measure, Verizon's performance under this measure continues to be excellent. During November, December and January, Verizon reported only 38 orders under this measure, which is too few to provide meaningful performance results. Nonetheless, Verizon's rate for completing orders for DSL loops within 6 days in Maine was 100 percent. During February, there were 29 observations under this measure in Maine and Verizon's performance was 100 percent. During March, there were 26 observations under this measure and Verizon's performance was 96.15 percent. *See Reply App. B, Tab 1 at 162.*

36. Verizon is also providing unbundled DSL loops to CLECs with a high level of quality, despite the fact that CLECs purchasing DSL loops in Maine do not routinely engage in cooperative testing with Verizon. As we explained in our declaration, during November, only one DSL loop had an installation trouble reported within 30 days; during December only four DSL loops had reported installation troubles; and during January, only five DSL loops had reported installation troubles (PR-6-01-3342). During February, only one DSL loop had an installation trouble reported within

30 days and during March only two DSL loops had reported installation troubles. *See* Reply App. B, Tab 1 at 165.

37. Verizon's DSL loop installation quality performance continues to be excellent in Massachusetts, where CLECs that purchase DSL loops engage in cooperative testing. During November, December and January, the I-Code rate on DSL loops in Massachusetts was 5.35 percent, compared to 5.95 percent for the retail comparison group (PR-6-01-3342). During February, the I-Code rate on DSL loops in Massachusetts was 6.00 percent, compared to 5.43 percent for the retail comparison group. During March, the I-Code rate on DSL loops in Massachusetts was 3.86 percent, compared to 5.44 percent for the retail comparison group. *See* Reply App. B, Tab 2 at 191.

38. Verizon's performance in maintaining and repairing CLEC DSL loops is also excellent. One measure of Verizon's maintenance performance is the network trouble report rate. During November, December and January, 0.59 percent of CLEC DSL loops in Maine had reported troubles found in either the outside plant or the central office, compared to 0.89 percent for the retail comparison group (MR-2-02-3342 and MR-2-03-3342). During February, 0.40 percent of CLEC DSL loops in Maine had reported troubles found in either the outside plant or the central office, compared to 0.67 percent for the retail comparison group. During March, 1.07 percent of CLEC DSL loops in Maine had reported troubles found in either the outside plant or the central office, compared to 0.85 percent for the retail comparison group. *See* Reply App. B, Tab 1 at 210. This means that well over 98 percent of CLECs' DSL loops in Maine had no reported troubles found in or outside the central office.

39. Verizon's performance to CLECs in Maine on one sub-measure of network trouble reports – MR-2-03-3342 (Network Trouble Report Rate – Central Office – xDSL Loops) – has been consistently good even though the reported results show some slight disparity between the wholesale group and the retail comparison group. From November 2001 through March 2002, the average trouble report rate under this sub-measure was 0.48 percent, meaning that more than 99.5 percent of CLECs' DSL loops had no reported troubles found in the central office during the month. *See Reply App. B, Tab 1 at 210.* The small difference between Verizon's wholesale and retail performance – approximately one-third of one percentage point – is not competitively significant. In addition, it is more appropriate to look at the total network trouble report rate (combining MR-2-02-3342 and MR-2-03-3342) because it does not matter to the end user where a trouble occurred. The total network trouble report rate for CLEC DSL loops, from November 2001 through March 2002, was 0.68 percent and 0.84 percent for the retail comparison group. This means that CLEC DSL loops experience fewer troubles each month than the retail comparison group.

40. Verizon's network trouble report rate also continues to be strong in Massachusetts. During November, December and January, 0.60 percent of CLEC DSL loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 0.93 percent for the retail comparison group (MR-2-02-3342 and MR-2-03-3342). During February, 0.58 percent of CLEC DSL loops in Massachusetts had reported troubles found in either the outside plant or the central office, compared to 0.83 percent for the retail comparison group. During March, 0.65 percent of CLEC DSL loops in Massachusetts had reported troubles found in either the outside plant

or the central office, compared to 1.02 percent for the retail comparison group. *See Reply App. B, Tab 2 at 241.*

