Cox Telcom's affiliates have practical experience with Directory Listing processes used by other incumbent LECs, and this provides Cox Telcom with insights concerning what processes are effective in minimizing errors and omissions in Directory Listings.

Cox Telcom appreciates the Commission's investigation into Verizon's process for directory listings, which is failed from start to finish and must be reformed to improve the quality of directory listings for consumers in Virginia. The deficiencies in Verizon's directory listing process cause customer service issues for Cox Telcom with its own customers, and force Cox Telcom to devote significant time and resources in coping with a broken process that Verizon will not fix despite escalations, complaints, and executive level management meetings.

Cox Telcom acknowledges that a minimal amount of directory errors and omissions is inevitable, and Cox Telcom also acknowledges that such errors by competitive LECs may contribute to such errors and omissions. However, there is nothing inevitable about the bulk of the errors and omissions in Verizon's directory listings. They are caused by a system whose defects make it error-prone, make it difficult to uncover those errors, and make it difficult to fix errors even if they are discovered. The bulk of the directory listing errors and omissions are caused by broad, systemic problems in Verizon's directory listing process that Verizon has failed to adequately address.

The most pressing concern is that consumers deserve accurate directory listings. Another concern is the anti-competitive impact on Verizon's competitors, whose reputations suffer and whose cost of doing business escalates when directory listings problems are not adequately addressed. In the following pages, Cox Telcom will describe the problems it faces with Verizon's directory listing process and will identify what it believes to be the root-cause of the directory errors. Lastly, Cox Telcom will recommend remedies to improve the process based on experience with a successful directory listing process in another jurisdiction.

II. Verizon's Directory Listing Errors

Verizon's directory listing process requires Cox Telcom to submit directory listing orders, confirm the directory listing orders, and then verify the final directory listing. As demonstrated below, these steps are completed in different systems and between two different companies (Verizon and Verizon Information Systems) that are not synchronized, are inconsistent, and are often incorrect. To demonstrate the complexity imposed by these deficiencies, Section II.A outlines the basic steps required to complete a directory listing order, Section II.B. describes flaws in Verizon's submission process, Section II.C. describes flaws in Verizon's confirmation process, and Section II.D. describes flaws in Verizon's verification process. Section II.E. describes how Verizon compounds these flaws in its submission, confirmation, and verification processes by introducing new software releases with inadequate means to address issues raised by the new releases. Section II.F. describes how Verizon's overall approach to addressing flaws in its directory listing process is short-sighted and ineffective because it fails to resolve the underlying causes of such flaws.

A. General Description of Directory Listing Process

The basic steps required to complete a directory listing order are as follows:

<u>Submission of Orders for Residential Listings</u>

1. Cox uploads directory orders to Verizon's Graphic User Interface (GUI) through an Electronic Data Interexchange (EDI) Interface.
2. Up to 30% of Cox's orders are rejected from this upload because Verizon maintains some residential orders in a billing system called E-TRAK and others in their Legacy billing system.
3. Cox must manually re-key the orders that were rejected from the upload.

Submission of Orders for Commercial Listings

1. Cox Telcom completes a Directory Listing Inquiry (DLI) to verify the existing main telephone number of the customer.
2. Cox Telcom pulls Customer Service Record (CSR) from Local Service Interface (LSI).
3. Cox Telcom keys directory listing order in the LSI.
4. Cox Telcom waits, then retrieves confirmation from LSI.
5. If Cox Telcom's submission generates error codes, Cox Telcom must resubmit the order in LSI and wait again to retrieve for confirmation.
6. Cox Telcom checks the LSI for Local Service Confirmation (LSC), Provisioning Completion Notification (PCN) and a Billing Confirmation Number (BCN).

Confirmation of Orders for Residential Listings

1. Confirmation is received back through the Cox EDI Interface.
2. If the confirmation is incorrect, Cox must re-key the order manually to Verizon's system.
3. Confirmed orders do not replicate the listing format that will appear in the book, but they do contain important information such as whether the listing should be published or not, the name on the listing, and whether or not there are additional listings.

Confirmation of Orders for Commercial Listings

1. When Cox Telcom receives confirmation of the changes it has submitted, Cox Telcom pulls a service order from LSI that reflects what Cox Telcom keyed into LSI.
2. Verizon uses this service order to re-key the order into its directory database (this can be several hundred lines of information).
3. Cox Telcom pulls a second CSR to confirm the changes.
4. Confirmed orders do not replicate the listing format that appear in the book, and this makes accurate confirmation of commercial directory listings virtually impossible.

