

DRAFT - 9/18/00
FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

Service Descriptions
Line Splitting

Verizon is exploring the feasibility of implementing several possible scenarios of line splitting that have been identified during the NY Collaborative proceeding.

Verizon has focused on the following three specific service scenarios:

1. A Verizon voice customer is converted to a competitive voice provider and separate DLEC for data service;
2. An existing Verizon voice customer with a DLEC provided DSL moves to a competitive voice provider and wishes to retain the same DLEC provided data service; and
3. An existing UNE-P customer wishes to add data service.

These line-splitting scenarios are discussed at a high-level in the service descriptions set forth below, which include Verizon's initial responses to the CLECs proposed business rules.¹ These responses include certain assumptions related to issues, such as, the business relationship among the voice and data providers, which voice CLECs will line split with which data CLECs, who will control the service in regards to ordering, modifying, and disconnecting services and who will pay for the appropriate invoices.

Verizon's preference is that the voice provider be the point of contact for facilitating line splitting on loops where the voice service is provided by other than Verizon. Recently, the CLECs requested Verizon to develop different permutations of each of the three scenarios that would allow ordering, modifications, disconnects and billing to occur when: (1) the voice CLEC is in control, (2) the data CLEC is acting on behalf of the Voice CLEC, or, (3) both the voice CLEC and data CLEC control their portions of the line.

¹ Line Splitting arrangements will be allowable with the same technologies that the FCC has declared acceptable for traditional Line Share arrangements. These include: ADSL (in accordance with T1.413), Splitterless ADSL (in accordance with T1.419), RADSL (in accordance with TR #59), or MVL (a proprietary technology).

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

The service descriptions set forth below are for discussion purposes and in no way obligates or commits Verizon to implement the scenarios as presented here as product offerings. Further discussion and product development may warrant changes to the descriptions provided here².

Verizon is not offering to provide 3rd party billing and collection activities on behalf of any CLEC, DLEC or another party (i.e., an ISP) for any of the scenarios discussed herein.

It is Verizon's intent to obtain feedback on the line splitting product descriptions with the CLECs at the September 21st NY Collaborative session. Verizon and the CLECs must come to agreement about which permutations will be developed going forward.³ As an initial matter, at least one of these scenarios (No. 3 -- both parties in control) appears to be inconsistent with existing FCC rules. The parties must resolve this issue as soon as possible. Once a mutual decision has been reached, Verizon can begin assessing the specific operational impacts in detail and can provide estimated development timelines to the CLECs. The timelines will include presentations on a regular basis at the NY Collaboratives that will communicate the progress of the initiatives. Due to the various complexities of line splitting, and if Verizon were to proceed, it would be Verizon's intent to carefully plan each phase of line splitting including pre-ordering, ordering, provisioning, order activity including modifications, disconnects, and billing.

The Service Descriptions provided here are works in progress. As aspects of the work flows and OSS processes necessary for line splitting are analyzed, and as layers of complexity are peeled back, additional work efforts are likely to be identified. This Service Description is a reflection of where Verizon is in its analysis as of September 18, 2000.

This document will change going forward.

² The provision of the Draft Service Descriptions for Line Sharing included in this document does not constitute a waiver of Verizon's legal rights and remedies. Verizon specifically reserves all its legal rights and remedies including all legal issues addressed in Verizon's Initial and Reply Briefs recently submitted in the litigation phase of Case 00-C-0127.

³ As noted, the three permutations are: (1) the voice CLEC is in control, (2) the data CLEC is in control and is acting on behalf of the CLEC, or, (3) both the voice CLEC and data CLEC control their portions of the line.

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

A. Description of Service Scenarios

Service Scenario 1: A Verizon voice customer is converted to a competitive voice provider and separate DLEC for data service

The status of the account pre-line splitting, regardless of the permutations discussed below, is as follows:

- the end user is receiving a Verizon Retail bill for their voice service and has a Verizon CSR on record
- Verizon has one account of record established
- the end user controls activity to their voice account including ordering, modifications, disconnects and repair activity
- voice testing is performed by Verizon
- the end user reports voice troubles to Verizon

Permutation 1: The Voice CLEC is in control.

