Exhibit No. _____ (TWR-1T)
Docket No. UT-003013 - Part E

**BEFORE THE**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

| | | |
|---|---|---|
| **IN THE MATTER OF THE CONTINUED COSTING AND PRICING PROCEEDING FOR INTERCONNECTION, UNBUNDLED ELEMENTS, TRANSPORT AND TERMINATION, AND RESALE** | **)** **)** **)** **)** **)** | **DOCKET NO. UT- 003013 PART E** |

**PART E DIRECT TESTIMONY OF**

**THOMAS W. RODGERS**

**ON BEHALF OF**

**VERIZON NORTHWEST INC.**

**SUBJECT: DESCRIPTION OF OSS ENHANCEMENTS**

**SEPTEMBER 5, 2002**

Exhibit No. _____ (TWR-1T)
Docket No. UT-003013 - Part E

**TABLE OF CONTENTS**

## I. INTRODUCTION

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

A. My name is Thomas Rodgers and my business address is 600 Hidden Ridge, Irving, Texas 75038.

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

A. I am employed by Verizon Services Group as Manager – CLEC Communications. I am testifying on behalf of Verizon Northwest Inc.

**Q. WHAT ARE THE RESPONSIBILITIES OF YOUR CURRENT POSITION?**

A. I am responsible for the administration of the Operational Support Systems ("OSS") Interface Change Management Process ("CMP") for the former GTE local telephone companies, including Verizon Northwest Inc. but excluding the Virginia and Pennsylvania operations. These operations are called "Verizon West".[1] My work group administers the external notification of changes to Verizon West's processes, systems and interfaces. We host monthly CMP meetings and ad hoc meetings with the Competitive Local Exchange Carrier ("CLEC") community to discuss modifications to Verizon West OSS. In June 2001, my responsibilities expanded to include acceptance and processing of CLEC initiated changes to Verizon West's OSS processes and interfaces.

[1]The local telephone operations in the former Bell Atlantic states are referred to as "Verizon East".

**Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.**

A. I am a graduate of Angelo State University, located in San Angelo, Texas, with a Bachelor of Business Administration degree. In 1980, I began my management career with GTE in California as a data sales associate. From 1980-1987 I held first line order center management positions that supported private line, foreign exchange and special and switched access services. In 1987 I joined GTE Service Corporation in Irving, Texas, and I performed various staff support and second line management roles within Carrier Services and Wholesale Markets as an account manager, staff manager, process improvement team lead, and program management lead. In 1996 I joined the Open Market Transition Program Office, where I coordinated arbitration OSS testimony with the OSS witness team, participated in the revision of interconnection agreement language, compiled the CLEC Support Handbook, and implemented the GTE CMP. For the Verizon CMP, I led OSS Collaborative Sessions with the CLEC community and implemented the Verizon CMP in the Verizon West operations.

**Q. HAVE YOU APPEARED BEFORE ANY REGULATORY COMMISSIONS?**

A. No. However, in 1999 – 2000 I participated in the California and Nevada Commissions' OSS Performance Measurement and Change Management technical workshops.

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

A. The purpose of my direct testimony is to describe the OSS system enhancements for which

Verizon West has incurred costs during 2000-2001 to provide CLECs access to the Company's OSS in compliance with Federal Communications Commission ("FCC") rules and orders issued to implement the Telecommunications Act of 1996 ("the Act"). I identify what was required for Verizon West to implement OSS functionality, and I provide an explanation of how that functionality benefits CLECs and not Verizon's retail line of business. Finally, I describe why these enhancements are prudent and reasonable, enabling CLECs in Washington to obtain wholesale services in a timely and efficient manner.

## II. OVERVIEW OF VERIZON WEST OSS

**Q. DO VERIZON WEST AND VERIZON EAST USE THE SAME OSS?**

A. No. Verizon West uses systems developed internally for and used in the former GTE states.[2] Verizon East uses systems originally created for and used in the former Bell Atlantic states. Verizon seeks cost recovery in Washington solely for the modifications made to the Verizon West systems used to process CLEC requests in Washington. Thus, for purposes of my testimony, I am only explaining OSS changes made to Verizon West systems.

**Q. PLEASE DESCRIBE VERIZON WEST'S OSS PROCESSES.**

A. Verizon West's OSS processes can be categorized based primarily on the four major OSS processing functions the Incumbent Local Exchange Carriers ("ILECs") were ordered to provide to CLECs on a non-discriminatory basis: 1) pre-ordering, 2) ordering and provisioning, 3) repair and maintenance, and 4) billing and usage.

The Pre-Ordering OSS modifications facilitate the exchange of information between Verizon West and CLECs regarding current or proposed customer products and services, or any other information required to initiate ordering of service.

[2] An exception to this statement are the states of Virginia and Pennsylvania. Since the service territories of GTE and Bell Atlantic overlapped in these two states, the companies agreed as part of their merger to convert the former GTE service territories in these two states to the Bell Atlantic OSS. Virginia was converted during the second quarter of 2002 and Pennsylvania is scheduled to be converted during the second quarter of 2003.

The Ordering and Provisioning OSS modifications automate and streamline order processing to improve the exchange of information between Verizon West and CLECs related to requests for service from Verizon West.

The Repair and Maintenance OSS modifications enhance the CLECs' capability to access repair and maintenance systems related to service repair requests.

The Billing and Usage OSS modifications enhance billing accuracy to facilitate the transfer of customer billing information between Verizon West and CLECs.

**Q. PLEASE DESCRIBE THE ORDERING INTERFACE.**

A. The purpose of the ordering interface is to allow CLECs to submit a Local Service Request ("LSR"). The LSR provides the field and content edits necessary to issue the service order. Any invalid field values or combination of fields in the CLEC LSR are detected and explained to the CLEC using error codes. The ordering interface also allows the CLEC to receive confirmation reports and completion and jeopardy notifications, and to query the status of pending orders. In addition, the ordering interface allows the CLEC's LSR to be converted into a Verizon National Ordering Collection Vehicle ("NOCV") service order. NOCV is the system used by Verizon Wholesale for resale and Unbundled Network Element ("UNE") ordering and by Verizon Retail for residential, business and governmental ordering.

**Q. PLEASE DESCRIBE THE TYPES OF ORDERING INTERFACES OFFERED BY VERIZON WEST.**

A. Verizon West provides three electronic interfaces for CLEC ordering: 1) Wholesale Internet Services Engine ("WISE"), 2) Electronic Data Interexchange ("EDI"), and 3) Common Object Request Broker Architecture ("CORBA").[3] In addition, Verizon West provides for a manual interface via fax for CLECs that do not have the capability to interface electronically.

**Q. DOES ONE TYPE OF OSS FUNCTIONAL INTERFACE ADDRESS THE NEEDS OF ALL CLECS?**

A. No. Verizon West offers various OSS solutions to meet the specific needs and capabilities of the CLECs. There are three general types of CLECs requiring interface access capabilities with Verizon West's OSS:

1) Large (Tier 1) CLECs generally have resources available to build their own customized systems. Most of these CLECs have developed application-to-application pre-order and order systems that apply EDI and CORBA transactions. Verizon West's Network Data Mover ("NDM") and File Transfer Protocol ("FTP") are available transmission options.

