

SMITH & DUGGAN LLP
ATTORNEYS AT LAW

TWO CENTER PLAZA
SIXTH FLOOR
BOSTON, MA 02108-1906
TEL 617.228.4400
FAX 617.248.9320

ALAN D. MANDL
AMANDL@SMITHDUGGAN.COM
DIRECT DIAL: 617.228.4464
LINCOLN OFFICE

LINCOLN NORTH
55 OLD BEDFORD ROAD
LINCOLN, MA 01773-1125
TEL 617.228.4400
FAX 781.259.1112

November 20, 2008

ORIGINAL	
N.H.P.U.C. Case No.	DT 07-011
Exhibit No.	C-1 Comcast
Witness	David J Kowolenko
DO NOT REMOVE FROM FILE	

BY EMAIL AND FEDERAL EXPRESS

Deborah A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission

Re: DT 07-011 Verizon New Hampshire Transfer of Assets to FairPoint Communications, Inc.

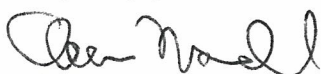
Dear Secretary Howland:

Pursuant to the Commission's Secretarial Letters dated November 14 and November 17, 2008, enclosed please find an original and seven (7) copies of the Comments and Recommended Conditions of Comcast Phone of New Hampshire, LLC, on Readiness of FairPoint Communications, Inc. to Give Verizon an Irrevocable Notice of Readiness for Cutover, together with the affidavit of David J. Kowolenko. A hard copy of this filing is being sent by Federal Express.

Mr. Kowolenko will testify at the November 25, 2008 evidentiary hearing in this matter.

Thank you for your assistance in this matter.

Very truly yours,



Alan D. Mandl
Counsel for Comcast Phone
of New Hampshire, LLC

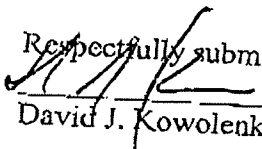
Enclosures
cc: Service List (by email only)

AFFIDAVIT OF DAVID J. KOWOLENKO

I, David J. Kowolenko, do hereby under oath depose and state as follows:

1. My name is David J. Kowolenko. I am Divisional Vice President for Voice Services for Comcast's North Central Division which serves nine states including New Hampshire and Vermont.
2. I have reviewed the Comments and Recommendations of Comcast Phone of New Hampshire, LLC on Readiness of FairPoint Communications to give Verizon an Irrevocable Notice of Readiness for Cutover being filed in Docket No. DT 07-011 on November 20, 2008 ("Comcast Phone Comments").
3. The Comcast Phone Comments contain additional information on FairPoint's readiness to (a) issue its irrevocable notice of cutover readiness to Verizon; and (2) cutover to FairPoint's new operational support systems beginning at the end of January 2009. To the best of my knowledge, the factual statements in the Comcast Phone Comments are true, accurate and complete.


Respectfully submitted,


David J. Kowolenko

6/18/09
Date

State of Vermont
County of Chittenden

The above named David J. Kowolenko, Divisional Vice President of Voice Services for Comcast's North Central Division, personally appeared before me on November 19, 2008 and stated that the foregoing statements are true, accurate and complete to the best of his knowledge and belief.


Notary Public Christina C. DeGraff-Murphy

My Commission expires:

2-10-2011

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Re: 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.

**DOCKET NO. DT07-011
NOVEMBER 20, 2008**

**COMMENTS AND RECOMMENDED CONDITIONS OF COMCAST PHONE OF NEW
HAMPSHIRE, LLC, ON READINESS OF FAIRPOINT COMMUNICATIONS, INC. TO
GIVE VERIZON AN IRREVOCABLE NOTICE OF READINESS FOR CUTOVER**

I. BACKGROUND

Pursuant to the New Hampshire Public Utilities Commission's ("Commission") Secretarial Letter, Comcast Phone of New Hampshire, LLC ("Comcast") files these Comments for the Commission's consideration in evaluating the readiness of FairPoint Communications, Inc. ("FairPoint") to provide its Irrevocable Notice of Cutover Readiness ("Notice") to Verizon. Comcast commends Liberty Consulting ("Liberty"), and the Commission Staff for their hard work, in cooperation with FairPoint and wholesale parties, at this critical stage of review prior to such Notice being issued. Comcast has actively participated in all available forums with FairPoint and has worked directly and successfully with FairPoint on a number of cutover readiness issues for the past ten months.

