

CRC 11+11A

DT 10-25

**CRC Communications of Maine, Inc.**

**Exhibit No. CRC-11**

**CLEC Issues List Created by Liberty Consulting**

**11: Original List Produced by Liberty**

**11-A: Original List Sorted and Formatted by CRC**

CRC 11  
DT 10-25

**Trina Bragdon**

---

**From:** Charles King [charlesking@optonline.net]  
**Sent:** Tuesday, May 11, 2010 5:36 PM  
**To:** frpclecs@lists.verizonbusiness.com  
**Cc:** Bob Falcone; 'Amanda Noonan'; 'Amy Spelke'; 'Andy Hagler'; 'David Goyette'; 'Derek Davidson'; 'Jim Porter'; 'Kate Bailey '; 'Michael Ladam'; 'Rich Kania'; 'Tamera Pariseau '  
**Subject:** CLEC Issues List  
**Attachments:** CLEC Issues 05-11-10 Updated.xls

Dear CLEC

We want to express our great appreciation to you for the time and effort many of you took on our April 22 and April 29 calls and through subsequent emails to explain to us your current issues with FairPoint's wholesale systems and processes. Attached is the final version of the spreadsheet we prepared listing these issues, incorporating your latest feedback to us since our second call on April 29.

We have discussed this list with the state staff members, and they plan as a next step to present this list of issues to FairPoint, asking the company to confirm the issues and outline the steps they are taking or planning to take to address them. Since many of the issues require a systems solution, the state staffs plan to address them initially with FairPoint's IT group.

After FairPoint's initial response, Liberty will likely discuss the issues in detail with the company. Given the length of time many of these issues have lasted and their frequent recurrence even after they are supposedly "fixed," we would like to determine the extent to which FairPoint has correctly determined the root cause of the issues and the effectiveness of FairPoint's testing of software changes. For this purpose, Liberty will request that you provide some specific examples of your issues to use in working with FairPoint. We've found these examples to be very valuable in similar investigations in the past.

We will keep you informed of the status of this process and any further information we might need from you.

Thank you again.

Chuck King  
The Liberty Consulting Group

Topic area	Issue description
Loss of Functionality	FairPoint does not provide the ability for the CLECs to access their own BANs for Directory Listings
CSI	For more complex accounts and for all government accounts (local, state and federal), CSI requests don't always return the information requested. CLECs are required to follow manual CSI process to obtain this information.
CSI	The data that the CLECs receive in response to a CSI often does not agree with the CSI information FairPoint's service representatives have access to. Besides the return of faulty data, there is also a parity concern with this problem.
Directory Listings Directory Listings	Cannot verify a caption listing. Inquiries time out or only return single-listing information. Cannot determine what LEC owns a customer's listing.
Loss of Functionality	Verizon's systems gave the CLECs the ability to pull information on their CABS accounts, FairPoint does not offer this functionality. It takes 3-5 days to pull the information using the SPOC or help desk.
CSI Systems	There is a lack of feature detail on the customer's account. (e.g., no call forwarding detail, hunting missing or unclear, no features, no listings. FairPoint fixed the hunting problem but it has resurfaced again.) Pre-ordering inquiries frequently time out before returning a response.
CSI	Completed order data is not reflected on the CSI. FairPoint takes too long to update CSI information as a result of service order activity. FairPoint indicates that this will be done within 10 days, but that often does not happen. (See related directory listings issue in Ordering & Provisioning.)
Loop Qual	When a CLEC cannot obtain a loop qual by address, FairPoint's manual investigation process can take up to a week to return the requested information. With Verizon responses were returned within 48 hours.
Addresses Directory Listings	Missing addresses in the system take FairPoint as long as two week to fix. In addition to new construction situations, these missing addresses often occur at locations where there is already working service. Dual name ID does not work, FairPoint's response only returns a single name.
Loss of Functionality	CLECs cannot pull Design Layout Reports. They were able to do this with Verizon All directory responses indicate caption listing even in cases where the account has a single line listing.
Directory Listings Loss of Functionality	CSI responses no longer reflect cost information or contract lengths. Automated loop qual responses are often inaccurate (estimate about 30-35% of the time). Additionally, manual loop inquiry responses are also often inaccurate (estimate 20-25% of the time).
Loop Qual Directory Listings CSI	Caption listings will not return packet information. Ported TN often reflect that they are still with FairPoint.
Data Problems	FairPoint continues to promise to clean-up its database discrepancy problems which cause many of the CLECs issues. Progress is questionable.
Loss of Functionality	FairPoint does not provide any explanation why a loop does not qualify as Verizon did.
Loop Qual CSI	FairPoint had implemented a fix to return to CLECs information indicating that a remote terminal is in use. However, this functionality has been lost again within the past month.
Directory Listings CSI	Resale CSIs missing key information such as listing and feature information DLI only returns a single listing even in cases where the customer has multiple listings. Often the returned listing is not the main listing. ALI codes are missing from information returned