Verification of Orders for both Residential and Commercial Listings

1. Cox Telcom has to wait until 30 days prior to the close of a directory to receive Listing Verification Report (LVR) to verify accuracy. The LVR is sent from Verizon Information Systems (VIS) and can contain different information for each directory listing than what was confirmed in Step 1 for Confirmation of Orders for Residential Listings and in Step 1 for Confirmation of Orders for Commercial Listings.
2. If there is a discrepancy on the LVR, Cox Telcom is required to complete a Verizon Discrepancy Report on an excel spreadsheet.

3. Cox Telcom does not receive confirmation that the errors are corrected. Instead, Cox Telcom only receives a confirmation that the discrepancy has been sent to Verizon.

Trouble Shooting

1. Cox Telcom calls Verizon specialists as listed on Verizon's website. The hold time for these specialists can be long. When Cox Telcom personnel reaches Verizon, a trouble ticket is taken. Resolution can take 2 to 5 days.
2. Cox Telcom can also submit an electronic trouble ticket to Verizon. Cox Telcom is called within a day by a Verizon specialist. Resolution can take 2 to 5 days.

In his 2002 report for the Commission's 271 proceeding involving Verizon Virginia ("271 Report"), Hearing Examiner Skirpan summarized Verizon's description of its directory listing process as shown in bold text below.[1] Cox Telcom's actual experience with these processes during the intervening years since the 271 Report was issued is shown in italicized text below.

Verizon Virginia described four procedures that CLECs and Resellers may use to validate their customers' listings.

First thirty days prior to the close date for a particular White Page directory, VIS provides each carrier a Listings Verification Report ("LVR"), which contains all listings for the carrier that are in the VIS database for publication in the upcoming directory.
The LVR provided to Cox Telcom 30 days prior to the directory close date contains many errors (captioned errors at a rate of 90%), and 30 days does not allow enough time to verify and resubmit orders to correct the listing prior to the book close.

Second, CLECs may view an up-to-date display of the White Page Directory database for all Virginia-published listings through a Web GUI.
Electronic confirmation provided by Verizon is unreliable because Verizon's failed internal processes enable inconsistency between this information and what will be produced on the LVR. Since the LVR is the verification tool, using the confirmation tool from Verizon has no value.

Third, at a CLEC's request, Verizon Virginia will provide the LVR in a searchable and sortable electronic text format.

[1] July 12, 2002 Report of Alexander F. Skirpan, Jr., Hearing Examiner, *In the matter of Verizon Virginia, Inc. to verify compliance with the conditions set forth in 47 U.S.C. § 271(c)*, PUC-2002-00046, at 136.

Although Cox Telcom has requested multiple times, it has not received the LVR in a format that is searchable and sorhable. It is electronically delivered to Cox Telcom, but any verification other than manual "stare and compare" is only possible after extensive manipulation by Cox's IT department.

Fourth, the CLECs receive an electronic confirmation order from Verizon Virginia, which if compared to the associated LSR, permits CLECs and Resellers to determine whether their listing was processed accurately. *Although Cox Telcom receives an electronic confirmation order and the information was processed correctly, in some cases it still does not match the LVR.*

Almost three years have elapsed since the 271 Report was issued, and little or no improvement has been made to Verizon's directory listing process. This is in sharp contrast to the experience of Cox Telcom's Oklahoma affiliate ("Cox Oklahoma") with SBC. Prior to the Oklahoma 271 proceeding, SBC's directory listing process was even more flawed than Verizon's. Based on improvements made in conjunction with a competitive LEC working group, SBC now has a directory listing process that is well worth emulating in Virginia. The remainder of these comments will illustrate specific flaws in Verizon's directory listing process and will conclude by briefly describing how the SBC process eliminates these flaws.

B. Verizon's Errors Related to Submission of Directory Listing Orders

Submission of orders for directory listings is unnecessarily time-consuming and error prone because Verizon uses out-of-synch systems, fails to retain listings where the number has been ported to another local exchange carrier, and requires that competitive LECs verify Verizon's work.