2) Medium-sized (Tier 2) CLECs generally do not have the resources available to

[3] CORBA is the industry standard for exchanging data such as pre-ordering and customer service record ("CSR") information. CORBA provides a standard interface for interoperability between systems for managing and routing message traffic that resides on disparate platforms.

develop their own systems. Most of these CLECs have developed, however, systems capable of auto faxing orders to Verizon West or using Verizon West's Graphical User Interface ("GUI"), which offers Internet access.

3) Small (Tier 3) CLECs generally have little or no resources available to develop their own systems. Most of these carriers manually fax the information to Verizon West.

**Q. PLEASE EXPLAIN THE FIRST ORDERING INTERFACE THAT VERIZON WEST OFFERS.**

A. The first ordering interface developed for CLECs uses a WEB GUI application over the Internet called WISE. It allows CLECs to input ordering information directly into Verizon West's ordering system via the Internet, and query the status of orders over the Internet. Medium and small CLECs that do not wish to create their own ordering gateway are the primary users of this interface.

**Q. HOW DO THE CLECS BENEFIT BY THE AVAILABILITY OF THIS FIRST ORDERING INTERFACE?**

A. This interface introduced a means for CLECs to input LSR ordering information into Verizon West's system. This allows for efficient ordering processes for CLECs that do not have their own ordering system.

**Q. PLEASE EXPLAIN THE SECOND AND THIRD ORDERING INTERFACES THAT VERIZON WEST OFFERS.**

A. The second and third ordering interfaces support ordering via application-to-application standards. The Ordering and Billing Forum ("OBF") Local Services Ordering Guideline ("LSOG") and T1M1 transmission standards support EDI and CORBA order options. This functionality is targeted to Tier 1 CLECs, but all CLECs can use LSOG documents. The CLECs that opt to use the current LSOG version use an electronic transmission of incoming forms, such as LSRs and Directory Service Requests ("DSRs"), and are subjected to internal edits that reject or accept account information for processing. Electronic Local Response ("LR"), error reports, jeopardy status reports and Service Activation Reports ("SAR") generate information that is returned to the CLEC electronically.

**Q. PLEASE EXPLAIN THE OBF AND ITS ROLE.**

A. The OBF is a forum of the Alliance for Telecommunications Industry Solutions ("ATIS"), which is a group involved in standards issues including interconnection and interoperability. The OBF provides a forum for telecommunications customers and providers, including ILECs, CLECs, and Interexchange Carriers ("IXCs"), to identify, discuss and resolve national issues that affect ordering, billing, provisioning and exchange of information about local and access services. The OBF is involved in the development of standard mechanisms by which ILECs and CLECs can interface effectively in the post-Act environment.

**Q. PLEASE EXPLAIN THE TERM "LSOG"?**

A. LSOG is a master "dictionary" developed by the ATIS OBF to define every field in the

LSR to insure consistent use and interpretation by all industry users of the LSR. New releases are issued periodically by the OBF. Verizon generally supports the development of industry standards wherever possible. Thus, Verizon's current practice is to have the two most recent versions available for CLECs to use in placing orders to provide both flexibility and up-to-date information.

**Q. HOW DO THE CLECS BENEFIT FROM THE AVAILABILITY OF THE SECOND AND THIRD ORDERING INTERFACES?**

A. These application-to-application interfaces give CLECs with their own systems a means to send Verizon West LSR ordering information using the LSOG forms. This is an efficient way to process large volumes of orders in a "real-time" processing and response environment.

**Q. PLEASE EXPLAIN VERIZON WEST'S REPAIR AND MAINTENANCE SYSTEMS.**

A. Verizon West handles all repair requests involving its network, whether from retail or wholesale users, via trouble tickets that are processed into Verizon West's Trouble Administration System ("TAS"). Verizon West has provided CLECs the capability to electronically send all information needed to process the trouble ticket request, and receive back from Verizon West any responses, error messages, or selection information necessary to complete the request. WISE Repair and the Electronic Bonding gateways are the two electronic interface options. The WISE Repair interface can be accessed through a WEB

GUI via the Internet or an Application Programming Interface ("API") from the CLEC's existing systems. These gateways process trouble tickets through the same Verizon West back-end systems used by Verizon West's own internally produced trouble tickets. Once the request is entered, it is processed into TAS, and Verizon West employees are dispatched as necessary via the Automated Work Administration System ("AWAS"). Alternatively, the CLECs can provide repair information to the Verizon Repair Resolution Centers ("VRRCs")[4] via an 800 toll-free access (with separate numbers for engineered, or designed, and non-engineered circuits).

**Q. PLEASE EXPLAIN VERIZON WEST'S BILLING AND USAGE SYSTEMS.**

A. Verizon West uses its retail end user billing system, Customer Billing Service System ("CBSS"), to bill for retail, resale and UNE services. CBSS billing data can be provided on paper or CD-ROM or as an electronic file structured in standard EDI version 811 electronic format. Transmission of a CBSS bill in EDI 811 format is available over the existing Connect Direct application used for Wholesale Network carrier bills. Verizon West also uses CBSS to bill retail and resale usage. Local usage information is provided along with access usage records in an industry-standard Electronic Message Record ("EMR") format. Verizon West also provides unrated usage records to the CLECs for their use in billing their end user customers. Unrated usage records show the amount of usage and information necessary to permit the CLEC to apply its own rates to the usage as appropriate. Customer billing information is obtainable for the end user in the same manner

[4] The VRRC was formerly known as the GTE CARE center.

that Verizon West obtains relevant information about its customers necessary for the rendering of a bill. Usage records may also be exchanged using the Connect Direct application used by Wholesale Network customers. Magnetic tape is also available.

## III. VERIZON WEST'S OSS MODIFICATION PROCESS

**Q. PLEASE EXPLAIN VERIZON WEST'S PROCESS FOR MODIFYING ITS WHOLESALE OSS.**

A. OSS enhancements are generated due to regulatory obligations or by ongoing desires to reduce National Market Center ("NMC")[5] operational costs, increase flow through capabilities, improve CLECs' ease of use of Verizon West's OSS interfaces; or improve generally OSS performance and efficiency. Enhancements originate from internal Verizon process owners and/or the CLEC community. The NMC and Wholesale Support Organization are process owners that design improvements to the ordering/provisioning process. The Verizon product managers are responsible for the pre-ordering, ordering/provisioning, repair/maintenance, and billing/usage of their local or network product. The CLEC community, through its Account Team and the CMP, also communicate its desires for process or system enhancements. As discussed in Sections III and V of my testimony, several CLEC-initiated enhancements resulted in 2000-2001 expenditures. Since February 2000, enhancements with the potential to impact the CLEC community have been reviewed with the CLECs through the CMP. Since July 2001, the CLEC community has participated in ranking Verizon-initiated and CLEC-initiated system

[5] In Part A of this proceeding, the NMC was referred to as the National Open Market Center

and process enhancements. All requests for process or system enhancements are internally evaluated. Verizon West then modifies the OSS interfaces based upon a thorough requirements gathering effort conducted with experts across cross-functional organizations (pre-ordering to ordering to provisioning to maintenance/repair to billing) to develop software requirements specifications. In addition, Verizon West adopted pre-order and order guidelines based on those developed within the OBF to ensure conformance to industry standards.