The remaining critical issue with respect to Comcast, as identified in the Liberty Report¹ is electronic bonding ("e-bonding" or Electronic Data Interchange "EDI") testing. Based on the Liberty Report and FairPoint's Supplemental Statement, there does not appear to be any dispute

¹ FairPoint Cutover Monitoring Status Report, The Liberty Consulting Group, November 12, 2008.

that EDI testing conducted by FairPoint was limited, inflexible and restrictive.² Comcast is pleased with the responsiveness of FairPoint and the additional testing that has occurred over the last few weeks. FairPoint is committed to ensuring that the critical tests identified by Comcast are successful. However, as discussed in more detail below, Comcast has learned only in the last few days that apparently there has been little to no integration testing performed between the EDI gateway and FairPoint's back office systems. First referenced its November 12, 2008 Report and then made even clearer at the technical sessions before the Vermont Public Service Board on November 14 and Commission Staff on November 17, Liberty has confirmed that while there was extensive internal performance and user acceptance testing for the WebGUI interface, there was apparently no such testing for the EDI interface.³ This is a critical omission that must be corrected prior to cutover. Without interoperability testing, there is no assurance that even the tests that have passed will function with FairPoint's back office systems.

Comcast must be able to submit orders via EDI to FairPoint without manual intervention and to have those transactions automatically "flow through" FairPoint's systems and be successfully completed as they are with Verizon today. The inability of Comcast to test these systems in a flexible and integrated environment continues to cause concern about whether the systems will function – with the EDI interface – as planned after Cutover. Comcast relies on the EDI interface because it is more efficient and scalable than the WebGUI and better serves Comcast's customers and business needs in Northern New England. EDI or e-bonding should permit day to day transactions to flow through FairPoint's back office systems for provisioning and generate notifications back to Comcast that FairPoint's provisioning has been completed, *all without manual intervention*. This capability has been provided by Verizon in New Hampshire

² Liberty Report at 12.

³ Liberty Report at 12, Transcript of Status Monitoring Conference on November 14, 2008 in VT Docket 7270 at pp. 22 – 23, 69 – 70. .

and Vermont and was among the criteria that Verizon satisfied in order to meet the Section 271 market opening standards under the 1996 Telecommunications Act.⁴ Notice of Cutover should not be permitted unless the following conditions are imposed upon FairPoint with respect to CLEC – EDI testing.

II. CONDITIONS SHOULD BE IMPOSED ON FAIRPOINT IF NOTICE OF CUTOVER READINESS IS GIVEN BY NOVEMBER 30, 2008.

Comcast concurs with the Liberty Report’s finding that FairPoint had not satisfied CLEC cutover readiness criteria applied by Liberty (Liberty Report at 14). Given the importance of e-bonding to Comcast’s business operations in Northern New England, FairPoint should be required to successfully complete the business critical e-bonding testing identified by Comcast prior to FairPoint issuing its Notice of Cutover Readiness. As conditions to allowing FairPoint to provide the Notice of Cutover Readiness by November 30, 2008, FairPoint should be required to: (1) successfully complete all fifteen test cases, as previously identified by Comcast, including back office confirmations, *prior* to Notice of Cutover being issued on or about November 30, 2008; (2) complete and verify in a written statement to the Commission that integration testing of EDI and FairPoint’s back end systems has been successfully completed prior to actual Cutover; (3) successfully complete prior to actual cutover specific remaining important e-bonding testing previously identified by Comcast, including interoperability testing and regression testing as identified by the Liberty Report (pg. 17) and FairPoint’s Supplemental Statement (pg. 4) and as set forth in Attachment A; (4) pay for Liberty to (a) continue to monitor and verify this testing and provide status reports to the State Commissions and/or Staff prior to actual cutover and (b) remain engaged post-cutover in the event that problems with the systems arise after cutover and

⁴ At page 49 of its February 15, 2008 Order in Docket No. 7270, the Vermont Public Service Board directed that “The Independent Monitor, established to ensure FairPoint’s system conversion process is implemented in a manner which eliminates risks to customers, should include as one of its criteria an assurance that FairPoint’s systems comply with the market opening requirements of the 1996 Act.”

defects need to be resolved; and (5) continue to develop its systems and support wholesale customers with respect to acceptance testing in the manner in which they are currently supported by Verizon. Additionally, the Commission should keep this docket open to monitor developments with regard to the performance of FairPoint's systems and as a Condition of Cutover, should provide parties with an opportunity to seek remedies, monetary or otherwise, for their costs associated with failures of the FairPoint systems or for FairPoint's failure to comply with any of the above conditions.

Proposed Condition 1: Fifteen tests identified by Comcast must be successfully completed prior to Notice of Cutover⁵.