When a Verizon voice customer is to be converted to a competitive voice provider and a separate DLEC for data service is being added as well, and the CLEC is in control, then the following activities would occur:

- a loop pre-qualification of the TN/Address would be performed by the CLEC
- if the facility is qualified, based on the type of loop being ordered, the voice CLEC would issue an LSR
- when the 2W Line Splitting DSL Loop is ordered, the LSR submitted by the voice CLEC would:
 - be populated with appropriate values to convert a Verizon voice account to a CLEC 2W Line Splitting DSL Loop
 - be populated with appropriate values to disconnect the Verizon retail voice account
 - note that a re-use of appropriate facilities is required in order to maintain the voice service
 - contain the SBN, circuit number, and CFA information
 - note that the loop is to be used for data in addition to voice (this will indicate on the account the need to retain copper facilities)
 - switch port, LNP, Directory and 911 related orders/order sections, if applicable, would be submitted and processed as usual
- the voice CLEC would submit an LSR to show a DLEC relationship for maintenance purposes
- the voice CLEC would control activity to the voice account including

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

- ordering, modifications, disconnects and repair activity
 - the voice CLEC would provide activity information to Verizon on the data maintenance and provisioning Line Splitting record that has been created
 - the voice CLEC would have access to the CSR
 - the voice CLEC would be responsible for voice and data testing
 - the voice CLEC would be responsible for paying Verizon for voice, data, and line splitting elements billed.
-
- if the loop is not on a qualified facility, the voice CLEC may have the option to request conditioning under the Digital Designed Loop product line
 - if conditioning is performed, the CLEC would be billed by Verizon for conditioning activity

Permutation 2: The DLEC is acting as agent on behalf of the CLEC.

When the DLEC is acting as agent on behalf of the CLEC, then:

- all orders would be placed by either the voice CLEC or the DLEC including new orders, modifications, disconnects and repair activity using the Voice CLEC's identification, ordering codes and various systems access rights
- the LSR submitted would indicate that the loop is to be used for data (this will indicate on the account the need to retain copper facilities)
- disconnects for the voice would be placed by the voice CLEC
- disconnects for data would be placed by the DLEC using the Voice CLEC's identification, ordering codes and various systems access rights; the DLEC would communicate disconnect activity to the Verizon as a result of the DLEC Line Splitting maintenance record on file
- CFA, SBNs, and circuit numbers would be provided by either party under the identification, ordering codes and various systems access rights of the Voice CLEC
- either party would be responsible for voice and data testing and interfacing with Verizon on an integrated basis under the Voice CLEC's identification, ordering codes and various systems access rights
- the interfacing party will be viewed as having full responsibility for the activities on the loop
- either party, using the voice CLEC's identification and systems access rights and codes would have CSR-viewing capabilities
- the voice CLEC would be responsible for paying Verizon for voice, data, and line splitting elements billed

DRAFT - 9/18/00
FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

Permutation 3: The Voice CLEC and DLEC each control their portion of the loop.

When the voice CLEC and DLEC each have control over their portion of the loop and independently order activity on an account where voice is provided by a competitive voice provider and where data is provided by a separate DLEC, then:

- a loop pre-qualification of the TN/Address would be performed by the CLEC or DLEC
- if the facility is qualified, based on the type of loop being ordered, the voice CLEC would issue an LSR for the loop and switch port, LNP, Directory and 911
- when the 2W Line Splitting DSL Loop is ordered, then the LSR submitted by the voice CLEC would:
 - be populated with appropriate values to convert a Verizon voice account to a CLEC 2W Line Splitting DSL Loop
 - be populated with appropriate values to disconnect the Verizon voice account
 - note that a re-use of appropriate facilities is required in order to maintain the voice service
 - contain the CFA, SBN and circuit number
 - note that the loop is to be used for data (this will indicate on the account the need to retain copper facilities)
 - switch port, LNP, Directory and 911 related orders, if applicable, would be submitted and processed as usual
- the voice CLEC would control activity to the voice account including ordering, modifications, disconnects and repair activity
- the DLEC would submit CFA information
- the DLEC would control activity to the data maintenance and provisioning record
- the voice CLEC and DLEC would have access to the CSR
- the DLEC would submit an LSR to show a DLEC relationship for maintenance purposes; a Line Splitting DLEC record would be created
- the voice CLEC would be responsible for voice testing
- the DLEC would be responsible for data testing
- either party could effect a change in the status to the other party's CSR by interchanging data among themselves and coordinating input between the CLEC and DLEC before providing to Verizon

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

- if the loop is not on qualified facilities, the voice CLEC or the DLEC may have the option to request conditioning under the Digital Designed Loop product line
- if conditioning is performed, the CLEC or the DLEC, who ever places the order, would be billed by Verizon for conditioning activity

Status of the account post line-splitting, after any one of the three permutations were exercised, would be as follows:

- Under permutations 1 and 2 the competitive voice provider receives a Wholesale bill for the appropriate voice and data charges, and under permutation 3 the DLEC receives a wholesale bill for the appropriate data charges and the voice provider receives a wholesale bill for the appropriate voice charges. In all three permutations either could be billed for conditioning related charges depending on the circumstances.
- a DLEC line split record is on file for provisioning/maintenance purposes
- a CSR is available; depending upon which permutation is exercised, either the CLEC or DLEC or both would have access to the CSR
- depending upon which permutation is exercised, either the voice CLEC or DLEC or both would be responsible for any activity or updates to the DLEC maintenance account
- responsibility for testing of voice and data would be dependent upon which permutation is exercised
- nothing done in these scenarios or permutations affect existing collocation or splitter billing charges at this time

Verizon would not be involved in the following activities; this information is being provided for clarity purposes. (Verizon is not providing a third party billing arrangement.) CLECs and DLECs/ISPs are responsible for these activities.

- the end user receives a voice bill from the CLEC
- the end user receives a data bill from the CLEC, DLEC or ISP
- disconnect arrangements and notifications would need to be coordinated between the CLEC/DLEC/ISP and Verizon would need to be notified of disconnect activity

DRAFT - 9/18/00
FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

Service Scenario 2: An existing Verizon voice customer with a DLEC provided DSL moves to a competitive voice provider and wishes to retain the same DLEC provided data service.

Status of accounts pre-line splitting, regardless of the permutations discussed below, are as follows:

- the end user is receiving a Verizon retail bill for their voice service and has a Verizon CSR on record; the DLEC has access to the CSR
- the end user is receiving a data bill from the DLEC or from an ISP
- Verizon has two accounts of record established: 1) a retail record, and 2) a Wholesale DLEC record which bills for a Line Share arrangement
- the end user controls activity to their voice account including ordering, modifications, disconnects and repair activity
- the DLEC controls activity to the data service and Wholesale Line Share account including ordering, modifications, disconnects and repair activity
- the DLEC controls CFA assignments
- voice testing is performed by Verizon and data testing is provided by the DLEC

For line splitting, there are two initial alternatives that must be considered:

- (Alternative 1) the end user migrates to a competitive voice provider and wishes to retain the same DLEC for data service; the data provider is one and the same as the competitive voice provider
- (Alternative 2) the end user migrates to a competitive voice provider and wishes to retain the same DLEC for data service; the data provider is different from the competitive voice provider

Alternative 1:

In this arrangement the CLEC is both a voice and data provider.

As a result, the three permutations do not need to be discussed since the one CLEC would be providing and ordering both the voice and data.