1. Verizon's Out-of-Synch Systems

When Cox Telcom submits a directory listing order, it must be confirmed by Cox Telcom in several different Verizon systems because there is no reconciliation between these systems. Directory listings appear differently on the directory listing section of the Customer Service

Record (CSR) than in the Directory Listing Inquiry (DLI). They are both pre-order functions of LSI (Local Service Interface) and should be identical. This lack of reconciliation between the directory listings in the directory listing section of the CSR and directory listings in the DLI causes the LSI system to generate errors that include "Invalid Act Type – LSR in query," "Invalid Directory BAN in ETRAK database-LSR in query," and incorrect TOS (Type of Service). These error codes reflect problems with the order in other Verizon systems which must be reconciled by Cox Telcom in order to complete the listing accurately and avoid having residential customers established as commercial listings. In February 2004, this problem was so widespread that approximately 70% of Cox Telcom's listings were affected by TOS errors. Although Cox Telcom brought this problem to the attention of Verizon's Wholesale Customer Care Center and Exceptions at Verizon, the problem still persists today.

The continued existence of customer accounts in Verizon's Legacy billing system versus E-TRAK billing system also causes significant operational issues. Approximately 30% to 50% of all directory orders submitted by Cox Telcom generate errors because of Verizon's E-TRAK billing system. Verizon does not allow Cox Telcom visibility into these systems to determine if one of its customers is in ETRAK or Legacy. This limited access to review listings creates porting problems and listing errors. A recent example includes the 2003 Peninsula Directory book close that involved Riverside Medical, a major commercial customer. Because Cox Telcom could not view the customer's listings, it resulted in the rework of approximately 200 erroneous listings. The error was escalated to Cox Telcom's Verizon Account Manager and the Verizon Directory Care Team Manager. Although months have gone by since then, resolution of this issue remains outstanding.

2. Verizon's Failure to Retain Customer Listings

Verizon's failure to accurately retain customer listings (especially those with complex commercial listings) when telephone numbers are ported from Verizon to Cox Telcom is another source of directory listing errors. In many cases, instead of simply retaining the listings as requested, Verizon changes the listing.

For instance, in October 2003, Cox Telcom was unable to retain directory listings on newly ported orders from Verizon. Cox Telcom informed Verizon and later Verizon created a "work around" process which added more manual effort to the progress. Another recent example was a listing for "Old Point National Bank." This listing was to be retained when the customer ported their telephone number from Verizon to Cox Telcom. However, the listing was dropped by Verizon, which resulted in additional work for Cox Telcom to recreate the complicated listing. Verizon sent Cox Telcom an LVR confirmation that the listings had been added, yet the listings were still omitted from the published directory.

C. Verizon's Errors Related to Confirmation of Changes

The difficulties posed by Verizon's ALI/BAN requirement were documented in Cox Telcom testimony cited in the Hearing Examiner's 271 Report.[2] At that time in 2002, Verizon would respond to a Cox Telcom directory listing order by sending a confirmation order that included the alpha listing identifier code ("ALI Code"), which had to be associated with a particular billing account number ("BAN") that Cox Telcom submitted with its initial order. Whenever Cox Telcom customers changed their listing or disconnected a telephone number, Cox Telcom was required to reference the ALI Code and BAN combination, or Verizon rejected the order. This entailed a challenging search for Cox Telcom because the many sources available to

[2] 271 Report at 135-136.

search for the ALI/BAN combination were neither easily searchable nor consistently accurate. The process was time consuming, administratively burdensome and costly to Cox Telcom.

It was not until June of 2003 that Verizon began an effort to correct the problem by releasing another version of software called CUST Code (Customer Code). Unfortunately, Verizon issued unclear directions to the competitive LECs on this conversion. Several months and many rejected orders later, Verizon finally clarified to Cox Telcom that Cox Telcom needed to clean-up the ALI/BAN association on its own records. Verizon sent Cox Telcom numerous lists of records to update. Only after Cox Telcom undertook considerable effort to complete the conversion on its own did the ALI/BAN problems get resolved.

Another problem associated with the confirmation process for directory listing orders demonstrates the difficulties caused by Verizon's out-of-synch systems. The process to complete a directory order requires Cox Telcom to key the order into Verizon's system, and then Verizon must re-key the order to transfer the order into the VIS directory database. Based on the number of caption errors that Cox Telcom discovered during the verification process for directory listings (caption listings are incorrect 90% of the time), Cox Telcom believes that a significant number of directory listing errors are made during the re-keying required to transfer the order into the VIS directory database. Typical errors include designations such as "Dr." or "PhD" being left out after Cox Telcom accurately submitted the information to Verizon to reflect the desired titles of customers.

