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November 2, 2009

VIA Electronic Filing and UPS

Public Utilities Commission of Oregon
Attention: Filing Center
550 Capitol Street NE, Suite 215
Salem, OR 97308-2148

Re: UM 1431 – Joint Application of Verizon Communications, Inc. and Frontier Communications Corporation for an Order Declining to Assert Jurisdiction Over, or, in the Alternative, Approving the Indirect Transfer of Control of Verizon Northwest Inc.

Enclosed for electronic filing in the above-captioned docket is the Direct Testimony and Exhibits of Integra Telecom.

If you have any questions in regard to this information, please feel free to contact me.

Very truly yours,

Davis Wright Tremaine LLP

A handwritten signature in black ink, appearing to read 'Mark P. Trinchero', with a long horizontal flourish extending to the right.

Mark P. Trinchero

MPT:bl

Enclosures

cc: UM 1431 Service List (parties)

DWT 13527653v1 0038936-001192

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CERTIFICATE OF SERVICE

UM 1431

I hereby certify on this 2nd day of November, 2009, the Direct Testimony and Exhibits of Integra Telecom was sent via UPS overnight mail to the Oregon Public Utility Commission. A copy was sent electronically to the service list below and via U.S. Mail to those who have not waived paper service:

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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of the Joint Application of Verizon)
Communications Inc. and Frontier)
communications Corporation For An order) Docket No. UM 1431
Declining to Assert Jurisdiction Over, or, in the)
alternative, Approving the Indirect Transfer of)
Control of Verizon Northwest Inc.)

DIRECT TESTIMONY

OF

JAMES HUESGEN

ON BEHALF OF

INTEGRA TELECOM

November 2, 2009

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, EMPLOYER AND BUSINESS**
3 **ADDRESS?**

4 **A.** My name is Jim Huesgen. I work for Integra Telecom, LLC. My business address
5 is 1201 NE Lloyd Blvd., Suite 500, Portland, OR 97232.

6 **Q. PLEASE DESCRIBE YOUR RESPONSIBILITIES AT INTEGRA.**

7 **A.** I am President and Chief Operating Officer of Integra. As Chief Operating
8 Officer, I am responsible for Integra's operations in its seven major market areas,
9 network planning and engineering, information services and network cost
10 management.

11 **Q. HOW LONG HAVE YOU WORKED FOR INTEGRA.**

12 **A.** I have been employed by Integra for ten years.

13 **Q. BRIEFLY DESCRIBE YOUR EDUCATION AND EXPERIENCE IN THE**
14 **TELE-COMMUNICATIONS INDUSTRY.**

15 **A.** I received a M.A. in Accounting from the University of North Dakota in 1973. I
16 am a Certified Public Accountant and worked for a national accounting firm for
17 10 years during which time I managed the audits of Pacific Telecom and
18 Alascom. During 1982 and 1983, I was a member of the Telecommunications
19 Industry Advisory Group (Plant Subcommittee) to the Federal Communications
20 Commission as it rewrote its Uniform System of Accounts. I have more than 25
21 years experience in executive management roles in telecommunications, including
22 nine years as Executive Vice President and Chief Financial Officer for Pacific
23 Telecom (PTI). In that role, I was responsible for finance, accounting,

1 purchasing, business development, and information services for PTI and all of its
2 subsidiaries. During this period, I led PTI's acquisition and integration of US
3 WEST rural exchanges in Colorado, Oregon, Washington and Minnesota, while
4 selling Alascom, PTI's long distance subsidiary serving the state of Alaska, to
5 AT&T and divesting several of PTI's non core subsidiaries, including the sale of
6 PTI's wireless operations in Chile to BellSouth. As a representative of PTI's
7 parent corporation, PacifiCorp, I was one of the principal negotiators of PTI's
8 \$2.2 billion sale to CenturyTel in 1997. In 1998, as a co-founder of Alaska
9 Communications Systems (ACS), I negotiated the financing and acquisition of
10 local exchange, wireless, and Internet service properties serving more than
11 320,000 access lines, 70,000 cellular customers, and 26,000 long distance
12 customers throughout Alaska. I joined Integra Telecom in January 2000 as
13 President and Chief Operating Officer and have also served as the Company's
14 Chief Financial Officer during a portion of my tenure with Integra. I was closely
15 involved in Integra's purchase of Electric Lightwave, Inc., a wholly owned
16 subsidiary of Frontier, in 2006 and Eschelon, Inc. in 2007 and the subsequent
17 integration of the acquired support systems and data into Integra's Operational
18 Support System platforms.

19 **Q. DOES INTEGRA OPERATE IN THE VERIZON-NORTHWEST**
20 **TERRITORIES IN OREGON THAT ARE THE SUBJECT OF THIS**
21 **PROCEEDING?**

22 **A.** Yes, it does.

1 **Q. HAVE YOU EVER TESTIFIED BEFORE THE OREGON PUBLIC**
2 **UTILITY COMMISSION?**

3 **A.** No, I have not. However, I have testified before the Colorado Public Utilities
4 Commission in or about 1993 regarding PTI's acquisition of 63 rural exchanges
5 in Colorado from US WEST. In 1999, I testified before the Alaska Public
6 Utilities Commission regarding ACS's acquisition of Anchorage Telephone
7 Utilities. In 1994, I submitted pre-filed initial testimony with the WUTC
8 concerning PTI's acquisition of 26 rural exchanges in Washington from US
9 WEST.

10 **Q. DOES INTEGRA OPPOSE THIS TRANSACTION?**

11 **A.** As a general statement, Integra does not oppose this transaction. However,
12 Integra believes safeguards are needed to protect the competitive industry while
13 Frontier focuses on the integration of its new territories.

14 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

15 **A.** The purpose of my testimony is to bring to the attention of the Commission, as
16 well as Verizon and Frontier, the issues that concern Integra and to suggest
17 appropriate safeguards.

18 **Q. PLEASE SUMMARIZE THOSE ISSUES?**

19
20 **A.** Integra's concerns are focused on four areas. The first relates to ensuring that any
21 costs related to the transaction are not born by competitive carrier wholesale
22 customers. The second deals with maintaining the current status of existing
23 wholesale service arrangements with Verizon Northwest in its territories that are
24 acquired by Frontier, including the rates, terms and conditions applicable to those

1 wholesale services. The third deals with the transfer of operational support
2 systems to Frontier. The fourth deals with the need for enforceable wholesale
3 service quality performance standards and remedies.

4
5 With respect to wholesale services, Integra is focused primarily on its existing
6 interconnection agreements with Verizon Northwest and the continued
7 availability of all the services currently available under those agreements, at the
8 same rates and on the same terms and conditions. However, Integra is also
9 interested in maintaining the status quo with respect to the availability, pricing,
10 terms and conditions of other wholesale services that Verizon Northwest offers
11 outside the context of interconnection agreements. Mr. Denney addresses these
12 concerns in his testimony.

13
14 With respect to the operational support systems (“OSS”), Integra is concerned
15 about Frontier’s ability to provide the existing level of service. Integra’s concerns
16 are based in part on the recent negative consequences experienced with the
17 cutover of systems from Verizon to Fairpoint in Maine, New Hampshire and
18 Vermont following the sale of those service territories to Fairpoint and from
19 similar negative consequences associated with the cutover of services from
20 Verizon to Hawaiian Telcom following the sale of Verizon service territories to
21 Hawaiian Telcom.

22

1 With respect to wholesale service quality, Integra is concerned about Frontier's
2 ability to maintain the level of wholesale service performance that Verizon
3 currently provides or is striving to provide and to satisfy the requirements of
4 providing wholesale service to competitors at a level that is at least equal to that
5 which it provides to its retail operations. Frontier is a much smaller company
6 with less experience providing wholesale services on the scale and scope that
7 Verizon provides such services. Mr. Denney addresses the issue of performance
8 measures to address these issues in the future.

9
10 **Q. DO OTHERS SHARE YOUR CONCERNS?**

11 A. Yes. It is my understanding that our concerns regarding flow through of
12 transaction costs to wholesale rates, maintaining the status quo with respect to the
13 wholesale service availability, pricing, terms and conditions, and with OSS
14 transition are largely shared with the Commission Staff and Comcast.
15 Commission Staff and Comcast witnesses in this docket address those issues and
16 Integra supports the recommendations of those witnesses with respect to those
17 issues. My testimony focuses mostly on service quality concerns.

18
19 **II. SUMMARY OF PROPOSED CONDITIONS**

20
21 **Q. IS INTEGRAL PROPOSING ANY SAFEGUARDS?**

22 A. Yes. A list of proposed conditions is attached to my testimony as Exhibit
23 Integra/2. In short, Integra's proposed conditions are designed to address the four
24 concerns I just described.

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Several of the proposed conditions are designed to ensure that Frontier will not flow through transaction-related costs to wholesale customers. *See* Proposed Condition Nos. 1, 2, 3, 4. These conditions mirror similar conditions that Commission Staff recommends with respect to retail rates.

A number of these proposed conditions are designed to maintain the status quo with respect to the availability of, and rates, terms and conditions applicable to, wholesale services. These proposed conditions include: 1) requiring Frontier to extend Verizon’s existing interconnection agreements for a period of up to three years from the date of the closing of the transaction, including those agreements that are currently in their “evergreen” phase (*see* Proposed Condition Nos. 6, 7); 2) requiring Frontier to maintain, for a period of at least three years, the same rates for **all** wholesale services, including among other services, tandem transit services, reciprocal compensation, and tariffed wholesale offerings (e.g., intrastate special access) (*see* Proposed Condition Nos. 9, 10, 11, 12); 3) prohibiting Frontier, for a period of one year following the closing of the transaction, from seeking to reclassify as “non-impaired” any wire centers in the former Verizon Northwest territories in Oregon (*see* Proposed Condition No. 13); and 4) requiring Frontier to allow a requesting competitive carrier to use as the template for negotiating a replacement interconnection agreement its existing interconnection agreement with Verizon Northwest (*see* Proposed Condition No. 8).

1 Another set of the proposed conditions are designed to preserve the status quo
2 with respect to wholesale service “support”. These include proposed conditions
3 requiring Frontier, post-transaction, to continue to provide wholesale carriers the
4 same types of information that Verizon makes available, with the same frequency.
5 These conditions also require Frontier post-transaction to continue existing
6 wholesale business practices such as Verizon’s CLEC User Forum and Verizon’s
7 Change Management Process and to maintain adequate staffing of wholesale
8 operations by trained personnel exclusively dedicated to wholesale operation. *See*
9 Proposed Condition Nos. 14, 15, 16, 17.

10
11 With respect to OSS, Integra supports the proposed conditions recommended by
12 the Commission Staff and Comcast. To avoid potential confusion, the
13 Commission Staff and Comcast proposed OSS conditions are not listed in Exhibit
14 Integra/2. Integra, nevertheless, supports the Commission Staff and Comcast
15 proposed OSS conditions.

16
17 Finally, another critical component to the proposed conditions addresses
18 wholesale service quality performance metrics, standards and incentives,
19 including self-executing remedies. As is explained in Integra witness Doug
20 Denney’s testimony, Integra recommends the Commission require Frontier to
21 continue providing the monthly reports of wholesale performance metrics that
22 Verizon Northwest currently provides, and that it provide these reports to
23 Commission Staff as well. Integra further recommends that the Commission

1 establish a docket designed to: 1) monitor Frontier’s wholesale performance
2 metrics following the transaction, 2) develop and establish wholesale performance
3 standards designed to ensure parity with Frontier’s performance for its own retail
4 operations, and to ensure that Frontier’s wholesale service quality is at least as
5 good as Verizon’s pre-transaction performance, and 3) establish self-executing
6 remedies for repeated failures to satisfy the standards. *See* Proposed Condition
7 No. 5.

8 **Q. WHAT IS YOUR CONCERN REGARDING THE COSTS RELATED TO**
9 **THE TRANSACTION?**

10 Transactions of this type can be extremely costly for both parties involved. The
11 concern is that there will be an attempt to pass those costs on to CLECs through
12 the wholesale products and services that the CLECs are dependent upon and over
13 which the incumbent local exchange carrier (“ILEC”) has a virtual monopoly.
14 For example, Integra recently received a Notice from Verizon that appears to be
15 related to this transaction. *See* Exhibit Integra/3. It states that it is “realigning its
16 data centers” which may require CLECs to change their connections with Verizon
17 and states that CLECs “will be responsible for paying any Verizon charges that
18 apply to these data connection changes...” These are the kind of charges that
19 Integra is concerned will be imposed on it. Integra’s proposed Condition Nos. 3,
20 4 and 15 are designed to address this concern.

1 **III. WHOLESALE SERVICE QUALITY IS CRITICAL TO INTEGRA'S**
2 **ABILITY TO COMPETE.**

3

4 **Q: PLEASE EXPLAIN THE IMPORTANCE OF WHOLESALE SERVICE**
5 **QUALITY TO INTEGRA'S ABILITY TO PROVISION SERVICE TO ITS**
6 **CUSTOMERS**

7 **A:** Integra competes in Oregon with the ILEC, Verizon, as to both price and
8 customer service. In order to compete effectively with the ILEC, Integra must
9 satisfy customer expectations, including time frames for providing service,
10 maintenance and repair. In order to provide its service, Integra purchases
11 facilities and services from incumbent LECs, such as Verizon, on a wholesale
12 basis. Thus as a competitive local exchange carrier ("CLEC"), Integra is in the
13 difficult position of being dependent upon the ILEC, the dominant carrier in the
14 area, while at the same time trying to compete with it.

15 **Q: WHY IS INTEGRA'S CUSTOMER SERVICE DEPENDENT TO SOME**
16 **EXTENT ON VERIZON?**

17 **A.** Since Integra must use the ILEC's facilities (in this case, Verizon) to provide
18 services to its customers, Integra's commitments to customers must be based on
19 the ILEC's performance of the necessary pre-order, order, installation,
20 maintenance and repair functions for wholesale facilities and services it purchases
21 from Verizon. Integra can only satisfy the expectations of its own customers
22 when it can rely on consistent performance by the ILEC.

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Because Integra’s customers demand and expect reliable and timely service, the negative consequences associated with being unable to satisfy customer expectations due to missed ILEC wholesale intervals are significant. If Integra cannot provide service when promised or the customer experiences an interruption of service due to unreliable service from the ILEC, the customer is upset at Integra. In effect, if Verizon’s wholesale service is unreliable, Integra gains a reputation as being unreliable. The negative consequences to Integra associated with being unable to satisfy customer expectations due to a decline in ILEC wholesale performance are significant.

Q: HAS INTEGRA EXPERIENCED INADEQUATE WHOLESALE SERVICE FROM VERIZON THAT HAS AFFECTED ITS CUSTOMER SERVICE?

A. Yes, for example, from June 2008 to the present, Integra and its end user customers experienced first hand the negative consequences that are associated with a decline in wholesale service quality. In June 2008, Verizon completed an internal work force realignment. Verizon transferred its pre-order, order, and provisioning support for the Verizon West region (which includes Oregon and Washington) from Idaho to the Virginia National Market Center (“NMC”) which was previously responsible for supporting the Verizon East territory. Verizon has admitted to Integra that they underestimated the complexity of the Verizon West processes.

1 **Q. WHAT HAS BEEN THE EFFECT ON INTEGRA OF VERIZON'S**
2 **FAILURE?**

3 **A.** This miscalculation led to a cascade of negative impacts to Integra and Integra's
4 end user customers, such as:

5 1. Instability in the service delivery (order) interval (see attached Exhibit
6 Integra/4: graph of Verizon average installation intervals). The result is that
7 Integra is unable to meet or set appropriate expectations with our end user
8 customers.

9 2. An increase in ILEC (Verizon) order and provisioning errors. This results
10 in customers being taken out of service prior to the confirmed due date for their
11 conversion to Integra, which leads to services being disconnected in error or
12 service delivered to the wrong location..

13 3. Delayed (untimely) and missing Local Service Order (LSR) status
14 notifications (e.g. Firm Order Commitments (FOC), jeopardies, errors,
15 completion notifications). This means that Integra is unable to set due date
16 expectations with its customers until an FOC with a confirmed due date is
17 provided by the ILEC. Integra depends upon timely ILEC jeopardy notifications.
18 When Integra does not receive an ILEC jeopardy or the jeopardy is late, the end
19 user and Integra continue to expect that the ILEC will complete the request on the
20 confirmed due date. In situations where the end user customer is moving,
21 planning their opening or other event, this scenario can lead to the customer not
22 having the telecommunication service needed to support their business plan.

1 **Q. WHY DO THE TYPES OF WHOLESALE SERVICE QUALITY**
2 **FAILURES CAUSE MAJOR PROBLEMS FOR INTEGRA?**

3 **A.** Currently, Verizon's OSS require that Verizon send a completion notice *before*
4 Integra is able to submit a subsequent change order or open a trouble ticket
5 following standard procedures. If Verizon has not sent a completion notice
6 Integra is required to follow time consuming escalation processes to change an
7 order or open a trouble ticket.

8
9 Integra schedules its technician resources based on the confirmed due dates.
10 Untimely jeopardy notices or completion notifications result in multiple
11 dispatches of Integra technicians (e.g. Integra dispatches a technician to complete
12 the installation of service only to find that the service was not delivered by the
13 ILEC) and negatively affect Integra's ability efficiently maintain and repair the
14 end user customer's service.

15 **Q. WHAT OTHER PROBLEMS DID INTEGRA EXPERIENCE AS A**
16 **RESULT OF THE CHANGE BY VERIZON?**

17 **A.** Integra saw a dramatic increase in the resolution time for pre-order, order and
18 provisioning issues (both service impacting and order impacting). For end user
19 service-affecting issues the resolution time frame went from same day resolution
20 to 2-3 days. For order impacting issues the resolution time frame went from 2-3
21 days to weeks. The increase in service order errors increased the call volume to
22 the NMC. This in turn resulted in excessive hold times. In July/August of 2008,

1 Integra experienced hold times of 1 hour or more (see attached Exhibit Integra/5:
2 graph of Verizon Center Responsiveness). Integra had to dedicate 2 full time
3 employees to manage the resolution of Verizon issues.

4
5 While the Exhibit indicates some improvement subsequent to the transfer to the
6 NMC in Virginia, which we believe is attributed to the positive benefits of
7 training and on the job experience of the Verizon employees in the NMC, we are
8 concerned that establishing a new NMC in a new location as part of this
9 transaction may cause deterioration of the improvements if current trained NMC
10 employees are not directed to or choose not to transfer to the new location.

11 **Q. DID INTEGRA MAKE VERIZON AWARE OF THESE PROBLEMS?**

12 **A.** Yes. In fact, a detailed report of these problems is available on Verizon's website
13 at:
14 [http://www22.verizon.com/wholesale/attachments/calendar/2009OpenCUFIssues.](http://www22.verizon.com/wholesale/attachments/calendar/2009OpenCUFIssues.pdf)
15 pdf, a copy of which is attached as Exhibit Integra/6.

16 **Q. DOES THIS NEGATIVE EXPERIENCE CAUSE INTEGRA TO BE**
17 **CONCERNED WITH THE POSSIBLE CONSEQUENCES FOR**
18 **WHOLESALE SERVICE AS A RESULT OF THE PROPOSED**
19 **TRANSACTION?**

20 **A.** Yes. These negative impacts on wholesale service quality caused by Verizon's
21 transfer of wholesale service support functions for the Western Region from

1 Idaho to Virginia suggest that such transfers of wholesale support functions can
2 be fraught with problems, even when done by Verizon itself, outside the context
3 of a merger transaction. As part of the transaction that is the subject of this
4 proceeding, Verizon will be moving and consolidating wholesale support
5 functions again and then turning over these consolidated support functions to
6 Frontier. The potential for wholesale service quality degradation is at least as
7 high as that Integra recently experienced with the 2008 realignment. In fact, the
8 potential for significant problems is likely greater with the current proposed
9 transaction.

10 **Q. FROM AN OPERATIONAL PERSPECTIVE, DO YOU BELIEVE THE**
11 **CURRENT VERIZON WHOLESALE PERFORMANCE METRICS ARE**
12 **ADEQUATE?**

13 **A.** No. As Mr. Denney indicates in his testimony, there are certain performance
14 measures that are currently lacking such as vendor meets and timely notification
15 of trouble status. Integra supports the Staff recommendation regarding the
16 establishment of monthly reports of wholesale performance metrics following the
17 Closing Date.

18 **Q. GIVEN THAT THESE ARE CONCERNS WITH ANY ILEC, WHY IS THE**
19 **POTENTIAL TRANSFER OF THESE SERVICES TO FRONTIER A**
20 **CONCERN?**

21 **A:** As I explained previously, Integra has suffered from service difficulties from
22 Verizon, difficulties that have never been fully resolved. The concern is that

1 compared with Verizon, which has been providing all forms of wholesale services
2 on a large scale to Integra and other competitive carriers, including
3 interconnection, collocation, UNEs, local number portability, etc., Frontier has
4 relatively little experience providing such services compared to Verizon.

5
6 It is my understanding that, in large part, Frontier's operating subsidiaries have
7 been treated as rural ILECs not subject to the requirements of Section 251(c).
8 Frontier provides UNEs and other wholesale services required by Section 251(c)
9 of the Act only in Illinois, Minnesota, Nebraska, New York and West Virginia.
10 Relative to Verizon, Frontier's wholesale services group has little experience with
11 providing the full panoply of services that Verizon provides in Oregon. This
12 means that in most of its territories, Frontier has provided only limited
13 interconnection services. If a huge ILEC, with extensive wholesale experience,
14 like Verizon, has difficulty meeting its interconnection obligations to Integra, a
15 transfer of those obligations to an entity, like Frontier, with little wholesale
16 experience certainly has the possibility of making things worse, or at least halting
17 any progress that Verizon was making.

18
19 Frontier's relative lack of experience with provisioning the full panoply of
20 wholesale services at the scope and scale at which Verizon supplies these services
21 gives rise to concerns that the transition will result in degradation to wholesale
22 service quality. Attached Exhibit Integra/7 demonstrates the relative lack of

1 experience that Frontier has in providing unbundled loops to competitive carriers
2 compared with Verizon. This transaction will result in a much smaller company
3 with relatively limited experience with provisioning many types of wholesale
4 services taking over Verizon territories in which Verizon has far greater
5 experience providing such services. The Joint Applicants have not provided
6 evidence to alleviate the concerns this raises.

7 **IV. THE CHANGE MANAGEMENT PROCESS MUST BE MAINTAINED**
8 **AND TECHNICALLY FEASIBLE CHANGE REQUESTS PROCESSED IN**
9 **A TIMELY MANNER.**

10
11 **Q. PLEASE EXPLAIN THE NEED FOR THE PROPOSED CONDITION**
12 **RELATING TO THE CHANGE MANAGEMENT PROCESS.**

13 **A.** As stated, Verizon's OSS for unbundled network elements ("UNEs") in the areas
14 subject to this transaction has numerous serious problems that Verizon had been
15 working hard to remedy. Unfortunately, Verizon stopped this work, apparently
16 because it planned to off-load the local exchange assets at issue in this proceeding
17 to Frontier.