The following activities would occur to implement this alternative:

- when a 2W Line Splitting DSL Loop is ordered, then the LSR submitted by the CLEC would:

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

- be populated with appropriate values to convert a Verizon voice account to a CLEC 2W Line Splitting DSL Loop
 - be populated with appropriate values to disconnect the Verizon voice account
 - note that a re-use of appropriate facilities is required in order to maintain the voice service
 - contain the SBN, circuit number, and CFA information
 - note that the loop is to be used for data (this will indicate on the account the need to retain copper facilities)
 - switch port, LNP, Directory and 911 related orders, if applicable, would be submitted and processed as usual
-
- even though the CLEC would be the provider for both voice and data, a data Line Split record would be created for maintenance and provisioning purposes
the CLEC would control activity to the voice and data including ordering, modifications, disconnects and repair activity
 - the CLEC would provide activity information to Verizon on the data maintenance and provisioning Line Splitting record that has been created
 - the CLEC would have access to the CSR
-
- the Wholesale DLEC account would change from a Line Share arrangement to a DLEC Line Splitting maintenance record

Alternative 2:

When the Verizon voice customer is converted to a competitive voice provider and retains their existing DLEC for data service, and if the data provider is different from the competitive voice provider, then the following activities would need to occur:

Permutation 1: The Voice CLEC is in control.

- When the 2W Line Splitting DSL Loop is ordered, then the LSR would:
 - be populated with appropriate values to convert a Verizon voice account to a CLEC 2W Line Split DSL Loop
 - note that a re-use of facilities is required
 - note that the loop is to be used for data (this will allow a notation to be placed on the account advising of the need to retain copper facilities)
 - contain the SBN, circuit number and CFA information

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

- switch port, LNP, Directory and 911 related orders, if applicable, would be submitted and processed as usual
- the voice CLEC would control activity to the voice account including ordering, modifications, disconnects and repair activity
- the voice CLEC would provide activity information to Verizon on the data maintenance and provisioning Line Splitting record that has been created
- the voice CLEC would have access to the CSR
- the voice CLEC would be responsible for voice and data testing
- all orders for voice and data would be placed by the voice CLEC; the DLEC would interface with the voice CLEC and not Verizon
- all disconnects for voice and data would be placed by the voice CLEC; the DLEC would interface with the voice CLEC and not Verizon
- the 2W Line Split DSL loop would be billed to the voice CLEC by Verizon

Permutation 2: The DLEC is acting as agent on behalf of the CLEC.

When the DLEC is acting as agent on behalf of the CLEC, then:

- all orders would be placed by either the voice CLEC or the DLEC including new orders, modifications, disconnects and repair activity using the Voice CLEC's identification, ordering codes and various systems access rights
- the LSR would indicate that the loop is to be used for data (this will indicate on the account the need to retain copper facilities)
- disconnects for the voice would be placed by the voice CLEC
- disconnects for data would be placed by the DLEC using the Voice CLEC's identification, ordering codes and various systems access rights; the DLEC would communicate disconnect activity to the Verizon as a result of the DLEC maintenance record on file
- CFA, SBNs, and circuit numbers would be provided by either party under the identification, ordering codes and various systems access rights of the Voice CLEC
- either party would be responsible for voice and data testing and interfacing with Verizon on an integrated basis under the Voice CLEC's identification, ordering codes and various systems access rights
- the interfacing party will be viewed as having full responsibility for the activities on the loop
- either party, using the voice CLEC's identification and systems access rights and codes would have CSR-viewing capabilities

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

- Verizon bills voice components to CLEC

Permutation 3: The Voice CLEC and DLEC each control their portion of the loop.

When the voice CLEC and DLEC each have control over their portion of the loop and can independently order activity on an account where voice is provided by a competitive voice provider and where data is provided by a separate DLEC, then:

- the LSR submitted by the CLEC would convert the existing line shared facility to a 2W Line Split DSL compatible loop
- the LSR would indicate that a reuse same facilities is required
- the LSR would initiate a disconnect of the Verizon voice service
- the LSR would need to contain the CFA, SBN, and circuit number

