

Alexander W. Moore
Associate General Counsel

ORIGINAL	
N.H.P.U.C. Case No.	DT 07-011
Exhibit No.	C-1 Verizon
Witness	Sherry Lichtenberg
DO NOT REMOVE FROM FILE	



185 Franklin Street, 13th Floor
Boston, MA 02110-1585

Phone 617 743-2265
Fax 617 737-0648
alexander.w.moore@verizon.com

November 20, 2008

VIA ELECTRONIC AND U.S. MAIL

Ms. Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301

Re: DT 07-011 – VERIZON NEW ENGLAND INC., BELL ATLANTIC COMMUNICATIONS, INC., NYNEX LONG DISTANCE COMPANY, VERIZON SELECT SERVICES INC. AND FAIRPOINT COMMUNICATIONS, INC. Joint Application for Approvals Related to Verizon's Transfer of Property and Customer Relations to Company to be Merged with and into FairPoint Communications, Inc.

Dear Ms. Howland:

Enclosed for filing is the original Affidavit signed by Sherry Lichtenberg and filed on behalf of Verizon New Hampshire.

Thank you for your attention to this matter.

Very truly yours,

Alexander W. Moore (kmm)

Alexander W. Moore

Enclosure

cc: Service List (electronic distribution only)

commissions including state Section 271 proceedings, network modernization proceedings and a variety of DSL proceedings.

3. Verizon Business is the group within Verizon Communications Inc. that includes the former MCI companies, which continue to do business in Maine, New Hampshire and Vermont following the closing of the transaction between Verizon New England Inc., other Verizon Affiliates and FairPoint on March 31, 2008. I have responsibility for Verizon Business' efforts to communicate and coordinate with FairPoint in order to continue to order, maintain, and support Verizon Business' customers in FairPoint's territory in Maine, New Hampshire and Vermont before and after cutover from Verizon's back office systems to FairPoint's new systems. This includes working directly with FairPoint and the Verizon Business IT and operations organizations to understand and test the FairPoint systems. The statements set forth in this affidavit are based on my personal knowledge and on knowledge reported to me by other Verizon employees pursuant to and in the ordinary course of business.

4. Verizon Business does not believe that the FairPoint systems are ready for cutover from Verizon's systems due to missing, incomplete or untested functionality. As of the time of this filing, FairPoint has not offered evidence to Verizon Business that FairPoint will offer the same functionality in certain material areas that Verizon's systems provide on behalf of FairPoint today. VZB believes that the Commission's approval order and related settlement agreements and testimony clearly contemplated that the same functionality would be available on FairPoint's systems. The chief concerns of Verizon Business are described below.

5. Daily Usage Files. Verizon Business is still waiting for FairPoint to provide it with a correct and complete daily usage file (“DUF”). While FairPoint has made progress in providing properly formatted records, problems with headers, trailers and sequence numbers for the records continue to make it impossible for Verizon Business to send these records to its own systems to create its customer bills for both local usage and access. In addition, problems with the DUF make it impossible for Verizon Business to load the data provided by FairPoint into its own systems to assess the quality of the record formats. We still do not have records that show various types of operator handled calls, which are included on DUF files provided by Verizon today in Maine, New Hampshire and Vermont. These types of records have been generated by FairPoint customers during the months of October and November and are included in the DUF files Verizon is currently providing to Verizon Business, but FairPoint has been unable to locate and send these records to us through their own systems. Without the proper records, Verizon Business will be unable to bill its customers properly, provide actual dialed call records for customers that request them, and bill other CLECs and ILECs for terminating and meet point access. FairPoint states in its Supplemental Statement filed on November 18, 2008, that it plans to provide DUF files for various categories of services to CLECs this week, but such untested promises cannot be credited. We have been working with FairPoint since July of 2008 on this process and to date FairPoint still has not solved the problem. Accordingly, until FairPoint actually provides DUF files in a format Verizon Business can use and demonstrates that it can provide them consistently, there is no reason to believe they will be able to do so after

cutover. FairPoint should not be allowed to cut over until this critical ability to provide accurate and timely customer bills has been adequately demonstrated.