18
19 The list of Verizon system failures for UNEs is long indeed. For example, Integra
20 has found that Verizon's raw loop data is often incorrect. When wholesale
21 customers such as Integra order 2-wire analog loops from Verizon, they must
22 indicate whether or not the loop is designed or not designed (i.e., served by a
23 remote terminal) based on the information contained in Verizon's own databases.
24 Frequently, however, that information is wrong, causing Verizon to delay

1 provisioning of Integra's order and, ultimately, provisioning of retail service to
2 Integra's end-user customer.

3
4 Integra has found that Verizon's connecting facility assignment ("CFA") records
5 or Cross Connect Equipment Assignment ("CCEA") records, which indicate
6 whether a particular connection point between Integra and Verizon is available
7 within a Verizon central office, are frequently inaccurate. As a result, after it
8 places an order for a UNE loop, Integra often receives a "jeopardy" notification
9 indicating that a particular connecting facility is not available when Integra's
10 records correctly indicate that it is in fact available. Resolving this discrepancy
11 extends the interval between the date that Integra submits a request for service
12 from Verizon and the date on which Integra can provide retail UNE-based service
13 to its end-user customer. Integra has also found that, unlike other ILECs such as
14 Qwest that permit wholesale customers to retrieve 100 CFA records from their
15 databases at a time, Verizon's Wholesale Internet Service Engine ("WISE") OSS
16 allows Integra to retrieve only one such record at a time, thereby further delaying
17 service delivery to Integra's retail customers.

18
19 Integra has also found that Verizon's customer service records ("CSRs"), or as
20 Verizon refers to them, Customer Service Inquiries ("CSIs"), are also frequently
21 inaccurate. When a Verizon customer switches to UNE-based service with
22 Integra, Verizon often fails to timely update the CSR/CSI accordingly, thereby
23 preventing Integra from submitting repair or other requests to Verizon for that
24 customer account. At the same time, when a customer disconnects its UNE-based
25 service with Integra and switches to Verizon, Verizon fails to timely update the

1 CSR/CSI accordingly and continues to bill Integra for the UNEs at issue.
2 Furthermore, when Verizon does not update its CSRs/CSIs, its CFA/CCEA and
3 outside plant records are also not updated. This is particularly troublesome when
4 Integra seeks to serve customers in multi-tenant buildings. For example, when an
5 Integra customer in a multi-tenant building disconnects service and Verizon fails
6 to timely update the CSR/CSI, Integra's ability to provide timely service to a new
7 customer in the same building may be hindered because Verizon's CFA and
8 outside plant records incorrectly indicate that the connecting facility is occupied
9 when it is in fact available.

10
11 Through the Change Management Process ("CMP"), Verizon communicated to
12 Integra and other wholesale customers that resolving these problems was
13 "feasible" and Verizon had been working to address them until this year.
14 Attached Exhibit Integra/8 shows the history of this change request. In January
15 2009, the company announced that it had eliminated all funding for the CMP for
16 2009. Attached Exhibit Integra/9 is a transcript of the meeting at which this
17 announcement was made. Consequently, Verizon is no longer working to resolve
18 dozens of OSS changes requested by CLECs over the past several years, the vast
19 majority of which Verizon had determined were feasible. Here, the Applicants
20 have not given any indication that Frontier will pick up where Verizon left off to
21 resolve these outstanding OSS problems.

22 **Q. WHAT DO YOU PROPOSE TO ALLEVIATE THESE CONCERNS**
23 **REGARDING THE CMP?**

1 A. Integra requests that the Commission adopt Proposed Condition No. 16, set forth
2 in Exhibit Integra/2. This condition would require Frontier, post-transaction, to
3 take up where Verizon left off in responding to important competitive carrier
4 Change Requests.

5 V. **WHOLESALE OPERATIONS MUST BE ADEQUATELY STAFFED BY**
6 **TRAINED PERSONNEL WHO ARE EXCLUSIVELY DEDICATED TO**
7 **FRONTIER'S WHOLESALE OPERATIONS**

8

9 Q. **DOES INTEGRA HAVE ANY OTHER CONCERNS REGARDING THE**
10 **PROPOSED TRANSACTION?**

11 A. Yes. The Verizon customer base involved in the proposed transaction is
12 comprised of retail customers and wholesale customers. As a result, I have two
13 concerns. First, from a competitive standpoint, the Frontier organizational
14 structure should retain safeguards against the sharing of information among
15 employees serving the retail customers and those serving the wholesale
16 customers. Second, recognizing that Verizon Northwest has a large wholesale
17 customer base, it would seem to require Frontier to maintain a separate wholesale
18 support group comprised of former Verizon employees transferring to Frontier.
19 In reading the testimony of Mr. McCarthy, Integra cannot determine how these
20 concerns will be addressed as the transaction closes.

21

22 Frontier should be required to have adequately trained personnel to support its
23 wholesale operations after closing and Verizon should be required to provide

PROPOSED WHOLESALE CONDITIONS

1. No wholesale service offered to competitive carriers at the time of closing will be discontinued except as approved by the Commission.
2. No changes will be made by Frontier or its Operating Companies to any special access services rate, rule or regulation currently included in the Operating Companies' access tariff without properly filing a rate application.
3. Frontier and its Operating Companies will not seek to recover through wholesale service rates one-time transfer, branding or transaction costs.
4. Frontier will hold wholesale customers harmless for increases in overall management costs incurred by the Operating Companies that result from the transaction.
5. Following the Closing Date, Frontier shall continue to provide the monthly reports of wholesale performance metrics that Verizon Northwest currently provides and provide access to these metrics to Commission staff. The Commission shall immediately open a docket to monitor Frontier's wholesale service quality, establish wholesale service quality benchmarks and related self-executing remedies.
6. Frontier Northwest will assume or take assignment of all obligations under Verizon Northwest's current interconnection agreements, tariffs, commercial agreements, line sharing agreements, and other existing arrangements with wholesale customers ("Assumed Agreements"). Frontier Northwest shall not terminate or change the conditions of any effective interconnection agreement during the unexpired term of the Agreement or for a period of three years from the Closing Date, whichever occurs later unless requested by the interconnecting party, or required by a change of law.
7. Frontier Northwest will allow requesting carriers to extend existing interconnection agreements, whether or not the initial or current term has expired, until at least three years from the Closing Date, or the date of expiration, whichever is later.
8. Frontier Northwest shall allow a requesting competitive carrier to use its pre-existing interconnection agreement, including agreements entered into with Verizon Northwest, as the basis for negotiating a new replacement interconnection agreement.
9. Rates for services, including tandem transit service, any wholesale tariffed offering, reciprocal compensation and TELRIC 252(c)(2), and (d), rates for 251(c) facilities or arrangements, shall not be increased by Frontier Northwest for at least three years from the Closing Date; nor will Frontier Northwest create any new rate elements or charges for distinct facilities or functionalities that are currently already provided under existing rates. Frontier Northwest shall continue to offer any currently offered Term and Volume

- Discount plans until at least three years from the Closing Date. Frontier Northwest will honor any existing contracts for services on an individualized term pricing plan arrangement for the duration of the contracted term.
10. Until at least three years from the Closing Date, Frontier Northwest will continue to provide transit service subject to the same rates, terms and conditions that are currently provided by Verizon Northwest unless directed otherwise by the Commission.
 11. Frontier Northwest will not withdraw its tariffed wholesale service offerings or intrastate offering of Frontier Northwest's special access circuits, unless required by law.
 12. Frontier Northwest will not seek to avoid any of its obligations under the Assumed Agreements on the grounds that Frontier Northwest is not an incumbent local exchange carrier ("ILEC") under the Federal Communications Act of 1934, as amended, 47 U.S.C. § 151 *et seq.*, (the "Communications Act"), nor on the grounds that it is exempt from any of the obligations hereunder pursuant to Section 251(f)(1) of Section (f)(2) of the Communications Act.
 13. For one year following the Closing Date, Frontier Northwest will not seek to reclassify as "non-impaired" any wire centers in Oregon for purposes of Section 251 of the Communications Act, nor will Frontier Northwest file any new petition under Section 10 of the Communications Act seeking forbearance from any Section 251 or dominant carrier regulation in any wire center in Oregon.
 14. Frontier Northwest shall provide and maintain on a going-forward basis updated escalation procedures, contact lists and account manager information at least 30 days prior to the transaction close date. The updated contact list shall identify and assign a single point of contact for each CLEC with the authority to address ordering, provisioning, billing and OSS systems maintenance issues of that CLEC.
 15. Following the transition or cutover date, Frontier Northwest will continue to make available to each wholesale carrier the types of information that Verizon currently makes available concerning wholesale operations support systems and wholesale business practices via the CLEC Manual, industry letters, and the change management process. In addition, Frontier Northwest will continue the CLEC User Forum process following the transition or cutover date. Frontier Northwest will provide the wholesale carriers training and education on Frontier West's wholesale operations support systems without charge to the wholesale carrier.
 16. Frontier Northwest will maintain a Change Management Process ("CMP") similar to Verizon's current process, including CMP meetings the frequency of which for the first twelve months from Closing Date shall be monthly, and thereafter, agreed upon by the parties and a commitment to at least two OSS releases per year. Pending CLEC Change Requests will be completed in a commercially reasonable time frame.

17. Frontier Northwest shall ensure that the legacy Verizon Wholesale and CLEC support centers are sufficiently staffed by adequately trained personnel dedicated exclusively to wholesale operations so as to provide a level of service that is comparable to that which was provided by Verizon prior to the transaction and to ensure the protection of CLEC information from being used for Frontier's retail operations.

October 8, 2009

Audience: CLEC, Reseller, ISP, IXC, Wireless

Re: Verizon Data Center Connectivity Changes / Action Required

Verizon plans to realign its data centers in the second quarter of 2010. If you interconnect with the Verizon Fort Wayne, Indiana data center, or if you do business with Verizon in Arizona, California, Idaho, Illinois, Indiana, Michigan, Nevada, North Carolina, Ohio, Oregon, South Carolina, Washington, or Wisconsin, you may need to change your connections with Verizon through which you conduct electronic data transactions with Verizon (for instance, to access Operations Support Systems functions, such as submitting orders for service and repair requests).

We would like to meet with you to develop a coordinated schedule of any Verizon data connectivity-related changes that may be required. Some data connections between Verizon and other companies currently are provided by 56KB, T1 or DS3 circuits. Other data connections are made by means of a VPN arrangement (Virtual Private Network-encrypted IPSEC interconnect tunnel). Verizon's preferred data connection is through a VPN arrangement.

Rearrangements, if necessary, must be completed by April 1, 2010. You will be responsible for paying any Verizon charges that apply to these data connection changes, as well as for any other charges or costs you may incur in relation to the data connection changes and your data connection arrangements with Verizon.

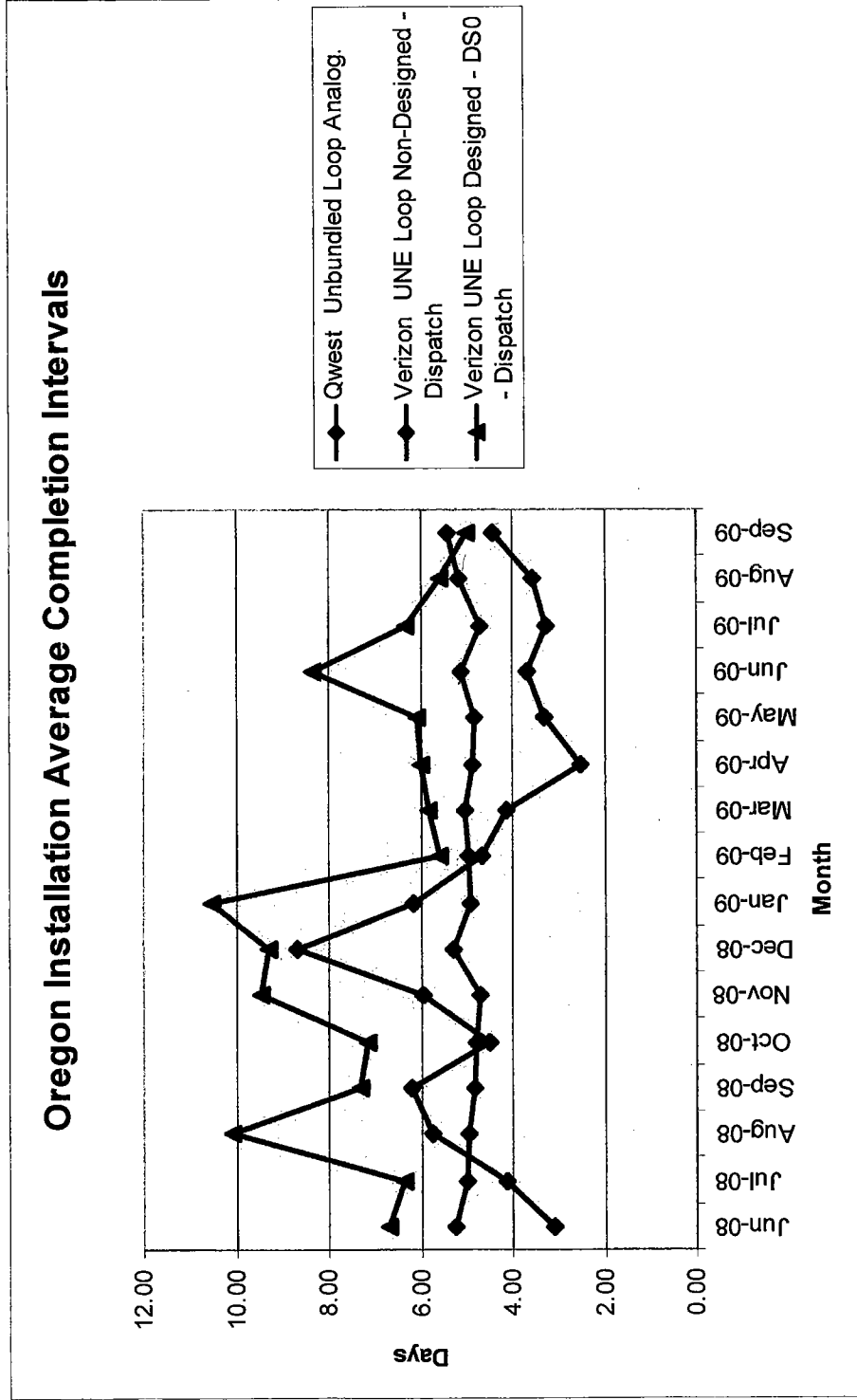
At this time, we would like to meet with you to develop a coordinated schedule of any data connectivity related changes that are required. Please contact connectivity.management.team@verizon.com at your earliest convenience to set up a meeting.

In general, the timelines to complete data connectivity changes are:

- Dedicated Circuit: It typically takes from 30 to 90 days to establish a dedicated circuit.
- VPN (preferred method): It usually takes about two (2) weeks to build the VPN tunnel configuration and complete the firewall policy.

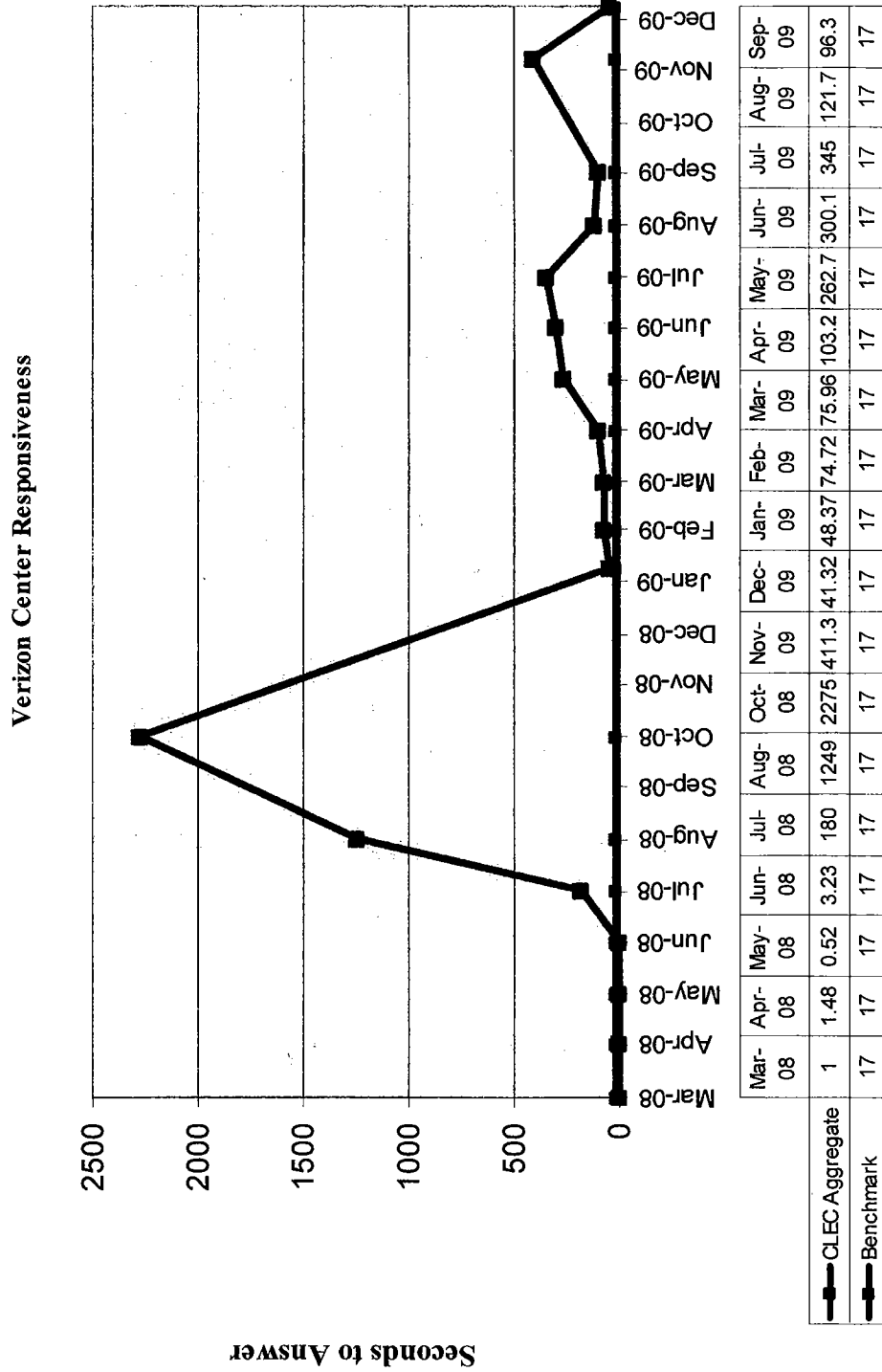
If you have any questions about this process, please feel free to contact your Verizon Partner Solutions account manager.

Impact of NMC Transition on Verizon Average Installation Interval



Source
 Qwest <http://www.qwest.com/wholesale/results/roc.html>
 Measurement: OP-4D Installation Interval (Average Days) Interval Zone One Unbundled Loop Analog.
 Verizon - WISE OSS - Carrier to Carrier Aggregate Report for Oregon and Washington
 Measurement: PR-2-06-3235 Average Completed Interval - UNE Loop Designed - DS0 - Dispatch
 Measurement: PR-2-09-3571 Average Completed Interval UNE Loop Non-Designed - Dispatch

Impact of NMC Transition on Verizon Center Responsiveness





2009 OPEN CUF ISSUES

Table of Contents:

#1 Review Verizon Changes Of Interest to CLEC Community.....	2
#116 Transition of Idaho NMC to Virginia NMC.....	4



#1 Review Verizon Changes Of Interest to CLEC Community

DESCRIPTION: Includes any changes to VZ organizations, systems, and/or business practices that may occur and affect the CLEC-community.

EXAMPLE:

OPENED: May 1998 by J.Katzman (Covad), M.Moor (Net2000), P. Appandrianopoulos (Rhythms), & T.Evans (Teligent).

CLEC SPONSORS: ALL

VERIZON FACILITATOR: Kathryn Kalajian

PRODUCT (S) AFFECTED BY I

ISSUE:

- | | | |
|--|---|---|
| <input type="checkbox"/> Collocation | <input type="checkbox"/> Line-Sharing | <input type="checkbox"/> Special Access (FCC Tariff) |
| <input type="checkbox"/> DSL | <input type="checkbox"/> Line-Splitting | <input type="checkbox"/> UNE-Loop |
| <input type="checkbox"/> Interconnection/IXC | <input type="checkbox"/> LNP | <input type="checkbox"/> UNE-Platform |
| <input type="checkbox"/> Interconnection/Switched Access | <input type="checkbox"/> Resale | <input type="checkbox"/> UNE Specials/IOF (Local Tariffs) |

OTHER (Please Specify): Anything that may affect Inter-Company Processes

STATE(S) WHERE ISSUE OCCURS:

- | | | | | |
|--|--------------------------------------|--|---------------------------------------|---|
| <input checked="" type="checkbox"/> Entire Footprint | <input type="checkbox"/> Connecticut | <input type="checkbox"/> Maryland | <input type="checkbox"/> New Jersey | <input type="checkbox"/> Vermont |
| <input type="checkbox"/> "North Region" | <input type="checkbox"/> Delaware | <input type="checkbox"/> Massachusetts | <input type="checkbox"/> New York | <input type="checkbox"/> Virginia |
| <input type="checkbox"/> "South Region" | <input type="checkbox"/> Maine | <input type="checkbox"/> New Hampshire | <input type="checkbox"/> Pennsylvania | <input type="checkbox"/> Washington, DC |
| | | | <input type="checkbox"/> Rhode Island | <input type="checkbox"/> West Virginia |

- CLOSED as of:** _____ **RESOLVED** **AGREE TO DISAGREE**
 UNRESOLVED **MOVED TO OTHER FORUM:** _____

FOLLOW-UP ACTION ITEM(S) & ASSIGNED OWNER(S) & DATE(S) DUE:

GENERAL MEETING MINUTES

12/10/08:

Web Site Enhancements

New Local Content

Under the Systems and Measures drop menu for-the Customer Wholesale Portal Report, the Verizon East License Agreement for Bulk Loop Qualification Extract has been updated

- In the **Local Ordering Guide web page**

The Supplemental Wire Centers Exemption list for 2008 has been updated and the **The 2009 Local Provisioning Availability Schedule** has been added. There have been several updates made to the Contact Us section and, based on discussion on yesterday's CMP call; further updates in the escalations lists and the appearance of this section are forthcoming.