- the voice CLEC would control activity to the voice account including ordering, modifications, disconnects and repair activity
- the voice CLEC and DLEC would have access to the CSR
- the DLEC would submit an LSR to show a DLEC relationship for maintenance purposes
- the DLEC would be responsible for any activity or updates to the DLEC maintenance Line Splitting account
- the voice CLEC would be responsible for voice testing
- the DLEC would be responsible for data testing
- orders for voice would be placed by the voice CLEC
- orders for data would be placed by the DLEC to Verizon; Verizon would communicate activity to the voice CLEC
- disconnects for data would be placed by the DLEC to Verizon; Verizon would communicate activity to the voice CLEC
- disconnects for non-pay by the CLEC should be communicated by the CLEC to both Verizon and to the DLEC
- the data CLEC would control CFA's

Status of the account post line-splitting, after any one of the three permutations were exercised, would be as follows:

- Under permutations 1 and 2 the competitive voice provider receives a Wholesale bill for the appropriate voice and data charges, and under permutation 3 the DLEC receives a wholesale bill for the appropriate data charges and the voice provider receives a wholesale bill for the appropriate voice charges. In all three permutations either could be

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

billed for conditioning related charges depending on the circumstances.

- a DLEC line split record is on file for provisioning/maintenance purposes
- a CSR is available; depending upon which permutation is exercised, either the CLEC or DLEC or both would have access to the CSR
- depending upon which permutation is exercised, either the voice CLEC or DLEC or both would be responsible for any activity or updates to the DLEC maintenance account
- responsibility for testing of voice and data would be dependent upon which permutation is exercised

Nothing done in these scenarios or permutations affect existing collocation or splitter billing charges at this time.

Verizon would not be involved in the following activities; this information is being provided for clarity purposes. (Verizon is not providing a third party billing arrangement.) CLECs and DLECs/ISPs are responsible for these activities.

- the end user receives a voice bill
- the end user receives a data bill
- disconnect arrangements and notifications would need to be coordinated between the CLEC/DLEC/ISP and Verizon would need to be notified of disconnect activity

DRAFT - 9/18/00
FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

Service Scenario 3: An existing UNE-P customer wishes to add data service.

The status of the UNE-P account pre-line splitting, regardless of the permutations discussed below, is as follows:

- the end user is receiving a CLEC bill for their voice service
- a Verizon CSR on record; the CLEC has access to the CSR
- Verizon has one account of record established: 1) a Wholesale CLEC UNE-P record which bills the CLEC for a UNE-P arrangement (bills are received from Verizon by the CLEC for the loop, the switch port and for transport)
- the CLEC controls activity to the voice account including ordering, modifications, disconnects and repair activity
- voice testing is performed by the CLEC
- CFA's do not exist for current UNE-P arrangements

Permutation 1: The Voice CLEC is in control:

When an existing UNE-P arrangement is being converted to a line-splitting arrangement, and the CLEC is in control, then the following activities would occur:

- a loop pre-qualification of the TN/Address would be performed by the CLEC
- if the facility is qualified, based on the type of loop being ordered, the voice CLEC would issue an LSR
- when a 2W Line Splitting DSL Loop is ordered, the LSR submitted by the voice CLEC would:
 - be populated with appropriate values to convert the CLEC 2W analog loop to a CLEC 2W Line Splitting DSL Loop
 - note that a re-use of facilities is required in order to maintain the voice service
 - contain the SBN, circuit number
 - a UNE-P conversion to a Line Splitting arrangement requires a CFA; this must be supplied on the conversion LSR
 - note that the loop is to be used for data in addition to voice (this will indicate on the account the need to retain copper facilities)
 - the voice CLEC would submit an LSR to show a DLEC relationship for maintenance purposes
- the CLEC controls activity to the voice account including ordering, modifications, disconnects and repair activity

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

- the voice CLEC would provide activity information to Verizon on the data maintenance and provisioning Line Splitting record that has been created
- the voice CLEC would have access to the CSR
- the voice CLEC would be responsible for voice and data testing
- the voice CLEC would be responsible for paying Verizon for all voice, data, and line splitting elements billed