6. WISOR GUI. Verizon Business is concerned that while the defects Verizon Business identified in the WISOR Graphical User Interface (“GUI”) appear to have been corrected, these corrections have not been tested under stress volumes. An impaired GUI or one that frequently times out would make it difficult, time-consuming and overly expensive for Verizon Business and other CLECs to interact with FairPoint, including to place orders.

7. Scope of Allowed CLEC testing. In addition, Verizon Business is concerned that FairPoint has unduly limited the scope and range of CLEC testing of its new systems. FairPoint and Capgemini limited the test “bed” or environment in which the testing took place. As Liberty Consulting noted in its Status Report of November 12, 2008 (“Liberty Report”):

[T]his testing environment is significantly less flexible and complete than those used for the other testing, such as internal Capgemini and FairPoint functional and UAT testing. The environment limits testing to the wholesale interface and the back-end FairPoint systems used for initial order entry and for trouble ticketing. None of the subsequent processing to complete provisioning, initiate billing, update databases, or complete the processing of trouble tickets is included in the CLEC test environment.

Liberty Report at 12. The specific test scenarios provided by FairPoint do not adequately represent the range of actual cases used in the real world. FairPoint provided 102 pre-determined test cases, a significant number of which are for electronically bonded trouble handling. This is an inadequate number of test cases. For example, Verizon makes 150 test cases available to CLECs to test changes implemented in Verizon’s wholesale systems. Most importantly, the test cases provided by FairPoint are specifically crafted

by FairPoint to its own requirements and do not allow customers to create transactions that could be tested in real world scenarios. For example, FairPoint does not allow CLECs to attempt to place change orders on lines they do not provide, does not allow CLECs to test orders with incorrect addresses or other data that should result in error conditions, and does not allow CLECs to attempt to retrieve Customer Service Records (CSRs) for other CLEC's customers.

8. Moreover, FairPoint does not allow CLECs to construct their own test scenarios or initiate "negative" test scenarios that would allow us to test the capability of the FairPoint systems to detect incorrect submissions and issue the proper rejects. For example, we do not have the capability to test placing an order against another company's customer. Other scenarios that would test whether this defect exists for ordering changes to or disconnecting other CLECs customers were not provided. This should have been tested to ensure that CLECs cannot inadvertently make changes to the service of customers that they do not serve, especially after Verizon Business identified a test scenario during testing that allowed it to open a trouble ticket for another CLEC's customer, a process that clearly should not be allowed. FairPoint should guarantee that one company cannot inadvertently place an order against another company's customer, in order to avoid widespread confusion of end-user customers.

9. Line Loss Reports. Verizon Business is concerned that line loss reports will need to be retrieved manually (or "pulled") from the FairPoint Wholesale portal. Accurate and timely line loss reports are required to notify CLECs when customers change carriers or disconnect their service so that double billing may be avoided. On Thursday, November 12, 2008, FairPoint told Verizon Business that it would be able to

send automatically (or “push”) line losses to Verizon. FairPoint has repeated this in its Supplemental Statement and added a general time frame of 14 business days after a CLEC provides the address to send the reports. Verizon Business will provide that information as soon as possible. FairPoint’s statements represent excellent progress, but the files must be received and tested to make sure that they are accurate and received in a timely fashion. While receiving line loss records is only part of the requirement for ensuring that customers are not harmed by FairPoint’s exit from Verizon’s OSS, FairPoint’s inability to date to provide accurate and timely line loss reports also demonstrates that it is not ready for cutover at this time.

10. Retail Billing. The errors in the wholesale billing process, such as the failure to provide a correct and complete DUF file, suggests that retail billing may also be an issue. FairPoint has not demonstrated that it can provide accurate and complete wholesale bills, including call records. The wholesale process is similar to the process for retail billing, raising the concern that it cannot generate accurate bills that properly account for recent activity on the customer’s account, such as payments, adjustments and unbilled usage. Liberty notes in its Report, at 6, that FairPoint and Capgemini have conducted 101 tests on FairPoint’s new billing and collection systems, but Liberty doesn’t say how many of those tests it reviewed, if any, and what specifically was tested.