Notes from meetings previous to 12/10/08 and relevant to this topic have been archived separately

#116: Transition of Idaho NMC work to Virginia NMC

CLEC SUBMITTING ISSUE SHOULD COMPLETE LINES 1 through 11:

1. **CLEC Name:** Integra Telecom, Inc.
2. **CLEC Contact, Phone Number and E-Mail Address:** Kim Isaacs
612-436-6038
kdisaacs@integratelecom.com
3. **Alternate CLEC Contact, Phone Number and E-Mail Address (Optional):** Laurie Roberson
503-953-7423
Laurie.Roberson@integratelecom.com
4. **SUBMISSION DATE:** 9/17/08
5. **SELECT PRODUCT(S) THIS ISSUE AFFECTS: (Double-click on box(es) to mark)**

<input type="checkbox"/> Collocation	<input type="checkbox"/> Line-Sharing	<input type="checkbox"/> Special Access (FCC Tariff)
<input type="checkbox"/> DSL	<input type="checkbox"/> Line-Splitting	<input type="checkbox"/> UNE-Loop
<input type="checkbox"/> Interconnection/IXC	<input type="checkbox"/> LNP	<input type="checkbox"/> UNE-Platform
<input type="checkbox"/> Interconnection/Switched Access	<input type="checkbox"/> Resale	<input type="checkbox"/> UNE Specials/IOF (Local Tariffs)
<input checked="" type="checkbox"/> OTHER (Please Specify): <u> All Products Supported by the NMC </u>		
5. **SELECT THE CATEGORY THIS ISSUE AFFECTS: (Double-click on box(es) to mark)**

<input type="checkbox"/> Pre-Order (Record Verification)	<input type="checkbox"/> Billing (Process)	<input type="checkbox"/> Ancillary Services (OS/DA/DL, etc.)
<input type="checkbox"/> Ordering (Process)	<input type="checkbox"/> Maintenance and/or Repair (Process)	<input checked="" type="checkbox"/> Other General Issue
<input type="checkbox"/> Provisioning (Process)		
6. **SELECT WHERE ISSUE OCCURS:** Entire Verizon East Or
 Entire Verizon West Or
 Entire Footprint Or Check off Specific State(s) Below:



- | | | | | |
|--------------------------------------|--|---|---|--|
| <input type="checkbox"/> California | <input type="checkbox"/> Indiana | <input type="checkbox"/> New Hampshire | <input type="checkbox"/> Pennsylvania | <input type="checkbox"/> Virginia |
| <input type="checkbox"/> Connecticut | <input type="checkbox"/> Maine | <input type="checkbox"/> New Jersey | <input type="checkbox"/> Pennsylvania - W | <input type="checkbox"/> Virginia-W |
| <input type="checkbox"/> Delaware | <input type="checkbox"/> Maryland | <input type="checkbox"/> New York | <input type="checkbox"/> Rhode Island | <input type="checkbox"/> Washington |
| <input type="checkbox"/> Florida | <input type="checkbox"/> Massachusetts | <input type="checkbox"/> North Carolina | <input type="checkbox"/> South Carolina | <input type="checkbox"/> Washington DC |
| <input type="checkbox"/> Idaho | <input type="checkbox"/> Michigan | <input type="checkbox"/> Ohio | <input type="checkbox"/> Texas | <input type="checkbox"/> West Virginia |
| <input type="checkbox"/> Illinois | <input type="checkbox"/> Nevada | <input type="checkbox"/> Oregon | <input type="checkbox"/> Vermont | <input type="checkbox"/> Wisconsin |

7. DESCRIBE THE ISSUE:

Integra has experienced and continues to experience a significant decline in the level wholesale support and service from Verizon. This is having a detrimental impact on Integra and our end user customer's. The decline in service is due to Verizon's unannounced 6/30/2008 transition of their National Market Center (NMC) support for Verizon West from the Idaho NMC to a center in Virginia. While Integra has been working with our Verizon account management team and the NMC senior management, we have not received a commitment from Verizon regarding when the issues will be resolved or when we can anticipate a return normal service levels.

Unfortunately as of today 9/17/08, Integra and our end user customer's are still experiencing issues as a result of Verizon's transition of the National Market Center (NMC). Verizon's overall performance is not improving. Verizon may improve on LSR response times only to see an increase in the order errors. A focus on order errors results in a decline in the LSR response times. We are still experiencing long hold times when calling the NMC, due dates 2 – 3 weeks beyond our requested due date, and very slow response time for NMC escalation tickets and project requests.

Integra has been meeting with Verizon weekly to address the issues but we have not seen significant improvements.



8. PROVIDE EXAMPLE(S):

In early July, it became clear that the transition of the Verizon's Idaho NMC to the Virginia NMC was having a negative impact on Integra and our ability to provision services for our end user customer's in a timely manner. Here is a small sample of the issue Integra and our end user customer's were experiencing in July and continue to experience to some level some 2 months later:

- Verizon was not responding to LSRs in a timely manner. It was taking days to receive a response (Firm Order Commitment FOC) from Verizon when typically it took hours.
- Service Order Intervals/Due Dates increased. Verizon was pushing out due dates two to three weeks beyond the requested due date on Integra's LSRs.
- NMC Escalation tickets were not being resolved in a timely manner.
 - Prior to the NMC transition, Verizon responded within hours to service affecting issues in July it was taking days to resolve these issues.
 - Prior to the NMC transition, Verizon responded to non-customer service impacting issues within two to three days. In July, was taking one to three weeks.
- Integra was experiencing excessive hold times. Hold times of 1 ½ hours were not uncommon.
- Integra was unable to get responses to project request. This results in missed commitments to our end users and significantly delayed some of Integra's network optimization project.

Verizon's CLEC aggregate performance results for PO-3-02-1400 Center Responsiveness in July 2008, illustrate the decline in the level of service Verizon is providing to the CLECs. The benchmark for Performance Measure PO-3-02-1400 is 17.00 seconds. In June 2008, prior to the NMC transition all of the Verizon National Market Centers answered calls in 3.23 seconds. In July 2008, all of the Verizon National Market Centers answered calls in 180.04 seconds. It is important to note that the 180.04 seconds is an aggregate of all of Verizon's National Market Centers. Integra contacts only the NMC in Virginia and our average hold time is 20 – 30 minutes.

9. IF CLEC HAS PROPOSED RESOLUTION, PLEASE DESCRIBE: Verizon should openly and regularly share their plans to resolve the outstanding issues with the CLEC community and to promptly return to normal levels of service.

10. Other CLECs Supporting Issue:

Priority One.



VERIZON COMPLETES LINES 12 through 14:

CUF REVIEW DATE: _____

11. Issue Accepted? Yes / No – If “No”, provide reason:

12. Assigned Issue # _____ **and Entitled:** _____

13. Issue Closed: (enter date closed) : _____

Summarize actions by Verizon and/or CLECs to resolve issue or check off applicable boxes:

Resolution: _____

Issue moved to the following Forum:

Agree to Disagree

12/10/08:

- Tom Thirsk, Director of the Verizon National Market Center (“NMC”), provided the following status:
 - Under the new call answering process, calls to the NMC are now being answered under 2 minutes
 - The NMC is still working out issues with timely callbacks
 - Verizon implemented two IT fixes in November to address an IT issue with system-generated JEPs that negatively impacted West orders in October and November. This issue, identified in October shortly after the CUF call, has resulted in increased calls to the NMC. The NMC has worked to ensure that all CLECs have received their JEP notifications and reason codes. An additional system notification issue has also been identified pertaining to an increase in system notifications issued on design/non design circuits. IT is scheduled to implement a program on December 11, 2008 that will capture these JEP notifications, which should serve to alleviate those calls.
 - Integra requested Verizon commence bi-weekly industry calls with all the CLECs and eliminate the individual calls NMC management conducts with some CLECs. Tom Thirsk stated he will consider that request. No CLEC voiced support on the call for this alternative.



10/15/08:

Integra's new issue requested Verizon regularly share with the CLEC community its plans to resolve the outstanding NMC issues with regard to West orders. This was accepted as an issue [CUF Issue Number 116]. Key points discussed include:

- The focus of the issue would be on aggregate CLEC issues and not on CLEC-specific issues. For CLEC-specific issues, arrangements can be made for the CLECs to discuss them directly with an NMC manager.
- The Chesapeake NMC director, Lorraine Taylor, and her management team have been directly available to those CLECs reporting delays, including having regularly scheduled meetings with Integra and a few other CLECs, to directly resolve their specific issues.
- The transition of the West local orders to the Chesapeake NMC has not impacted the CLEC ability to submit electronic LSRs. These orders have been processed and provisioned business as usual. Aggregate performance data has indicated that the vast majority of LSR and reject notifiers continue to be processed in a timely manner.
- A small percentage of the LSRs falling out for additional manual processing experienced delays over the months of July and August. Some of these delays can be attributed to Verizon representatives gaining additional experience and work efficiencies in the systems required to process the West orders. Verizon has been actively monitoring the situation and has implemented the following steps to help ensure the timely processing of all notifiers:
 - Provided extensive training and continuous floor support.
 - Shifted additional resources from other Verizon work centers to assist with the processing of work as daily volumes fluctuate.
 - Authorized overtime as necessary.
- Lorraine Taylor, Director of the NMC, provided more detail pertaining to the transition. The three components of the transition were (1) getting the LSR's processed timely and correctly, (2) (3) reducing hold time on the ACD.
- It is now the fourth month of the transition and the first component has been successfully achieved and the second component is definitely improving. The third component, which is in direct correlation with the second, will be achieved as soon as the management of trouble tickets is at optimum. This requires on-going effort on both sides (Verizon and CLEC).
- PriorityOne mentioned that intervals are long. There was discussion on the increased use of the escalation process by CLECs to try to improve their due dates. Verizon explained that when an order is submitted, Verizon's systems generate the next available date (based on work force availability and work load). CLECs can request an expedited due date by

OR Docket No. UM 1431
Verizon and Frontier Responses to Staff Data Request Nos. 106-146
July 27, 2009

DATA REQUEST NO. 126:

Please identify the states in which Frontier offers unbundled network elements, and indicate the number of UNE loops it currently provides in each.

Response:

Without limitation of their other General Objections, please see, in particular, General Objection Nos. 3 and 12. Subject to and without waiver of our general and specific objections, Applicants respond as follows:

Frontier currently does not have any competitive carriers purchasing UNE loops in Oregon.

Prepared By: Cassandra Guinness
Date: July 27, 2009

OR Docket No. UM 1431
Verizon and Frontier Responses to Staff Data Request Nos. 106-146
July 27, 2009

DATA REQUEST NO. 127:

Please identify the states in which Verizon offers unbundled network elements, and indicate the number of UNE loops it currently provides in each.

Response:

Without limitation of its other General Objections, please see, in particular, Applicants' General Objection Nos. 1, 3, 6, 12. Subject to and without waiver of its general and specific objections, Applicants respond as follows:

Verizon offers unbundled network elements in Oregon. Verizon has provided ***BEGIN
CONFIDENTIAL* *END CONFIDENTIAL*** UNE loops in Oregon as of
year end 2008.

Prepared By: Jim Miggans
Date: July 27, 2009

CONFIDENTIAL
SUBJECT TO GENERAL PROTECTIVE ORDER

OR Docket No. UM 1431
Verizon and Frontier Responses to Staff Data Request Nos. 106-146
July 27, 2009

DATA REQUEST NO. 128:

Please identify the states in which Frontier offers services for resale, and indicate the number of resold lines it currently provides in each.

Response:

Without limitation of their other General Objections, please see, in particular, General Objection Nos. 3 and 12. Subject to and without waiver of our general and specific objections, Applicants respond as follows:

Frontier currently does not have any competitive carriers reselling local service in Oregon.

Prepared By: Cassandra Guinness
Date: July 27, 2009

OR Docket No. UM 1431
Verizon and Frontier Responses to Staff Data Request Nos. 106-146
July 27, 2009

DATA REQUEST NO. 129:

Please identify the states in which Verizon offers services for resale, and indicate the number of resold lines it currently provides in each.

Response:

Without limitation of its other General Objections, please see, in particular, Applicants' General Objection Nos. 1, 3, 6, 12. Subject to and without waiver of its general and specific objections, Applicants respond as follows:

Verizon offers switched access lines for resale in Oregon. As of year end 2008, Verizon provided ***BEGIN CONFIDENTIAL*** **END CONFIDENTIAL*** lines for resale in Oregon.

Prepared By: Jim Miggans
Date: July 27, 2009

CONFIDENTIAL
SUBJECT TO GENERAL PROTECTIVE ORDER

Docket No. UM-1431

Verizon and Frontier Responses to Staff Data Requests Nos. 147-159

August 3, 2009

DATA REQUEST NO. 149:

Please list in table format the Frontier and Verizon central offices (including CLLI code and city name) in which the companies lease space to CLECs (e.g., collocation space).

Response:

Without limitation of its other General Objections, please see, in particular, Applicants' General Objection Nos. 4, 7, and 8.

Subject to and without waiver of its general and specific objections, Applicants respond as follows:

Citizens Telecommunications Company of Oregon (CTC-Oregon) does not currently have carriers collocated in its Oregon central offices.

With regard to Verizon, see Highly Confidential attachment OR Staff Set14 VZ149 Attach1 Collocation arrangements dec2008 HIGHLY CONFIDENTIAL.

Prepared By: Jim Miggans; Cassandra Guinness

Date: August 3, 2009

Verizon Attachment (HIGHLY CONFIDENTIAL)

**OR Staff Set14 VZ149 Attach1 Collocation arrangements dec2008
HIGHLY CONFIDENTIAL**

HIGHLY CONFIDENTIAL - USE RESTRICTED
PER SUPERSEDING HIGHLY CONFIDENTIAL
PROTECTIVE ORDER NO. 09-273 IN DOCKET
UM 1431

Docket No. UM-1431
Verizon and Frontier Responses to Staff Data Requests Nos. 161-172
August 14, 2009

DATA REQUEST NO. 172:

In Staff's Data Requests numbers 126, 127, 128 and 129, Staff seeks information that will facilitate Staff's evaluation of the merged company's ability to adequately provide wholesale services in Oregon. To adequately evaluate this aspect Staff requests data not only for Oregon, but for the other states in which Verizon and/or Frontier operate. Verizon and Frontier provided information for Oregon only. Please provide data for the other states in Data Requests numbers 126, 127, 128 and 129.

126. Please identify the states in which Frontier offers unbundled network elements, and indicate the number of UNE loops it currently provides in each.

127. Please identify the states in which Verizon offers unbundled network elements, and indicate the number of UNE loops it currently provides in each.

128. Please identify the states in which Frontier offers services for resale, and indicate the number of resold lines it currently provides in each.

129. Please identify the states in which Verizon offers services for resale, and indicate the number of resold lines it currently provides in each.

Response:

Without limitation of the other General Objections, please see, in particular, Applicants' General Objection Nos. 1, 3, 6, 7, and 12. Subject to and without waiver of the general and specific objections, Applicants respond as follows.

Regarding No. 126: Frontier offers unbundled network elements in Illinois, Minnesota, Nebraska, New York, and West Virginia. Frontier has provided *****BEGIN CONFIDENTIAL***** **END CONFIDENTIAL***** in those states as of July 2009.

Regarding no. 127: Verizon offers unbundled network elements in the following Spinco states: Arizona, Idaho, Illinois, Indiana, Michigan, Nevada, North Carolina, Ohio, Oregon, South Carolina, Washington, Wisconsin, West Virginia. Verizon has provided *****BEGIN CONFIDENTIAL***** *****END CONFIDENTIAL***** UNE loops and EELs in those states as of year end 2008.

Regarding no. 128: Frontier offers switched access lines for resale in Alabama, Arizona, California, Georgia, Idaho, Illinois, Iowa, Minnesota, Mississippi, Nebraska, Nevada, New York, Pennsylvania, Tennessee, Utah, West Virginia, and Wisconsin. As of July 2009, Frontier resold *****BEGIN CONFIDENTIAL***** *****END CONFIDENTIAL***** lines in those states.

CONFIDENTIAL
SUBJECT TO GENERAL PROTECTIVE ORDER

PWG Change Request History Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
1	2711 C02-3217 378615 E	<p>Title: Allow coordinated conversion for Pair Changes during Loop provisioning.</p> <p>Description: Currently when a hot cut is scheduled and a NDT condition on one or more lines cannot be resolved, the CLEC is required to send a supp, changing the affected pair (s). The only option to the standard 5-day interval for this type of change is a cumbersome escalation process to the NMC and RCCC to get management personnel to push the request through. We would like an automated process that will update CFA information quickly without management intervention. The real intent of this initiative is to move the provisioning interval for a supp to change the CFA from 5 days to 1 day.</p> <p>Process: Order; Jurisdiction: North, South; System: Other; Primary Area: UNE-Hot Cut; LSOG Version : 5 and above</p> <p>Initiator: Loriann Burke, XO 10/18/02</p>	<p>Overall = 5.0</p> <p>Allegiance = 5 AT&T = 5 Broadview = 5 Cavalier = 5 Choice One = 5 Conversent = 5 Covad = 5 Cox = 5 CTSI = 5 Met Tel = 4.5 MetroTelconnect = P OneCom = 5 TalkAmerica = P MCI = 5</p>	<p>STATUS: Feasible</p> <p>10/10/07 Industry review completed. Request designated as feasible. Confirmed this is East only as West has "Coordinated Conversion" process. Title updated to more closely reflect work requested. Initiator/company updated. 9/14/04 Not Scheduled. 5/4/04 Updated Title to reflect revised intent - topic resubmitted for evaluation 4/13/04 Not scheduled 2/10/04 Allegiance requested issue revisited 11/12/03 Updated status 10/7/03 Updated Description. 11/12/02 - Rated by CLECs; LOE = Low 11/5/02 - New to list</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
2	C05-2078 395377 E	<p>Title: Receipt of the Cat 11 records on a daily basis.</p> <p>Description: This initiative is requesting receipt of the Cat 11 records on a daily basis rather than every 7-10 days for the Verizon North (MA and NH) territory.</p> <p>Process: Billing Jurisdiction: VZN</p> <p>Transaction: N/A</p> <p>Systems: Billing Primary Area: UNE</p> <p>Documentation: N/A LSOG: N/A</p> <p>Initiator: Tracy Kelly-O'Neill, Comcast 8/30/2005 Kerry Burke</p>	<p>Overall = 5</p> <p>Broadview = P Cable Vision =P Comcast = 5 CTC = 5</p>	<p>STATUS: Feasible</p> <p>10/24/07 Reviewed updated status with industry noting that coding changes are required. Optimum solution is the ability to select either daily or weekly distribution.</p> <p>10/11/07 Confirmed coding changes are required. Request designated as feasible.</p> <p>10/10/07 Industry review completed. Advised this could probably be addressed as trouble ticket but decision to maintain as type 5.</p> <p>9/14/05 Rated.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
3	C05-2272 395724 E/W	<p>Title: Allow for quicker identification of cancelled orders</p> <p>Description: Make the LSC response for a SUP 1 to cancel clearly show that the order has been cancelled.</p> <p>Initiator/Date: Laurie Fredricksen, Integra, 09/29/05</p>	<p>Overall = 5.0</p> <p>AT&T = P Covad = 5 Eschelton = 5 HTC = 5 Integra = 5 MCI = 5 SBC = 5 Sprint = 5 Telcove = 5 Time W = 5 Trinsic = 5 XO = 5 Logics = P</p>	<p>STATUS: Feasible</p> <p>10/24/07 – Advised East has same issue. Change region to E/W. 10/10/07 – Industry review completed. Request designated as feasible. Some additional investigation will be pursued to determine if this will remain West only. It was confirmed to be GUI only. 10/18/05 – New to List. Rated by CLECs</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
4	C05-2622 396339 W	<p>Title: Enhance the WISE Interface to pull the pre-order data into the LSR</p> <p>Description: Enhance the WISE interface to allow Pre-Order Address Validations, Reserved TNs, Appointment Reservations RESIDs to be auto-populated into an LSR.</p> <p>Expand Pre Order to Order integration to include use of order templates. Primary issue is pulling over valid address from Pre Order while using custom templates.</p> <p>Process: Pre-Order & Order Jurisdiction: VZ West</p> <p>Systems: WISE</p> <p>Initiator/Date: Kim Isaacs, Eschelon, 11/22/05</p>	<p>Overall = 5.0</p> <p>AT&T = P Comcast = P Covad = P Eschelon = 5 HTC = 5 Integra = 5 Priority One = 5 Sprint = P Telcove = 5 Time W = P Trinsic = P VarTec = 5 XO = 5</p>	<p>STATUS: Feasible</p> <p>10/24/07 – Industry review completed. Request designated as feasible. Verizon notes that very rough level of effort deemed this a large effort. 01/17/06 – New to List. Rated by CLECs.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
5	C06-0019 E/W	<p>Title: Expand Pre-Order View of cable pair availability</p> <p>Description: Expand Pre-Order (WISE, EDI, CORBA) View Co-Location Facility query and response to allow the user to query a range of slots.</p> <p>Initiator/Date: Kim Isaacs, Eschelon, 11/22/05</p> <p>11/7/07 – This request is specific to DS0 requests and should include ability to query up to a range of 100.</p>	<p>Overall = 5.0</p> <p>AT&T = P Covad = P Eschelon = 5 HTC = 5 Integra = 5 Priority One = 5 Sprint = P Telcove = 5 Time W = P Trinsic = P</p>	<p>STATUS: Feasible</p> <p>11/7/07 Industry review completed and request designated as feasible. Region changed to reflect E/W. Notes added to clarify request.</p> <p>01/17/06 – New to List. Rated by CLECs.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
6	C06-0862 W	<p>Title: Drop project requirement for Return to Native port in orders.</p> <p>Description: Eschelon proposes that Verizon drop the Return to Native project requirement for port in to Resale and UNE-P requests.</p> <p>Process: Ordering Jurisdiction: West Transaction: LSR</p> <p>Systems: Wise, EDI</p> <p>Primary Area: Resale, UNE P,</p> <p>Documentation: Order Business Rules</p> <p>LSOG Version: 6 and ></p> <p>Initiator: Kim Issacs, Eschelon 4/12/2006</p>	<p>Overall = 5</p> <p>AT&T = 5</p> <p>AT&T (L) = P</p> <p>ATX = 5</p> <p>Broadview = P</p> <p>Choice One= 5</p> <p>Comcast = 5</p> <p>Covad = P</p> <p>Cox = P</p> <p>CTC = 5</p> <p>CTSI= P</p> <p>Eschelon = 5</p> <p>Electric Light = P</p> <p>HTC = P</p> <p>MefTel = 5</p> <p>Mountain = P</p> <p>Penn</p> <p>Telecom=5</p> <p>Sprint = 5</p> <p>Synchronoss = P</p> <p>Telcove = 5</p> <p>Telcape = 5</p> <p>Time Warner = 5</p> <p>Trinsic =</p> <p>Unity Com = 5</p> <p>XO = P</p>	<p>STATUS: Feasible</p> <p>11/13/07 Industry review completed and request designated as feasible. Customer advised due date window could be up to 30 day due to project requirement.</p> <p>5/9/06 Ranked.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
7	47038 W	<p>Title: Allow for correct and convenient determination if a loop should be ordered as designed or non-designed</p> <p>Description: This initiative is requesting that Verizon Create a new field that clearly states if the loop should be ordered as designed or non-designed. Currently the CLEC is required to check various fields on the Loop Qual transaction to make the determination and still may order incorrectly and receive a Jeep on due date.</p> <p>Process: Pre-Order Jurisdiction: VZ West</p> <p>Transaction: Loop Qual</p> <p>Systems: Wise, EDI, Corba Primary Area: UNE</p> <p>Documentation: Pre-Order Business Rules</p> <p>LSOG Version: 9</p> <p>Initiator: Laurie Fredrickson, Integra 1/9/2007</p>	<p>Overall = 5</p> <p>AT&T L = 5 AT&T C/T = 5 ATX = P Broadview = 5 Covad = 5 COS = 5 Comcast = 5 CTSI = P HTC = 5 Integra Telecom = 5 Penn Telecom = P Sprint = P Time Warner = P Trinsic = P XO = 5</p>	<p>STATUS: Feasible</p> <p>11/13/07 Industry review completed and request designated as feasible. 2/13/07 Ranked.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CL/EC Ratings	Status/Comments
8	59104 W	<p>Title: T5 Implement Directory Listing Inquiry transaction similar to what is offered in the East states.</p> <p>Description: The purpose of this initiative is to implement a Directory Listing Inquiry transaction that permits a search of the Verizon listing databases using a variety of selection criteria. This Pre-Order transaction currently exists in the East. Keep current ability to view non-pub on the CSI.</p> <p>Process: Pre-Order Jurisdiction: VZ West</p> <p>Systems: WISE, EDI & CORBA Primary Area: Directory Listings</p> <p>Documentation: Pre-Order Business Rules</p> <p>LSOG Version: 9</p> <p>Initiator: Carol Frike, Sprint 10/10/2007</p>	<p>Overall = 5</p> <p>AT&T L = 5 AT&T C/T = 5 Concretio = 5 Covad = P Cox = 5 DSCI = P HTC = P Integra = 5 Nationline = P One Comm = P Paetec = P Penn Telecom = P Priority = 5 Sprint = 5 Unity Comm = P XO = P</p>	<p>STATUS: Feasible</p> <p>01/16/08 Added non-pub description per the initiator's request. 11/13/07 Industry review completed. 11/13/07 Ranked</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
9	C03-1209 C03-1334 383920 384305 E/W	<p>Title: Single LSR for Voice and Data Migration - Migration #1</p> <p>Description: The purpose of this initiative is to allow CLECs to migrate voice and data service including line split and line share on a single LSR without the customer experiencing significant data and or voice downtime. In addition, this request includes a change in voice provider, change in data provider, and change in both voice and data provider on a single LSR.</p> <p>From Line Sharing to Line Splitting (UNEP) Assumptions: Existing Arrangement – VZ Voice, VZ or DLEC Data New Arrangement – CLEC UNE P Voice with or without change in Data provider CLEC & DLEC partnership agreement, pre-positioned 30 business days prior to order activity Activity requested on single LSR Voice migration ordered by CLEC If new DLEC, voice CLEC or DLEC acting as agent submits LSR and notifies the other Voice disconnect – Voice CLEC Data disconnect – Voice CLEC or DLEC acting as agent of VLEC; account restructure required from Line Splitting to UNEP Voice CLEC reports voice trouble DLEC reports data trouble</p> <p>Note: Accomplishes C02-3091 & C03-0072 as a subset of this change. VZ East CR: C03-1209 Migration Scenario Ranking: • #1 (9/2005) • #1 (12/2003)</p> <p>Reason: System enhancement Process: Order; Jurisdiction: Verizon System: LSI, WISE, EDI Primary Area: UNE, UNE-P, Resale LSOG Version: All</p> <p>Initiator/Date: Mary Halpin AT&T, 07/22/03</p>	<p>East Overall = 4.9</p> <p>Allegiance = 5 AT&T = 5 Broadview = 5 Cavalier = 5 Choice One = NR Covad = 5 Cox = 5 CTSI = 5 Met Tel = 5 NOS=4 TalkAmerica = P VarTec = 5 MCI = 5 Z-Tel = NR</p> <p>West Overall = 4.9</p> <p>AT&T = 5 MCI = 5 ChoiceOne = 4.5 CTSI = 5 Allegiance = 5 VarTec = 5 Covad = 5</p>	<p>STATUS: Feasible</p> <p>10/24/07 – Industry review completed. Request designated as feasible. Verizon advised that this request has been partially completed. Customers request templates to show how to process and notes added to capture what is supported. Industry agrees to consolidate East and West request into 1.</p> <p><u>Prior East Notes</u> 9/14/04 Not Scheduled. 6/25/04 Moved from Oct 04 Candidate List 2/10/04 Candidate October 04 8/12/03 Rated by CLECs 8/5/03 New to list.</p> <p><u>Prior West Notes</u> 07/20/04 – Moved to Not Scheduled. 05/18/04 – Revised Title from Single LSR to Create and to Migrate Voice/Data to Single LSR to Migrate Line Share to Line Split 03/16/04 – AT&T revised assumptions for Migration Scenario #1. 02/17/04 – Scheduled as candidate for Oct '04 Release. 09/15/03 – CR revised by Initiator. 08/19/03 – New to List. Rated by CLECs.</p>