**Q. PLEASE EXPLAIN THE VERIZON CHANGE MANAGEMENT PROCESS ("CMP").**

A. Verizon regularly communicates process and system changes to the CLEC community. Information is exchanged as part of a high level schedule that becomes more defined to include field specific changes as the implementation date approaches. There is also a comment cycle whereby the CLEC community may request clarification or challenge a proposed change. The CLEC community may also initiate a change to a Verizon system or process and may also rank the importance of Verizon initiated CLEC impacting changes. Several changes in the 2001 schedule originated from a CLEC expectation or change request. For example, the CLEC Test Environment was created in June 2001 to provide the application-to-application interface users the opportunity to perform new entrant and new release testing. System outages are also communicated as part of the CMP process.

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("NOMC").

**Q. WHY DID VERIZON NOT USE OUTSIDE VENDORS?**

A. Prior to the Act, Verizon West's OSS were developed internally, not by outside vendors such as Telcordia. Since the processes were already in place, Verizon West decided to use the Verizon Data Services[6] workforce that was already familiar with the systems and processes to make the necessary changes and modifications to the existing processes, interfaces and systems. These changes did not require Verizon West to consider using outside resources in order to complete them in a cost effective and timely manner.

**Q. WHAT PROCESS WAS EMPLOYED TO CONTROL COSTS FOR THESE ENHANCEMENTS?**

A. Work performed by Verizon Data Services was handled through an internal "authorization to proceed" process that GTE developed in early 1996. This process is initiated by a "change request" from the business or functional owner of a new process or product, and this change request specifies the "high level" business needs. This change request generates an initial estimate from Verizon Data Services, which is then returned to the System Development group within the Process Efficiency organization for review and further modifications. Based upon the Verizon Data Services estimate, the process owner will make a decision to cancel or proceed to the next step. If the project proceeds to the next step, a detailed system and business requirement document is created and submitted to Verizon Data Services, which then generates a refined estimate. Again, the System Development Group will make a decision to either proceed with the project or cancel it. If

[6] Verizon Data Services was formerly known as GTE Data Services ("GTEDs").

the decision is to proceed, Verizon Data Services is authorized to begin developing the system high level and detail design. The end result of this iterative process is a clear statement of work with a complete understanding of the estimated costs associated with the project.

## IV. IMPLEMENTATION CRITERIA FOR OSS COST RECOVERY

**Q. WHAT CRITERIA DID VERIZON WEST USE TO DETERMINE WHETHER TO SEEK COST RECOVERY FOR OSS ENHANCEMENTS IN THIS DOCKET?**

A. Although I am not testifying to the costs associated these enhancements,[7] Verizon West utilized the following criteria to evaluate whether costs for OSS changes should be eligible for recovery:

1) Completed projects or in-progress projects scheduled to be completed in 2001 (excluding cancelled and unscheduled projects);

2) One-time expenses incurred in response to regulatory requirements to develop and implement OSS changes for use by CLECs;

3) Costs are prudent and reasonable;

4) Costs that are not linked to specific "demand-driven" activity but generally benefit all CLECs; and

5) Costs that are not included in either recurring or non-recurring cost studies.

[7] Verizon witness Larry Richter is Verizon's OSS cost witness in this proceeding.

Examples that meet these criteria include the costs of (1) purchasing, creating or modifying network or systems capabilities and product offerings to comply with FCC rules and orders and (2) developing or revising processes and methods and procedures needed to comply with the rules and orders.

**Q. CAN YOU DESCRIBE WHAT CLEC SERVICES WILL BENEFIT FROM SYSTEM IMPROVEMENTS VERIZON WEST DEVELOPED FOR THE CARRIERS AND THEIR END USERS?**

A. Not specifically, for several reasons. First, the Local Wholesale and Network Wholesale system improvements implemented by Verizon West affect processes (pre-ordering, ordering/provisioning, repair/maintenance and billing/usage), not services, and these processes affect all wholesale products and services that Verizon West provides to its CLEC customers. Therefore, in a very general sense, these processes affect all of the resale services as well as UNEs that Verizon West provides.

Second, the OSS changes Verizon West implemented to provide line sharing, Mechanized Loop Pre-Qualification ("MLPQ"), and Line Shared Unbundled Subloop Arrangements ("LSUSLA") benefit the CLECs who are interested in establishing a line sharing arrangement. As with Local Wholesale and Network Wholesale OSS enhancements, the OSS changes Verizon West made for line sharing, MLPQ, and LSUSLA affect processes, not services, and these processes (ordering, provisioning, and billing) were modified

specifically to enable line-sharing arrangements.

**Q. DID VERIZON'S RETAIL ORGANIZATION BENEFIT FROM THESE SYSTEM IMPROVEMENTS?**

A. No. While the CLEC community uses Verizon West's OSS to perform pre-order, order/provisioning, repair/maintenance and billing/usage functions, these wholesale OSS interfaces and gateways are not used by Verizon's Retail organization

**Q. ARE THERE ANY VERIZON SUBSIDIARIES THAT MAY HAVE BENEFITED FROM THE OSS ENHANCEMENTS?**

A. To the extent these system changes benefited CLECs in general, they also benefited Verizon's CLEC, Verizon Select Services Incorporated ("VSSI"). However, since VSSI is treated in the same manner as any other CLEC, it too must utilize the same interfaces as the CLECs. Thus, Verizon's OSS costs will be recovered from VSSI in the same manner as they will be recovered from other CLECs.

**Q. ARE THERE ANY OTHER VERIZON OPERATIONS THAT MAY HAVE BENEFITED FROM THE OSS ENHANCEMENTS?**

A. Yes. The Bell Atlantic/GTE Merger Order ("Merger Order")[8] resulted in the establishment of a separate affiliate, Verizon Advanced Data Inc. ("VADI"), to provide advanced

[8] In the Matter of GTE Corporation, Transferor, and Bell Atlantic Corporation, Transferee, For Consent to Transfer Control, CC Docket No. 98-184, Memorandum Opinion and Order, (Adopted and Released: June 16, 2000) ("Merger Order").

services.[9] On September 26, 2001, the FCC granted Verizon's request to reintegrate VADI.[10] The Merger Order set certain transitional obligations that Verizon must follow in order to assure appropriate operational parity upon the return of advanced services to the ILEC. These obligations require the ILEC to provide advanced services through a separate office or division within the ILEC, which must operate on an arms-length basis with the ILEC in many respects, including the use of the same interfaces as CLECs when ordering facilities from the ILEC used to provide a majority of advanced services orders.

Therefore, it is possible that the separate office or division established upon VADI's return of advanced services to the ILEC benefits from these OSS enhancements since it too must utilize the same interfaces as the CLECs. The fact remains, however, that the OSS costs will be recovered from the advanced services office or division just as they will be recovered from CLECs.

## V. 2000-2001 OSS ENHANCEMENTS

**Q. PLEASE IDENTIFY THE MAJOR PROCESS CATEGORIES AFFECTED BY THE OSS MODIFICATIONS THAT VERIZON WEST MADE DURING 2000**

[9] VADI received certification in the State of Washington on July 31, 2000 in Docket No. UT-001018 to offer and furnish facilities-based and resold telecommunications services.
[10] On December 12, 2001, the Commission granted Verizon NW's application to acquire facilities from VADI. *Order Granting Application, Docket UT-011410 dated 12/12/01*. The actual transfer of VADI's assets to Verizon in Washington occurred on January 1, 2002.

