

Covad Communications Company Response to Appendix B Questions.

1. Describe the hot cut process currently used to transfer lines from the ILEC switch to the CLEC facilities.

For Data providers who partner with Voice providers, there is no existing hot cut process to transfer lines from an ILEC switch to CLEC facilities. Verizon does have processes in place to support migrating an end user from line splitting (CLEC voice and CLEC data) back to Verizon retail voice or back to a Verizon line sharing arrangement (Verizon voice and CLEC data). Verizon has refused to develop processes to migrate CLEC line splitting arrangements incorporating unbundled local switching (UNE-P) to a line splitting arrangement incorporating facilities-based switching (UNE-L).

Verizon's currently proposed processes to handle data on UNE-L are problematic for the following reasons:

- A. Since Verizon has no migration process in place, Verizon proposes that the only way to transfer a customer from a UNE-P to UNE-L line splitting arrangement would be to first submit an order to cancel the UNE-P line splitting arrangement, disconnecting both the voice and data, and then submit a new order to install a new UNE-L line splitting arrangement. This requires two orders to be submitted and a clear disruption in the customer's voice and data services.
- B. Verizon's line splitting processes and OSS are different for UNE-P and UNE-L, have not been fully developed and are therefore not scalable. Line splitting in a UNE-P environment requires the UNE-P provider and the data provider to interconnect using a Connecting Facility Assignment (CFA) and the unbundled switch port Office Equipment (OE). Verizon requires the disassembly of UNE-P into its components, the Switch port and the UNE Loop to provide Line Splitting. For Line Splitting in a UNE-L environment, Verizon requires the voice and data CLECs to interconnect using Verizon's Dedicated Transit Service (DTS). DTS is a special access service and involves completely different processes and OSS than Line Splitting orders in UNE-P scenarios. All orders for UNE-P Line Splitting, as with all DS 0 UNEs, are placed using Local Service Requests (LSRs). With DTS, Verizon requires CLECS to submit an Access Service Request (ASR), rather than an LSR. The DTS request would connect the voice carrier's CFA to the splitter. To date, Verizon has yet to instruct CLECs what to submit in order to connect the splitter to the UNE Loop.
- C. UNE-P Line Splitting is currently in place and both voice and data CLECs have made the necessary investments and OSS changes to support it.

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Verizon's proposal to have Line Splitting on UNE-L orders submitted on ASRs forces CLECs to build new systems and processes and duplicate their efforts to accomplish the same provisioning process used with UNE-P providers. The only difference is Verizon is forcing CLECs to use ASRs instead of LSRs for Line Splitting on UNE-L. This takes Line splitting on UNE-L out of the hot cut domain because Verizon has stated that hot cuts are handled on LSRs. Clearly, Line splitting on UNE-L must be addressed in the voice hot cut proceedings to ensure the customer's data is not disrupted.

- D. ASRs are handled by a different work center in Verizon than the centers that handle the provisioning of UNE loops on LSRs. ASRs are typically used to provision high capacity services, such as DS1 and DS3 services. The agents in these centers are neither trained nor familiar with the processes and challenges CLECs typically encounter while provisioning line splitting.

Verizon's decision to use different processes, work centers and OSS for UNE-P and UNE-L providers impedes the availability of data services to voice providers. Verizon can easily modify its OSS to support the interconnection of two CFAs. Verizon does this now in order to provision voice services in a UNE-L environment. Verizon also inventories the data provider's splitter assignments as CFAs in its OSS for Line Sharing where Verizon's dial tone equipment is connected to a competitive data CLEC's CFA. Both the data and voice CFAs are inventoried in the same Verizon OSS (SWITCH-FOMS). Verizon simply refuses to perform the same functions for a facilities-based voice CLEC that it does for its own retail voice service today. Specifically, Verizon must develop processes to support the continuation of data services simultaneously with the movement of the customer's voice service from UNE-P to UNE-L on an individual hot cut basis and batch hot cut basis. If these processes are not addressed, facilities based carriers will be severely impaired in their ability to provide bundled services which clearly puts them at a competitive disadvantage.

2. List each task that is part of the current process. Provide the average time it takes to complete the task, the typical occurrence of the task during the process, the labor rate for the task, and the common overhead loading associated with the labor rate. Indicate the source of the data; i.e. time/motion studies, SME analysis, etc.

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Currently, there are no existing voice hot cut processes to transfer lines from an ILEC switch to CLEC facilities when the loop is being split by CLECs to provide voice and data services.

3. Describe a batch hot cut process that you would implement to meet the FCC's requirement to establish a batch hot cut process. Include an estimate of the maximum number of lines per batch.

The work content involved with UNE-P Line Splitting (placing a MDF cross connection that terminates between a Voice Carrier's CFA and a Data Carrier's CFA) is no more complicated nor will it require any more work content than is involved with UNE-L Line Splitting (placing a MDF cross connection between a Voice Carrier CFA and an ILEC cable pair). Therefore, hot cuts involving Data CFA activity for Line Splitting UNE-P and UNE-L should be included in any batch process that is developed. Any batch hot cut process that involves the transfer of voice from UNE-P to UNE-L must also address the continuation of data services.

4. List each task that is part of the batch hot cut process described in the answer to the preceding question. Provide the average time it takes to complete the task, the typical occurrence of the task during the process, the labor rate for the task, and the common overhead loading associated with the labor rate.

Covad is only involved in the assignment of the Data CFA and providing that information to its Voice Partner in a Line Splitting (UNE-P or UNE-L) arrangement. The hot cut and batch hot cut process would be managed between the Voice provider and the ILEC.

5. If UNE-P is no longer available, what monthly volumes of hot cuts would be required: (a) to migrate existing UNE-P customers to another form of service and (b) to connect new customers in the ordinary course of business. Provide supporting documentation for these volume estimates.

Voice carriers are in the best position to address projected volumes of migrating UNE-P to another form of service and to connect new customers in the ordinary course of business. It is imperative that the Collaborative review the ILEC's ability to address Line splitting on UNE-L in its batch hot cut recommendations to ensure there is no disruption to the customer's data service. Without such consideration, Line splitting on UNE-L should be considered impaired and UNE-P retained for providing data services with a CLEC voice arrangement.