10/24/07 Note – This change request is partially supported. This scenario is

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
		<p><i>supported:</i> <i>REQTYP = DB/ACT = V migrate to Wholesale Advantage Line Split arrangement with no change to data provider (VZ or DLEC). Line Split partnership must be in place.</i></p> <p><i>This scenario is not supported.</i> <i>REQTYP = DB/ACT = V migrate to Wholesale Advantage Line Split arrangement with change to data provider (VZ or DLEC).</i></p> <p><i>What remains is to allow the data migration concurrent with the voice migration.</i></p>		

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
10	C05-0437 393189 E	<p>Title: Create a simple system for requesting "aerial to burial" loop changes.</p> <p>Description: ATX would like to have the process for a request to have a customers aerial loop buried work the same way that the Alternate Serving Wire Center process works.</p> <p>Reason: We are getting these requests more frequently, but the current process is not well defined. VZ and other CLECs will benefit</p> <p>Process: Order Jurisdiction: VZ East</p> <p>Transaction: LSR Primary Area: UNE</p> <p>Systems: LSI, EDI Documentation: Order Business Rules</p> <p>Initiator: Jennifer Kuhns, Broadview 2/24/05</p>	<p>Overall = 4.9</p> <p>ATX = 5</p> <p>Broadview = 5</p> <p>Cablevision = P</p> <p>Choice One = 5</p> <p>Covad = 5</p> <p>Cox = 5</p> <p>CTSI = 5</p> <p>CTC = 5</p> <p>DSCI = P</p> <p>MCI = 5</p> <p>Met Tel = P</p> <p>Optimum</p> <p>Global = P</p> <p>Penn Telecom = 5</p> <p>Supra = P</p> <p>Telcove = 5</p> <p>Time Warner = P</p> <p>Trinsic = 4</p>	<p>STATUS: Feasible</p> <p>11/13/07 Industry review completed and request designated as feasible. Customers note this issue still comes up from time to time. Request to look at not only establishing a process for the initial request for buried wire, but also the maintenance of it.</p> <p>4/12/05 Ranked.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
11	C05-2428 396125 E/W	<p>Title: Allow the CFA validation tool to accept the input of T1 & T3 CFAs and CCEAs.</p> <p>Description: The purpose of this request is to provide facility validation capability for the "termination for the customer collocation" aka CCEA. Currently Verizon supports validation options for the "port on a mux leased from Verizon" aka CFA via the CFA Validation tool in CSG.</p> <p>Initiator/Date: Laurie Fredricksen, Integra, 10/26/05 Mike Clancy, Covad</p> <p>Notes 11/7/07 From an ordering perspective ASR (DS1/DS3 ordered via ASR in East) CFA information include "port on a mux" info and this can be validated through CSG CCEA information includes the customer collocation info and this validation is currently not supported.</p> <p>LSR (DS1/DS3 ordered via LSR in West) Both "port on Verizon mux" and "customer collocation" info comes in via CFA field. Customer can validate using ASR/CFS for the first but not the later.</p>	<p>West Overall = 4.9</p> <p>AT&T = 5 Covad = 4 Eschelon = 5 HTC = 5 Integra = 5 MCI = 5 MetTel = P SBC = 5 Time W = P</p> <p>East Overall = 4.7</p> <p>Allegiance = 4.7 AT&T = 5.0 Broadview = 4.5 Cavalier = 4.0 Choice One = 5.0 Covad = 5.0 Cox = 4.0 CTSI = P Met Tel = 4.5 Penn Telecom = 5.0 TalkAmerica = P VarTec = P MCI = 5.0 Z-Tel = P</p>	<p>STATUS: Feasible</p> <p>11/7/07 Industry review completed and request designated as feasible. Notes added for clarification. Agreement this West request is duplicate of East request C03-1146. Will combine here and change region to E/W.</p> <p>8/14/07 status changed to Not Scheduled.</p> <p>11/15/05 - New to List. Rated by CLECs. East specific notes carried over from C03-1146.</p> <p>9/14/04 Pending Requirements.</p> <p>4/13/04 Not scheduled</p> <p>9/9/03 Added inclusion of CCEA.</p> <p>7/8/03 Rated by CLECs</p> <p>7/1/03 New to list.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
12	55246 W 21739	<p>Title: Provide access to resold Customer Service Records.</p> <p>Description: The purpose of this initiative is to provide access to resold Customer Service Records, so that LSRs can be populated completely and accurately.</p> <p>Process: Pre-Order Jurisdiction: VZ West System: WISE, EDI & CORBA Primary Area: Resale Documentation: Pre-Order Business Rules</p> <p>LSOG Version: 9</p> <p>Initiator: Carol Frike, Sprint 11/27/2007</p>	<p>Overall = 4.9</p> <p>AT&T L = 5 AT&T C/T = 5 Cavalier = 5 Comcast = 5 Concretio = 5 Covad = 5 Cox = 5 DSCI = P Eschelon = 5 Frontier = P HTC = 5 Integra = 5 One Comm = 4 Optimum = 5 Paetec = 5 Penn Telecom = P Sprint = 5 XO = 5</p>	<p><u>STATUS: Pending Requirements</u></p> <p>12/11/07 – Rated by CLECs 11/27/07 – New to list</p>

PWG Change Request History
Type 5

Rank	CR#/Type	Description of CR	CLEC Ratings	Status/Comments
13	081112106 E/W	<p>Title: T5 Reduce System Downtime for Maintenance Release Weekends</p> <p>Description: When a maintenance/release weekend is scheduled we would like Verizon to use the window of 11 p.m - 12 a.m. Friday, 11 p.m - 12 a.m. on Saturday and 11 p.m - 12 a.m. on Sunday versus having the systems down the entire weekend.</p> <p>Process: Pre-Order, Order Jurisdiction: VZ East and West</p> <p>System: LSR, CSI, SAR Primary Area: Resale, UNE, UNE-P, Interconnection, LNP</p> <p>Documentation:</p> <p>LSOG Version: 9</p> <p>Initiator: Carol Frike, Sprint 11/12/08</p>	<p>Overall = 4,9</p> <p>AT&T = 5</p> <p>Broadview = 5</p> <p>Cavalier = 5</p> <p>Cleartel = 5</p> <p>Comcast = 5</p> <p>Consolidated = 4</p> <p>Covad = 5</p> <p>Cox = 5</p> <p>Granite = 5</p> <p>HTC = 5</p> <p>Integra = 5</p> <p>Nationsline = 5</p> <p>One Comm = 4</p> <p>Paetec = 5</p> <p>Sprint = 5</p> <p>TW = 5</p> <p>XO = 5</p>	<p>STATUS: Feasible</p> <p>12/09/08 -- Rated by CLECs 11/12/08 -- New to list</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
14	2304 C02-1849 372230 E	<p>Title: Jeopardy for Facility Notice Transactions</p> <p>Description: The CLEC community would like to receive via EDI and or the GUI detailed response of the Facility Problem and expected delay time on all orders that are placed in Jeopardy due to Facilities. Our understanding is the WFA comments do not flow through to SOP and therefore do not flow through to EDI or GUI.</p> <p>Process: Pre-Order, Order Jurisdiction: North, South System: EDI, Web GUI</p> <p>Primary Area: UNE; LSOG Version: N/A</p> <p>Initiator: John Berard & Libba Fennell-Johnson, Covad, 10/23/01</p>	<p>Overall = 4.8</p> <p>AT&T = 4.5 Bridgcom = 5 Broadview = 4.5 Covad = 5 Cox = 5 Met-Tel = Qwest = 5 SBC = 5 Sprint = 5 MCI = 5 Z-Tel = 4</p>	<p>STATUS: Feasible</p> <p>11/28/07 Industry review completed and request designated as feasible. 9/14/04 Pending Requirements. 5/13/04 VZ requests discussion in light of Network Modification C03-1966 5/6/03 Verizon does not build facilities to meet UNE demand. Information on future jobs to provide facilities is not readily available. Cost to provide would be prohibited. 11/15/02 – LOE = High 7/2/02 – Verizon reviewing jeopardy process to determine best solution. This request is being taken into consideration in that review. 11/27/01 – Requirements Document review 11/13/01 – Rated by CLECs 11/6/01 – New to list</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
15	C04-0284 387077 E	<p>Title: Enhancement of Automated Jeopardy</p> <p>Description: Enhancement to provide automated notification of order jeopardy for two additional conditions. Jep-EO, and Jep-PCO.</p> <p>Reason: CLECs will be able to move the orders to correct order status automatically.</p> <p>Process: Ordering Jurisdiction: North & South ; System: LSI, EDI</p> <p>Primary Area: UNE, UNE-P; LSOG Version:</p> <p>Initiator: John Boshier, COVAD, 2/11/04</p>	<p>Overall = 4.8</p> <p>Alliance =5 AT&T = 4.5 Broadview =N/R Choice One=4.5 Covad = 5 Cox = 5 CTSI = 5 Met Tel =4.5 MCI= 5 Penn Telecom=4.5 VarTec = 5 Z-Tel =P</p>	<p>STATUS: Feasible</p> <p>1128/07 Industry review completed and request designated as feasible. 9/14/04 Pending Requirements. 3/9/2004 All related CR C04-0279, 0288, 0283 and 0281 rated as a group.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLIEC Ratings	Status/Comments
16	C06-0517 10861 E/W	<p>Title: MOVE Service Order process Improvement.</p> <p>Description: Processes be changed to associate all T&F orders to each other. That systems be modified to ensure that if a related T order is jeopardized that the F order is automatically placed in a jep status and the work to disconnect the order is stopped. Expected result will reduce, if not eliminate, disconnects in error because of a jeopardized T order. AT&T experiences disconnects in error because of jeopardized T orders. In the event the F order is completed before the T order on the due date and the T order is jepped, Verizon should immediately reinstate the service in an effort to prevent an out of service condition.</p> <p>Process: Order Jurisdiction: East/West</p> <p>Systems: LSI/EDI Primary Area: Resale, UNE P, UNE</p> <p>Documentation:</p> <p>Initiator: Mary Halpin, AT&T 3/1/2006</p>	<p>Overall = 4.8</p> <p>AT&T = 5 ATX = 5 Broadview = 5 Comcast = P Covad = P Cox = 5 CTSI = 5 Integris = P Penn Telecom = 5 Qwest = P RCN = P REMI = 5 Sprint = 4 Time Warner = P Trinsic = 5 Vartec = 5 XO = P</p>	<p>STATUS: Feasible</p> <p>11/28/07 Industry review completed and request designated as feasible with caveat that the level of effort is extremely large. 8/14/07 Change status to Not Scheduled. 3/14/06 Ranked.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
17	C05-0436 393188 E	<p>Title: Bill circuits by the States they service to the correct state BAN</p> <p>Description: In NE, Verizon has no MP in place for directing Loops to their proper state Master BANs and we are experiencing them being billed in multi state jurisdictions.</p> <p>Reason: CLEC will benefit by having the correct state circuits billed to the correct state BAN.</p> <p>Process: Order Jurisdiction: MA, NH, RI</p> <p>Transaction: LSR Primary Area: UNE</p> <p>Systems: LSI, EDI Documentation: Order Business Rules</p> <p>Initiator: Arthur Barone, Broadview Networks 2/24/05</p>	<p>Overall = 4.7</p> <p>ATX = 3</p> <p>Broadview = 5</p> <p>Cablevision = P</p> <p>Choice One= 5</p> <p>Covad = P</p> <p>Cox = 5</p> <p>CTSI= P</p> <p>CTC =5</p> <p>DSCI =P</p> <p>MCI = 4</p> <p>Met Tel = 5</p> <p>Optimum</p> <p>Global =P</p> <p>Penn Telecom= P</p> <p>Supra = 5</p> <p>Telcove = 5</p> <p>Time Warner = P</p> <p>Trinsic = 5</p>	<p>STATUS: Feasible</p> <p>11/28/07 Industry review completed and request designated as feasible. Customers advised this is currently being looked at as a trouble and work is in progress for this request.</p> <p>4/12/05 Ranked.</p>

**PWG Change Request History
Type 5**

Integra/8
Hines,open/19

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
18	C05-1180 30425 E	<p>Title: Don't allow the disconnect process prior to the connect process on related transactions.</p> <p>Description: This initiative is requesting that when related transactions contain a disconnect and a connect, don't allow the disconnect process prior to the connect process.</p> <p>Process: Ordering Jurisdiction: VZ East</p> <p>Transaction: LSR</p> <p>Systems: LSI, EDI Primary Area: Resale, UNE, UNE P</p> <p>Initiator: Joyce Stewart, ATX 5/2/05</p>	<p>Overall = 4.7</p> <p>AT&T = 5 ATX = 5 Broadview = 5 CableVision = 5 Covad = 5 Cox = 5 CTSI = 4 CTC = 5 ITC Delta Com = 5 MCI = 4 Penn Telecom = 5 Sprint = 3 Trinsic = 5 XO = 5</p>	<p>STATUS: Feasible</p> <p>11/28/07 Industry review completed and request designated as feasible with caveat that the level of effort is extremely large. 8/14/07 Change status to Not Scheduled. 6/14/05 Ranked</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
19	C05-2422 396124 W	<p>Title: Ability to return multiple iterations in CSI for the ECKKT and the NDLP</p> <p>Description: Improve the CSI (Customer Service Inquiry) pulled by SBN (Summary Bill Number) to include all circuits and complete information on those circuits.</p> <p>Initiator/Date: Laurie Fredricksen, Integra, 09/29/05</p>	<p>Overall = 4.7</p> <p>AT&T = 4</p> <p>Covad = P</p> <p>Eschelon = 5</p> <p>HTC = 5</p> <p>Integra = 5</p> <p>MCI = 4</p> <p>MetTel = P</p> <p>SBC = 5</p> <p>Time W = P</p>	<p>STATUS: Feasible</p> <p>11/28/07 Industry review completed and request designated as feasible. 11/15/05 – New to List. Rated by CLECs</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
20	C04-0697 387797 E	<p>Title: Retain function "Continue for Remaining "and "Values for Remaining" in LSI redesign.</p> <p>Description: Retention of the functionality of "Continue for Remaining "and "Values for Remaining" as tools in the new LSI format being rolled out in June. Functionality is currently being removed in June 04 LSI Re-design.</p> <p>Business Narrative:</p> <p>Reason: Current functionality saves time and produces accurate orders.</p> <p>Process: Ordering Jurisdiction: North & South ; System: LSI</p> <p>Primary Area: Resale, UNE, UNE-P, LSOG Version: 5 and above</p> <p>Initiator: Pam Beattie, DSCI 3/30/2004</p>	<p>Overall = 4.6</p> <p>Allegiance = 4.5</p> <p>AT&T = 4.5</p> <p>Bridgecom = P</p> <p>Broadview = 5</p> <p>Cavalier =</p> <p>Choice One= P</p> <p>Comcast = P</p> <p>Covad = P</p> <p>Cox = 4</p> <p>CTSI=</p> <p>Met Tel = P</p> <p>Penn Telecom= 5</p> <p>TalkAmerica= P</p> <p>VarTec = P</p> <p>MCI= P</p> <p>Z-Tel = P</p>	<p>STATUS: Feasible</p> <p>11/28/07 Industry review completed and request designated as feasible.</p> <p>5/10/05 Pending Requirements</p> <p>9/14/04 Pending Scheduling.</p> <p>4/13/04 rated.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	GLEC Ratings	Status/Comments
21	C05-1769 394972 E/W	<p>Title: Disconnect DSL capability on shared Loop where the voice is being migrated.</p> <p>Description: Permit the provisioning of orders using a single LSR to migrate from Lineshare, Linesplit, VISTA or any other commercial equivalent service to Resold Voice, UNE-P, Wholesale Advantage or any equivalent commercial service using the double LOA and provide loss notice both the losing VLEC and DLEC.</p> <p>Process: Order Jurisdiction: VZ East/West</p> <p>Transaction: LSR</p> <p>Systems: LSI, EDI Primary Area: Resale, UNE P, UNE</p> <p>Documentation: Order Business Rules LSOG: 6 ></p> <p>Initiator: Shelly Pascoe, One Communications 07/13/05</p> <p>10/24/07 Note – What needs to be covered with this request is the following scenarios: REQ TYP = DB (East), EB, MB (West), NB, PB, QB ACT = V AGAUTH = Z (Dual LOA) – signifying a disconnect of the data.</p>	<p>Overall = 4.6</p> <p>AT&T = 5 ATX = 4 Broadview = 5 Cable Vision = 5 Comcast = 4 Covad = 5 CTSI = 4 CTC = 4 Eschelon = 5 FL Digital Nwrk = 5 HTC = 4 Integra = 5 ITC Delta = 4 MCI = 5 MetTel = 5 Penn Telecom = 4 SBC = P Sprint = 4 Synchroniss = 5 Telcove = 4 Time W = P Trinsic = 5 US LEC = P XO = P</p>	<p>STATUS: Feasible</p> <p>03/27/08 Changed initiator from Liz Balvin, Covad to Shelly Pascoe, One Communications. 03/10/08 Withdrawn by initiator Liz Balvin, Covad. 01/30/08 Changed initiator from Mike Ciancy to Liz Balvin. 10/24/07 Industry review completed. Request designated as feasible with a moderate to high level of effort. Customers request notes on what migration requests remain outstanding. 7/11/06 Pending Scheduling 6/13/06 Candidate Oct 06. 02/14/06 Pending Scheduling. 09/14/05 Rated. 08/09/05 Deferred.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
22	54641 W 22295	<p>Title: Allow Service Recovery to be requested on repair trouble ticket.</p> <p>Description: The purpose of this initiative is to allow CLECs the ability to add a recording/forwarding # for their customers experiencing Repair issues.</p> <p>Process: Trouble Administration Jurisdiction: VZ West</p> <p>Systems: LSI-TA Primary Area: Wholesale Advantage, Resale</p> <p>Documentation: Trouble Administration Business Rules</p> <p>LSOG Version: 9</p> <p>Initiator: Laurie Frederickson, Integra 7/5/2007</p>	<p>Overall = 4.6</p> <p>AT&T L=4 AT&T C/T = 5 Cablevision = P Comcast = P Covad = 5 Cox = 4 Eschelon = 5 Frontier = P Granite = 5 HTC = 5 Integra = 5 Logix = 5 One Comm = 4 Optimal Global = 4.5 Paetec = P PennTel = P VCI = P</p>	<p>STATUS: Feasible</p> <p>12/11/07 Industry review completed and request designated as feasible. 8/14/07 Ranked.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
23	080623105 W	<p>Title: T5 West – Only Require LACT=I / LACT=O Not Required.</p> <p>Description: Request Verizon West only require an LACT=I page similar to what is required by Verizon East and not require the LACT=O page.</p> <p>Process: Order Jurisdiction: VZ West</p> <p>Systems: WISE Primary Area: LNP</p> <p>Documentation:</p> <p>Initiator: Carol Frike , Sprint 06/23/08</p>	<p>Overall = 4,6</p> <p>AT&T = 4</p> <p>Broadview = P</p> <p>Cablevision = P</p> <p>Cavalier = P</p> <p>Cleartel = P</p> <p>Comcast = 5</p> <p>Consolidated = P</p> <p>Covad = P</p> <p>Cox = P</p> <p>Frontier = P</p> <p>HTC = P</p> <p>Integra = 4</p> <p>Level 3 = 5</p> <p>Nationsline = P</p> <p>Optimum Global = P</p> <p>Paetec = P</p> <p>Sprint = 5</p> <p>Time Warner = 5</p> <p>XO = P</p>	<p>STATUS: Pending Requirements</p> <p>09/09/08 Rated. 08/12/08 New to list. Deferred.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
24	C04-2406 391690 E	<p>Title: Shorten the port interval on simple ports.</p> <p>Description: Comcast would like to shorten the port interval on simple ports one line only through EDI to next business day.</p> <p>Reason: With flow through systems, orders should be automatically processed and not subject to the same interval as a manually processed order.</p> <p>Process: Ordering Jurisdiction: MA, NH, PA and VA</p> <p>Transaction: LSR</p> <p>Systems: LSI, EDI Primary Area: LNP</p> <p>Documentation: Interval Guidelines</p> <p>Initiator: Nancy Sanders, Comcast 11/30/04</p>	<p>Overall = 4.5</p> <p>ATX = 4</p> <p>Broadview = 5</p> <p>Choice One = 5</p> <p>Comcast = 5</p> <p>Conversant = 4</p> <p>Covad = 5</p> <p>Cox = 5</p> <p>CTC = 4</p> <p>CTSI = 5</p> <p>Met Tel = P</p> <p>Nielos = 5</p> <p>Penn Telecom = 4</p> <p>REMI = 4</p> <p>Trinsic = P</p> <p>XO = P</p>	<p>STATUS: Feasible</p> <p>12/11/07 Industry review completed and request designated as feasible.</p> <p>2/8/05 Ranked.</p> <p>1/11/05 Jean Derrig to review issue with CUF.</p> <p>12/14/04 Beth Cohen VZ to further research issue.</p> <p>1/11/05 Deferred.</p>