**AND 2001.**

A. In addition to the four OSS processes described above (pre-ordering, ordering/provisioning, repair/maintenance, and billing/usage), OSS performance measures were affected by Verizon West's system enhancements. This new category includes the development of wholesale performance measurements, providing CLECs with on-line access to these reports, and providing access to detailed OSS performance measurement support data.

The remainder of my testimony describes the OSS enhancements contained on pages 1-8 of Section A1 of Mr. Richter's Exhibit LR-6C. As explained by Mr. Richter, the 2000-2001 Development & Enhancement ("D&E") costs capitalized by Verizon Data Services and subsequently billed to Verizon Services Group were identified and tracked by assigning a distinct Data Processing Service Request ("DPSR") to each OSS enhancement. I address these enhancements or DPSRs based on the following five distinct service classifications that are explained in Mr. Richter's testimony: 1) Local Wholesale, 2) Network Wholesale, 3) MLPQ, 4) Line Sharing, and 5) LSUSLA.

Due to the large number of OSS enhancements contained in the "Local Wholesale" service category on pages 1-4 of Section A1 of exhibit LR-6C, I describe these OSS enhancements in groupings based on one of the following reasons for initiating the enhancement: 1) reducing NMC operational costs and increasing efficiency, 2) increasing flow through capabilities, 3) improving CLECs' ease of use of Verizon West's OSS

interfaces, and 4) improving OSS performance.

### A. Local Wholesale Service Category

**Q. WHAT FCC ORDERS PROMPTED VERIZON WEST TO IMPLEMENT ITS LOCAL WHOLESALE AND NETWORK WHOLESALE OSS CHANGES TO ITS INTERFACE SYSTEMS?**

A. Verizon West's OSS interface systems were designed and implemented primarily to comply with the provisions of the FCC's rules implementing the requirements of the Act. In its initial set of rules, the FCC determined that ILECs must provide non-discriminatory access to their OSS functions for pre-ordering, ordering/provisioning, maintenance/repair, and billing/usage available to the ILEC itself.[11] The FCC issued a subsequent Order requiring additional ILEC network elements to be unbundled.[12] Enhancements to OSS were also necessary to maintain and to improve the responsiveness and stability of the OSS.

**Q. PLEASE EXPLAIN THE OSS LOCAL WHOLESALE SERVICE CATEGORY.**

A. As explained by Mr. Richter, the OSS enhancements contained in the Local Wholesale Service category are those D&E costs the Company incurred to provide CLECs access to

[11] *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, "First Report and Order," FCC 96-325.

[12] *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, "Third Report and Order and Fourth

the Company's OSS functions for the ordering and provisioning of Resale/UNE services submitted through the Local Service Request ("LSR") process.

**Q. WERE SOME OF THE LOCAL WHOLESALE ENHANCEMENTS THAT ARE LISTED IN EXHIBIT LR-6C ALSO ADDRESSED BY VERIZON**

Further Notice of Proposed Rulemaking," FCC 99-238.

**WITNESS JEROME HOLLAND'S PART A TESTIMONY IN THIS PROCEEDING?**

A. Yes. Jerome Holland described the following DPSRs in his Part A direct testimony:

| Project No. | DPSR No. |
|---|---|
| 19 | PMCD0768<br>SIGD0043<br>SIGD0044<br>SIGD0045<br>SIGD0047<br>SIGD0049<br>SIGD0050<br>SIGD0057<br>SIGD0061<br>SIGD0064<br>SIGD0068<br>SIGD0077<br>SIGD0079 |
| 20 | SIGD0060<br>SIGD0076 |
| 21 | SIGD0066 |
| 22 | AWAD0228 |

In Part A of this proceeding, Verizon sought recovery of the 1998 and 1999 OSS transition costs that it incurred for these DPSRs, while in Part E of this proceeding Verizon is seeking recovery of the 2000 OSS costs associated with these enhancements. Mr. Holland's description of these projects and how these enhancements benefited the CLECs and not Verizon's Retail organization are also applicable to the 2000 OSS costs associated with these DPSRs, and are incorporated here by reference.

**Q. PLEASE EXPLAIN PROJECT 19.**

A. Project 19 D&E costs are associated with the CLEC ordering interfaces. This project

created a new interface and format to support the industry standard LSOG Version 4.

**Q. HOW DID THE COMPLETION OF PROJECT 19 BENEFIT CLECS AND THEIR CUSTOMERS?**

A. Project 19 allows CLECs with their own system and means to send Verizon West LSR ordering information using the LSOG version 4 standard, which is an efficient way to process large volumes of orders.

**Q. DOES VERIZON'S RETAIL ORGANIZATION BENEFIT FROM THE COMPLETION OF PROJECT 19?**

A. No. CLEC ordering interfaces are not used by Verizon's retail operations.

**Q. PLEASE EXPLAIN PROJECT 20.**

A. Project 20 D&E costs are associated with the CLEC repair and maintenance interface. This project developed an Integrated Voice Response Unit ("IVRU") for Verizon West's repair call center used by CLECs. It also enhanced the WISE interface to improve the screen layout and increase usability

**Q. DID THE COMPLETION OF PROJECT 20 BENEFIT CLECS AND THEIR CUSTOMERS?**

A. Yes. The IVRU can provide CLECs with improved answer time and functionality. Enhancements to the WISE interface will also improve the overall CLEC experience.

**Q. DID THE VERIZON RETAIL ORGANIZATION BENEFIT FROM THE COMPLETION OF PROJECT 20?**

A. No. This project established an IVRU and enhanced WISE, which are interfaces used only by CLECs and not Verizon's Retail organization.

**Q. PLEASE EXPLAIN PROJECT 21?**

A. Project 21 D&E costs are associated with the CLEC billing interface. This project enhanced Verizon West's current billing to the CLECs by providing additional information on the bill, such as circuit IDs associated with UNE loops. It also provided enhancements to reject usage sent by third parties by providing additional information.

**Q. DID THE COMPLETION OF PROJECT 21 BENEFIT CLECS AND THEIR CUSTOMERS?**

A. Yes. Project 21 improved the ability of the CLEC to audit the bills received from Verizon West. It also allowed for proper billing of third party usage.

**Q. DID THE VERIZON RETAIL ORGANIZATION BENEFIT FROM THE COMPLETION OF THESE OSS MODIFICATIONS?**

A. No. The CLEC billing and usage functions are not be used by Verizon's Retail operations.

**Q. PLEASE DESCRIBE PROJECT 22.**

A. Verizon West established a comprehensive set of performance measures designed to allow CLECs to determine how Verizon West's OSS systems and processes are performing. The measures and standards are based on a California Commission order and are the work product of an extensive collaborative effort between CLECs and Verizon West. CLECs operating within the State of Washington will have access to Washington-specific results by logging into a secure Internet web site.

**Q. DID THE COMPLETION OF PROJECT 22 BENEFIT CLECS AND THEIR CUSTOMERS?**

A. Yes. Allowing the CLECs to obtain OSS performance results via the Internet will place them in a better position to predict future performance and develop their own processes/systems.