- if the loop is not on a qualified facility, the voice CLEC may have the option to request conditioning under the Digital Designed Loop product line
- if conditioning is performed, the CLEC would be billed by Verizon for conditioning activity

- the Wholesale CLEC Unbundled Loop and Unbundled Switch Port account would be modified to show a relationship to a Wholesale DLEC maintenance Line Splitting record; there is no billing relationship between Verizon and the data CLEC since the DLEC would be paying the CLEC for use of the high frequency portion of the loop

Permutation 2: The DLEC is acting on behalf of the voice CLEC:

When the DLEC is acting on behalf of the Voice CLEC, then:

- all orders would be placed by either the voice CLEC or the DLEC including new orders, modifications, disconnects and repair activity using the voice CLEC's identification, ordering codes and various systems access rights
- the LSR submitted would indicate that the loop is to be used for data (this will indicate on the account the need to retain copper facilities)
- disconnects for the voice would be placed by the voice CLEC
- disconnects for data would be placed by the DLEC using the voice CLEC's identification, ordering codes and various systems access rights; the DLEC would communicate disconnect activity to Verizon as a result of the DLEC Line Splitting maintenance record on file
- CFA, SBNs, circuit numbers would be provided by either party under the identification, ordering codes and various systems access rights of the voice CLEC
- either party would be responsible for voice and data testing and interfacing with Verizon on an integrated basis under the voice CLEC's identification, ordering codes and various systems access rights

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

- the interfacing party will be viewed as having full responsibility for the activities on the loop
- either party, using the voice CLEC's identification and systems access rights and codes would have CSR-viewing capabilities
- the voice CLEC would be responsible for paying Verizon for all voice, data, and line splitting elements billed

Permutation 3: The Voice CLEC and DLEC each control their portion of the loop.

When the voice CLEC and DLEC each have control over their portion of the loop and can independently order activity on an account where voice is provided by a competitive voice provider and where data is provided by a separate DLEC, then:

- a loop pre-qualification of the TN/Address would be performed by the CLEC or DLEC on the CLECs existing loop
- if the facility is qualified, based on the type of loop being ordered, the voice CLEC would issue an LSR
- when a 2W Line Splitting DSL Loop is ordered, the LSR submitted by the voice CLEC would:
 - be populated with appropriate values to convert the CLEC 2W analog loop to a CLEC 2W Line Splitting DSL Loop
 - note that a re-use of facilities is required in order to maintain the voice service
 - contain the CFA, SBN, circuit number
 - note that the loop is to be used for data in addition to voice (this will indicate on the account the need to retain copper facilities)
 - the voice CLEC would need to coordinate activities of the conversion from a 2W analog loop to a 2W Line Share DSL Loop with the DLEC before the DLEC could issue any orders for data
- the Wholesale CLEC Unbundled Loop and Unbundled Switch Port account would be modified to show a relationship to a Wholesale DLEC maintenance Line Splitting record
- the voice CLEC would control activity to the voice account including ordering, modifications, disconnects and repair activity
- the DLEC would submit CFA information
- the DLEC would control activity to the data Line Split maintenance and provisioning record
- the voice CLEC and DLEC would have access to the CSR
- the DLEC would submit an LSR to show a DLEC relationship for maintenance purposes; a Line Splitting DLEC record would be created

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

- the voice CLEC would be responsible for voice testing
- the DLEC would be responsible for data testing

- if the loop is not on qualified facilities, the voice CLEC or the DLEC may have the option to request conditioning under the Digital Designed Loop product line
- if conditioning is performed, the CLEC or the DLEC, who ever places the order, would be billed by Verizon for conditioning activity

Status of the account post line-splitting, after any one of the three permutations were exercised, would be as follows:

- Under permutations 1 and 2 the competitive voice provider receives a Wholesale bill for the appropriate voice and data charges, and under permutation 3 the DLEC receives a wholesale bill for the appropriate data charges and the voice provider receives a wholesale bill for the appropriate voice charges. In all three permutations either could be billed for conditioning related charges depending on the circumstances.
- a DLEC line split record is on file for provisioning/maintenance purposes
- a CSR is available; depending upon which permutation is exercised, either the CLEC or DLEC or both would have access to the CSR
- depending upon which permutation is exercised, either the voice CLEC or DLEC or both would be responsible for any activity or updates to the DLEC maintenance account
- responsibility for testing of voice and data would be dependent upon which permutation is exercised
- Verizon has two accounts of record established: 1) a Wholesale CLEC record which bills the CLEC for a Unbundled Loop and an Unbundled Switch Port, and, 2) a Wholesale maintenance DLEC record

Nothing done in these scenarios or permutations affect existing collocation or splitter billing charges at this time.

Verizon would not be involved in the following activities; this information is being provided for clarity purposes. (Verizon is not providing a third party billing arrangement.) CLECs and DLECs/ISPs are responsible for these activities.

- the end user receives a CLEC bill for their voice service
- the end user receives a DLEC or ISP bill for their data service

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

- disconnect arrangements and notifications would need to be coordinated between the CLEC/DLEC/ISP and Verizon would need to be notified of disconnect activity

DRAFT - 9/18/00
FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

.....

The information provided below is an initial high level analysis of operational impacts. As a result, this section will require changes going forward.

The operational impacts associated with line splitting are extensive. New Verizon records and new relationships between Retail and Wholesale and between Wholesale and Wholesale accounts would need to be established.

Several of the identified impacts and new processes/records that need to be established with Line Splitting, include but are not limited to the following:

- establish a 2W Line Splitting DSL Loop including any new NC/NCI, Service Modifier and other associated codes
- develop the ability and processes (including system processes) to convert a 2W analog loop to a 2W Line Splitting DSL Loop
- analyze potential LSR modifications including Telcordia approved valid values
- develop a new DLEC Line Split maintenance record including:
 - the format
 - access rights to the record
 - various system interfaces including but not limited to: RETAS, WFA, Service Order and Billing
 - disconnect processes
- establish the ability for a CLEC to have input into a DLEC Line Split record
- establish the ability for a DLEC to have input into a CLEC Line Split record
- analyze voice and data testing processes and interfaces
- develop coordination activities associated with conversions from a Verizon 2W analog loop to a competitive voice provided loop and Line Split arrangement
- develop processes and timelines for inputs to Verizon on various activities such as disconnects
- ability to bill conditioning to either a CLEC or DLEC in a Line Split arrangement
- the Wholesale DLEC Line Share account would need to be modified to show a relationship to a Wholesale CLEC account and would be retained as a maintenance record; in some scenarios the billing relationship between Verizon and the data provider would be

DRAFT - 9/18/00

FOR DISCUSSION PURPOSES IN NY PSC CASE NO. 00-C-0127

discontinued since the DLEC would now be paying the competitive voice provider for use of the high frequency portion of the loop

- develop repair reporting activities for line splitting situations
- CLECs and DLECs must work out disconnect scenarios and develop notifications to Verizon that are expected due to the line splitting arrangement and records in place
- Relationship information would need to be communicated not only on records but also to the Verizon work groups associated with these types of orders
- Business rules would be impacted
- Change control requirements would need to be considered
- UNE-P LSR would need to be modified to allow line splitting (i.e., to place loop and line number information for a line splitting type loop rather than a POTS loop)

This list does not address CLEC/DLEC coordination activities that must occur, such as coordination of CFA, date dues, communications to Verizon, etc. These issues will be identified in future updates to the service descriptions.

A tremendous amount of coordination between all parties would have to take place if the DLEC is allowed to control orders, modifications, disconnects, etc. for the data service or if both the CLEC and DLEC individually have control. Coordination efforts and issues associated with provisioning a new arrangement are significant here including readiness from provisioning aspects as well as readiness on the date due.

OSS modifications, M&Ps and internal and external training will be extensive and will be required.

SECTIONS TO BE DEVELOPED:

Provisioning (including Splitter Designations and related activities)
Spectrum Management
Technical References to be developed
Operational Impacts