D. Verizon's Errors Related to Verification of Listings

Directory listing errors are exacerbated by Verizon's out-of-synch process for verifying listings. This process uses a validation tool called the Listing Verification Report ("LVR") that is inaccurate and ineffective. It is inaccurate because it is drawn from a different data source than where the order was submitted and confirmed. It is ineffective because Cox Telcom is unable to view the proof sheet of its listings in context before the directory is printed.

Verizon claims that the LVR provides competitive LECs like Cox Telcom the ability to view and audit directory listings. However, the inadequacies of the LVR were documented in Cox Telcom testimony cited in the Hearing Examiner's 271 Report,[3] and even though almost three years have elapsed since that report was issued, Verizon has done little to address these inadequacies.

Cox Telcom's testimony cited in the 271 Report was that the process for auditing the LVR was unmanageable and manually intensive because it was a large document not available in a sortable, electronic and real-time format.[4] This problem persists today. The LVR continues to be ineffective in both manual and electronic format. While Verizon has provided the LVR to Cox Telcom via an "electronic" medium, it is not electronic in the sense that it can be easily compared to other computer files. To make the electronic LVR somewhat useful, Cox Telcom's IT department extensively manipulated the LVR in an effort to map the LVR to an internal proofing tool. Without this extensive manipulation by Cox Telcom, the LVR, even in its electronic format, requires that verification be done by the age-old "stare and compare" method that is time consuming, inefficient and error-prone.

As noted in the 271 Report, the LVR did not provide the layout of caption listings,[5] and problems regarding caption listings persist to this day. Although caption listings are now outlined in the LVR, the formatting is difficult to read, contains duplicate items not added by Cox Telcom, and includes confusing degrees of intention on commercial listings. Listings do not appear as they will in the book, and it requires investigation to determine if Verizon has

[3] 271 Report at 139.
[4] 271 Report at 139.
[5] 271 Report at 139.

completed a commercial directory listing correctly. In her 271 testimony, Cox Telcom's witness Tracy Carhart recommended that Verizon provide a verification document called a galley proof which does lay-out the listings exactly as they appear in the directory. BellSouth provides galley proofs to Cox Telcom's affiliate in BellSouth's region. Based on this experience, Cox Telcom has discovered since the 271 Report was issued that, while the galley proof is better than Verizon's LVR because the galley proof shows the actual layout of the directory listing, it is a less than adequate verification tool because it is not sortable or electronically verifiable.

Another improvement used by BellSouth is that it provides the LVR to its customers several times a year. This is in stark contrast to Verizon's practice of waiting to provide Cox Telcom a copy of the LVR until 30 days before the close of the directory. Verizon's last minute sharing of its LVRs does not leave Cox Telcom enough time to verify and submit changes before the close of the directory.

Submitting an LVR discrepancy report provides another opportunity to perpetuate errors in the directory process. Once Cox Telcom submits its corrections to the LVR by completing an excel spreadsheet detailing again the correction listings, Verizon again manually re-keys this information in its system. After Cox Telcom personnel spend hours conducting this manual verification and resubmitting corrections to Verizon, it is still likely that Verizon will publish Cox Telcom's listings incorrectly.

E. Verizon's Errors Related to New Software Releases

Directory listing errors also occur because of Verizon's practice of releasing new software or merged software to its systems without adequate testing or a fall-back plan to ensure that correct directory listings are published.

A Verizon system upgrade in 2001 caused errors with Cox Telcom's directory orders because a locality field would not accept information. The severity of this problem and the negligence of Verizon in properly addressing this problem forced Cox Telcom to file an informal complaint with the Commission. Moreover, Cox Telcom's 271 testimony -- cited in the 271 Report -- highlighted several areas in which Cox Telcom had difficulties with software upgrades. First, Verizon does not proactively test and identify software problems prior to their release, especially E-TRAK changes.[6] Second, Verizon's President's Day software upgrade in February 2002 prevented Cox Telcom from making timely directory listing changes, and even Verizon Virginia's work-around suggestions failed.[7]

Significantly, problems with implementing new software have persisted since the 271 Report was issued. In June 2003, Cox Telcom agreed to participate in Verizon's beta launch for enhancements to the End-User Listings Conversion structure. During the testing period, Cox Telcom was assigned a Verizon Subject Matter Expert (SME) to serve as a focal point for any unusual circumstances that may occur when submitting listing orders via the system. The release of the software was scheduled for a Friday at midnight, and on the next Monday morning Cox Telcom was unable to process new listing orders for both commercial and residential customers. Once orders could be submitted, Cox Telcom did not receive the promised support of the Verizon SME. Telephone messages left to the SME by Cox Telcom were unanswered and the Verizon representative handling the issues was not informed or able to effectively resolve problems. System issues and Verizon personnel issues during this Beta test resulted in numerous listing errors requiring unnecessary hours of additional work for Cox Telcom.