**PWG Change Request History
Type 5**

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
25	C05-2076 395375 E	<p>Title: Allow creation of trouble tickets for off premises extensions/dual svc locations.</p> <p>Description: This initiative will allow the creation of trouble tickets for off premises extensions and dual service locations. Verizon is currently rejecting these requests.</p> <p>Process: Trouble Admin Jurisdiction: VZ East</p> <p>Systems: LSI-TA, EB, TAXI Primary Area: Resale, UNE P</p> <p>Documentation: TA Business Rules, LSOG N/A</p> <p>Initiator: Janice Ziegele, Broadview 8/29/2005</p>	<p>Overall = 4.5</p> <p>ATX = 5</p> <p>Broadview = 5</p> <p>Cable Vision = 4</p> <p>Covad = P</p> <p>Cox = 4</p> <p>CTSI = P</p> <p>CTC = 4</p> <p>MCI = 4</p> <p>Met Tel = 5</p> <p>Penn Telecom = 5</p> <p>Time Warner = P</p> <p>Trinsic = 4</p> <p>US LEC = P</p>	<p>STATUS: Feasible</p> <p>12/11/07 Industry review completed and request designated as feasible. 9/14/05 Rated.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
26	C05-0575 393481 E	<p>Title: Integrate the validate collocation assignment step process.</p> <p>Description: Integrate the validate collocation assignment step process such that "busy pairs" are auto-query back to the CLEC at the time of LSR submitted.</p> <p>Reason: Current process requires verification from the APC Assignment Provisioning Center before CLEC is queried back. It may be days before CLEC is notified of busy pair issue. At times this occurs after Due Date.</p> <p>Process: Order Jurisdiction: VZ East</p> <p>Transaction: LSR Primary Area: UNE</p> <p>Systems: LSI, EDI Documentation: Order Business Rules</p> <p>Initiator: Shelly Pascoe, One Communications 3/10/05</p>	<p>Overall = 4.4</p> <p>AT&T = 3 ATX = 3 Broadview = 4.5 Cavalier = P Conversant = 5 Covad = 5 Cox = 4 CTC = P ITC Delta.Com = P MCI = 5 Met Tel = P Ntelos = 5 Penn Telecom = 4.5 Sprint = P Time Warner = P Trinsic = 5 US LEC = P VarTec = P</p>	<p>STATUS: Feasible</p> <p>11/7/07 Industry review completed and request designated as feasible. Verizon stipulated it is feasible to add facility assignment check to LSR process but it is not feasible to address database facility records issues with this request. 5/10/05 Ranked 4/12/05 No CLEC Representation</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
27	C05-1215 394090 W	<p>Title: The ability to submit bulk or batched PIC change orders.</p> <p>Description: Eschelon is requesting that Verizon allow CLECs to submit bulk PIC changes on resold and UNE-P accounts via a system and process similar to that which IXCs use to submit PIC changes. Currently, CLECs are required to submit an LSR for each PIC change. If a Wholesale customer has 1200 PIC changes, they must submit 1200 LSR. Verizon allow IXCs PIC changes to be submitted in batches via a CARE format. Verizon is currently not providing Wholesale customers the same opportunity to process bulk or batched PIC changes in the same manner as IXCs.</p> <p>Initiator/Date: Kim Isaacs, Eschelon, 5/10/05</p>	<p>Overall = 4.4</p> <p>AT&T = 5</p> <p>Blue Casa = 5</p> <p>Covad = 5</p> <p>Eschelon = 5</p> <p>HTC = P</p> <p>Integra = 4</p> <p>MCI = 4</p> <p>Met Tel = P</p> <p>SBC = 4</p> <p>Sprint = P</p> <p>Telcove = 4</p> <p>Time W = P</p> <p>Trinsic = 3</p> <p>XO = 5</p>	<p>STATUS: Feasible</p> <p>12/11/07 Industry review completed and request designated as feasible. 06/21/05 – New to List. Rated by CLECs.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
28	63425 E	<p>Title: Add OCN to file name on LLR Report.</p> <p>Description: This initiative will enhance the Provider Notification Report to contain the OCN to the file name.</p> <p>Process: Reports Jurisdiction: VZ East</p> <p>Transaction: N/A</p> <p>Systems: FTP Primary Area: Resale, UNE P, UNE, LNP</p> <p>Documentation: VZ PN Reference Guide LSOG: N/A</p> <p>Initiator: Dok Matthews, Consolidated Communications 8/26/2005</p>	<p>Overall = 4.4</p> <p>ATX = 3</p> <p>Broadview = P</p> <p>CableVision = 4</p> <p>Comcast = P</p> <p>Covad = 5</p> <p>Cox = 5</p> <p>CTSI = 4</p> <p>CTC = 5</p> <p>MCI = P</p> <p>Met Tel = 4</p> <p>Penn Telecom = 5</p> <p>Telcove = 5</p> <p>Time Warner = P</p> <p>Trinsic = P</p> <p>US LEC = P</p>	<p>STATUS: Pending Scheduling</p> <p>03/24/08 Updated CR number.</p> <p>01/31/08 Updated initiating company name.</p> <p>12/11/07 Industry review completed and request designated as feasible.</p> <p>9/14/05 Rated.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
29	C05-2077 395376 E	<p>Title: Add Trouble Ticket Service Recovery Request and Response to the TAXI TML interface.</p> <p>Description: This initiative will enhance the TAXI TML interface to provide existing functionality currently available through LSI TA. Currently the CLEC must use a combination of TAXI TML and LSI TA when a customer is completely out of service and is requesting a transfer of calls.</p> <p>Process: Trouble Admin Jurisdiction: VZ</p> <p>Systems: TAXI Primary Area: Resale, UNE P</p> <p>Documentation: TA Business Rules LSOG: N/A</p> <p>Initiator: Janice Ziegele, Broadview 8/29/2005</p>	<p>Overall = 4.4</p> <p>ATX = 4</p> <p>Broadview = 5</p> <p>CableVision = 4</p> <p>Covad = P</p> <p>Cox = 4</p> <p>CTSI= P</p> <p>CTC = 4</p> <p>MCI = 5</p> <p>Met Tel = 5</p> <p>Penn Telecom= P</p> <p>Telcove = P</p> <p>Time Warner = P</p> <p>Trinsic = P</p> <p>USLEC = P</p>	<p>STATUS: Feasible</p> <p>12/11/07 Industry review completed and request designated as feasible. 9/14/05 Rated.</p>

**PWG Change Request History
Type 5**

Integra/8
Huespen/31

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
30	C05-2276 395726 W	<p>Title: Enhancements to the SCORE search function</p> <p>Description: Request for enhancements to the Service Code Online Report (SCORE). Request for an IOSC reverse lookup and a lookup by feature description. CLEC would like the ability to enter the IOSC or feature description into SCORE and have SCORE return the IOSCs, Descriptions, Restrictions and whether the IOSC is available for ordering.</p> <p>Initiator/Date: Kim Isaacs, Eschelon, 09/26/05</p>	<p>Overall = 4.4</p> <p>AT&T = P Covad = P Eschelon = 5 HTC = P Integra = 5 MCI = 4 SBC = 5 Sprint = P Telcove = 4 Time W = P Trinsic = 4 XO = 4 Logics = P</p>	<p>STATUS: Feasible</p> <p>04/08/08 Combined with C05-2203. 12/11/07 Industry review completed and request designated as feasible. 10/18/05 – New to List. Rated by CLECs</p>

PWG Change Request History
Type 5

Rank	CR#/Type	Description of CR	CLEC Ratings	Status/Comments
31	081125107 E	<p>Title: T5 East - Expand TELNO Field to Allow 14 Characters</p> <p>Description: Change the TELNO field on the EU tab to enable 14 digit TNs, as opposed to 12.</p> <p>Process: Order, Repair Jurisdiction: VZ East</p> <p>Systems: LSR Primary Area: Resale, UNE, UNE-P, Interconnection, LNP</p> <p>Documentation:</p> <p>LSOG Version: 9</p> <p>Initiator: Mary Ewing, One Communications 11/25/2008</p>	<p>Overall = 4.4</p> <p>AT&T = P Covad = P Eschelon = 5 HTC = P Integra = 5 MCI = 4 SBC = 5 Sprint = P Telcove = 4 Time W = P Trinsic = 4 XO = 4 Logics = P</p>	<p>STATUS: Feasible</p> <p>12/09/08 – Rate by CLECs 11/25/08 – New to List.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
32	C06-1713 W	<p>Title: Return partial address validations parsed into respective fields</p> <p>Description: This initiative is requesting that when the CLEC does an address validation and partial address match is returned we would like the "alternatives" to be parsed into respective fields the way they are for exact match. The existing concatenated method should remain in place; thus giving two ways a partial address match could be returned.</p> <p>Process: Pre-Order Transaction: Address Validation</p> <p>Jurisdiction: VZ West</p> <p>Systems: Wise/EDI/Corba</p> <p>Primary Area: Resale, UNE, Wholesale Advantage</p> <p>Documentation: Pre-Order Business Rules</p> <p>LSOG Version: 6 ></p> <p>Initiator: Carol Fricke, Sprint 6/7/2006</p>	<p>Overall = 4.2</p> <p>AFN = 4</p> <p>AT&T C/T = 4</p> <p>Broadview = 4</p> <p>Comcast = 4</p> <p>Covad = 4.5</p> <p>CTSI = 4</p> <p>Eschelon = 4</p> <p>HTC = 5</p> <p>Integra = 5</p> <p>Level 3 = 4</p> <p>One Comm = 4</p> <p>Penn Telecom = 4</p> <p>RCN = 4</p> <p>Sprint = 5</p> <p>Trinsic = 4</p> <p>Unity Com = 4</p> <p>US LEC = 4</p>	<p>STATUS: Feasible</p> <p>12/11/07 Industry review completed and request designated as feasible. 10/10/06 Ranked</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
33	C05-1853 394974 E	<p>Title: Resale voice with DRL to Resale with CLEC data. (change data provider)</p> <p>Description: This initiative will allow CLECs to migrate Resale voice with DRL data to Resale voice unchanged voice provider with CLEC data either by the voice CLEC or its partner data CLEC.</p> <p>Process: Order Jurisdiction: VZ</p> <p>Transaction: LSR</p> <p>Systems: LSI, EDI Primary Area: Resale</p> <p>Documentation: Order Business Rules LSOG: 6 ></p> <p>Initiator: Elliot Goldberg, Mettel</p>	<p>Overall = 4.3</p> <p>AT&T = 5</p> <p>ATX = 4</p> <p>Broadview = 4</p> <p>CableVision = P</p> <p>Comcast = P</p> <p>Covad = 5</p> <p>Cox = 4</p> <p>CTSI = P</p> <p>CTC = 4</p> <p>Eschelon = P</p> <p>FL Digital</p> <p>Nwrk = P</p> <p>HTC = P</p> <p>Integra = P</p> <p>ITC Delta = 4</p> <p>MCI = P</p> <p>MefTel = 5</p> <p>Penn Telecom = 4</p> <p>SBC = P</p> <p>Sprint = P</p> <p>Synchronist = P</p> <p>Telcove = 4</p> <p>Time W = P</p> <p>Trinsic = 4</p> <p>US LEC = P</p> <p>XO = P</p>	<p>STATUS: Feasible</p> <p>11/7/07 Industry review completed and requested designated as feasible. Advised that this scenario is not specifically noted in C05-1854. West supports so this is changed to East only.</p> <p>02/14/06 Pending Scheduling.</p> <p>09/14/05 Rated.</p> <p>08/09/05 Deferred.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
34	C03-0439 381932 2894 E	<p>Title: POTS Reuse for T1 Service</p> <p>Description: The purpose of this initiative is to provide the CLECs with the ability to review end user address specific circuit information that would enable the CLEC to evaluate/propose rearrangements of end user lines/circuits when a no facility condition is encountered for UNE T1 orders. This circuit specific information would include those lines/circuits also provided by other CLECs.</p> <p>Upon CLEC request of T1 service, Verizon should do the following:</p> <ul style="list-style-type: none"> - Assign CLEC service order with available qualified facilities. - If no qualified facilities are available, Verizon should review user address telecommunication services to identify potential facilities rearrangement, including identifying the ability to leave switch port active, to satisfy the CLEC service order. - Upon identifying the potential qualified facilities, in regards to the above #2, Verizon should inform the CLEC and await their decision to move forward or cancel the service order. <p>Process: Preorder; Jurisdiction: MA, NY, DC, MD, NJ, PA; System: LSI, EDI; Primary Area: UNE, UNE-P; LSOG Version: 5 and above.</p> <p>Initiator: Lorian Burke, XO 3/17/03</p>	<p>Overall = 4.2 Allegiance = 5 AT&T = 3.5 Broadview = P Cat Comm = P Cavalier = 4 Choice One = 5 Covad = 4 Cox = 3 CTSI = 5 Met Tel = 4.5 One Comm = 4 Penn Telecom = 4 Remi Telecom = 4.5 TalkAmerica = 4 VarTec = 3.5 MCI = P Z-Tel = P</p>	<p>STATUS: Pending Requirements</p> <p>01/31/08 Updated initiating company and contact. 01/29/08 Edits made to change request. 12/19/07 Industry Review Completed. Additional requirements to be submitted. Mike Clancy sent in edits. 9/14/04 Not Scheduled. 5/4/04 Under Review 10/7/03 Changed to Not Scheduled 8/5/03 Candidate February 2004 4/8/03 New to list/LOE=Low</p>

**PWG Change Request History
Type 5**

Integra/8
Huesgen/36

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
35	C05-2241 395630 W	<p>Title: Auto populate fields on the WISE forms.</p> <p>9/26/05: Request that the AN populated on the LSR form be auto-populated on all other forms: EU, LS, LSNP, NP, RS, PS.</p> <p>5/9/06: Auto populate the Date/Time Sent D/TSent Field on the LSR for all submitted and supplemental Local Service Requests.</p> <p>Process: Ordering Jurisdiction: West Transaction: LSR</p> <p>Systems: Wise, EDI</p> <p>Primary Area: Resale, UNE P, UNE</p> <p>Documentation: Order Business Rules</p> <p>LSOG Version: 6 and ></p> <p>Initiator/Date: Kim Isaacs, Eschelon, 09/26/05</p>	<p>Overall = 4.2</p> <p>AT&T = P Covad = 4 Eschelon = 5 HTC = 5 Integra = 5 MCI = 4 SBC = 3 Sprint = 3 Telcove = 5 Time W = 5 Trinsic = 4 XO = 3 Logics = P</p>	<p>STATUS: Feasible</p> <p>12/19/07 Industry review completed and request designated as feasible. 10/18/05 – New to List. Rated by CLECs</p>

**PWG Change Request History
Type 5**

Integra/8
Huesgen/37

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
36	080227102 E/W	<p>Title: T5 LSI-TA to allow Multi-Tickets for Vendor Meets</p> <p>Description: LSI-TA to allow Multi-Tickets for Vendor Meets.</p> <p>Process: Repair Jurisdiction: VZ West and South</p> <p>Systems: LSI, WISE, EDI Primary Area: Resale, UNE, UNE-P</p> <p>Documentation: Order Business Rules</p> <p>LSOG Version: 9</p> <p>Initiator/Date: Eddie Pimentel, Granite 02/27/08</p>	<p>Overall = 4.2</p> <p>AT&T = 5</p> <p>Broadview = 4</p> <p>Cablevision = P</p> <p>Cavalier = P</p> <p>Comcast = P</p> <p>Consolidated = 4</p> <p>Covad = 3</p> <p>DSCI = P</p> <p>Fibernet = 3</p> <p>Freedom Ring = P</p> <p>Frontier = 4</p> <p>Granite = 5</p> <p>HTC = P</p> <p>Integra = 4</p> <p>Line Systems = 5</p> <p>One Comm = 5</p> <p>Optimum</p> <p>Global = P</p> <p>Paetec = P</p> <p>Priority One = 4</p> <p>Sprint = P</p> <p>XO = P</p>	<p>STATUS: Feasible</p> <p>04/08/08 – New to List. Rated by CLECs</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
37	C05-0322 392921 W	<p>Title: Improved enhanced reporting capabilities in WISE</p> <p>Description: Improved enhanced reporting capabilities in WISE: ability to query outstanding rejects, JEPS, LSCS, etc...<i>Provide a list of orders that still need to be handled and are outstanding and have not been worked, same for orders in a jep status.</i></p> <p>Sponsor/Date: Terri Mansir, AT&T C/T 02/10/05</p>	<p>Overall = 4.1</p> <p>AT&T = P MCI = 4 Birch = P Telcove = 4 SBC = 5 VarTec = P Covad = 3 Eschelon = 5 ChoiceOne = 4 HTC = 4 Sprint = P Time W = P XO = P Trinsic = 4 Syniverse = P Integra = 4</p>	<p>STATUS: Feasible</p> <p>12/19/07 Industry review completed and request designated as feasible. Initiator changed from Barry Queen, SBC to Terri Mansir, AT&T C/T. 03/15/05 – New to List. Rated by CLECs</p>

**PWG Change Request History
Type 5**

Integra/8
Huesgen/39

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
38	C05-1860 394978 E	<p>Title: Allow the CLEC community to manage Assume Dial 9 Centrex services.</p> <p>Description: This initiative will allow the CLEC community to manage Assume Dial 9 Centrex services. The owning CLEC requires the capability to deny incoming and outgoing service capabilities.</p> <p>Process: Order Jurisdiction: VZ East</p> <p>Transaction: LSR</p> <p>Systems: LSI, EDI Primary Area: Resale, UNE P</p> <p>Documentation: Order Business Rules LSOG: 6 ></p> <p>Initiator: Janice Ziegele, Broadview 7/26/05</p>	<p>Overall = 4.1</p> <p>AT&T = P Broadview = 5 Cox = P CTSI = P CTC = 4 Met Tel = 5 Penn Telecom = 3 Sprint = P Telcove = 4 Trinsic = 4 US LEC = P</p>	<p>STATUS: Feasible</p> <p>12/19/07 Industry review completed and request designated as feasible. 8/09/05 Ranked.</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
39	C05-1530 394476 W	<p>Title: Suppress SAR4 TNS/Lines that are not listed on the LSR.</p> <p>Description: The SAR4 detail section should only contain TNS/Lines that are listed on the LSR service specific form, regardless of how the SAR4 was generated; manual or mechanized or what is contained on the CSR.</p> <p>Initiator/Date: Gloria Velez, AT&T, 6/14/05</p>	<p>Overall = 4.0</p> <p>AT&T = 5</p> <p>Covad = P</p> <p>Eschelon = 4</p> <p>FDN = P</p> <p>HTC = P</p> <p>Integra = P</p> <p>ITC Delta = P</p> <p>MCI = 3</p> <p>Met Tel = P</p> <p>SBC = P</p> <p>Sprint = P</p> <p>Synchronous = P</p> <p>Telcove = P</p> <p>Time W = P</p> <p>Trinsic = P</p> <p>XO = P</p>	<p>STATUS: Feasible</p> <p>01/08/08 Industry review completed. Verizon designates this request as feasible.</p> <p>09/20/05 – Rated by CLECs</p> <p>09/01/05 – Open Discussion Conference Call</p> <p>08/16/05 - Deferred</p> <p>07/19/05 – New to List. Deferred</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
40	63426 E	<p>Title: Alter Provider Notification Reports by adding report total to a column.</p> <p>Description: This initiative will enhance the Provider Notification Report to capture the "total on this report = x" info and place the information in a new column next to file name.</p> <p>This will allow CLEC to easily identify those reports without activity.</p> <p>Process: Reports Jurisdiction: VZ East</p> <p>Transaction: N/A</p> <p>Systems: FTP Primary Area: Resale, UNE P, UNE, LNP</p> <p>Documentation: VZ PN Reference Guide LSOG: N/A</p> <p>Initiator: Dok Matthews, Consolidated Communications 8/26/2005</p>	<p>Overall = 4</p> <p>ATX = 4 Broadview = P CableVision = P Covad = 5 Cox = 4 CTS = 4 CTC = 4 MCI = P Met Tel = 2 Penn Telecom = 5 Telcove = 4 Time Warner = P Trinsic = P US LEC = P</p>	<p>STATUS: Pending Scheduling</p> <p>03/24/08 Updated CR number. 01/31/08 Updated initiating company name. 01/08/08 Industry review completed. Verizon designates this request as feasible. 9/14/05 Rated.</p>