41. Another measure of Verizon's performance is the percentage of repair appointments for DSL loops that Verizon fails to meet. As we demonstrated in our declaration, during November, December and January, Verizon received a total of 13 trouble reports for CLEC DSL loops in Maine, which are too few to provide meaningful performance results. Nonetheless, Verizon met all but one repair appointment (MR-3-01-3342 and MR-3-02-3342). During February, Verizon received only two trouble reports for CLEC DSL loops in Maine and met all repair appointments. During March, Verizon received only five trouble reports for CLEC DSL loops in Maine and met all repair appointments. *See Reply App. B, Tab 1 at 211.*

42. Verizon's performance under this measure in Massachusetts continues to be excellent. During November, December and January, Verizon met 93.67 percent of repair appointments for CLEC DSL loops in Massachusetts, compared to 91.03 percent for the retail comparison group (MR-3-01-3342 and MR-3-02-3342). During February, Verizon met 95.29 percent of repair appointments for CLEC DSL loops in Massachusetts, compared to 90.72 percent for the retail comparison group. During March, Verizon met 93.75 percent of repair appointments for CLEC DSL loops in Massachusetts, compared to 88.62 percent for the retail comparison group. *See Reply App. B, Tab 2 at 242.* This means that Verizon met more than 94 percent of repair appointments for CLEC DSL loops in Massachusetts over this five-month period.

43. A third measure of Verizon's maintenance performance is the comparative time to complete repairs. As mentioned above, during November, December and

January, Verizon received a total of 13 trouble reports for CLEC DSL loops in Maine, which are too few to provide meaningful performance results. Nonetheless, during November, December and January, Verizon's mean time to repair six CLEC DSL loop troubles outside the central office in Maine was 23.70 hours, compared to 21.66 hours for the retail comparison group (MR-4-02-3342). During this same period, Verizon's mean time to repair seven CLEC DSL loop trouble reports in the central office in Maine was 4.39 hours, compared to 7.43 hours for the retail comparison group (MR-4-03-3342). During February, Verizon had no CLEC DSL loop troubles outside the central office in Maine. Also during February, Verizon's mean time to repair two CLEC DSL loop troubles in the central office in Maine was 2.04 hours, compared to 6.21 hours for the retail comparison group. During March, Verizon's mean time to repair one CLEC DSL loop trouble outside the central office in Maine was 15.33 hours, compared to 16.56 hours for the retail comparison group. Also during March, Verizon's mean time to repair four CLEC DSL loop troubles in the central office in Maine was 1.47 hours, compared to 4.74 hours for the retail comparison group. See Reply App. B, Tab 1 at 212, 213.

44. Verizon's Massachusetts performance under this measure also continues to be excellent. During November, December and January, Verizon's mean time to repair CLEC DSL loop troubles outside the central office was 14.58 hours, compared to 18.25 hours for the retail comparison group (MR-4-02-3342). During this same period, Verizon's mean time to repair CLEC DSL loop troubles in the central office was 3.23 hours for CLECs, compared to 9.80 hours for the retail comparison group (MR-4-03-3342). During February, Verizon's mean time to repair CLEC DSL loop troubles outside the central office in Massachusetts was 12.60 hours, compared to 19.02 hours for the

retail comparison group. Also during February, Verizon's mean time to repair CLEC DSL loop troubles in the central office in Massachusetts was 4.81 hours, compared to 9.55 hours for the retail comparison group. During March, Verizon's mean time to repair CLEC DSL loop troubles outside the central office in Massachusetts was 13.59 hours, compared to 20.07 hours for the retail comparison group. Also during March, Verizon's mean time to repair CLEC DSL loop troubles in the central office in Massachusetts was 3.07 hours, compared to 11.23 hours for the retail comparison group. *See Reply App. B, Tab 2 at 244.*

45. Finally, Verizon had only 13 trouble reports on CLEC DSL loops in Maine during November, December and January, only two of which were repeat trouble reports (MR-5-01-3342). These are too few to produce meaningful performance results under the repeat trouble report rate. During February and March, Verizon did not have any repeat trouble reports for CLEC DSL loops in Maine. *See Reply App. B, Tab 1 at 214.*

46. Verizon's repeat trouble rates in Massachusetts were in parity. During the months of November, December and January, Verizon's repeat trouble report rate on CLEC DSL loops was 13.61 percent, compared to 17.89 percent for the retail comparison group. During February, Verizon's repeat trouble report rate on CLEC DSL loops was 14.15 percent, compared to 18.62 percent for the retail comparison group. During March, Verizon's repeat trouble report rate on CLEC DSL loops was 14.29 percent, compared to 17.90 percent for the retail comparison group. *See Reply App. B, Tab 2 at 246.*

e. 2-Wire Digital Loops.