[6] 271 Report at 52.
[7] 271 Report at 136.

Similarly, in June of 2003, a Verizon Information Systems (VIS) conversion created a backlog of Cox Telcom's directory listings for input into the database during that month. Many listings and omissions occurred on accounts to which Cox Telcom made no revisions. For almost ten days, Cox Telcom could not submit any new directory orders to Verizon. Even after this issue was brought to the attention of Cox Telcom's Account Manager at Verizon and to the Verizon Directory Care Team Manager, Cox Telcom's concerns were not addressed satisfactorily.

Yet another example of problems caused by Verizon releasing new software or merged software to its systems without adequate testing occurred when the South Hampton Roads directory was published in August 2003. At that time, Cox Telcom received numerous telephone calls from irate customers because of omitted directory listings. Cox Telcom again brought this issue to Verizon's attention and requested a root cause analysis, a letter of apology to circulate to Cox Telcom's customers, and a list of errors. All Verizon provided was a list of errors even though Verizon admitted that these omissions were caused by another software conversion at VIS.

When the Peninsula Directory closed in 2003, another Verizon system error due to a software conversion cost Cox Telcom five days of input to the directory. In order to complete book activity prior to book close deadline, Cox Telcom was forced to escalate the issue to Verizon Manager, Senior Regulatory Staff, and finally to the Verizon Regional President.

Several Cox Telcom commercial customers were omitted from the South Hampton Roads directory in 2003. These customers were listed in 2002 and Cox Telcom had not submitted any orders to Verizon to change or delete these listings. Verizon reported back that these listings were omitted due to a conversion at VIS.

In September of 2004, a Verizon software conversion caused some non-listed listings to be printed in the Verizon telephone directory in Virginia, Maryland and West Virginia. Verizon's only response was to provide a list of Cox Telcom customers affected.

In October of 2004, Verizon's issue of another software release caused slow or no LSI response when competitive LECs submitted directory listing orders. During this period, Cox Telcom was unable to receive confirmation on listings that were critical for the Peninsula book closing. The loss of functionality began on October 18, 2004 and remained unresolved until November 3, 2004. A reasonable approach to this situation required the book close deadlines to be extended, but achieving this result took many conference calls with Verizon and the assignment of Verizon service managers as liaisons during this period before Verizon finally agreed to extend the deadline to submit orders to Cox Telcom.

F. Verizon's Errors Exacerbated by Verizon's Response

As alluded to above, Verizon's response to errors is invariably reactive and limited in scope, which results in far more errors than if Verizon used a more proactive, problem-solving approach to addressing directory listing errors.

1. Customer Notification Identifies Errors

Cox Telcom is often not aware that a directory listing problem exits until Cox Telcom customers discover Verizon's error and then notify Cox Telcom. For example, Cox Telcom's customers discovered the errors with the Hampton Roads Directory and the TOS problems. As the entity responsible for producing the directory, Verizon should be accountable to proactively advise carriers of known problems or errors so that Cox Telcom, at least, can attempt to be proactive about addressing them before they have an impact on Cox Telcom's customers.

2. Manual Workarounds Are Used and Root Causes are Ignored

Frequently, Verizon system problems are remedied by ineffective "workarounds" instead of solutions that fix the root cause of the problem. These manual workarounds provide only a temporary patch rather than a permanent fix, and they drain Cox Telcom's resources. For instance, in February 2001, Cox Telcom filed a complaint with the Commission regarding Verizon's response in handling a problem that occurred when Verizon updated its directory listing orders to Local Service Ordering Guide Verizon 4 (LSOG 4) without notification to Cox Telcom. Once Cox Telcom alerted Verizon that there was a problem with submitting orders, a Verizon representative informed Cox Telcom that there had been a "glitch" in Verizon's software that caused the software to reject all directory listing orders that had the locality field populated. As a workaround, Verizon instructed Cox Telcom to submit its directory listing orders with the town or city located in the remarks section of the order rather than in the field created for a locality, and Verizon would correct the order once it was received. Cox Telcom submitted the orders as instructed by Verizon. Several months later, when Cox Telcom received the LVR, Cox Telcom identified approximately 3,500 residential and commercial directory listings that lacked a locality. Cox Telcom then checked the 411 listing on the customers and discovered that many could not be found because Verizon had either not updated the locality as promised or had used the incorrect locality. When Cox Telcom brought this to Verizon's attention, Verizon requested that Cox Telcom populate a spreadsheet that contained the customer names, telephone and correct directory listing (already provided in the directory listing to Verizon). This would have required Cox Telcom to give Verizon the same information Cox Telcom had already provided, and Cox Telcom was compelled to file a complaint with the Commission to resolve this issue.