PWG Change Request History
Type 5

Rank	CR#/Type	Description of CR	CLEC Ratings	Status/Comments
41	C05-0321 392920 W	<p>Title: Advance search capabilities of LSRs in WISE database.</p> <p>Description: Advanced search capabilities of LSRs in WISE database, i.e., partial pons, end user name, ECCKT, fict 3, cable pair. Provide substring (wild card) search capability.</p> <p>Initiator/Date: Terri Mansir, AT&T TX 02/10/05</p>	<p>Overall = 3.9</p> <p>AT&T = P MCI = 3 Birch = 4 Telcove = 4 SBC = 5 VarTec = P Covad = 3 Eschelon = 4 ChoiceOne = 4 HTC = 5 Comcast = 3 Sprint = P Time W = P XO = P Trinsic = P Syniverse = P Integra = 4</p>	<p>STATUS: Feasible</p> <p>01/08/08 Industry review completed. Verizon designates this request as feasible. Initiator changed from Barry Queen, SBC to Terri Mansir, AT&T TX. Wild card search capability added to description. 03/15/05 – New to List. Rated by CLECs</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
42	C06-0515 W	<p>Title: Revise the trigger for the Completion Notice</p> <p>Description: AT&T is requesting that Verizon provide a Billing Completion Notice, in addition to the Provisioning Completion. There is no other way to determine when the Verizon systems work is done, without the receipt of the two completions. There could also be an impact to repair processes due to the lack of a valid Billing Completion.</p> <p>Initiator/Date: Mary Halpin, AT&T, 03/03/06</p>	<p>Overall = 3.9</p> <p>AT&T = 5 Comcast = 4 Covad = 4 Eschelon = 4 HTC = 4 Integra = 4 Lakefield = 3 Priority One = 4 Sprint = 3 Telcove = 4 Time W = 4 Trinsic = 5 XO = 3</p>	<p>STATUS: Feasible</p> <p>01/08/08 Industry review completed. Verizon designates this request as feasible. 03/21/06 – Ranked.</p>

PWG Change Request History
 Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
43	C06-0207 E/W	<p>Title: Expand the PHONE field in the Trouble Administration using TAXI TML services.</p> <p>Description: This initiative is requesting to expand the PHONE field to allow the ability to enter a contact reach TN with an extension #.</p> <p>Process: Trouble Administration Jurisdiction: East/West</p> <p>Systems: TAXI Primary Area: Resale, UNE P, UNE</p> <p>Documentation: Technical Specifications for TAXI</p> <p>Initiator: Janice Ziegele, Broadview 1/24/2006</p>	<p>Overall = 3.8</p> <p>ATX = 4</p> <p>Broadview = 5</p> <p>Choice One = P</p> <p>Comcast = P</p> <p>Covad = P</p> <p>Cox = 4</p> <p>CTSI = P</p> <p>Eschelon = P</p> <p>HTC = P</p> <p>Integra = P</p> <p>ITC Delta =</p> <p>Lakefield = P</p> <p>Met Tel =</p> <p>Penn Telcom = 3</p> <p>Priority One = P</p> <p>REMI = 3</p> <p>RCN = P</p> <p>Qwest = P</p> <p>Sprint = P</p> <p>Telcove = P</p> <p>Time W = P</p> <p>Trinsic = P</p> <p>U4 =</p> <p>VarTec = P</p> <p>XO = P</p>	<p>STATUS: Feasible</p> <p>01/08/08 Industry review completed. Verizon designates this request as feasible. Melissa Delmonico (Verizon) advised. 3/14/06 Ranked East 3/21/06 Ranked West</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
44	61111 E/W	<p>Title: T5 Create a flag in Loop Qual LSI and Bulk Extract that indicates the TN product type</p> <p>Description: Create a unique flag in Loop Qual LSI and Bulk Extract (available on the CWP website) that indicates the TN is Retail, Resale or Wholesale Advantage. Identifying whether the number is Retail, Resale or Wholesale Advantage will provide CLECs the ability to determine whether intended product(s) can be ordered.</p> <p>NOTE: Verizon systems generate fatal rejects when a class of services are ineligible for migration, thus the means to identify whether a TN is Retail/Resale/Wholesale Advantage is already built.</p> <p>Process: Pre-Order Jurisdiction: All VZ</p> <p>Systems: LSI, WISE, EDI Primary Area: UNE-P</p> <p>Documentation: Pre-Order Business Rules</p> <p>LSOG Version: 9</p> <p>Initiator: Liz Balvin, Covad 11/07/2007</p>	<p>Overall = 3.56</p> <p>AT&T L = 2</p> <p>AT&T C/T = 5</p> <p>Broadview = P</p> <p>Cablevision = P</p> <p>Cavalier = 3</p> <p>Cleartel = 2</p> <p>Closecall = P</p> <p>Comcast = P</p> <p>Consolidated = P</p> <p>Covad = 5</p> <p>Cox = P</p> <p>Eschelon = 4</p> <p>Frontier = P</p> <p>Granite = 3</p> <p>HTC = P</p> <p>Integra Telecom = 4</p> <p>One Comm = 4</p> <p>Pactec = P</p> <p>Sprint = P</p> <p>XO = P</p>	<p>STATUS: Pending Requirements</p> <p>03/13/08 Added note from initiator.</p> <p>03/11/08 Rated by CLECs.</p> <p>01/08/08 Industry review completed.</p> <p>Verizon designates this request as feasible.</p> <p>12/12/2006 Ranked</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
45	C06-2205 W	<p>Title: Modify the SAR response to return TNs as specified.</p> <p>Description: Modify the SAR response to not send TNs in a range when the range is not specified on the resale or port service specific forms. The SAR response should mirror the format used on the forms. For example, if the form was submitted listing individual TNs, the SAR should contain individual TNs. If a range of TNs is submitted, the SAR should contain a range of TNs.</p> <p>Process: Order Jurisdiction: VZ West</p> <p>Systems: WISE/EDI Primary Area: Wholesale Advantage, Resale</p> <p>Documentation: Order Business Rules</p> <p>LSOG Version: 9</p> <p>Initiator: Gloria Velez, AT&T 11/9/06</p>	<p>Overall = 3.4</p> <p>AT&T L = 5</p> <p>AT&T C/T = 3</p> <p>ATX = P</p> <p>Broadview = P</p> <p>Cavalier = P</p> <p>Comcast = P</p> <p>CTSI = P</p> <p>Eschelon = P</p> <p>HTC = 4</p> <p>Integra Telecom = P</p> <p>Penn Telecom = P</p> <p>Sprint = 4</p> <p>Time Warner = 2</p> <p>Trinsic = 2</p> <p>US LEC = P</p> <p>XO = 4</p>	<p>STATUS: Feasible</p> <p>01/08/08 Industry review completed. Verizon designates this request as feasible. 12/12/2006 Ranked</p>

PWG Change Request History
Type 5

Rank	CR#/ Type	Description of CR	CLEC Ratings	Status/Comments
46	63428 E	<p>Title: Increase the number of templates that can be saved using LSI</p> <p>Description: This initiative is requesting to increase the number of templates that can be saved using LSI.</p> <p>Process: Order Transaction: LSR</p> <p>Jurisdiction: VZ East</p> <p>Systems: LSI</p> <p>Primary Area: Wholesale Advantage, Resale, UNE</p> <p>Documentation: Order Business Rules</p> <p>LSOG Version: 6 ></p> <p>Initiator: Eugene Danilova, QTel 3/1/2006</p>	<p>Overall = 3</p> <p>QTel = 3</p> <p>AT&T L = P</p> <p>AT&T C/T = P</p> <p>Comcast = P</p> <p>Covad = P</p> <p>DSCI = 3</p> <p>Eschelon = P</p> <p>Integra = P</p> <p>Level 3 = 3</p> <p>Mountain</p> <p>Comm = P</p> <p>Penn Telecom = 3</p> <p>Time Warner = P</p> <p>Trinsic = 3</p> <p>UTC = P</p> <p>US LEC = P</p> <p>XO = P</p>	<p>STATUS: Pending Scheduling</p> <p>03/24/08 Updated CR number.</p> <p>01/08/08 Industry review completed.</p> <p>Verizon designates this request as feasible.</p> <p>11/14/06 Ranked</p>



Verizon Change Management Meeting

**Moderator: Wanda Cox
January 13, 2009
2:00 pm ET**

Woman: (Unintelligible) was busy too.

Man: Everybody's back from vacation.

Coordinator: Welcome and thank you for standing by. All lines are open for today's conference call. To mute or un-mute your phone when you're not speaking, please press star 6.

Today's conference is being recorded. If anyone has an objection, you may disconnect at this time. I'd like to go ahead and turn today's call over to Wanda Cox. Ma'am, you may begin.

Wanda Cox: Thank you (Julie). Good afternoon everyone. Welcome to the 2000 -- let me try it again -- January 2009 Change Management Meeting and I hope it's not too late to say this, but Happy New Year to all of you.

In addition to please making sure that you keep your phone on mute if you're not speaking, I will ask you to identify yourself if you do speak so that we can



capture that for the transcript and in a moment when everyone is ready, she's going to review our attendance for today.

(Evelyn): Hello everyone. So far I have (Madison Barry) from Frontier, (Roger Del Grosso) from Concretio, (Jamie Rhein) from (Winn Telecom), Jamie Shay from Integra, (Peggy Rubino) from Paetec, (Tracy Zurfluh) from Cavalier, (Demetrius Robinson) from Cox Communications, Liz Balvin from Covad, Kerri Burke from Comcast, Antoinette Griffin from Cox.

(Judy Harpold) from Cybernet, Loriann Burke from XO, (Cristal Causey) from HTC, (Stephanie Reynolds), (Angela Meng) from Cavalier, Kim Isaacs from Integra, (Mary Conquest) from (Novox), (Dok Matthews) from Consolidated, (Jeanne Kulesa) from (Synchronoss).

(Bennett Pang) from Comcast, (Chris Gilpin) from AT&T, (Elizabeth Garcia) from AT&T, (Shelly Pascoe) from (One Communications), Mary Ewing from One Communications, (Benny Almas) from TelePacific and I think that's everybody.

Carol Frike: Carol Frike with Sprint.

(Evelyn): Oh, hi Carol.

Carol Frike: Hello. Thank you.

(Stephanie Reynolds): And that's (Stephanie Reynolds) from (Nationsline).

(Evelyn): Okay, thank you (Stephanie).

(Sherry): And this is (Sherry) (Zheng) with (NeuStar).



(Evelyn): Hi (Sherry).

(Sherry): Hello.

(Ninfa Bennett): And we also have (Ninfa Bennett) with Cox Communications.

Woman: Hello.

Woman: Hello.

Woman: (Unintelligible).

(Evelyn): Thank you everyone.

Wanda Cox: Okay. Thank you (Evelyn). All right. We'll get started with our agenda and first up we have (Paul White) from the PSCC with an update on system availability.

(Paul White): Thank you and today I'm just reporting that the Verizon systems and bases are indeed operational with no major processing issues and currently - so we're experiencing normal transaction processing. And Wanda that is all I have.

Wanda Cox: Great. Thank you, (Paul). Any questions? Okay. Next up we have (Joanne Thetga) from CTE.

(Joanne Thetga): Thanks Wanda. Good afternoon everyone. Just wanted to touch base with everyone regarding the February release. We have posted the expected results for the test decks on the Web and email notifications have gone out.



Testing will begin for the February release on January 26 and hope to have that all wrapped up by the 19th of February. If you have not gotten your test plan to us for all of those that are testing EDI and/or CORBA, they were due yesterday.

Please get them to us as soon as possible so that we can make sure that everything is there, accounts are built for you and that you're ready to begin on the 26th of January. That's all I have. Anyone have any questions for testing?

Wanda Cox: Great. Thank you (Joanne).

(Joanne Thetga): Sure.

Wanda Cox: Next on our agenda we have Patty Dooley who will be giving a review of the latest Web enhancements.

Patty Dooley: Thanks Wanda. Good afternoon everyone. The Web enhancements email went out yesterday morning and it includes the 2009 local and access provisioning.

Availability schedules have been posted to the VPS Web site. The local ordering guide (UNE) West order sample number 2 has been - that's the new order sample that's been posted.

For contact us for local, there have been updates to the PSCC mobility services and the national market center. For access services, updates to the OCEC, the wireless special access provisioning for the West, (UNE) high cap provisioning for the West.



We have added provisioning contacts for East and West for the fast packet operations. Updates have been made to project management for special access switched and wireless.

Also, updates have been made to wireless switch provisioning for New York. Switch provisioning for New York and provisioning for (UNE) special access switched and wireless for New Jersey.

And one note is coming next month, we'll have a new order sample R27 for resale DID, DOD and PBX for the West and that is in development and we hope to have it available by the end of the month. And that's all I have Wanda.

Wanda Cox: Great. Thank you. Any questions?

Jamie Shay: This is Jamie from Integra. I did notice this morning that there is an error on the Web site under Contact Us.

Patty Dooley: Okay.

Jamie Shay: In the RCCC (UNE) (POTS)...

Patty Dooley: Yes.

Jamie Shay: Or the (POTS) (UNE-P), it comes up and says no results found.

Patty Dooley: For which...

Jamie Shay: RCCC (POTS).

Patty Dooley: For which area? Any particular state?



Jamie Shay: Oh, I'm sorry. Washington. Sorry.

Patty Dooley: Washington State?

Jamie Shay: Yes.

Patty Dooley: Okay. Thank you Jamie.

Loriann Burke: Hi this is Loriann at XO. Just a quick question on the provisioning availability schedule, I noticed that Inauguration Day is a holiday in the Potomac region. Will that have an impact on maintenance and also LNP orders which are actually worked out of Boston?

Patty Dooley: I'm not sure about that, but I'll take that back and find out and get back to Wanda with an answer on that.

Loriann Burke: Great. Okay. Thank you.

Patty Dooley: Thank you.

Wanda Cox: Any more questions? Excuse me.

(Chris Gilpin): This is (Chris Gilpin) with AT&T. Can you clarify about the Inauguration Day again? In Virginia - any of your offices in Virginia such as the (NOMC), is that going to be open?

Patty Dooley: I honestly - I'll have to look into that and get back to Wanda. (NOMC) in Virginia.



Loriann Burke: Well this is Loriann again. I had left a message for (Michael Hill) yesterday and he called back this morning saying that his office is going to be open. I guess the folks who are processing the West orders...

(Chris Gilpin): Oh.

Loriann Burke: ...they'll be working, but not the people processing the orders for the Potomac region I guess.

Wanda Cox: Okay and we'll get some clarification.

(Chris Gilpin): Okay.

Wanda Cox: Sorry about that. Excuse me. Any more questions? Okay. Next up the topic has to do with the dial-in procedures for this call. Starting with the February meeting the dial-in process will change.

This will eliminate the time waiting in queue for an operator to add you to the (bridge) each month and we have (Terry Agnew) here from Conference Services to walk us through the new process and answer any questions that you may have. (Terry)?

(Terry Agnew): Thank you. Going forward a week before your February 10 conference call you will receive an email inviting you to the February 10 conference call. The email will be sent from Verizon Change Management Mailbox.

Included in that invitation will be a URL that you will need to log on to and register for each call. In order to log on and register for each call, you must do that at least an hour before the scheduled start time.



Otherwise, the system will automatically lock you out and you will no longer be able to register for that particular conference call.

After you are finished with a registration process, you will be sent an email with your personal pin number. Going forward in the February conference call, you will still dial a toll-free number.

You will now be required to enter a seven digit participant pass-code and then each individual need to enter their personal pin-code.

You will not want to share your pin-code with other users. It is assigned to your name and that's how you will be able - we will be able to recognize when you've joined the conference call.

Once again, the point to remember, you must register at least an hour before the scheduled start time or you will be locked out. Any questions?

Kim Isaacs: This is Kim Isaacs from Integra and we will have to register each month?

(Terry Agnew): Yes ma'am.

Kim Isaacs: Okay. And for the month of February, will there be operator backup in case people are unaware of this or forget?

(Terry Agnew): Yes ma'am.

Kim Isaacs: Thank you.

(Terry Agnew): You're welcome.



Wanda Cox: Okay. Any other questions? Great. I do just want to point out, there is an hour shutoff prior to the call, but we will continue to send out the meeting notice one week in advance. So you can register at that point as well. So you don't have to worry about missing it and doing it at the last minute. All right.

Next, we'll move onto the PWG section of our call and if you turn to the PWG doc, we rated two requests last month and on Page 13 -- excuse me -- Page 11, item number 13 we rated reduce the system downtime for maintenance release weekends and that had an overall rating of a 4.9. Any questions?

The second item we reviewed last month is item number 31 which is found on Page 12 to expand the (tele no) field to 14 characters. That had an overall rating of a 4.4. Any questions on that?

Okay. Great. I also have an update - excuse me for just one second. Sorry, that will teach me to have water for these calls.

I also have an update regarding the end-user listing project. We had targeted that for the February release. However, due to funding issues, it will not be implemented in the February timeframe and at this time I do not have a new release date. Any questions?

Woman: I'm sorry. Did you say - you said no release date for...

Wanda Cox: For the end-user listing project.

Woman: Okay. Thank you.

Wanda Cox: You're welcome. And finally, regarding the 2009 (CNP) budget, I did want to make you aware that there is no funding for this year in order for us to do any



initiatives I guess is the best way to say it. That is the latest information I have on our budget. Any questions?

(Laurie): This is (Laurie) with Integra. So all of these CRs that we have had hanging out here for years, nothing's going to happen this year?

Wanda Cox: That is correct.

Liz Balvin: Hey Wanda. This is Liz Balvin. Is that for both retail and wholesale?

Wanda Cox: That is for anything brought to (CMP).

Liz Balvin: I'm sorry. Maybe it's because I'm - never gone through a negative IT budget, but how is that possible that (unintelligible) designated any resources?

Wanda Cox: Because there is no budget to do them with. I'm sure that - as well as in other company where you're also being affected by the same economy that we are and our budgets have been drastically reduced.

Kim Isaacs: I believe - this is Kim. I believe what Liz is asking is are there no updates to the Verizon resale side as well?

Wanda Cox: I can't speak to that. I'm telling you that there is no budget for Change Management for this year.

Kim Isaacs: So, what happened to all our OSS charges?

Wanda Cox: What do you mean?



Kim Isaacs: We've paid per - we've paid an OSS charge per order. What happens to that money?

Wanda Cox: In some states there is an OSS recovery charge that pays for maintenance on a system, as well as recouping charges for previous releases. It is not for enhancements.

And if I'm incorrect, I'd be more than happy to review anything that you have said that corrects me. But that's all the digging that I've found. That's what I - that's the wording and that was the intention.

(Louis Agro): This is (Louis Agro) and we have gone down that road and in terms of trying to justify to get budgets, but right now we have not been given a budget. And we've gone down that road.

We've looked through contracts, through commissioned orders trying to look for something that says something to the effect of, you know, what needs to be provided, but in every instance that we've found thus far the charges are for past recovery and to keep the system running that's already in place.

(Dok Matthews): (Louis), this is (Doug) at Consolidated Communications.

(Louis Agro): Yes, go ahead.

(Dok Matthews): We met in Harrisburg a couple months ago.

(Louis Agro): Sure. Yes. I remember. Yes.

(Dok Matthews): So you're saying that if the (CLEC) community can get a commission to review this and produce any finding that the (CLECs) were expected to



receive ongoing changes as part of the OSS charges that you would welcome that reply from the commission?

(Louis Agro): If there's something in an order that's out there that I've missed that you'd like to point out to me, that will be great. Get it to me. If there's something in one of your contracts...

(Dok Matthews): Well no, I'm saying...

((Crosstalk))

(Dok Matthews): ...what if the commission were to make the ruling in 2009?

(Louis Agro): Well, the other option I would say would - if there's a ruling that we can get cost recovery on future.

(Dok Matthews): Okay.

(Louis Agro): That might be an option we can go down. I'd have to find out through all our finance people how we do that here.

(Dok Matthews): Okay.

(Louis Agro): But if we were to come up with a number and then I guess we'd have to figure out how you recover from each party and what state. We'd have to figure out how to divvy all that up.

(Dok Matthews): Okay. Thanks.



(Louis Agro): What states it impacted and where to be - would that be something that everyone in those states or that would use the system would support? Would they support cost recovery going forward? That could be an (unintelligible).

(Demetrius Robinson): This is (Demetrius) from Cox Communications. I had a quick question. Do you foresee possibly in the say half way into the year where this no funding may possibly change or is that just - it's been decided that it's just not in the budget at all for the year of '09?

(Louis Agro): I guess any - I don't want to raise or lower expectations...

Wanda Cox: Yes.

(Louis Agro): It's been simply, you don't have a budget at this point and...

(Demetrius Robinson): Okay.

(Louis Agro): ...it's like the no date on a release. They're not saying we're going to review it in June or July.

I would hope that - I mean when I look at - when I open a newspaper I don't have much hope, but, you know, if things were to turn around and the economy looks a little brighter on the - and the market starts growing rather than shrinking, there's probably a possibility. But I don't want to say that's a definite.

(Demetrius Robinson): Right.

(Louis Agro): Yes, anything's possible.



(Demetrius Robinson): And I would...

(Louis Agro): My door hasn't been shut for the whole year, but it's not necessarily open either.

