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April 16, 2004

Ms. Lisa S. Harvey
Chief, Bureau of Regulatory Review
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: **DOCKET NO. 000121C - VERIZON RESPONSE TO MARCH 29, 2004 LETTER**

Dear Ms. Harvey:

This is in response to your March 29, 2004 letter regarding Verizon's flow-through performance results. As explained more fully below, the Commission's summary of Verizon's flow-through performance reflects two misunderstandings regarding the benchmark standards set forth in the California JPSA. An examination of Verizon's actual flow-through performance shows that the Company's flow-through performance is strong, and that CLECs are receiving non-discriminatory access to OSS.

Your letter contends that Verizon failed to meet a "predominance" of flow-through sub-measures each month from October 2003 through January 2004. As stated above, this contention is based upon two basic misunderstandings. First, the table in your letter indicates that Verizon failed to meet the sub-measures in Section 4b (Percentage of Flow-Through Orders – Received Electronically) when, if fact, there is no compliance standard for these sub-measures -- these standards are for diagnostic purposes only. Second, the table in your letter overstates the number of "non-complaint" sub-measures in Section 4a (Percentage of Flow Through Orders – Currently Programmed), because it overlooks that the performance standard for these sub-measures was 90% from October through December 2003, and did not change to 95% until January 2004. Verizon may have contributed to this error because the Company's monthly report to the Commission also misstates the standard for these sub-measures.

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The chart below displays Verizon's actual flow-through performance results from October 2003 through January 2004:

Verizon Florida Flow-Through Performance Results		
Month	Compliant Sub-Measures	Measures Below Standard
October 2003	20	3
November 2003	20	3
December 2003	21	2
January 2004	14	7
February 2004	18	5

These figures demonstrate that Verizon is not missing a "predominance" of the flow-through measures, but instead is meeting a predominance of the measures.

Verizon's flow-through performance is particularly impressive when viewed in the proper context. At the total UNE and total Resale level, the Company's performance exceeds the 95% threshold for most months. This is significant because Verizon manages its results at those levels and the sample sizes are too small below those levels to yield meaningful results.

Although Verizon's performance has been strong, the Company has already taken steps to ensure that its performance gets even better. These efforts include the following initiatives:

- System updates to exclude errors against Local Service Requests (LSR) that are not eligible for flow-through.
- System updates to eliminate manual corrections of service order errors related to "hunting" scenarios.
- System corrections to eliminate warning messages on Local Number Portability partial migration scenarios (thereby allowing successful flow through on these LSRs).
- Increases in time interval for processing LSRs to allow successful flow-through.

A preliminary analysis of the March result's shows that these efforts have already resulted in significant improvement in Verizon's flow-through results. As Verizon identifies other items that can improve flow-through for groups of orders, it will continue to improve performance. However, it may take some time to notice the full effect of these efforts because some of the programming updates may take six or more months to implement.

In any event, Verizon's flow-through performance has nothing to do with whether CLECs have non-discriminatory access to OSS, because Verizon manually processes orders that do not automatically flow through the system. Indeed, the only party that is harmed if an order does not flow through is Verizon, which must bear the cost of manually handling the order.

In sum, Verizon's flow-through performance is excellent, and is not impeding the CLECs' ability to gain nondiscriminatory access to OSS.

Please contact me at the above-referenced number if you have any questions or comments.

Sincerely,

David M. Christian