47. CLECs typically order 2-Wire digital loops in those situations where a DSL loop is not available. The volume of 2-Wire digital loops provided by Verizon has continued to be minimal. In March, for example, Verizon provisioned only 16 2-Wire digital loops in Maine. As of the end of March, Verizon has only about 80 2-Wire digital loops in service in Maine.

48. Verizon's performance in providing 2-Wire digital loops is very good. During November, December and January, Verizon provisioned a total of only 26 2-Wire digital loop orders in Maine, which is too few to provide meaningful performance results. Nonetheless, Verizon installed all but one of these 2-Wire digital loop orders on time (PR-4-04-3341). During February, Verizon provisioned only 13 2-Wire digital loops and all but one of them were on time. During March, Verizon provisioned only 16 2-Wire loops and all of them were on time. *See Reply App. B, Tab 1 at 157.*

49. Verizon's performance in provisioning 2-Wire digital loops in Massachusetts continues to be excellent. During November, December and January, Verizon did not miss any installation appointments on 2-Wire digital loops (PR-4-04-3341). During February and March, Verizon did not miss any installation appointments on 2-Wire digital loops in Massachusetts. *See Reply App. B, Tab 2 at 182.*

50. Verizon is providing unbundled 2-Wire digital loops to CLECs with a high level of quality. One subset of total trouble reports – those reported within 30 days of installation (so-called "I-Codes") – are included in the Carrier-to-Carrier Performance Reports as Percent Installation Troubles Reported within 30 days (PR-6-01-3341). As we explain below, the reported installation quality measure for 2-Wire digital loops is

skewed by factors that are beyond Verizon's control and is therefore not a meaningful measure.

51. Most of the CLEC 2-Wire digital loops are provisioned using fiber and are predominantly used for data transmission (IDSL). Cooperative testing of the 2-Wire digital loops that CLECs purchase has proved more difficult than for DSL loops. Because the loop is very often provided over fiber, through a plug-in card in the central office and another card at the remote terminal, it is not possible for any of the test equipment used by the CLECs to test beyond the card in the central office. (Like all stand-alone, unbundled loops, Verizon has no access for test purposes.) Further, the normal tests that a technician would perform on a copper loop, including the cooperative test process employed for DSL loops, do not work on 2-Wire digital loops provided over fiber. Nor can a technician's test equipment obtain readings on a 2-Wire digital loop provided over fiber. In contrast, Verizon has the ability to test the dispatched retail POTS loops that it provisions, which are included in the retail comparison group.

52. Because the reported installation quality measure for 2-Wire digital loops (PR-6-01-3341) is skewed by factors that are beyond Verizon's control, it is not a meaningful measure. Moreover, Verizon received no installation trouble reports on 2-Wire digital loops in Maine during February and only two installation troubles during March, which are too few to provide meaningful performance results (PR-6-01-3341). *See Reply App. B, Tab 1 at 159.* In Massachusetts, Verizon had only seven installation troubles reported during February and only 12 installation troubles reported during March, which are too few to provide meaningful performance results. *See Reply App. B, Tab 2 at 184.*

53. The vast majority of 2-Wire digital loops do work at the time of installation. In addition, CLECs are willing to accept 2-Wire digital loops without testing them at the time of installation and to submit trouble reports for those few loops they discover do not work properly during the CLECs' installation of equipment at the customer premises. Moreover, as explained below, when CLECs do experience troubles on 2-Wire digital loops, their troubles are resolved, on average, much more quickly than troubles in the retail comparison group.