Loss of Functionality	Cannot obtain multiple TNs on a single CSI, each TN needs to be polled individually.
Loop Qual	Loop lengths returned are often incorrect
Manual Requests	Responses to manual requests are not timely
CSI	CSIs are often not available
Dark Fiber	Responses to dark fiber inquires are not timely and there is not standard acceptance criteria for dark fiber.
Documentation	VFO documentation is poor
CSI	Cannot pull CSIs for analog circuits with pseudo TNs
Loss of Functionality	CLECs would like to have FairPoint develop a standard response for manual loop qualification inquires, providing all of the information the CLEC requires (e.g., loop length, PARTS RT). Currently, CLECs receive a screen shot of a email response from FairPoint's engineering department.
CSI	CSIs rarely carry any CFA. If it appears, it contains only first four digits, making it hard to reconcile bill to inventory

Topic area	Issue description
Loss of Functionality	Unable to delete a BAN listing. Must ask FairPoint to do manually.
Loss of Functionality	Unable to determine the status of an order in the system for late or JEP orders; must rely on the SPOC or ROC.
Loss of Functionality	Unable to get accurate DEMARC information. Verizon used to provide this data through eWPTS.
Directory Listing Orders	Listing orders often error as "listing does not exist" even in cases where it clearly does exist.
Manual Processing Systems	LSRs often drop out of the flow through process and nobody at FairPoint does anything about them until the CLECs bring them to FairPoint's attention.
Manual Processing Systems	System fixes for one problem often cause other problems. Orders that reject for system problems will often not be addressed by FairPoint until the CLEC open a WHD ticket on the order. CLECs do not get a reject notice; the order just sits in ACK/ACPT state.
Systems	The manual work that the CLECs must do to "baby sit" FairPoint's systems has greatly driven up the CLECs' cost of doing business.
Systems	Some CLECs find it necessary to expend the resources to create daily spreadsheets for their SPOC on all outstanding orders. Manual order tracking is a huge time waster for the CLECs
Related PONS	Related PON orders are not being worked concurrently, causing service outages
Related PONS	RPON orders need to be announced and SPOC needs to be instructed to "babysit" the orders all the way through the process.
Systems	Systems errors occur too frequently, requiring CLECs to resubmit orders. This occurs at least once per day.
Systems	System error messages to the CLECs don't always reflect what the problem is that would allow the CLEC to take action to fix it.
SUPPs	Supplemental orders receive a FOC; however, the order is worked on the original due date, often causing service outages.
Disconnect Orders	Orders for circuit disconnects are not worked in a timely fashion by FairPoint and are not implemented on the FOC due date. CLECs continue to be billed for service beyond the disconnect due date.
CLEC-to-CLEC Conversions	Resale conversions involving two CLECs result in a service outage 100% of the time. This also happens with conversions from retail to resale but not as frequently.
Multiple FOCs	CLECs receive multiple FOCs on circuit-type orders, with subsequent FOCs often changing the circuit ID or requiring a dispatch when the first FOC indicated a cut through.
Hot Cuts	Hot cut process has improved but it is still very manual. eWPTS-based process with Verizon was much better.
Process	ROC will issue a JEP on an order for lack of facilities, yet order will continue to be worked by other FairPoint organizations, causing service outages. This happens often on CLEC-to-CLEC hot cuts.
Systems	Erroneous system error "Not able to create new customer in M6," which was fixed, has returned with FairPoint's 3/18 systems "upgrade."
NID Moves Manual Processing	Provisioning plan for NID moves does not include a dispatch step, causing service outages.
Systems	Manual orders often miss critical information such as circuit IDs. CLECs often cannot order service to a location where FairPoint has previously provisioned service.

