

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

Petition by DIECA Communications, Inc. )  
d/b/a Covad Communications Company for )  
Arbitration of Interconnection Rates, Terms, )  
and Conditions and Related Arrangements )  
with Verizon Florida Inc. Pursuant to )  
Section 252(b) of the Telecommunications )  
Act of 1996 )

Docket No. 020960-TP

**REBUTTAL TESTIMONY OF**

**FAYE H. RAYNOR**

**ON BEHALF OF**

**VERIZON FLORIDA INC.**

**FEBRUARY 20, 2003**

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1                                    **REBUTTAL TESTIMONY OF FAYE H. RAYNOR**

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3    **Q.    ARE YOU THE FAYE H. RAYNOR WHO TESTIFIED PREVIOUSLY IN**  
4                                    **THIS PROCEEDING?**

5    A.    Yes.

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7    **Q.    PLEASE DESCRIBE THE PURPOSE OF YOUR REBUTTAL**  
8                                    **TESTIMONY.**

9    A.    The purpose of my rebuttal testimony is to address some of the  
10                                    statements in the joint testimony of Covad's witnesses concerning  
11                                    performance measurements (Issue Nos. 13 and 37).

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13   **Q.    CAN YOU DISCUSS COVAD'S PROPOSALS FOR THE INCLUSION**  
14                                    **IN THE PARTIES' INTERCONNECTION AGREEMENT OF**  
15                                    **INTERVALS IN WHICH VERIZON MUST RETURN LOCAL SERVICE**  
16                                    **REQUEST CONFIRMATIONS ("LSRCS") ON COVAD'S ORDERS?**  
17                                    **(Evans/Clancy Joint Direct Testimony at 15, 17)**

18   A.    Yes. Ms. Evans and Mr. Clancy claim that the "intervals proposed by  
19                                    Covad are identical to those set forth in New York's current guidelines."  
20                                    Evans/Clancy Joint Direct Testimony at 15. Aside from the fact that the  
21                                    intervals proposed in their testimony here are not the same as those  
22                                    contained in Covad's proposed language for inclusion in the parties'  
23                                    agreement, there is no reason for this Commission to include in the  
24                                    parties' agreement intervals set out in New York guidelines. This  
25                                    Commission has recently adopted performance measurements that

1 apply to Verizon's performance for all ALECs in Florida. See FPSC  
2 Vote Sheet, February 18, 2003 for Docket No. 000121C-TP. While a  
3 hearing is expected, those are the performance standards that govern  
4 Verizon's performance in Florida today.

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6 Even if Covad were seeking to include in the parties' interconnection  
7 agreement the *Florida* measurements pertaining to LSRC intervals, Ms.  
8 Evans and Mr. Clancy would still be wrong in claiming that Covad "is not  
9 seeking to change the industry-wide performance standards."  
10 Evans/Clancy Joint Direct Testimony at 15. Covad's proposal  
11 apparently would include in the agreement only the intervals in which  
12 LSRCs are to be returned, but not also the accompanying performance  
13 standards (e.g., 95% on time), business rules, and exclusions, all of  
14 which are an integral part of the measurements that this Commission  
15 adopted.

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17 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

18 A. Yes.

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