In the fourth quarter of 2003, Verizon instructed Cox Telcom to drop the listings (instead of retaining them) and enter the listings as new once the customer ported to Cox Telcom. This workaround again resulted in additional work that could have been avoided had Verizon's focus been on providing long-term solutions rather than stop-gap measures.

3. No Trending Or Triage For Trouble Tickets

Rather than identifying a problem as systematic, Verizon's escalation process continues to treat each issue as a one-time event. There is no proactive analysis used to locate and resolve systemic problems. Verizon also fails to address widespread problems. For instance, when orders are rejected due to Verizon's negligence as a result of a software release issue, Verizon requires that new orders are submitted not more than three at a time even though hundreds of Cox orders may need to be resubmitted. This causes significant operational issues for Cox Telcom.

III. Verizon's Wholesale Billing Problems

Verizon does not automatically apply the wholesale discount to Cox Telcom bills. Incorrect application of Cox Telcom's resale discount for directory listings started in January of 2001. The difficulties posed by this incorrect application were documented in Cox Telcom testimony cited in the Hearing Examiner's report in the Commission's 271 proceeding,[8] and even though almost three years have elapsed since that report was issued, Verizon has done little to address these difficulties.

The Cox Telcom testimony during Verizon's 271 proceeding documented problems Cox Telcom faced with Verizon's inability to send Cox Telcom accurate bills for directory listings. The billing was corrected in January of 2002, but credits were not issued. When Verizon converted from Legacy billing to ETRAK billing in June 2003, the resale discount was again

[8] 271 Report at 53-55.

omitted. Although Cox Telcom disputed these items with Verizon, the problem was not corrected until December 2004 for the former Bell Atlantic areas and still has not been corrected for the former GTE areas. The total amount of disputed charges has totaled over $250,000, and currently $43,000 in disputed amounts remain unresolved.

Verizon also erroneously bills Cox Telcom a Record Order Change for directory listings. This dispute has been on-going for over two years. Although Verizon has confirmed that the erroneous bills are caused by human error, this recurring problem has not been resolved. The total amount of disputed charges has totaled approximately $70,000, and currently $26,000 disputed amounts remain unresolved. Each Record Order Change is $17.00; $70,000 in disputes represents 4,118 instances of the same billing error that Cox Telcom has had to dispute with Verizon.

These ongoing billing problems require Cox Telcom to expend considerable time and energy tracking and disputing incorrect bills, and they create more unnecessary work for Cox Telcom employees dedicated to monitoring Verizon's directory listings.

IV. Impact of Verizon's Directory Errors

The inadequacies of Verizon's directory listing process have created many hardships for Cox Telcom and its customers. All operational issues are significant because they result in added cost to Cox Telcom and poor customer satisfaction. There are anti-competitive repercussions with Verizon's directory errors when (a) Cox Telcom customers who port to Cox Telcom from Verizon assume that directory listing errors must be caused by Cox Telcom because the errors occur as they make the change to a new LEC, and (b) much of the added cost required by workarounds is borne by Verizon's competitors rather than Verizon. Although Verizon's billing problems do not directly affect Cox Telcom's customers, they impact Cox

Telcom's bottom-line, unnecessarily increasing the costs that Cox Telcom incurs to compete with Verizon, and distracting Cox Telcom from focusing on customer service issues.

A. Impact on Cox Telcom Customers

Most customer issues are severe because being omitted from the directory is a concern for residential customers (particularly if they were listed before they ported to Cox Telcom) and adversely affects revenue for commercial customers. Some customer problems may be considered moderate if only a name is misspelled; however, even misspellings or omitting credentials like a "Dr." or "PhD" can be significant to a customer.

To illustrate the impact on Cox Telcom's customers, below are three examples of Cox Telcom customers who have experienced errors or omissions due to Verizon's failed processes. They are simply for illustrative purposes: there are many more instances of customers who have experienced errors or omissions, and some have submitted their own to the Commission in this proceeding. Even though their problems were caused by Verizon, because they are Cox Telcom customers, they view Cox Telcom as the responsible party. Because these problems have often been difficult to resolve with Verizon and/or included repeated mistakes by Verizon, Cox Telcom continues to look bad in the eyes of its customers.