Order Intervals	Intervals offered by FairPoint are much longer than those that were offered by Verizon. Intervals offered are longer than FairPoint's published standard intervals.
Other	FairPoint's field technicians provide the CLEC's customers with inaccurate information, which typically reflects poorly on the CLECs
False PCN & BCN	Order is complete on FOC date and PCN/BCN are received yet no work was done. These orders seem to flow through FairPoint's systems without getting the required work accomplished. This happens an estimated 40% of the time.
Performance Reporting	FairPoint's performance reports are incorrect and misleading as a result of problems such as the false PCN/BCN issue.
Directory Listing Orders ASR	Directory listing often comes back with "no existing listing" on ported TNs. This happens with both JB-V and JB-N order types. Often get errors for incorrect CCNA when the information is correct.
Systems Hot Cuts	New loop orders are often coming through as cut through. The SPOC used to work these to make sure they were dispatched, but now CLECs are being told that they "must trust the systems," which requires the CLECs to issue a tag-and-locate order after the original order completes.
CFA Change	FairPoint is not providing timely PCNs or BCNs on hot cut orders CFA change orders are getting worked ahead of the due date, causing service outages.
Directory Listing Orders	Cannot migrate the directory listing with a hot cut order. Request results in a "no DL to migrate" error.
Order Intervals	Published interval is not being followed for disconnect orders. The orders get a FOC with the published interval due date but the orders are generally not worked on that date.
Process	When orders need to be delayed due to an overload of repair problems. FairPoint cannot tell the CLECs which orders it will be delaying, preventing them from notifying their customers of the delay.
False PCN & BCN	Many tag-and-locate orders are needed because FairPoint is not working the original order properly. This often results in a vendor meet to resolve issues.
Process	SPOCs do not provide timely responses to inquiries/problems. Many SPOCs do not have full systems access.
Directory Listing Orders	Directory listings are not updated in a timely manner after receipt of the BCN. FairPoint's manual update process also takes too long. Because of continued problems with directory listing updates, CLECs are required to manually check all their DL orders after completion to verify that the updates have been made. (See related CSI issue in Pre-order.)
Missing data	TNs and addresses missing from FairPoint's systems. It takes FairPoint too long to update systems once notified of these problems.
Loss of Functionality	For missing addresses Verizon would return a range of valid house numbers, FairPoint does not provide this functionality.
Line Loss Reports	Line loss reports to the CLECs are not always accurate or not always sent. This can cause customers to be double billed.
Process Complex Orders	FairPoint does not provide installation notices preventing the CLECs from giving acceptance notices
Intervals	All complex orders result in a JEP, requiring manual follow-up Some CLECs request longer intervals because they don't trust FairPoint to make the standard interval

Systems	M6 errors prevent the rescheduling of a due date because the order is "stuck"
Process	FairPoint will issue artificial completion notices so that a repair dispatch can be made to fix a problem with the physical provisioning of the order. For SPUNE/SWUNE conversions performed before cutover, no record of the disconnected SA circuit exists in FairPoint's database, leading field techs to believe it is an out-of-service circuit. Techs have used these pairs for new services, resulting in loss of service on existing circuits.
Process/Records	Same Day SUPPs on Directory orders returns a response that the order has already been worked. The SPOCs have indicated that these orders are getting worked early, preventing the CLEC's an ability to SUPP the order.
SUPPs	Orders reject for a partial port of an account with hunting. To get around this, the end-user customer has to open a ticket with FairPoint to remove hunting. The CLEC can only request porting after the ticket closes, delaying the porting and causing the customer to be without hunting for approximately 7 or 8 business days.
Loss of Functionality	