Wanda Cox: And I would just add to that that at this point in the year obviously we've missed the February release. June would be pushing it, so we're still probably not going to look in - if that were a possibility as money should arrive, we wouldn't be looking for anything prior to October just as a kind of an aside, just the way the calendar falls.

Liz Balvin: Hey Wanda. This is Liz again. Just I just ask a clarifying question...

Wanda Cox: Sure.

Liz Balvin: ...on the process? So, (CLECs) are relying on Verizon (CMP) personnel or, you know, (Louis) yourself to advocate our budget needs and you've essentially been told we're not getting any additional enhancements. We're still going to have the release calendars...

Wanda Cox: Correct.

Liz Balvin: ...in place. So I any enhancements with the EDI interface or exact will take place.

Wanda Cox: Right. And anything - I mean, for example, in the February release there was a trouble ticket that was issued. Things that are - that need to be fixed will obviously continue to be fixed along that same calendar because that's already in place as expected. It wouldn't happen any differently than that.



But at this point - and believe me as much as you'd like, I have been advocating. I mean the list is out there. I've been talking about it, showing what the impact would be. We would start obviously with the ones that we already have in queue and work from there.

Liz Balvin: Okay and I know on other (unintelligible) regions the actual devoted resources do support both the retail and wholesale sides. True here?

Wanda Cox: Oh, you mean like the - how was our IT kind of budgeted or what the groups look like?

Liz Balvin: I guess that would be a better way to ask it, yes.

Wanda Cox: Okay. I don't know to be honest. I believe that they are separate entities. I cannot say that for certain because there are a lot of synergies between the two systems. Obviously.

Liz Balvin: Right.

Wanda Cox: There are things internally unfortunately that have been put on hold just because the funding is not there. This is - our budget's not just for IT things, but across the board have been impacted by the way things are. It's just not the IT budget. Are there any more questions?

(Demetrius Robinson): Yes this is (Demetrius) for Cox. I did notice on your Web site that you guys updated the - your holiday calendar and now it includes Inauguration Day. When the link was sent out last week this information was not on there.

Wanda Cox: Okay.



(Demetrius Robinson): However, it just - I think it just updated I think either yesterday or today.

Wanda Cox: Right and then they sent out the notice from the enhancement team. Some other notice saying it had been updated.

(Demetrius Robinson): We didn't get that enhancement.

Wanda Cox: It was on - from the Partner Solutions mailbox. We can check to make sure that you're on that (unintelligible) as well.

(Demetrius Robinson): Okay. Thank you.

Wanda Cox: You're welcome. Any more questions? Okay. Well then our next call will be held on February 10. Please keep in mind the new process for joining the conference (bridge) and we will get that information out to you by the 3rd.

Carol Frike: Hey Wanda.

Wanda Cox: Yes ma'am.

Carol Frike: It's Carol Frike at Sprint. I was wondering since it seems like we're going to have short agendas this year with...

Wanda Cox: Yes.

Carol Frike: ...no budget. Is there any chance that we could do some different things like maybe have a different (SME) on the calls to answer questions that people are having instead of all the emails that fly around?



Well like for me and my example is that I'm constantly bugging you guys with directory questions. Would it be possible to maybe get a (SME) on the call and we could hold the questions for the meeting and maybe do a different (SME) each call or something?

Wanda Cox: If there are questions that you want answers to, the best bet would be to send them to us and we can see who we can get for you.

Carol Frike: Okay.

Wanda Cox: I don't know if I can just identify a (SME) and say okay, this month it will be XYZ topic.

Carol Frike: Okay.

Wanda Cox: We can try to answer it that way.

Carol Frike: All right.

Wanda Cox: Okay.

Carol Frike: Thanks.

Wanda Cox: You're welcome. Any other questions?

(Metek): Wanda, this is (Metek). I joined late. I think you covered the new process for (CMPs) at the first part of the meeting. Can you please reiterate it really quickly or if that's better I think to follow up with a phone call I can do that later.



Wanda Cox: Regarding the conference?

(Metek): Yes.

Wanda Cox: Regarding the conference (unintelligible). (Terry), you still here? I can give it to you in a nutshell.

(Metek): Yes.

Wanda Cox: So each month you'll be responsible for registering for each call...

(Metek): Okay.

Wanda Cox: ...at least one hour in advance and that's a simple process of your name, email address and company. You'll receive back a pin that you'll need to use to access the call each month and that way you will not have to wait for an operator. You will actually be direct dialing right into the call.

(Metek): Okay.

Wanda Cox: And that - all this information will be sent to you each month when we get the - in advance, the same way we send the agenda.

(Metek): Oh, okay. Sounds good. Thank you very much.

Wanda Cox: You're welcome. Any additional questions. Okay. Great. I'll see you next month.

Woman: Thank you.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of the Joint Application of Verizon)
Communications Inc. and Frontier)
communications Corporation For An order) Docket No. UM 1431
Declining to Assert Jurisdiction Over, or, in the)
alternative, Approving the Indirect Transfer of)
Control of Verizon Northwest Inc.)

DIRECT TESTIMONY

OF

DOUGLAS DENNEY

ON BEHALF OF

INTEGRA TELECOM

November 2, 2009

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Douglas Denney. I work at 1201 Llyod Blvd, Suite 500 in Portland,
4 Oregon.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by Integra Telecom, Inc., as Integra's Director of Costs and
7 Policy. My job duties include negotiating interconnection agreements,
8 monitoring, reviewing and analyzing the wholesale costs Integra or its
9 subsidiaries pay to carriers such as Verizon, Qwest, and representing Integra and
10 its affiliates on regulatory issues. I am also involved in Integra's review of ILEC
11 performance assurance plans.

12 Integra Telecom, Inc. has 7 affiliated companies in Oregon. These companies
13 are: Electric Lightwave, LLC, Eschelon Telecom of Oregon, Inc., Advanced
14 TelCom, Inc, Integra Telecom of Oregon, Inc., Shared Communications Services,
15 Inc., Oregon Telecom Inc., and United Communications, Inc. For convenience, I
16 will generally refer to Integra Telecom, Inc. and its affiliates as Integra.

17 Integra operates in both the Verizon and Qwest territories in Oregon. In total,
18 Integra has nearly 250,000 access line equivalents in Oregon.

19 **Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL**
20 **BACKGROUND.**

21 A. I received a B.S. degree in Business Management from Phillips University in
22 1988. I spent three years doing graduate work at the University of Arizona in

1 Economics, and then I transferred to Oregon State University where I have
2 completed all the requirements for a Ph.D. except my dissertation. My field of
3 study was Industrial Organization, and I focused on cost models and the
4 measurement of market power. I taught a variety of economics courses at the
5 University of Arizona and Oregon State University. I was hired by AT&T in
6 December 1996 and spent most of my time with AT&T analyzing cost models. In
7 December 2004, I was hired by Eschelon Telecom, Inc. (“Eschelon”). Eschelon
8 was purchased by Integra in August 2007. I am presently employed by Integra.

9 I have participated in over 40 proceedings in the Integra operating territory.
10 Much of my prior testimony involved cost models — including the HAI Model,
11 BCPM, GTE’s ICM, U S WEST’s UNE cost models, and the FCC’s Synthesis
12 Model. I have also testified about issues relating to the wholesale cost of local
13 service — including universal service funding, unbundled network element
14 pricing, geographic de-averaging, and competitive local exchange carrier access
15 rates. I testified on a number of issues in the Eschelon / Qwest arbitrations,¹ and
16 have been involved in the Qwest and Verizon “non-impaired” wire center lists
17 and related issues. I have also been involved in the performance assurance plans
18 that impact Integra. This includes negotiations of changes to performance plans
19 to assure they provide meaningful incentives for wholesale service quality.

20 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN OREGON?**

¹ The docket numbers for the Qwest-Eschelon ICA arbitrations are, for Arizona, T-03406A-06-0572; T-01051B-06-0572 (“Arizona arbitration”); for Colorado, 06B-497T (“Colorado arbitration”); for Minnesota, P-5340, 421/IC-06-768 (“Minnesota arbitration”); for Oregon, ARB 775 (“Oregon arbitration”); for Utah, 07-2263-03; petition filed but no testimony yet (“Utah arbitration”); and for Washington, UT-063061 (“Washington arbitration”).

1 A. Yes, I have participated in numerous dockets in Oregon. When with AT&T, I
2 testified in multiple phases of docket UM 731 regarding universal service, UT
3 148 regarding Qwest's unbundled loop rate, and UT 138/139 regarding the
4 mapping of building blocks to Unbundled Network Elements. I also participated
5 in numerous workshops regarding Qwest's unbundled network element rates as
6 part of UM 1025 and filed testimony in UM 1100, the original Triennial Review
7 Order ("TRO") docket, which was stopped after the D.C. Circuit Court remanded
8 parts of the TRO to the FCC. While with Eschelon (and now Integra) I have
9 participated in three Oregon dockets, besides this docket – (1) UX 29 regarding
10 Qwest's petition for deregulation of business services, (2) UM 1251 regarding
11 Commission approval of Qwest's non-impaired wire center list, and (3) ARB 775
12 regarding the interconnection agreement arbitration between Eschelon and Qwest.

13 **Q. PLEASE DESCRIBE HOW YOUR TESTIMONY IS ORGANIZED.**

14 A. The first section of this testimony describes Integra and my background. Section
15 II of this testimony explains why it is important that Frontier commit to keeping
16 in place its current wholesale agreements, including interconnection agreements.
17 During a time of acquisition, transition and uncertainty, the knowledge that
18 existing agreements will be maintained and available going forward is crucial.
19 Section III of this testimony explains the importance of wholesale service quality
20 standards with self-executing remedy payments. In this section I recommend that
21 the Commission require Frontier to continue the performance reports currently
22 provided by Verizon and that the Commission open a separate docket to review

1 and implement a performance plan with self-executing remedy payments. Section
2 IV concludes this testimony.

3 **Q. ARE THERE ANY EXHIBITS TO YOUR TESTIMONY?**

4 A. No.

5 **II. WHOLESALE AGREEMENTS SHOULD BE MAINTAINED FOR A**
6 **PERIOD OF THREE YEARS FOLLOWING THE ACQUISITION**

7 **Q. WHAT IS YOUR REQUEST WITH RESPECT TO THE WHOLESALE**
8 **AGREEMENTS, INCLUDING INTERCONNECTION AGREEMENTS, IN**
9 **PLACE WITH VERIZON IN OREGON?**

10 A. Integra recommends that Frontier be required to make existing wholesale
11 agreements, including interconnection agreements, available for a period of 3
12 years. This condition is outlined in more detail in Exhibit 1 to Mr. Huesgen's
13 Testimony, Proposed Condition No. 7. In addition, Integra recommends that
14 wholesale services will not be discontinued, unless approved by the Commission;²
15 Frontier will not change special access / private line rates currently offered by
16 Verizon without making a filing to request a tariff change nor will Verizon
17 withdraw these offers;³ and Frontier will allow carriers seeking to renegotiate
18 their interconnection agreements to use pre-existing agreements as the basis for
19 new negotiations.⁴

² Huesgen Exhibit 1, Proposed Condition 1.

³ Huesgen Exhibit 1, Proposed Conditions 2 and 11.

⁴ Huesgen Exhibit 1, Proposed Condition 8.

1 **Q. PLEASE DESCRIBE THE INTERCONNECTION AGREEMENTS THAT**
2 **INTEGRA AND ITS SUBSIDIARIES IN OREGON HAVE WITH**
3 **VERIZON NORTHWEST.**

4 A. Integra's Oregon affiliates operate pursuant to separate interconnection
5 agreements with Verizon Northwest in both Oregon and Washington. There are
6 separate Oregon interconnection agreements between Verizon Northwest and
7 each of the following Integra subsidiaries: Electric Lightwave, LLC., Integra
8 Telecom of Oregon Inc., Advanced TelCom, Inc., Eschelon Telecom of Oregon,
9 Inc., Oregon Telecom, Inc. and United Communications, Inc. In addition, some
10 of these Integra companies also have commercial agreements with Verizon for the
11 Wholesale Advantages Services Agreement. This is Verizon's UNE-P
12 replacement product that combines the unbundled loop from a carriers'
13 interconnection agreement with unbundled switching which Verizon is no longer
14 required to offer at UNE rates.

15 **Q. HASN'T FRONTIER'S WITNESS ALREADY TESTIFIED THAT**
16 **FRONTIER WILL "ASSUME OR HONOR"⁵ ALL THE EXISTING**
17 **INTERCONNECTION AGREEMENTS THAT VERIZON-NORTHWEST**
18 **HAS WITH COMPETITIVE CARRIERS IN OREGON?**

19 A. Yes, but Frontier's commitment does not alleviate our concern. Frontier witness
20 McCarthy states, "Frontier will assume or honor all obligations under Verizon's
21 current interconnection agreements, wholesale tariffs, and other existing
22 wholesale arrangements in addition to complying with the statutory obligations

⁵ FTR/100, McCarthy/43, line 12.

1 applicable to all ILECs.”⁶ Frontier made a similar statement in response to a
2 Commission staff data request. Specifically, Frontier stated that it “will assume
3 and honor all obligations under Verizon’s interconnection agreement, wholesale
4 tariffs and other wholesale arrangements including the rates in these agreements
5 that are in place at the time of closing. See Response to Staff Data Request No.
6 147 (Aug. 3, 2009) (Attached as Exhibit Integra/11).

7 Frontier’s commitment is not much assurance. Integra’s interconnection
8 agreements are all in evergreen status, which means they simply continue in
9 operation until a party requests termination. At that point the statutory time
10 frames⁷ associated with negotiating a new interconnection agreement would
11 begin. The existing agreement would remain in effect only until the new
12 agreement was completed.

13
14 Verizon also has flexibility with respect to many tariff rates. Honoring these
15 tariffs does not mean that Frontier will not seek to increase or change rates, terms
16 or conditions for private line or resale services that CLECs such as Integra rely; it
17 simply means that Frontier plans to follow the existing processes to change rates.
18 Integra’s fear is that adding uncertainty to a time of instability will significantly
19 impact Integra’s ability to serve its customers in Oregon.

⁶ FTR/100, McCarthy/43, lines 12-15.

⁷ 47 C.F.R. § 252(b) allows for a total of 9 months when a new agreement is requested. Parties may voluntarily extend this time frame.

1 From Integra's perspective, Frontier is promising to assume or honor contracts
2 that it can terminate at any time. This is not much assurance.

3 **Q. HOW LONG HAVE THE AGREEMENTS BEEN IN "EVERGREEN**
4 **STATUS?"**

5 A. The agreements with Verizon have been in evergreen status for approximately six
6 years.

7 **Q. DOESN'T THIS IMPLY THAT THE AGREEMENTS ARE OLD AND IN**
8 **NEED OF REPLACEMENT?**

9 A. No. The fact that the agreements are in "evergreen status" does not mean that the
10 agreements are stale or out of date. In fact, the agreements have been amended
11 for changes in law and changes in Integra's need for facilities from Verizon. All
12 of Integra's agreements with Verizon have been amended to reflect the FCC's
13 Triennial Review Order ("TRO")⁸ and Triennial Review Remand Order
14 ("TRRO").⁹ In addition various agreements have been updated to provide for
15 HDSL loops, updated collocation terms and pricing, routine network
16 modifications, and fiber optic cross connects.

⁸ *Report and Order and Order on Remand and Further Notice of Proposed Rulemaking*, Before the Federal Communications Commission, In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, and Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket Nos. 01-338, 96-98 and 98-147, Released August 21, 2003 ("TRO").

⁹ *Order on Remand*, Before the Federal Communications Commission, In the Matter of Unbundled Access to Network Elements and Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket Nos. 04-313 and 01-338, Released February 4, 2005 ("TRRO").

1 **Q. WHY AMEND AN AGREEMENT WHEN AN ENTIRE NEW**
2 **AGREEMENT COULD BE NEGOTIATED?**

3 **A.** The agreements between Integra’s affiliates and Verizon Northwest have been in
4 place for many years. For example, the interconnection agreement between
5 Verizon Northwest and Integra Telecom of Oregon, Inc. was entered into in 2000.
6 The interconnection agreement between Verizon Northwest and Eschelon
7 Telecom of Oregon, Inc. has been in effect since 2002. Both Verizon and Integra
8 are familiar with these agreements and have developed and become accustomed
9 to a course of dealing and conduct with each other that in large measure satisfies
10 the business needs of the parties.

11 In addition, as I mentioned previously, when needed these agreements have been
12 amended to reflect the evolving nature of the relationship between the parties over
13 the years.

14 Negotiation of a new agreement can be a painful, resource intensive and
15 potentially long project. Though parties can enforce the time frames of the act,
16 the time required for intensive, serious, good-faith negotiations would
17 undoubtedly take longer than the nine months contemplated by the Act. For
18 example, Eschelon negotiated its interconnection agreement with Qwest for years
19 before disputed issues were brought before this Commission in Oregon. And
20 though Eschelon and Qwest were able to resolve a multitude of issues through
21 negotiation, numerous issues remained that were arbitrated before this
22 Commission.

1 **Q. IF NEGOTIATION AND ARBITRATION IS SO MUCH WORK, WHY IS**
2 **INTEGRA CONCERNED THAT FRONTIER MAY DECIDE TO**
3 **TERMINATE THE AGREEMENT?**

4 A. Unlike Integra, Frontier has no history with these agreements and may prefer to
5 change things in ways that Integra can not anticipate. Mr. McCarthy states,
6 “Frontier stands ready to put in place *new interconnection agreements* on
7 *substantially* the same terms and conditions...”¹⁰ In addition, Frontier has been
8 unwilling to commit to the ongoing availability of the interconnection agreements
9 for any substantial period of time. What Mr. McCarthy means by “*substantially*
10 the same terms and conditions”¹¹ is unclear. This implies that there would be
11 some changes and often the interpretation of the term *substantial* can vary
12 depending on the perspective of the party seeking a change.

13 Thus, the transfer of these agreements to Frontier creates a concern for Integra
14 that post-transaction Frontier may wish to terminate the interconnection
15 agreements it has assumed that are in evergreen status and impose replacement
16 interconnection agreements based on Frontier’s template agreement, with which
17 Integra is not familiar. That has the potential to create great uncertainty about the
18 services and facilities that Integra purchases under those agreements and also
19 could create the need for costly and time-consuming arbitrations, at a time when
20 Frontier should be focused on integration activities and Integra would prefer to be
21 focused on serving its customers in Oregon.

¹⁰ FTR/100, McCarthy/43, lines 22-23 (emphasis added).

¹¹ FTR/100, McCarthy/43, line 23 (emphasis added).

1 **Q. WHAT DOES INTEGRA PROPOSE TO ALLEVIATE THIS CONCERN?**

2 A. Integra requests the Commission impose Proposed Condition Nos. 6-15 in Exhibit
3 2. The combined effect of these conditions will ensure that the wholesale
4 supplier-user relationship that exists between Verizon Northwest and Integra's
5 operating subsidiaries in Oregon will remain largely undisturbed as a result of the
6 transaction, which will in turn protect competitors and their customers in Oregon
7 from potential disruption that could harm telecommunications competition in the
8 State.

9 **III. WHOLESALE SERVICE QUALITY REPORTS SHOULD CONTINUE**
10 **AND THE COMMISSION SHOULD OPEN A SEPARATE DOCKET TO**
11 **ESTABLISH A PERFORMANCE PLAN WITH SELF-EXECUTING**
12 **REMEDIES**

13 **Q. WHAT IS YOUR REQUEST WITH RESPECT TO THE WHOLESALE**
14 **SERVICE QUALITY?**

15 A. Integra recommends that Frontier be required to continue to report on the service
16 quality measures contained in the Carrier-to-Carrier Guidelines Performance
17 Standards and Reports in Oregon.¹² In addition, Integra recommends this
18 Commission open a second proceeding, immediately following the acquisition, to
19 investigate and establish self executing performance remedies in order to incent
20 non-discriminatory performance for Frontier's wholesale customers. This

¹² This document, dated May 15, 2006, currently applies to the Verizon properties in California, Florida, Indiana, North Carolina, Ohio, Oregon and Washington ("OR Verizon Performance Reports") and is available on the Verizon website at:
<http://www22.verizon.com/wholesale/clecsupport/content/1,,east-performancemeasures-pa,00.html>.

1 condition is outlined in more detail in Exhibit Integra/2, Proposed Condition No.
2 5.

3 **Q. WHY IS INTEGRA CONCERNED WITH WHOLESALE SERVICE**
4 **QUALITY AFTER THE ACQUISITION OF THE VERIZON**
5 **PROPERTIES IN OREGON BY FRONTIER?**

6 A. Integra distinguishes itself through its customer relationships and its ability to
7 offer customers reliable and diverse voice and data network. Because Integra
8 relies, in part, upon network facilities leased from Verizon,¹³ the quality of service
9 received from Verizon, and subsequently Frontier, is an important component of
10 Integra's ability to serve customers well. There are no generally available, last
11 mile wholesale substitutes available to Integra to serve end user customers across
12 the Verizon territories in Oregon and Washington. As a result, Verizon's and
13 Frontier's behavior will have a significant impact on Integra's customer
14 relationships. Since Frontier will be Integra's only supplier of connections to end
15 user customers and Frontier will be Integra's largest competitor, Frontier will
16 have the incentives and the ability to limit Integra's success in the market through
17 poor wholesale service. This is why performance measures and a performance
18 assurance plan are essential for the preservation of competitive markets across the
19 Verizon territories in Oregon and Washington.

20 Frontier's gain from poor wholesale service performance translates directly to
21 harm to CLECs and competition and subsequent gains to Frontier. The gains to
22 Frontier are potentially reduced cost of providing wholesale service quality, wins

¹³ Integra will continue to rely upon these same facilities after the Frontier acquisition.

1 in the competitive marketplace, and a potentially tarnished CLEC reputation. It
2 also means poor service to consumers.

3 The end user customer demands reliable service and values met commitments.
4 The end user customer rarely has the patience to take sides when its service no
5 longer works or when its order is not filled on time -- the customer simply
6 demands reliable service. The end user customer's experience is with its retail
7 service provider regardless of who is providing the underlying network
8 components. Thus, poor wholesale performance by Frontier necessarily
9 negatively impacts the CLEC utilizing these facilities.

10 **Q. HAS FRONTIER PROVIDED ANY ASSURANCES REGARDING ITS**
11 **WHOLESALE PERFORMANCE AFTER THE ACQUISITION?**

12 A. No. Mr. McCarthy only states, "Frontier will use the same systems used by
13 Verizon prior to closing to manage Verizon's existing wholesale and CLEC
14 relationships in Oregon. As a result, CLECs *should not* have to process orders in
15 a different manner nor have their existing OSS arrangement disrupted."¹⁴
16 Immediately following this Q&A there is an almost identical Q&A with an almost
17 identical answer. However, in this case Mr. McCarthy states, "CLECs *will not*
18 have to process orders in a different manner..."¹⁵

19 What Frontier is actually promising is unclear. Regardless, these statements make
20 no guarantees with respect to wholesale service quality. Frontier appears willing

¹⁴ FTR/100, McCarthy/44, lines 7-10 (emphasis added).