1. Riverside Hospital

Cox Telcom has made several attempts to have Verizon delete listings for doctors who were no longer associated with Riverside Hospital. For two years, many such listings continued to appear in the directory and were issued out by Verizon's 411 Operators. Cox Telcom would submit orders to Verizon to correct the 411 database, but the 411 database would then mysteriously revert back to providing out of date telephone numbers. Verizon failed to address listing verification discrepancies in a timely manner to make the telephone book closing date. This resulted in errors on Riverside's listings.

2. Old Point National Bank

The entire caption listing submitted to Verizon was published incorrectly in both the Peninsula and Chesapeake directories. Verizon's LVR showed a total of 51 listings when it should have had only 33 listings. The listings did not show up on the caption sequence and some of the numbers printed the word "complex" in the actual listing. Many of the Purchase Order Numbers (PONs) Cox Telcom submitted received invalid jeopardy codes from Verizon which delayed the update of the 411 database with Old Point's listings. Cox Telcom sent an LVR discrepancy to Verizon that highlighted the errors. Cox Telcom also provided an image that illustrated how the caption should appear in the directory. Despite these steps, the directory published the wrong listings.

3. Virginian Pilot

Incorrect NPA's were published for the Virginian Pilot in 2002 due to Verizon's error. Cox Telcom had to actively seek out and push Verizon to accommodate remedies it readily gives to its own customers who have experienced errors due to Verizon's negligence.

B. Impact on Cox Telcom Business

1. Reputation

Customers look to Cox Telcom as the responsible party to ensure correct directory listings. When errors or omissions are made by Verizon, they negatively affect the customers' perception of Cox Telcom's service and operational efficiency. In other words, there is an understandable, but inaccurate, tendency to blame Cox Telcom for Verizon's misdoings.

2. Resource and Financial Impacting

Cox Telcom's Regional Operation Center (ROC) paid $171,909 in 2004 for temporary workers to complete various checks of Verizon's work to ensure that all commercial and residential orders were correct in Verizon's various systems. Cox Telcom has created one directory compliance position that is solely focused on resolving directory complaints (both Cox Telcom caused and Verizon caused) for the state of Virginia. In addition to temporary hires, 20% of Cox Telcom's directory listing team time is spent checking Verizon's databases for accuracy.

V. Remedies

A. Best Approach

Verizon's systems must be in synch and reconcilable. Clearly, the lack of such a system today is the root-cause of the customer errors in Verizon's directory listing process. Verizon should be required to use an effective system for processing directory listing orders that would eliminate the need for separate submission, confirmation, and verification stages for processing an order. This system would eliminate the re-keying process that is fraught with errors, would incorporate a useful verification system that readily permits carriers to confirm what the directory listing will look like, and would utilize only one data source. Such an effective process would have these attributes:

<u>Directory Listing Process</u>

1. Cox Telcom sends a directory order to Verizon
2. Verizon confirms the order to Cox Telcom in a format that replicates exactly how the listing will appear in the book.
3. The confirmed order is published in the book.
4. If changes need to be made, Cox Telcom sends another order, it is confirmed in a timely manner and in the exact form that it will appear in the book, and that confirmed order is published.

Verification Process

If a competitive LEC seeks to verify its listings, Verizon would provide an electronic report that is
(a) sortable by
- type of listing (nonpublished/ nonlisted/ listed/name only)
- class of customer (residential/commercial)
- by name
- by telephone number
- by BAN

(b) reliable, and
(c) is drawn from the same data source used for ordering and confirmation.

The listings would appear in this report the exact way that they will be published in the book. Lastly, the report would be available on a real-time basis, not just 30 to 60 days prior to the close of the book.

Interaction between Carriers

The incumbent LEC would proactively look for patterns in errors or rejections and, when it identified a trend, would contact competitive LECs to work together to resolve the issue. The incumbent LEC would make system upgrades and software releases transparent to competitive LECs and would utilize adequate testing and a fall-back plan to ensure correct directory listings are published.