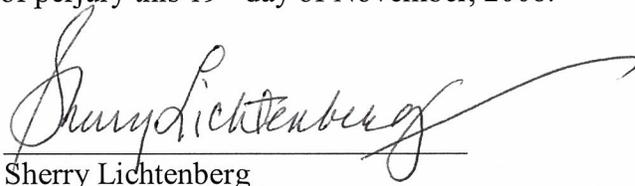
11. Finally, in addition to these specific concerns, there appear to be significant limitations to Liberty’s review of the systems testing by FairPoint and Capgemini for CLEC and retail customers. Liberty only reviewed a “small sample of the test cases.” (Liberty Report at 6.) Liberty stated that it “made a detailed examination of approximately 5% of the system test cases.” (*Id.*) While Liberty claims the testing was

“robust,” Report at 8, it does not explain which tests it reviewed or even how many tests it reviewed in each category (such as for Wholesale Ordering and Fulfillment). In addition, there is insufficient evidence in the Liberty report concerning FairPoint’s volume and flow-through tests. Liberty states that Capgemini has completed Integrated Performance Testing and asserts that “all 200 test cases have now passed.” (Report at 18.) But Liberty stated at the joint technical conference held by the staffs of the New Hampshire and Maine Public Utility Commissions on November 17, 2008, that Liberty itself did not review *any* of the performance, or volume, testing conducted by FairPoint and Capgemini. Liberty also stated that it monitored the flow of only a few orders through the new FairPoint systems. In addition, FairPoint explained that it does not yet know what percentage of orders will flow through its systems (meaning the percentage of orders that the systems will handle automatically and will not require manual intervention) and it hasn’t developed metrics by which to assess the performance of its flow-through testing. That raises the question of what it means for a performance test to get a “passing” grade. It appears that neither Liberty nor FairPoint knows whether FairPoint’s new systems will hold up under the pressure of receiving and processing thousands of orders every day after cutover.

12. Liberty states that FairPoint has not met the CLEC testing cutover criteria. (Report at 17.) Liberty also states its belief that it is “feasible” that FairPoint could satisfy those criteria and demonstrate its readiness to serve CLECs with additional testing in a “few more weeks” but fails to define a “few more weeks.” (Report at 2 and 24.) Liberty was unable to provide any more detail at the November 17 technical conference. Verizon Business agrees that FairPoint is not ready for cutover at this time, but Verizon

Business has no assurances that FairPoint will be ready in just a “few more weeks” in light of its inability to address the CLEC issues to date. Additionally, once FairPoint provides notice of readiness to Verizon, we are concerned that FairPoint will turn its full attention and resources to preparing for and implementing the cutover, at the expense of addressing the open CLEC issues. Verizon Business suggests that on this record, if the Commission were to allow FairPoint to give notice of cutover on November 30, 2008 for cutover at the end of January, 2009, it should at a minimum establish hard and fast dates for FairPoint to address each of the concerns identified above and also in the Liberty Report and assess fines or provide other appropriate sanctions on FairPoint to ensure that it addresses these issues well in advance of cutover since FairPoint currently intends to commit irrevocably to cutover before demonstrating its readiness in all respects.

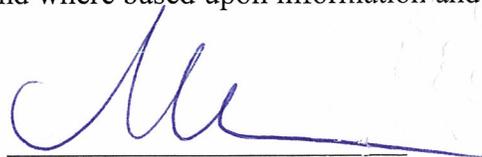
Signed under the pains and penalties of perjury this 19th day of November, 2008.


Sherry Lichtenberg

STATE OF MAINE
County of Cumberland, ss.

November 19, 2008

Personally appeared before me the above-named Sherry Lichtenberg, who after first being duly sworn, made oath that the foregoing statements made by her are true to the best of her knowledge, information and belief, and where based upon information and belief, she believes the same to be true.


Notary Public

My Commission Expires:
Pauline T. Plourde
Notary Public, Maine
My Commission Expires
June 9, 2010