54. Verizon's performance in maintaining and repairing CLEC 2-Wire digital loops is excellent. One measure of Verizon's maintenance performance is the network trouble report rate. As we explained in our declaration, Verizon had only two network troubles on CLEC 2-Wire digital loops during November, only five network troubles during December and only five network troubles reported during January in Maine, which are too few to provide meaningful performance results (MR-2-02-3341 and MR-2-03-3341). Verizon had no network trouble reports on CLEC 2-Wire digital loops during February and only three network troubles in March. *See* Reply App. B, Tab 1 at 204. Because these performance measures include installation trouble reports – indeed, 9 of the 15 troubles found during November through March were installation troubles – these measures are affected by the same issues described above. In addition, as a result of the small volume of CLEC lines and the much larger volume of lines in the retail comparison group, Verizon would have had to provide perfect performance to meet the parity standard for these two measurements as even one trouble report in any month was sufficient to cause Verizon to miss that standard.

55. Verizon's network trouble report rate on CLEC 2-Wire digital loops also continues to be strong in Massachusetts. During November, December and January, only about 1.25 percent of CLEC 2-Wire digital loops in Massachusetts had troubles found in either the outside plant or the central office (MR-2-02-3341 and MR-2-03-3341). During February, only 0.98 percent of CLEC 2-Wire digital loops had troubles found in either the outside plant or the central office. During March, only 1.39 percent of CLEC 2-Wire digital loops had troubles found in either the outside plant or the central office. *See* Reply App. B, Tab 2 at 235.

56. Another measure of Verizon's performance is the percentage of repair appointments for 2-Wire digital loops that Verizon fails to meet. During November, December and January, Verizon had a total of only 12 trouble reports on CLEC 2-Wire digital loops in Maine, which are too few to provide meaningful performance results. Nonetheless, during this period Verizon did not miss any repair appointments for 2-Wire digital loops in Maine (MR-3-01-3341 and MR-3-02-3341). During February and March, Verizon did not miss any repair appointments for CLEC 2-Wire digital loops in Maine. *See* Reply App. B, Tab 1 at 205.

57. Verizon's performance under this measure in Massachusetts continues to be excellent. During November, December and January, Verizon met 97.24 percent of repair appointments for CLEC 2-Wire digital loops in Massachusetts, compared to 91.03 percent for the retail comparison group (inverse of MR-3-01-3341 and MR-3-02-3341). During February, Verizon met 89.47 percent of repair appointments for CLEC 2-Wire digital loops in Massachusetts, compared to 90.72 percent for the retail comparison group. During March, Verizon met 96.29 percent of repair appointments for CLEC 2-

Wire digital loops, in Massachusetts, compared to 88.62 for the retail comparison group. *See Reply App. B, Tab 2 at 236.*

58. A third measure of Verizon's maintenance performance is the comparative time to complete repairs. As explained above, during November, December and January, Verizon had only 12 trouble reports for CLEC 2-Wire digital loops in Maine, which are too few to provide meaningful performance results. Nonetheless, during that period, Verizon's mean time to repair CLEC 2-Wire digital loops was 9.01 hours, compared to 20.89 hours for the retail comparison group (MR-4-01-3341). During February, Verizon had no troubles reported under this measure. During March, Verizon's mean time to repair three troubles on CLEC 2-Wire digital loops was 3.19 hours, compared to 15.93 hours for the retail comparison group. *See Reply App. B, Tab 1 at 207.*

59. Verizon's Massachusetts performance under this measure also continues to be excellent. During November, December and January, Verizon's mean time to repair troubles in or outside the central office was 9.93 hours for CLECs, compared to 17.47 hours for the retail comparison group (MR-4-01-3341). During February, Verizon's mean time to repair troubles in or outside the central office was 15.54 hours, compared to 18.11 the retail comparison group. During March, Verizon's mean time to repair troubles in or outside the central office was 11.48 hours, compared to 19.27 for the retail comparison group. *See Reply App. B, Tab 2 at 238.*

60. Finally, during November, December and January, Verizon had a total of only four repeat trouble reports in Maine, which are too few to produce meaningful performance results (MR-5-01-3341). During February, Verizon had no repeat troubles

on CLEC 2-Wire digital loops in Maine. During March, Verizon had only one repeat trouble in Maine. *See* Reply App. B, Tab 1 at 209.

61. During November through March, Verizon's repeat trouble rates on CLEC 2-Wire digital loops in Massachusetts were in parity (MR-5-01-3341). *See* Reply App. B, Tab 2 at 240.

f. Line Sharing.