SBC, an incumbent LEC in Oklahoma, has created such a system. Cox Oklahoma, a competitive LEC, submits orders to SBC and is able to review an electronic confirmation in a tool called "Webview." The confirmation order in Webview visually represents the listing in the exact way it will appear in the book and also includes information such as the type of listing, service location details, etc. If Cox Oklahoma identifies a listing error, it resolves the error by calling either a specific contact assigned to Cox Oklahoma in SBC's local service center, or a specific contact in the directory department. The SBC contact reviews the order with Cox Oklahoma over the telephone and corrects it immediately. Cox Oklahoma is then able to return to Webview to reconfirm the listing. SBC provides Cox Oklahoma a CDROM that includes a snapshot of Cox Telcom's listings exactly as they will appear in the book 60 days prior to book close. Cox Oklahoma's IT department has been able to transfer the data from SBC's CDROM to an excel spreadsheet to create an electronic match to Cox Oklahoma's internal customer data. Cox Oklahoma reports that SBC uses a "fall-out" process to proactively look for patterns in error or rejections from their GUI system. When SBC identifies a trend, it contacts Cox Oklahoma so that they may work together to resolve the issue. Also, SBC's system upgrades and software releases are transparent to Cox Oklahoma.

This process has resulted in an extremely low error rate (of both SBC and Cox Oklahoma) of .008% of all Cox Oklahoma listings in the last published book. Clearly, the synchronized systems and proactive, cooperative response by SBC to issues have enabled a more effective process for Cox Oklahoma and has resulted in a very low number of errors for Cox Oklahoma customers.

B. Bare Minimum Approach

Adopting a process similar to SBC's is the only way to eliminate the defects that make Verizon's directory listing process too error prone, too difficult to find errors, and too difficult to fix errors. This kind of process would give customers in Virginia the level of directory listing service they deserve.

If this type of process is not required by the Commission, then, at a bare minimum, the Commission should recognize that there will be no real improvement in the errors and omissions caused by Verizon's directory listing process unless Verizon reconciles its databases and adopts a cooperative, proactive approach to working with other carriers that rely on Verizon's directory listings. Accordingly, the Commission should impose requirements upon Verizon that will achieve these goals.

C. Accountability

Verizon must be held accountable for an accurate directory based on orders sent to Verizon by competitive LECs. This requires Verizon to implement a reliable process and to be held to performance standards. If Verizon causes errors, it must pay competitive LECs for damages, which could be based upon wholesale metrics implemented in other states.

VI. Conclusion

Remedies and accountability are essential to increasing the accuracy of directory listings for consumers. Remedies and accountability are essential so that competitive LECs are not forced to expend more resources and money than Verizon does to secure accurate listings for itself from Verizon. A simple process such as SBC has deployed whereby a synchronized system enables an order to be submitted, confirmed and printed as confirmed as soon as the order is submitted would ensure that customers enjoy correct listings and competitive LECs are not disadvantaged.

Cox Telcom appreciates this opportunity to offer comments. Cox Telcom respectfully urges the Commission Staff to consider and incorporate these comments and recommendations into its report, and Cox Telcom would appreciate the opportunity to reply to the Staff report and to respond to Verizon's response to the Staff report and the comments filed in this proceeding.

Respectfully submitted,

COX VIRGINIA TELCOM, INC.

March 25, 2005

By Counsel

E. Ford Stephens (VSB # 25959)
Cliona Mary Robb (VSB # 34344)
Christian & Barton, LLP

1200 Mutual Building
909 East Main Street
Richmond, Virginia 23219-3095
Telephone: (804) 697-4100
Fax: (804) 697-4112
Counsel for Cox Virginia Telcom, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing ***Comments of Cox Virginia Telcom*** was hand-delivered, e-mailed, or mailed, first-class postage prepaid, this 25th day of March, 2005, to the parties listed below.

Cliona Mary Robb

C. Meade Browder, Esquire
Sr. Assistant Attorney General
Office of the Attorney General
Division of Consumer Counsel
900 East Main Street, 2nd Floor
Richmond, Virginia 23219

Steven C. Bradley, Deputy Director
Division of Communications
State Corporation Commission
1300 East Main Street, 9th Floor
Richmond, Virginia 23219

John K. Shumate, Jr., Esquire
State Corporation Commission
1300 East Main Street, 10th Floor
Richmond, Virginia 23219

Ms. Lydia R. Pulley
Vice President, Secretary & General Counsel
Verizon Virginia, Inc.
600 East Main Street, Suite 1100
Richmond, Virginia 23219-2441

Glenn P. Richardson, Esquire
Associate General Counsel
State Corporation Commission
1300 East Main Street, 10th Floor
Richmond, Virginia 23219

Robert C. Dalton
Division of Utilities Accounting
State Corporation Commission
1300 East Main Street
Richmond, VA 23219

711300.1

10