**Q. DID THE VERIZON RETAIL ORGANIZATION BENEFIT FROM THE COMPLETION OF THESE OSS MODIFICATIONS?**

A. No. This performance measure interface is not used by Verizon's retail operations.

**Q. WHICH LOCAL WHOLESALE DPSRS WERE INITIATED TO REDUCE NMC OPERATION COSTS AND IMPROVE EFFICIENCY?**

A. The following wholesale DPSRs were initiated to reduce NMC operation costs and improve efficiency.

| | |
|---|---|
| PMCD0902 | SIGD0134 |
| PMCD1212 | SIGD0142 |

| | |
|---|---|
| SIGD0082 | SIGD0145 |
| SIGD0083 | SIGD0150 |
| SIGD0089 | SIGD0157 |
| SIGD0091 | SIGD0158 |
| SIGD0095 | SIGD0171 |
| SIGD0097 | SIGD0185 |
| SIGD0104 | SIGD0192 |
| SIGD0105 | SIGD0211 |
| SIGD0109 | SIGD0212 |
| SIGD0110 | SIGD0216 |
| SIGD0115 | |
| SIGD0121 | |

**Q. PLEASE EXPLAIN HOW THESE LOCAL WHOLESALE DPSRS IMPROVED PROCESS EFFICIENCY.**

A. These DPSRs share a common purpose of eliminating rework, reducing provisioning costs and improving management controls. PMCD01212 provided the ability to correctly bill the Subscriber Line Charge where an end user has multiple lines. PMCD0902, SIGD0121, and SIGD0142 created the ability to identify the source of an LSR (fax or electronic submission) to enable the return of confirmation information according to the media used to transmit the LSR. SIGD0082, 0083, 0089, 0091, 0095, 0097, 0105, 0104, 0109, 0110, 0115, 0134, 0145, 0150, 0157, 0158, 0185, 0212, and 0216 improved management controls of incoming LSRs. SIGD0171 automated manual reject codes, and SIGD0192 automated the population of date and time stamp on supplemental orders. SIGD0211 provided "view only" access to production orders to Verizon designated staff and training employees. This enhanced their ability to modify training documents based on current issues.

**Q. DID THE COMPLETION OF THESE DPSRS BENEFIT CLECS AND THEIR CUSTOMERS?**

A. Yes. CLECs benefited by being able to send an LSR via FAX, WISE GUI, or EDI and have the confirmation, jeopardy or completion returned by the same interface media. Providing the NMC personnel with enhanced reporting tools improved responsiveness to CLEC inquiries. Automating error codes benefits the CLECs by improving the turn around of incoming orders with errors. Verizon staff and training personnel could investigate production-impacting scenarios in real time without interfering in the provisioning process.

**Q. DID THE VERIZON RETAIL ORGANIZATION BENEFIT FROM THE COMPLETION OF THE OSS MODIFICATIONS MADE TO IMPROVE PROCESS EFFICIENCY?**

A. No. These enhancements improved only the efficiency of Verizon West's NMC and its ability to provide to CLECs.

**Q. WHICH LOCAL WHOLESALE DPSRS WERE INITIATED TO SUPPORT INCREASED FLOW THROUGH CAPABILITIES?**

A. The following wholesale DPSRs were initiated to improve flow through capabilities.

| | |
|---|---|
| PMCD0900 | SIGD0138 |
| PMCD0901 | SIGD0139 |
| PMCD0907 | SIGD0143 |
| PMCD0987 | SIGD0144 |
| PMCD1003 | SIGD0153 |
| PMCD1013 | SIGD0168 |
| PMCD1110 | SIGD0169 |
| SIGD0094 | SIGD0170 |

| | |
|---|---|
| SIGD0098 | SIGD0173 |
| SIGD0099 | SIGD0177 |
| SIGD0100 | SIGD0186 |
| SIGD0102 | SIGD0187 |
| SIGD0103 | SIGD0195 |
| SIGD0107 | SIGD0200 |
| SIGD0108 | SIGD0209 |
| SIGD0113 | SIGD0213 |
| SIGD0127 | SIGD0214 |
| SIGD0128 | SIGD0215 |
| SIGD0130 | SIGD0221 |
| SIGD0136 | |

**Q. PLEASE EXPLAIN HOW THESE LOCAL WHOLESALE DPSRS IMPROVED FLOW THROUGH CAPABILITIES.**

A. This grouping of DPSRs covers all initiatives to improve flow through of existing UNE and resale products that are ordered electronically. Product types that are electronically ordered are evaluated. As necessary, additional edits are created or manually applied edits are automated to configure a correctly formatted CLEC order to be provisioned without manual intervention. SIGD0153 automated the trouble report process for UNE loop services, provided access to trouble history and pending trouble report status, and confirmed CLEC ownership of the account. SIGD0221 enhanced the CLEC OSS repair function by redesigning the trouble reporting process to perform retail testing prior to creating a trouble ticket. CLECs had gained access to the retail testing functionality in Phase 1, but they were not using these tools to isolate trouble prior to contacting Verizon West. PMCD0907 made the necessary changes to enable the UNE Platform ("UNE-P") order created in PMCD0900 eligible for processing on a flow through basis. SIGD0130 automates local number portability orders. PMCD1110 confirmed the accuracy of internal

databases necessary to confirm CLEC account ownership. PMCD1013 improved the automation of the hot cut coordinated conversion process. PMCD0987 automated the circuit assignment process. SIGD0098, 099, 0100, 0102, 0103, 0209 provided additional automation and flow through of the ordering process for ADSL service. SIGD0094 automated the assignment of due date for ADSL services. PMCD0901, 1003, SIGD0107, 0127, 0138, 0143, 0144, 0195, 0200, 0213, 0214, 0215 modified business rules and edits to improve the percentage of incoming requests that are provisioned without manual intervention. These enhancements cover all local wholesale products, and are the result of defect analysis on why electronic orders fall out. SIGD0108, 0113, 0128, 0168, 0169, 0170, 0186, and 0187 also worked towards improving flow through for directory listings orders, inside wire, residual billing, voice mail, partial migrations, CLEC-to-CLEC migration, and requests for directory listing changes associated with a port out service. SIGD0139 eliminated type of service order service code discrepancies. SIGD0173 automated simple order processing for loop service requests. SIGD0177 automated temporary disconnect/reconnect of a CLEC end user voice services. SIGD0136 created a mechanized Caption Listing Request Form to automate the submission of a CLEC request for the end user's directory listings containing a caption.

**Q. DID THE COMPLETION OF THESE DPSRS BENEFIT CLECS AND THEIR CUSTOMERS?**

A. Yes. These enhancements generally worked to move a paper order to an electronic format. This provided CLECs the opportunity to automate their order submission process. Once

established as a type of service capable of being ordered, the provisioning interfaces were configured to support order automation.

**Q. DID THE VERIZON RETAIL ORGANIZATION BENEFIT FROM THE COMPLETION OF THE OSS MODIFICATIONS MADE TO INCREASE FLOW THROUGH CAPABILITIES?**

A. No. Verizon's Retail organization does not use the CLEC OSS interfaces. All OSS enhancements were made to the systems that accept and edit incoming CLEC orders.