¹⁵ FTR/100, McCarthy/44, lines 17-18 (emphasis added).

1 to commit to the promise, but not the performance. This makes Frontier's
2 statements of little value.

3 **Q. WHAT HAS FRONTIER STATED WITH RESPECT TO RETAIL**
4 **SERVICE QUALITY?**

5 A. Regarding retail service quality Frontier has stated its objective is to “*maintain*
6 *and improve* the service that is currently provided.”¹⁶ Mr. McCarthy explains that
7 the company’s “*predominant business focus* is delivering *high quality* wireline
8 services,”¹⁷ and Frontier commits to investing in its network to serve, “large
9 business customers as well as residential and small business customers.”¹⁸
10 Lacking is any mention of wholesale customers, especially those who purchase
11 unbundled network elements that will be used to compete directly with Frontier.

12 **Q. WILL FRONTIER’S PROMISES WITH RESPECT TO RETAIL**
13 **SERVICE PERFORMANCE BENEFIT WHOLESAL PERFORMANCE?**

14 A. Not necessarily. Frontier’s dichotomous role as being both the largest supplier of
15 wholesale services to CLECs such as Integra, as well as being the largest retail
16 competitor for these carriers will provide Frontier with the incentives to exploit
17 this dual role for its own benefit in the marketplace.¹⁹

¹⁶ FTR/100, McCarthy/25, lines 6-7 (emphasis added).

¹⁷ FTR/100, McCarthy/24, lines 4-5 (emphasis added).

¹⁸ FTR/100, McCarthy/25, lines 1-2.

¹⁹ Other agencies have recognized the inherent issues resulting from this dichotomous role. For example, the Minnesota commission said with respect to Qwest: “As a provider of monopoly and bottleneck wholesale services, as well as the best-known provider of retail services, Qwest has unparalleled opportunities to manipulate the wholesale service transfer process to its benefit.” Order, *In The Matter of a Request by Eschelon Telecom for an Investigation Regarding Customer Conversion by Qwest and Regulatory Procedures*, Minnesota PUC

1 Frontier has already indicated that it will be looking for strategies to improve its
2 company's bottom line. Mr. McCarthy states with respect to increased
3 competition Frontier's, "focus on strategic choices have become increasingly
4 important,"²⁰ and Frontier will look to "target resources into the most strategic
5 operations."²¹ He notes that competition has forced companies to "re-evaluate
6 how they operate their business,"²² "operate more efficiently"²³ and make
7 customer retention "part of the everyday strategy."²⁴ At the same time Frontier
8 discusses the realities of limited "capital resources"²⁵ and the need to
9 "productively deploy its resources"²⁶ for the health of the company.

10 **Q. DOES FRONTIER HAVE EXPERIENCE PROVIDING WHOLESALE**
11 **SERVICES SUCH AS UNBUNDLED NETWORK ELEMENTS?**

12 A. While I am aware that Frontier does have some agreements to sell unbundled
13 network elements across its current territory, it is my understanding that the
14 degree and extent to which Frontier sells these services, compared with Verizon,
15 is vastly limited. For example, Frontier currently has 12,626 access lines in
16 Oregon,²⁷ while Verizon has approximately 310,000.²⁸ Integra purchases

Docket P-421/C-03-616 (July 30, 2003), p. 7.

²⁰ FTR/100, McCarthy/10, line 13.

²¹ FTR/100, McCarthy/11, lines 1-2.

²² FTR/100, McCarthy/10, line 9.

²³ FTR/100, McCarthy/10, line 10.

²⁴ FTR/100, McCarthy/10, line 11.

²⁵ FTR/100, McCarthy/11, line 1.

²⁶ FTR/100, McCarthy/10, lines 18-19.

²⁷ FTR/100, McCarthy/6, chart at line 5.

²⁸ *Joint Application*, In the Matter of the Joint Application of Verizon Communications Inc. and

1 significantly more loops from Verizon in Oregon and Washington than Frontier
2 currently has access lines in these states. When Mr. McCarthy discusses
3 Frontier's experience in operating a telecommunications network such as the one
4 being purchased in Oregon, he makes no mention of Frontier's experience with
5 wholesale customers.²⁹

6 The combination of Frontier's lack of wholesale experience, statements regarding
7 competitive strategies, the lack of wholesale quality assurance and promises of
8 retail performance improvement cause Integra concern regarding the direction
9 Frontier will take with respect to wholesale performance.

10 **Q. WHAT HAS BEEN INTEGRAS RECENT EXPERIENCE WITH**
11 **VERIZONS WHOLESALE SERVICE QUALITY WITH RESPECT TO**
12 **UNBUNDLED NETWORK ELEMENTS?**

13 A. The testimony of Integra witness, Mr. Huesgen describes some of the recent
14 issues Integra has experienced with Verizon.

15 **Q. WHAT WOULD BE THE BENEFIT FROM REQUIRING A**
16 **WHOLESALE SERVICE QUALITY PLAN FOR FRONTIER AFTER ITS**
17 **ACQUISITION OF VERIZON?**

18 A. A wholesale performance plan, with self-executing remedies would provide many
19 benefits to the telecommunications market, and thus end user customers, in the

Frontier communications Corporation For An order Declining to Assert Jurisdiction Over, or, in the alternative, Approving the Indirect Transfer of Control of Verizon Northwest Inc., Docket No. UM 1431, May 29, 2009, ("Joint Application"), ¶ 9. Frontier currently does not have any access lines in Washington.

²⁹ FTR/100, McCarthy/38, line 6 – McCarthy/39, line 10.

1 current Verizon territories in Oregon. First, the ability to track and monitor
2 wholesale performance is crucial to a successful acquisition of the Verizon
3 properties by Frontier. A broad range of measures and regular review of
4 performance will allow all parties to monitor Frontier's performance and trends
5 which will allow Frontier, hopefully, to implement corrective actions before poor
6 performances escalates into costly, protracted disputes between parties. This is
7 why it is crucial, as a minimum step, for this Commission to require Frontier to
8 maintain the current Oregon Verizon Performance Reports on an ongoing basis.

9 Second, a wholesale performance plan with self-executing remedies will assure
10 that markets remain open to competition after the Frontier acquisition of the
11 Verizon properties in Oregon. The FCC has relied on the self-executing nature of
12 remedies in performance plans to ensure that markets remained open after the
13 regional bell operating companies ("RBOCs") obtained permission to enter
14 interLATA, interstate long distance markets.³⁰ These plans were designed to
15 address service quality issues; protect CLEC customers; provide mechanisms
16 protecting the incumbent local exchange carriers ("ILECs") interests while
17 recognizing the benefit of gaining 271 authority. The plans put into place in
18 conjunction with the FCC's 271 Approval Order provided "assurance that the
19 local market will remain open after [RBOC] receives section 271

³⁰ See for example, *Memorandum Opinion and Order*, In the Matter of Application by Qwest Communications International, Inc. for Authorization To Provide In-Region, InterLATA Services in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming, WC Docket No. 02 - 314, Adopted December 20, 2002, ¶ 442 ("FCC 271 Approval Order").

1 authorization...”³¹ The FCC views “the existence of a satisfactory performance
2 monitoring and enforcement mechanism... as probative evidence that the BOC
3 will continue to meet its section 271 obligations [i.e. wholesale competitive
4 obligations] after a grant of such authority.”³² Further, the FCC concluded that
5 the PAP provides “assurance that the local market will remain open ...”³³

6 The same rationale that led to the creating of self-executing performance plans for
7 the RBOCs exists in the Frontier acquisition. A self-executing performance plan
8 can be used to make sure that Frontier’s *strategic choices* are not made at the
9 expense of CLECs in Oregon. Since many measures in a self-executing
10 performance plan can be benchmarked against Frontiers retail performance, a plan
11 will also assure that as Frontier implements improved performance across the
12 state, that all customers utilizing portions of the Frontier network will benefit
13 from these improvements.

14 Third, a performance plan with self-executing remedies will provide Frontier with
15 the proper incentives to remedy performance when necessary. Performance plans
16 are designed to provide a wholesale provider with incentives to meet wholesale
17 performance standards. If the plan provides for proper incentives to avoid poor
18 service quality, then Frontier will avoid making payments under the Plan by
19 improving its service relative to the standard it is being measured against (either a
20 benchmark or Frontier retail parity). A large benefit of such a plan is that the

³¹ FCC 271 Approval Order, ¶ 440.

³² FCC 271 Approval Order, ¶ 440.

³³ FCC 271 Approval Order, ¶ 440.

1 ability to avoid payments simply by meeting performance benchmarks. For
2 example, a review of Qwest's performance across the Qwest region has shown
3 that with a self-executing performance plan in place, Qwest's overall performance
4 has improved over time.³⁴ Performance plans with self-executing remedies are
5 are particularly essential because the expense of filing a Commission complaint
6 for each individual service quality problem would typically greatly exceed the
7 cost of the particular individual problem, while the cumulative significant adverse
8 affect of poor service quality would be harmful to CLECs and competition.
9 Therefore, the expense of litigating individual issues deters a CLEC's ability to
10 obtain a remedy for those service quality problems.

11 **Q. PLEASE DESCRIBE THE CURRENT OREGON VERIZON**
12 **PERFORMANCE REPORTS.**

13 A. The Oregon Verizon Performance Reports was initially developed as part of a
14 settlement agreement between Verizon and CLECs in California.³⁵ It was
15 intended to provide measures that would "allow the Commission to monitor
16 improvements in OSS performance,"³⁶ but did not "address statistical tests and
17 incentives."³⁷ Performance measures were broken into nine major categories

³⁴ Analysis of Qwest's Performance Assurance Plans Final Report, Prepared for the Qwest Regional Oversight Committee by Liberty Consulting Group, June 30, 2009 ("ROC Liberty Report"), pp. 25 and 39.

³⁵ Oregon Verizon Performance Reports, p. 5.

³⁶ Oregon Verizon Performance Reports, p. 5.

³⁷ Oregon Verizon Performance Reports, p. 7.

1 which include, Pre-Ordering, Ordering, Provisioning, Maintenance, Network
2 Performance, Billing, Collocation, and Interfaces.³⁸

3 **Pre-Ordering** measures the responsiveness of Verizon's OSS pre-ordering
4 interface. Pre-ordering activities include address verification, request for a
5 customer service record, loop qualification and facility availability.³⁹ One pre-
6 ordering activity that is not measured is timely and adequate responses from the
7 Partner Solutions Customer Care Center ("PSCC"). This center handles the
8 questions that the National Market Center is not responsible for knowing, which
9 mainly regards pre-order information such as address validations, connecting
10 facility assignment validation ("CFA") and loop qualification. Verizon currently
11 refuses to assist by phone for issues other than system availability and passwords
12 directing the CLECs to open trouble tickets via the electronic CLEC Self Service
13 Ticketing Tool. This results in trouble tickets which often stay open for weeks
14 and in some cases months. This function should be staffed and handled properly
15 in a post transaction environment.

16 **Ordering** activities involve exchange of information between Verizon and the
17 CLEC regarding requests for service. Ordering includes submission of a service
18 request, rejection of service requests with errors, and confirmation of successful
19 service requests with an assigned due date for delivery of the service.⁴⁰ A crucial
20 measure among ordering is the measure OR-1 FOC/LSC Notice Timeliness. This

³⁸ Oregon Verizon Performance Reports, pp. 7-8.

³⁹ Oregon Verizon Performance Reports, pp. 7 and 21.

⁴⁰ Oregon Verizon Performance Reports, p. 7.

1 measures the “percentage of valid service requests confirmed within the agreed
2 upon timeframes.”⁴¹ Timely confirmations are crucial to Integra’s ability to
3 communicate accurately with its newly acquired customers and late or inaccurate
4 information from Verizon will potentially sour Integra’s relationships and
5 integrity with the customers Integra is attempting to serve.

6 **Provisioning** includes activities that are required to install, change or disconnect a
7 customer’s service. Provisioning includes not only the functions to establish
8 service, but also the communication between Verizon and Integra regarding the
9 status of the provisioning process.⁴² Crucial measures to Integra within this
10 category include PR-7-2 which measures the timeliness of jeopardy notices;⁴³ PR-
11 2 which measures the time it takes to complete the order;⁴⁴ PR-4-01 which
12 measures the percent of installations not completed by the due date;⁴⁵ PR-4-02
13 which measures the time period that orders are not completed by the original due
14 dates due to Verizon reasons;⁴⁶ PR-6-05 which measures the time it takes to
15 restore problems that arise during the provisioning process;⁴⁷ and OR-4-18 which
16 measures the percent of order completion notices returned with a specified time
17 frame.⁴⁸ Each of these measures directly impacts Integra’s customer’s experience

⁴¹ Oregon Verizon Performance Reports, p.25.

⁴² Oregon Verizon Performance Reports, p. 8.

⁴³ Oregon Verizon Performance Reports, p. 51.

⁴⁴ Oregon Verizon Performance Reports, p. 37.

⁴⁵ Oregon Verizon Performance Reports, p. 41.

⁴⁶ Oregon Verizon Performance Reports, p. 41.

⁴⁷ Oregon Verizon Performance Reports, p. 47.

⁴⁸ Oregon Verizon Performance Reports, p. 33. The specified time frame depends on the interface used (i.e. EDI, Electronic Batch or other).

1 as it relates to its dealing with Integra. This experience is especially important as
2 many of these orders involve setting up new service for customers and thus the
3 experience that Integra is able to provide, which relies in part upon Verizon, can
4 have long lasting impacts over the business life of the customer. One measure
5 missing in the provisioning measures involves vendor meets. This is the case
6 where Verizon and Integra (or the customer's phone vendor) schedule a time to
7 meet to ensure proper provisioning of working facilities. Missed appointment
8 cost Integra money and can delay Integra's ability to provide service to its
9 customer. A second measure missing in the maintenance category is timely
10 notification of trouble status during out of service situations caused by Verizon
11 order errors. Lack of status creates frustration for both Integra and its customers
12 and impacts Integra's customer relationships.

13 **Maintenance** involves the repair and restoral of customer service. The ability to
14 provide on-going, high-quality service relies most significantly on Verizon's
15 maintenance performance.⁴⁹ Delays in repair or a customer's perception that it is
16 receiving less attention from Integra than it could get elsewhere play a crucial role
17 in Integra's ability to maintain customer relationships. Crucial measures within
18 the maintenance category include MR-2, which measures the percent of circuits
19 reporting trouble within a given month;⁵⁰ MR-4-01 which measures the time that
20 it takes to resolve a reported trouble;⁵¹ and MR-5-01 which measures the

⁴⁹ Oregon Verizon Performance Reports, p. 8.

⁵⁰ Oregon Verizon Performance Reports, p. 56.

⁵¹ Oregon Verizon Performance Reports, p. 60.

1 percentage trouble that result in a second (repeat) trouble report within a 30 day
2 period.⁵²

3 **Network Performance** involves Verizon's performance relating to call blocking
4 on various network trunks. In addition this category includes a measure the
5 timeliness into which NXX data is loaded into the LERG.⁵³ While these activities
6 are important, because they involve the exchange of traffic between Verizon and
7 Integra customers, Verizon poor performance can impact both companies and
8 thus Verizon typically would have the incentive to perform in this category.

9 **Billing** involves both the exchange of information that Integra may need to bill its
10 customers as well as the accuracy and timeliness of the bills that Verizon provides
11 to Integra for facilities Integra leases from Verizon.⁵⁴ The most crucial measure,
12 from Integra's perspective, in this category is BI-3 which measures billing
13 accuracy. This measures the percent of a bill that needs to be adjusted due to
14 billing errors.⁵⁵ Inaccurate billing causes a great amount of time and resources on
15 the part of Integra to properly validate and dispute Verizon's bills. Integra should
16 be able to expect accurate bills from Verizon. Billing is an area of great
17 frustration for Integra. Both inaccurate bills and the ability to resolve disputes
18 regarding inaccurate bills are of concern. The time that it takes to resolve
19 disputes, promptly reflect payments, post payments to proper accounts and correct
20 mis-applied payments is a source of growing concern as the Frontier acquisition

⁵² Oregon Verizon Performance Reports, p. 64.

⁵³ Oregon Verizon Performance Reports, pp. 8, 66 and 68.

⁵⁴ Oregon Verizon Performance Reports, p. 8.

⁵⁵ Oregon Verizon Performance Reports, pp. 72.

1 proceeds. Integra experiences a lot of issues and Verizon is presumably familiar
2 with their processes, bills and rates. What will happen when Frontier takes over
3 and is unfamiliar with systems, processes, bills and rates?

4 **Collocation** involves the timeliness of processing CLEC collocation requests.⁵⁶
5 While timely responses to collocation requests are important, the frequency of
6 new collocations and augments to existing collocations is rare and thus a monthly
7 measure of performance is of limited value.

8 **Interfaces** involves the availability of OSS interfaces and “is fundamental to the
9 CLEC being able to effectively do business with the ILEC.”⁵⁷ A crucial measure
10 within this category is PO-3 which measures the average time it takes the work
11 center to answer a call.⁵⁸ Integra would call this center this center when it has
12 questions after the successful submission of an order. These questions might
13 involve details regarding a reject or jeopardy notice, a missing firm order
14 commitment, or Verizon service order errors. Integra’s recent experience with
15 Verizon during Verizon’s workforce center transition is discussed in detail by Mr.
16 Huesgen. This experience causes concern over the Frontier acquisition and
17 stresses the importance of this measure.

18 **Q. QWEST HAS A PERFORMANCE ASSURANCE PLAN IN OREGON.**
19 **HOW DOES THIS PLAN DIFFER FROM THE OREGON VERIZON**
20 **PERFORMANCE REPORTS?**

⁵⁶ Oregon Verizon Performance Reports, p. 8.

⁵⁷ Oregon Verizon Performance Reports, p. 9.

⁵⁸ Oregon Verizon Performance Reports, p. 84.

1 A. The most significant difference between the Qwest Performance Assurance Plan
2 (“QPAP”) in Oregon and the Verizon performance reports is the self-executing
3 remedies contained in the Qwest plan. Qwest’s plan calls for payments to
4 CLECs, for each miss, when Qwest fails to meet the relevant performance
5 standard. For most measures, Qwest pays \$150 per miss for the first month a
6 standard is missed. Importantly, when a standard is missed for consecutive
7 months the per miss payment amount is ratcheted up, increasing as additional
8 months are missed.⁵⁹ The performance payments, along with their escalation,
9 provide Qwest with the proper incentives to remedy on-going performance issues
10 covered by measures in the plan. As mentioned previously, with a self-executing
11 performance plan in place, Qwest’s overall performance has improved over
12 time.⁶⁰

13 **Q. HOW DOES VERIZON’S PERFORMANCE COMPARE TO QWEST’S**
14 **PERFORMANCE?**

15 A. Typically Verizon’s service quality performance is worse when compared to
16 comparable service quality measures for Qwest. In addition, Verizon’s
17 performance has greater volatility. Table 1 below compares key maintenance
18 measures for Verizon and Qwest for two-wire loops. Table 2 shows a similar
19 comparison for DS1 loops. The average column shows the aggregated 2009
20 performance. The best and worst columns represent the best monthly average and
21 worst monthly average over the time period (Jan 2009 – Sep 2009). While

⁵⁹ Performance Assurance Plan, Qwest Oregon SGAT Nineteenth Revision Exhibit K, June 26, 2007, § 6.2.2.

⁶⁰ ROC Liberty Report, pp. 25 and 39.

1 definitive conclusions cannot be drawn without a more thorough investigation as
 2 to the differences it does support Integra’s perception that Verizon’s service
 3 quality is generally lower and has a greater degree of variation than Qwest’s
 4 service quality.

5 **Table 1: Service Quality Comparison (Selected Measures) -- 2-wire loops**

Selected Measures -- 2-wire loop aggregated data (Jan 2009 - Sep 2009)								
Measure		Measure Name	Average		Best		Worst	
Verizon	Qwest		Verizon	Qwest	Verizon	Qwest	Verizon	Qwest
PR-2	OP-4	Provisioning Interval	5.7	4.4	4.1	4.4	8.3	4.5
PR-4-01	OP-3	% of Due Dates Missed	9.8%	4.0%	1.4%	2.2%	24.4%	9.2%
MR-2	MR-8	Trouble Rate	0.55%	0.34%	0.42%	0.24%	0.90%	0.46%
MR-4	MR-6	Mean Time to Restore (hours)	29.1	9.0	17.3	5.7	47.9	20.2
MR-5	MR-7	Repeat Trouble Rate	11.72%	5.72%	4.39%	2.17%	18.97%	7.30%

7 **Table 2: Service Quality Comparison (Selected Measures) – DS1 loops**

Selected Measures -- DS1 loop aggregated data (Jan 2009 - Sep 2009)								
Measure		Measure Name	Average		Best		Worst	
Verizon	Qwest		Verizon	Qwest	Verizon	Qwest	Verizon	Qwest
PR-2	OP-4	Provisioning Interval	10.3	8.6	8.2	7.7	11.5	10.7
PR-4-01	OP-3	% of Due Dates Missed	17.7%	3.1%	3.6%	0.0%	33.3%	15.7%
MR-2	MR-8	Trouble Rate	N/A	1.51%	N/A	1.05%	N/A	2.13%
MR-4	MR-6	Mean Time to Restore (hours)	16.1	4.4	5.0	3.0	27.4	9.1
MR-5	MR-7	Repeat Trouble Rate	10.42%	12.55%	0.00%	7.04%	31.25%	21.57%

9 **Q. PLEASE SUMMARIZE INTEGRAS RECOMMENDATIONS TO THIS**
 10 **COMMISSION REGARDING WHOLESALE PERFORMANCE**
 11 **STANDARDS.**

12 **A.** Integra recommends that this Commission require Frontier to continue reporting
 13 service quality as described in the Oregon Verizon Performance Reports. Frontier
 14 should be required to make CLEC specific data available to requesting CLECs as

Docket No. UM-1431
Verizon and Frontier Responses to Staff Data Requests Nos. 147-159
August 3, 2009

Interconnection

DATA REQUEST NO. 147:

Does Frontier plan to continue to use Verizon's *Statement of Rates for Unbundled Network Elements* for unbundled network elements (UNEs) in Verizon territory?

Response:

Yes. Frontier will assume and honor all obligations under Verizon's interconnection agreements, wholesale tariffs and other wholesale arrangements including the rates in these agreements that are in place at the time of closing.

Prepared By: Cassandra Guinness
Date: August 3, 2009