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

Service Descriptions
Line Splitting –January 4, 2001View

These service descriptions focus on the following two specific service scenarios:

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.

The service descriptions set forth below are intended to reflect the continuing OSS line splitting working group discussions, as Verizon understands them. The objective of the OSS line-splitting working group is to reach closure on these service descriptions. The service descriptions become the source document for purposes of developing the specific IS requirements¹.

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.

The working group will develop the timelines associated with the overall OSS development and will include presentations on a regular basis at NY Collaboratives that will communicate the progress of the initiatives. Due to the various complexities of line splitting, it is 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 January 4, 2001.

This document may change going forward.

¹ *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*

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A. Description of Service Scenarios

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

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

The VLEC may use existing “migrate as specified” UNE-P ordering processes and forms to migrate a VZ voice customer with data (line sharing) to CLEC voice service with data (line splitting).

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

- (Alternative 1) the end user migrates to a CLEC voice provider and wishes to retain the same DLEC for data service; the data provider is one and the same as the CLEC voice provider
- (Alternative 2) the end user migrates to a CLEC voice provider and wishes to retain the same DLEC for data service; the data provider is different from the CLEC voice provider. In both alternatives the VLEC is responsible for converting the Verizon voice customer to the UNE P line and assuring that the appropriate DLEC service is associated.

Alternative 1:

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

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1. The following activities would occur to implement this alternative. When the LSR is issued, the retail service is migrated to a 2W Line Split loop record and a Line Split port record to support the continuation of data service
2. Contain the SBN and circuit number
3. VZ will return a circuit ID associated with the 2W Line Split loop to the VLEC
4. The VLEC is responsible for maintaining a cross-reference of the circuit ID associated with the 2W Line Split loop to the TN associated with the switch port
5. The VLEC would control activity to the voice and data including ordering, modifications, disconnects and repair activity
6. Subsequently, if the VLEC wishes to add switch related features to the account, it can utilize established PS forms (TN based)
7. A move or disconnect order of the 2W Line Split loop must be sent to VZ on the established LS form (based on the circuit ID.)
8. The VLEC owns the CSR

Alternative 2 (Permutation 1- The VLEC is in control):

When the Verizon voice customer is converted to a VLEC provider and retains their existing DLEC for data service, and if the data provider is different from the VLEC, then the VLEC submits the LSR using its own AECN and also populates the LSP authorization field with the AECN of the DLEC. The Voice CLEC and DATA CLEC are responsible for maintaining a cross reference of the Circuit ID associated with the 2W Line Split loop to the TN associated with the switch port. All other activities follow as stated above in Alternative 1.

Status of the account post line-splitting, would be as follows:

- the CLEC voice provider receives a Wholesale bill for the appropriate voice, data, and line splitting elements billed. The DLEC receives a wholesale bill for the collocation and splitter billing elements.
- a CSR is owned by the voice CLEC and access to the CSR is provided consistent with the rules developed in CLEC-to-CLEC

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

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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

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

The CLEC may use existing “migrate as specified” UNE-P ordering processes and forms to migrate a VZ voice customer to CLEC voice service. The CLEC may then migrate the UNE-P combination to a Line Splitting arrangement. The Loop portion of the arrangement must be xDSL compatible and will be connected to a DLEC or third party splitter (ANSI T1.413 or MVL compliant). The CLEC or third-party CLEC shall combine, in their Collocation arrangement, the analog circuit-switched voiceband portion of the xDSL compatible Loop with unbundled local switching and unbundled transport and shall terminate the data channel in a CLEC or third-party CLEC provided DSLAM.

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
- the CLEC owns the CSR
- Verizon has one account of record established: 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:

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

1. a loop pre-qualification of the TN/Address would be performed by the voice CLEC
2. 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
3. if conditioning is performed, the Voice CLEC would be billed by Verizon for conditioning activity
4. if the facility is qualified, based on the type of loop being ordered, the voice CLEC would issue an LSR to order line splitting
5. The VLEC submits the LSR under its own AECN and also populates the LS authorization field with the DLECs AECN.
6. The LSR would trigger the conversion of the existing UNE P arrangement to a 2W Line Split loop record and a Line Split port record to support the addition of data
7. Contain the SBN, and CFA
8. VZ will return a circuit ID associated with the 2W Line Split loop to the voice CLEC
9. The voice CLEC and the data CLEC are responsible for maintaining a cross reference of the circuit ID associated with the 2W Line Split loop to the TN associated with the switch port
10. Subsequently, If the voice CLEC wishes to add switch related features to the account, it can utilize established PS forms (TN based)
11. A move or disconnect order of the 2W Line Split loop must be sent to VZ on the established LS form (based on the circuit ID).
12. The voice CLEC owns the CSR
13. The voice CLEC would be responsible for voice and data testing
14. The VLEC will report trouble on the TN with the associated circuit identification in remarks. The DLEC will report trouble on the circuit identification number with the associated TN in remarks.

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

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

1. A loop pre-qualification of the TN/Address would be performed by the data CLEC
2. If the loop is not on a qualified facility, either party may have the option to request conditioning under the Digital Designed Loop product line
3. If conditioning is performed, the Voice CLEC would be billed by Verizon for conditioning activity

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4. If the facility is qualified, based on the type of loop being ordered, then the DLEC would issue an LSR using its own AECN and SBN to order line splitting
5. The DLEC submits the LSR under its own AECN and also populates the LS authorization field with the AECN of the VLEC.
6. The LSR would trigger the conversion of the existing UNE P arrangement to a 2W Line Split loop record and a Line Split port record to support the addition of data
7. Contain the SBN, circuit number, and CFA information
8. VZ will return a circuit ID associated with the 2W Line Split loop to the server ID that the line splitting order was received from
9. The voice CLEC and the data CLEC are responsible for maintaining a cross-reference of the circuit ID associated with the 2W Line Split loop to the TN associated with the switch port .
10. All orders would be placed by either the voice CLEC or the DLEC including new orders, modifications, disconnects and repair activity using their own identification, ordering codes and various systems access rights.
11. Subsequently, If the voice CLEC wishes to add switch related features to the account, it can utilize established PS forms (TN based)
12. A move or disconnect order of the 2W Line Split loop must be sent to VZ on the established LS form (based on the circuit ID). The data CLEC will issue the LS form utilizing its own AECN and SBN.
13. When the order is sent through EDI, Verizon will return FOC to the server ID from which the order was sent.
14. Either party would be responsible for voice and data testing and interfacing with Verizon on an integrated basis under their own identification, ordering codes and various systems access rights
15. The VLEC will report trouble on the TN with the associated circuit identification in remarks. The DLEC will report trouble on the circuit identification number with the associated TN in remarks.

Status of the account post line-splitting, after either of the two permutations was exercised, would be as follows:

- the voice CLEC would be responsible for paying Verizon for all line related voice, data, and line splitting elements billed. Verizon would continue its normal billing to the DLEC for collocation and splitter billing elements.
- a 2W Line Split loop record and a Line Split port record is on file for provisioning/inventory / maintenance purposes
- a CSR is owned by the voice CLEC and access to the CSR is provided consistent with the rules developed in CLEC-to-CLEC

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Nothing done in these scenarios or permutations affects 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 CLEC, DLEC or ISP bill for their data service
- disconnect arrangements and notifications would need to be coordinated between the CLEC/DLEC/ISP and Verizon would need to be notified of disconnect activity

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B. OSS and Process Changes Required to Implement Line Splitting

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 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 Split 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 Split Loop
- analyze potential LSR modifications including Telcordia approved valid values
- establish the ability for a DLEC to have input into a CLEC Line Split record , by using its own identification, ordering codes and various system access rights
- analyze voice and data testing processes and interfaces
- develop coordination activities associated with conversions from a Verizon 2W analog loop to a voice CLEC provided loop and Line Split arrangement
- develop processes and timelines for inputs to Verizon on various activities such as disconnects

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- develop repair reporting activities for line splitting situations
- Relationship information is communicated not only on records but also to the Verizon work groups associated with these types of orders
- Business rules are impacted
- Change control requirements are considered

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 have been identified in updates to the service descriptions.

A tremendous amount of coordination between all parties is taking place when the DLEC controls orders, modifications, disconnects, etc. on a VLEC account using its own identification and codes. 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 are extensive and required.

SECTIONS TO BE DEVELOPED:

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