**Q. WHICH LOCAL WHOLESALE DPSRS WERE INITIATED TO IMPROVE CLEC EASE OF USE OF VERIZON'S OSS INTERFACES?**

A. The following DPSRs were initiated to improve CLEC ease of use of Verizon's OSS interfaces.

| | |
|---|---|
| PMCD0890 | SIGD0165 |
| PMCD0908 | SIGD0183 |
| PMCD0924 | SIGD0188 |
| PMCD1111 | SIGD0197 |
| SIGD0141 | SIGD0205 |
| SIGD0146 | SIGD0206 |
| SIGD0156 | SIGD0219 |
| SIGD0162 | SIGD0220 |

**Q. PLEASE EXPLAIN HOW THESE LOCAL WHOLESALE DPSRS IMPROVED THE CLECS' EASE OF USE OF VERIZON'S OSS.**

A. These DPSRs provided CLECs with new processes, enhanced functions, and other initiatives in response to changing market conditions. For example, PMCD0924 modified the loss notification process in response to CLEC merger and acquisition activities. Usually,

when Verizon West receives order activity from a CLEC that is not the end user's current local service provider, this indicates a CLEC-to-CLEC migration. Verizon West's response is to send a loss notification report to the former provider alerting it of the change. When a CLEC sends a request using the identity of a CLEC it acquired through a merger or acquisition, the merged CLEC expects Verizon West to identify that ownership of the account has really not changed and, to suppress sending the loss notification. SIGD0197 modified field names across LSOG 4-5 forms to improve consistency. This modification originated from Verizon OSS CLEC collaborative sessions. SIGD0146 created ordering edits to prevent the submission of a LSR in a non-production LSOG version. SIGD0188 offered pre-order address validation functions to the Network Wholesale customer. This expansion of a local feature into the access market should help reduce problems with service addresses on Access Service Requests ("ASR"). SIGD0205 created the CLEC Test Environment where new entrant and new release of EDI and CORBA production code is tested in a non-production environment. SIGD0206 added LSR specific notification including the option of no-notification. SIGD0141, 0156, 0162, 0165, and 0219 improved performance reporting capabilities. PMCD0908 created performance reporting on-line capability. PMCD0890 enhanced the retail billing output to provide loop circuit identification on numbers on the UNE bill. PMCD1111 enhanced Verizon's ability to render the CLEC a wholesale bill containing line specific information. SIGD0183 and 0220 expanded download report functions and added CLEC-to-CLEC reporting to the OSS performance metric website.

**Q. DID THE COMPLETION OF THESE DPSRS BENEFIT CLECS AND THEIR CUSTOMERS?**

A. Yes. CLECs that have merged with other CLECs typically retain the ordering identifier of the pre-merger business units. They expect Verizon West to distinguish between them when the merged entity orders services using the identifier of any business unit. Common field names made it easier for the CLEC representatives and developers to map field names across the LSOG 4 and LSOG 5 order guidelines. The test environment created a non-production test environment for new entrants and new release testing. This benefited the CLECs by reducing the risk associated with going into production with untested interfaces. Other enhancements created on-line reporting of OSS performance measurements and improved the usefulness of this tool.

**Q. DID THE VERIZON RETAIL ORGANIZATION BENEFIT FROM THE COMPLETION OF THE OSS MODIFICATIONS MADE TO IMPROVE CLEC'S EASE OF USE OF VERIZON WEST'S OSS INTERFACES?**

A. No. These system enhancements were made to wholesale interfaces that are only utilized by CLECs.

**Q. WHICH LOCAL WHOLESALE DPSRS WERE INITIATED TO SUPPORT OSS PERFORMANCE?**

A. The following DPSRs were initiated to support OSS performance:

| | |
|---|---|
| SIGD0026 | SIGD0111 |
| SIGD0058 | SIGD0112 |

| | |
|---|---|
| SIGD0078 | SIGD0166 |
| SIGD0088 | SIGD0167 |
| SIGD0093 | SIGD0198 |

**Q. PLEASE EXPLAIN HOW THESE LOCAL WHOLESALE DPSRS IMPROVED OSS SYSTEM PERFORMANCE?**

A. The DPSRs noted above improve how data is exchanged between the CLEC and Verizon West's OSS, within Verizon West's OSS, and between Verizon West's OSS and its legacy systems. SIGD0058, 0078, 0088, 0111, 0112, 0166, and 0198 improved the exchange of information between SIGS and backend systems and system performance. SIGD0026 enhanced wholesale billing. SIGD0093 improved the transfer of loop qualification data for access by the CLEC through the MLPQ. SIGD0167 eliminated delay in the assignment of due dates.

**Q. DID THE COMPLETION OF THESE DPSRS BENEFIT CLECS AND THEIR CUSTOMERS?**

A. Yes. These enhancements were necessary to maintain system responsiveness and improve the flow of data between the systems of Verizon West and the CLECs.

**Q. DID THE VERIZON RETAIL ORGANIZATION BENEFIT FROM THE COMPLETION OF THE OSS MODIFICATIONS MADE TO IMPROVE OSS PERFORMANCE?**

A. No. These system enhancements were made to wholesale interfaces that are only utilized

by CLECs.

### B. Network Wholesale Service Category

**Q. EXPLAIN THE OSS NETWORK WHOLESALE SERVICE CATEGORY.**

A. As explained by Mr. Richter, the OSS enhancements contained in the Network Wholesale Service category are those costs the Company incurred to provide CLECs access to the Company's OSS functions for the ordering and provisioning of UNE services submitted through the ASR process.

**Q. PLEASE EXPLAIN THE IMPORTANCE AND SCOPE OF THE NETWORK WHOLESALE SYSTEM ENHANCEMENTS.**

A. These enhancements improved the CLECs' ease of use of Verizon West's Access Customer Gateway interface. Verizon's ability to support the resale of dark fiber was also enhanced with the establishment of a pre-order address validation and electronic ordering process.

**Q. DID THE COMPLETION OF THESE DPSRS BENEFIT CLECS AND THEIR CUSTOMERS?**

A. Yes. The website improved CLEC navigation and access to information. Automating the dark fiber pre-order and order process replaced manual faxing of CLEC requests for augmenting existing dark fiber routes.

**Q. DID THE VERIZON RETAIL ORGANIZATION BENEFIT FROM THE COMPLETION OF THE OSS MODIFICATIONS MADE TO THE NETWORK WHOLESALE SERVICE CATEGORY?**

A. No. These interfaces are not used by Verizon Retail organization.

## C. MLPQ Service Category

**Q. WHAT FCC ORDERS PROMPTED VERIZON WEST TO IMPLEMENT ITS OSS CHANGES FOR MECHANIZED LOOP QUALIFICATIONS?**

A. As explained by Mr. Richter, Verizon West implemented MLPQ to comply with the FCC's UNE Remand Order that required ILECs to provide CLECs with nondiscriminatory access to the same information about the loop that is available to the ILEC.

Phase I of the MLPQ modification included enhancement of the WISE interface to perform the MLPQ function. Through the WISE, CLECs have the ability to request loop qualification information. When a CLEC submits a request, the request is forwarded to the appropriate system. The system(s) validates the Working Telephone Number ("WTN") or address, then gathers the loop make-up data based on the facility path associated with the WTN or address. The data is returned to the requester via the same method from which it was submitted.

With the completion of OBF Issue 1881, Phase II of the project was finalized and

implemented to permit EDI and CORBA to perform the MLPQ function.

**Q. PLEASE EXPLAIN THE OSS MLPQ SERVICE CATEGORY.**

A. As explained by Mr. Richter, MLPQ OSS transition costs are those D&E costs Verizon West incurred to establish the MLPQ process for WISE, EDI and CORBA interfaces.