Topic area	Issue description
Payments	CLEC bill payments are often either misapplied or are not applied at all. This has been a continual problem since cutover and has not gotten any better. Occurs about 50% of the time.
Disconnects	Disconnect orders are not getting worked on time or circuits are physically disconnected but CLECs continue to get billed for them. When the orders are worked FairPoint does not prorate the credits correctly. Estimate is that this is occurring 25% of the time.
Disconnects	Disconnects worked in January '09, prior to cutover, were not credited back to the disconnect date. FairPoint is requiring Verizon FOC from the CLECs to provide this credit. One CLEC still has 30 of these orders still in dispute with FairPoint.
Disconnects	Resale disconnects of complex services such as ISDN, Centrex and analog circuit with pseudo TNs are physically disconnected but billing of the circuit never stops.
Disconnects	For resale service when the BTN of a multi-line account gets ported from the reseller, FairPoint does not use one of the remaining WTNs to establish a new BTN but continues to bill the CLEC for the BTN that was ported away.
Dispute Resolution	When FairPoint concurs with a dispute on a disconnect, the bill credit often does not go all the way back to the due date of the disconnect order, resulting in another dispute.
Disconnects Incorrect Billing	CLECs receive BCNs and PCNs for disconnect orders but billing of the circuit doesn't stop unless the CLEC calls the problem to FairPoint's attention.
Loss of Functionality	CLECs continue to get bills for accounts that belong to other CLECs. FairPoint cannot provide the directory line-by-line listing bill detail that they used to get from Verizon.
Incorrect billing	Retail customers that ported their service to a CLEC are still getting billed by FairPoint. This goes as far back as a customer who ported away from FairPoint in August '09.
Incorrect billing	Accounts that are not PICed to a carrier are still getting billed by FairPoint as if the account is PICed to that carrier.
Loss of Functionality	FairPoint continues to provide multiple DUF files rather than a single file, preventing the CLECs from being able to easily audit the files.
DUF	DUF volumes are significantly below (estimate 20%) what they were prior to cutover.
Record Accuracy	FairPoint is not accurately capturing the amount of traffic that the CLECs are terminating to FairPoint.
Dispute Resolution	Fairpoint has no sense of urgency in resolving disputes or locating payments received but not posted
Invoice Timeliness	Electronic invoices often are not received in a timely manner. CLECs need to call Fairpoint to get electronic invoices issued or get paper copies
Loss of Functionality	Verizon website provides the CLECs the ability to review the status of its bill disputes. FairPoint does not provide this functionality.
Dispute Resolution	FairPoint does not accept the bill dispute form posted on its website. FairPoint requires the CLECs to file disputes using the Verizon form. Once disputes are filed, FairPoint provides the CLECs with a separate form indicating the status of the claim. This multiple form process requires the CLECs to manually compare the forms to determine the status of each claim submitted. Automatic batch id's are assigned by FairPoint per each dispute form filed. However, if several claim forms are filed at once, no indication of which batch id belongs to which claim filed is provided. An email and/or call to our FP billing contact/specialist is required to get this information.

Topic area	Issue description
Tag & Locate	The CLECs volume of "tag and locates" through the M&R department are significantly greater than they were with Verizon. This is resulting from installation orders not being worked properly (issue also addressed in Ordering & Provsioning).
Chronic Troubles	FairPoint never provides a solution to the CLECs chronic trouble reports and instead just keeps providing short term fixes.
Chronic Troubles	FairPoint has facility quality issues that are causing chronic troubles. About 10-15% of the trouble reports that FairPoint closes as no trouble found (NTF) must be reopened. This is a higher percentage than the CLECs experienced with Verizon.
Repair Quality	

Topic area	Issue description
PAP Reporting	Reports are always late and there is no consistency in the reporting. Reports are also inaccurate. Some CLECs don't receive reports at all.
LVR Reports	The LVR reports supplied by FairPoint are extremely inaccurate leaving the CLECs in the dark on how their customer accounts are going to appear in the phone books.
Process Training	SPOCs and help desk personnel are unfamiliar with directory listings processes and systems.
	Minimal training on DL available (5 min. in a 3 hr. LNP class).