62. As we demonstrated in our initial declaration, Verizon's overall line sharing performance has been excellent. Verizon's line sharing performance continues to be strong in February and March. As of the end of March, Verizon has in service approximately 800 line sharing arrangements in Maine for unaffiliated CLECs.

63. Verizon is continuing to provision CLEC line sharing arrangements when CLECs want them. As we explained in our declaration, during November, December and January, Verizon missed only 0.96 percent of installation appointments for no-dispatch orders for CLECs in Maine (PR-4-05-3343). During February, Verizon missed only one no-dispatch order for CLECs in Maine. During March, Verizon did not miss any installation appointments for no-dispatch orders in Maine. *See* Reply App. B, Tab 1 at 170. This means that Verizon is installing more than 99 percent of line sharing orders on time in Maine.

64. Verizon's line sharing performance in Massachusetts continues to be strong. During November, December and January, Verizon did not miss any installation appointments for CLEC line sharing arrangements that did not require a dispatch in Massachusetts (PR-4-05-3343). During February and March, Verizon did not miss any installation appointments for no-dispatch orders in Massachusetts. *See* Reply App. B,

Tab 2 at 196. This means that Verizon is installing 100 percent of line sharing orders on time in Massachusetts.

65. Verizon reports another provisioning measure – percentage of loops completed within 3 business days (PR-3-03-3343). Although the Commission has not relied on similar measures in the past and need not do so here, Verizon’s performance for this measure is nevertheless good. As we explained in our declaration, during November, December and January, Verizon provisioned 95.93 percent of CLEC line sharing orders in Maine within three business days when a three business-day interval was requested. During February and March, Verizon’s performance under this measure was 97.14 percent for CLEC line sharing orders in Maine. *See* Reply App. B, Tab 1 at 168.

66. Verizon is continuing to provide line sharing arrangements in Maine to CLECs with a high degree of quality. As we explained in our initial declaration, during November, December and January, only 0.30 percent of CLEC line sharing arrangements in Maine received trouble reports within 30 days of installation, compared to 0.37 percent for the retail comparison (PR-6-01-3343). This means that Verizon received only one CLEC line sharing installation trouble report during the entire period. During February, Verizon did not have any line sharing installation troubles in Maine. During March, Verizon had only one line sharing installation trouble in Maine. *See* Reply App. B, Tab 1 at 172.

67. Verizon’s line sharing installation quality for line sharing arrangements in Massachusetts continues to be strong. During November, December and January, there were only seven CLEC troubles reported on line sharing orders within 30 days of installation (PR-6-01-3343). During February, Verizon had only one installation trouble

on line sharing arrangements in Massachusetts. During March, Verizon had only one installation trouble on line sharing arrangements in Massachusetts. *See* Reply App. B, Tab 2 at 198.

68. As we explained in our initial declaration, there continues to be very little CLEC maintenance and repair activity for line sharing in Maine or Massachusetts. During November, December and January, Verizon received only two measured trouble reports in Maine for line sharing arrangements (MR-2-02-3343 and MR-2-03-3343), which are too few to provide meaningful performance results. During February, Verizon did not have any measured line sharing troubles in Maine. During March, Verizon had only three measured line sharing troubles in Maine. *See* Reply App. B, Tab 1 at 215.

69. Likewise, during November, December and January, in Massachusetts, Verizon had only 17 measured line sharing troubles in Massachusetts (MR-2-02-3343 and MR-2-03-3343). During February, Verizon had only six measured line sharing troubles in Massachusetts. During March, Verizon had only two measured line sharing troubles in Massachusetts. *See* Reply App. B, Tab 2 at 247. With such low volumes of CLEC trouble tickets, the performance data can fluctuate significantly based on the results for a handful of trouble tickets. Nevertheless, the limited performance data that is available demonstrates that Verizon is providing CLECs with excellent maintenance and repair service for line sharing.

70. The first measure on which the FCC has relied in the past tracks the percentage of repair appointments that Verizon misses. Since most line sharing troubles are found in the central office and do not require an outside dispatch, the Percent Missed Repair Appointment – Central Office measure (MR-3-02-3343) is the most significant