**Q. PLEASE EXPLAIN THE IMPORTANCE OF IMPLEMENTING THE MLPQ ENHANCMENTS.**

A. Loop Qualification is part of the pre-order OSS function, and is used by CLECs to pre-test Verizon West's facilities that may be used in provisioning service to a potential end user. By entry of a valid telephone number or address, the facilities used to provision services to that location are revealed to the CLEC. Armed with the facility make-up information described in Mr. Richter's testimony, the CLEC can determine if the facility is capable of supporting DSL. Loop Qualification was first made available via the WISE interface and deployed in EDI and CORBA with the availability of LSOG 5.

**Q. DID THE COMPLETION OF THESE DPSRS BENEFIT CLECS AND THEIR CUSTOMERS?**

A. Yes. These enhancements enabled CLECs to target market customers for advanced services and replaced fax return processes with an electronic option.

**Q. DID THE VERIZON RETAIL ORGANIZATION BENEFIT FROM THE COMPLETION OF THE OSS MODIFICATIONS MADE TO THE NETWORK WHOLESALE SERVICE CATEGORY?**

A. No. These enhancements were to wholesale interfaces not used by Verizon's Retail organization.

## D. Line Sharing Service Category

**Q. WHAT FCC ORDERS PROMPTED VERIZON WEST TO IMPLEMENT ITS OSS CHANGES FOR LINE SHARING?**

A. Verizon West implemented changes to its OSS for line sharing to comply with the FCC's Line Sharing Order and Line Sharing Reconsideration Order.[13] These enhancements provided the initial capability for the voice and the data providers to jointly access appropriate account information, order services, disconnect service and create trouble tickets for voice or data service. Automation of the line sharing order was also required to make line sharing available to be provisioned without manual intervention.

**Q. EXPLAIN THE OSS LINE SHARING SERVICE CATEGORY.**

[13] *In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Third Report and Order in CC Docket No. 98-147, Fourth Report and Order in CC Docket No. 96-98 rel. Dec. 9, 1999) ("Line Sharing Order") and Third Report and Order on Reconsideration in CC Docket No. 98-147, Fourth Report and Order on Reconsideration in CC Docket No. 96-98, Third Further Notice of Proposed Rulemaking in CC Docket No. 98-147, Sixth Further Notice of Proposed Rulemaking in CC Docket No. 96-98

A. This service category includes the D&E costs necessary to create the ability to accept a line-sharing request and to enable a correctly formatted CLEC LSR to be provisioned without manual intervention. Enhancements to the WISE Repair interface were also required to accept, process and close a CLEC trouble ticket.

**Q. HAS VERIZON INCLUDED ANY OSS ENHANCEMENTS IN ITS COST RECOVERY REQUESTS IN THIS PROCEEDING FOR LINE SPLITTING?**

A. No. Verizon West has only recently begun implementing the required OSS enhancements for CLECs and Data Local Exchange Carriers ("DLECs") to start ordering line-splitting services. Therefore, the complete activities analysis and project summaries required for a cost recovery request are not available at this time. Verizon reserves its right to revisit the OSS enhancements cost recovery issue for line splitting at a later date.

**Q. PLEASE IDENTIFY THE MAJOR PROCESSING CATEGORIES THAT WERE AFFECTED BY VERIZON WEST'S LINE SHARING OSS MODIFICATIONS.**

A. OSS modifications were made to external and internal ordering processes, internal provisioning and billing processes. In addition, the repair database had to be updated to reflect customers with line sharing service.

**1. Ordering Interfaces**

(Line Sharing Reconsideration Order), FCC 01-26, January 19, 2001.

**Q. HOW WERE THE CHANGES IMPLEMENTED FOR ORDERING?**

A. Modifications to line sharing ordering occurred in three phases. Changes were made to update the CLECDLEC profiles to allow the CLEC/DLEC to order a line sharing service. The CLEC/DLEC profile contains a list of products the CLEC/DLEC is authorized to order based on its interconnection agreement. In addition, the WISE web site was updated with line sharing ordering information. This change did not affect the way the CLEC/DLECs order today, but a new return feed was created specifically for line sharing to alert the CLEC/DLEC when the end user modified the retail account structure. This provides the CLEC/DLEC with an opportunity to react to the changes and take action based upon its market strategy. The return feed also provides critical information to the CLEC/DLEC, such as telephone number changes on the account.

The creation of the CLEC/DLEC LS notification also included new return feeds for LSOG 2 and LSOG 4 with the following fields for information: CC (company code), WTN (working telephone number), CVD (conversion date), ECCKT (exchange company circuit ID), LSPAN (Local Service Provider's authorization number), OSTN (old shared telephone number), FBTN (service fictitious billing telephone number), and TXTYP (transaction or activity type).

**Q. PLEASE EXPLAIN PHASE I.**

A. Phase I of the implementation of ordering for the line sharing product included adding new values to the Type of Service ("TOS") field on the LSR form to 1) separate the line sharing product from other loop requests, 2) associate edits for the business rules to ensure valid

ordering of line sharing, and 3) enhance flow through for the install portion of the line sharing request. Upon implementation, the flow through installation order would be fully written by the automation system, and then routed to a NMC associate for completion of the activity required to cross-reference the line sharing account with the retail account.

**Q. WHY IS IT IMPORTANT TO ASSOCIATE THE LINE SHARING ACCOUNT WITH THE RETAIL ACCOUNT?**

A. Cross-referencing or associating the two accounts is required due to activity that can occur on the retail account that may impact line sharing. For example, an end user may contact a Verizon residential service office and request to disconnect local service. Without cross-referencing that shows that the account has a line sharing service, Verizon would not be in a position to notify the DLEC. In addition, a request for a telephone number change would not be communicated to the DLEC.

**Q. PLEASE EXPLAIN PHASE II.**

A. Phase II of line sharing implementation included several modifications to ordering and billing. The second phase completed the flow through automation process for line sharing requests by automating the associated retail order via a mass order generator and eliminating the requirement for manual intervention, although manual intervention can occur for various reasons at points of failure throughout the automation process. These modifications included:

1) The addition of a new screen to the legacy system, NOCV, and related and necessary changes to numerous other existing NOCV screens to allow the automation of order processing;

2) Associated customer profile modifications to identify line sharing service;

3) Table modifications for validation to ensure the CLEC is established to offer line sharing service; and

4) The creation of a new Loss Notification return feed. The Loss Notification (soon to be renamed Provider Notification) return feed notifies the CLEC/DLEC when the end user disconnects voice services. This is necessary to alert the CLEC/DLEC to convert the service to a UNE loop or the line sharing service will be disconnected automatically. Notification for changing telephone numbers was also included.

**Q. YOU MENTIONED THAT MANUAL INTERVENTION CAN OCCUR FOR VARIOUS REASONS. COULD YOU PROVIDE AN EXAMPLE?**

A. One example would be if the order had incorrect or missing information. In this situation, the order would be rejected during the automation process and would require a NMC associate to manually intervene to correct the order or to contact the CLEC/DLEC.

**Q. YOU HAVE USED THE TERM "FLOW THROUGH". PLEASE EXPLAIN VERIZON'S USE OF THE TERMS "MANUAL" AND "SEMI- MECHANIZED" AS THEY RELATE TO "FLOW THROUGH"?**

A. Manual activity requires a NMC associate to completely write the orders when

CLEC/DLECs submit requests via FAX. Semi-mechanized activity occurs when requests are submitted to Verizon West electronically and a representative must intervene to enable the order to proceed in the provisioning process. Flow through is an electronically submitted LSR, where a service order is created and distributed to provisioning without manual intervention.

**Q. PLEASE EXPLAIN THE ACTIVITIES THAT OCCURRED IN PHASE III?**

A. Since internal modifications to Verizon West's processes were affected by the requirements of line sharing, a third phase of implementation was required. Modifications were made to the NOCV Non-Designed Loop ("NDLP") screen to create fielded information that had been previously noted on a general remark screen. The fielded information then required modifications to illustrate association of the information to pending order files for comparison purposes.

**Q. HOW DO THE CLEC/DLECS BENEFIT BY THESE CHANGES?**

A. CLEC/DLECs benefit because they have been provided with an automated line sharing ordering process that improves local service confirmation timeliness, flow through percentages, and reject timeliness; decreases jeopardy scenarios; and automates the notification to the CLEC/DLEC regarding changes to the end user account structure.

**Q. DID VERIZON'S RETAIL ORGANIZATION BENEFIT FROM THESE CHANGES?**

A. Verizon's Retail organization did not benefit, as it does not sell the line sharing service and

would have no need for the return feed information.

### 2. Provisioning Interfaces

**Q. DID VERIZON WEST MAKE ANY CHANGES TO ITS PROVISIONIG PROCESSES IN ORDER TO PROVIDE LINE SHARING?**

A. Yes. Modifications to the provisioning interfaces were made to accommodate the changes made to the ordering interfaces. These changes included updates to the Assignment Activity Inventory System ("AAIS"), such as new MARK Input Term ("MIT") codes to identify line sharing. These changes also included new NOCV screens, such as Shared Services ("SSVC") screen, created to ensure that cross-references between the POTS and line share accounts were available for both provisioning and repair.

**Q. HOW DO CLEC/DLECS BENEFIT BY THESE CHANGES?**

A. Yes. All provisioning and engineering databases must reflect the line sharing product offering and the identity of the data provider. This relationship is critical to provisioning services and responding to a trouble report. These enhancements are basic and intended to allow Verizon to support the line-sharing product. CLEC/DLECs benefit by being able to initiate subsequent line sharing orders and repairs requests electronically by using OSS interfaces rather than manually by telephone.

**Q. DID VERIZON'S RETAIL ORGANIZATION BENEFIT FROM THESE**

**CHANGES?**

A. No. These enhancements identify the CLEC/DLEC offering of line sharing on an account.

### 3. Billing Interfaces

**Q. DID VERIZON WEST MAKE ANY CHANGES TO ITS BILLING PROCESSES IN ORDER TO PROVIDE LINE SHARING?**

A. Yes. Modifications were made to billing to recognize the new line sharing attributes and to create a separate line sharing account in order to bill the CLEC/DLEC for the line sharing elements.

**Q. HOW DO CLEC/DLECS BENEFIT BY THESE CHANGES?**

A. The modifications ensure accurate and timely billing of the new line-sharing product.

**Q. DID VERIZON'S RETAIL ORGANIZATION BENEFIT FROM THESE CHANGES?**

A. No. The rendering of an accurate wholesale bill to a CLEC/DLEC provides no direct benefit to Verizon's Retail organization

## E. LSUSLA SERVICE CATEGORY

**Q. WHAT FCC ORDERS PROMPTED VERIZON WEST TO IMPLEMENT ITS**

**OSS CHANGES FOR LSUSLA?**

A. As explained by Mr. Richter, Verizon implemented LSULSA in accordance with the FCC's Line Sharing Order.

**Q. PLEASE EXPLAIN THE OSS LSUSLA SERVICE CATEGORY.**

A. This service category includes D&E costs that were incurred to create the ability to accept an incoming subloop request and for the request to be provisioned without manual intervention.

**Q. DID THE COMPLETION OF THESE DPSRS BENEFIT CLECS AND THEIR CUSTOMERS?**

A. Yes. The ordering and provisioning of a subloop is treated the same as local service products capable of being supported on a flow through basis, which is more operationally efficient to both the CLEC and Verizon.

**Q. DID THE VERIZON RETAIL ORGANIZATION BENEFIT FROM THE COMPLETION OF THE OSS MODIFICATIONS MADE TO THE NETWORK WHOLESALE SERVICE CATEGORY?**

A. No. The Verizon Retail organization does not use the wholesale interfaces.

## VI. FUTURE OSS ENHANCEMENTS

**Q. DOES VERIZON WEST CONTINUE TO DEVELOP OSS INTERFACE SYSTEMS IN ADDITION TO REQUIREMENTS THAT WERE PREVIOUSLY IMPLEMENTED?**

A. Yes. Verizon West continues to be actively involved in pursuing national interface standards for OSS systems. Verizon West participates in various ATIS OSS committees that have been organized for this purpose. By supporting these efforts, Verizon West intends to continue managing the costs of developing future interfaces, and develop those enhancements in a manner that allows CLECs to realize the full benefits of the functionality being developed.

**Q. WHAT OSS IMPROVEMENTS HAS VERIZON WEST UNDERTAKEN FOR COMPLETION IN 2002 AND BEYOND?**

A. Verizon West is continually improving its OSS performance. Verizon West has completed or is in the process of completing several OSS improvements during 2002. For example, earlier this year Verizon West implemented LSOG 5 and retired LSOG 2. Verizon also

implemented the initial and labor-intensive manual process for two line splitting scenarios. The first accepts a line splitting order for UNE-P and adds a data provider and the second is for an existing line sharing account to migrate to line splitting. Enhancements were made to support line sharing of a subloop arrangement. Loop flow through performance was also implemented. Process efficiency was improved by converting certain manually applied edits to system generated edits. The Customer Service Inquiry ("CSI") pre-order transaction was enhanced to provide additional access to non-formatted remark information. The WISE Repair interface was modified to mirror the pre-order and order screens and the log in process was streamlined. The retail billing system was enhanced in phases to produce an industry standard Billing Output Specification ("BOS") for CLECs. Verizon implemented an industry defined Provider Notification to support giving the outgoing CLEC resale notification, line sharing notification, line splitting notification, line sharing to line splitting notification and UNE-P to line splitting notification. Line Sharing and UNE-P business rules and edits were enhanced to improve flow through.

## VII. SUMMARY

**Q. PLEASE SUMMARIZE THE MAIN POINTS OF YOUR TESTIMONY.**

A. Verizon West made a number OSS enhancements during 2000 and 2001 to implement FCC rules and orders promulgated under the Act. These enhancements provide CLECs functional capabilities that they would otherwise not have. These enhancements do not benefit Verizon's retail operations but do benefit the CLECs and their customers. By

drawing on its internal expertise, Verizon West was able to commence these projects promptly and to ensure that they were prudently developed and effectively implemented. Verizon should be allowed the opportunity to recover the costs it incurred to conduct these projects and implement changes to its OSS.

**Q. DOES THIS CONCLUDE YOUR PHASE E DIRECT TESTIMONY?**

A. Yes, it does.