As discussed above, certain conditions must be imposed on FairPoint in order for a Notice of Cutover Readiness to go forward on or before November 30, 2008. There can be no serious dispute that CLEC EDI testing has been limited and restrictive (see Liberty Report at 17 and FairPoint Supplemental Statement dated November 18, 2008 at 2 agreeing to address Liberty's concerns). Indeed, it appears that FairPoint did not conduct performance and user acceptance testing using EDI.⁶

Comcast believes that all fifteen prioritized tests must pass successfully *prior* to a Notice of Cutover Readiness being issued. Comcast is pleased to note that tremendous progress has been made toward completing these tests and we understand that FairPoint has committed to the successful completion of these crucial test before giving its cutover readiness notice to Verizon. Comcast agrees with FairPoint's assessment of the testing status provided in its November 18,

⁵ In May, 2008, Comcast submitted a test deck of 53 tests – reflective of the typical tests that Comcast completes with Verizon (and other e-bonded carriers) as part of any software release or upgrade. When it became apparent these tests were not going to be accommodated, on November 4, 2008 Comcast sent a letter to FairPoint and Liberty prioritizing certain tests that it felt were critical to be completed before FairPoint provided notice of cutover readiness to Verizon. Comcast requested that all 53 tests be successfully completed before actual cutover. The November 4, 2008 Letter is attached as Exhibit B. The test deck is attached as Exhibit D.

⁶ Transcript of VT Status Monitoring Conference in Docket 7270 on November 14, 2008 at 22 – 23, 69 – 70.

2008 Supplemental Statement; as of today, of the fifteen initial tests requested, only the following two tests either have not yet been tested, or have yet to pass:

1. Pre-Order Test: CSR for a multi-line account (Test number not yet assigned) – This test case has not been provided to Comcast. FairPoint is in the process of verifying this test case in their systems. Per the Supplemental Statement, the test case should be provided by November 19, 2008.
2. OR-67: Local Number Port (2 lines) and Directory Listing Order – Billing Confirmation Notice returned with missing fields. Defect ticket opened and has not been resolved.

Billing Confirmation Notices (BCN), as with Jeopardy Notices (JEP) and Provisioning Confirmation Notices (PCN) are critical back office confirmation notices recognized by Liberty in its Report at page 17 that must be completed. Comcast looks forward to the successful resolution of these tests.⁷

Proposed Condition 2: FairPoint should be required to verify in a written statement that integration testing of EDI and FairPoint's back end systems has been successfully completed prior to actual Cutover

Based on the comments of Liberty during the technical session in Vermont on November 14, 2008, Comcast learned that while system integration testing had occurred for the web-GUI interface, no similar tests were conducted or completed with respect to the EDI gateway for CLECs that rely on e-bonding (Nov. 14 Tr. at 22-23; 69 - 70) . The facts acknowledged at the Vermont technical session⁸ better informed Comcast of the additional limitations of the testing environment, causing additional concerns about the adequacy of the tests. In Comcast's opinion, the integration of the EDI gateway to FairPoint's back end system must be successfully tested in the same manner as they were with the web-GUI. There is no indication, based upon the limited CLEC EDI tests that have been performed to date, that such integration tests have been performed. Without such verification, there can be no confidence that even if the fifteen

⁷ A Comcast grid showing the results of testing for the 15 test casts is attached as Exhibit C.

⁸ The absence of performance and user acceptance testing was again confirmed by Liberty at the technical session in the Maine and New Hampshire Dockets on November 17, 2008 in Kittery, ME, but the session was not transcribed.

test cases are successfully performed prior to Notice, that they will be successful in a live environment. It appears to Comcast that these tests were conducted in a vacuum, without validation of whether they will function end to end. As a condition of Notice of Cutover Readiness, FairPoint should perform internal performance and user acceptance and integration testing for the EDI interface, and provide a written statement, with verification by Liberty, to the Commission that such integration testing has been performed successfully prior to actual cutover. Given the short amount of time between when this internal EDI testing deficiency was confirmed and the Notice of Cutover Readiness is planned, Comcast is requesting that this be made a Condition to be fulfilled after FairPoint provides the irrevocable notice of cutover readiness but *before* actual cutover.

Proposed Condition 3: FairPoint should successfully complete specific remaining important e-bonding testing, life-cycle testing and regression testing as identified by Comcast prior to actual cutover as set forth in Attachment A.

As Liberty noted in its Report, continued CLEC testing is critical – even after a Notice of Cutover Readiness is issued. For this reason, as a further pre-condition for issuance of a Notice of Cutover Readiness, FairPoint should be required to successfully complete the specific remaining tests as set forth in Attachment A prior to actual cutover. FairPoint agreed in its Supplemental Statement that it would take actions recommended by Liberty, including providing evidence to Liberty that “CLEC testing scenarios sufficiently mirror the historical range of wholesale transactions in the Northern New England states.” Supplemental Statement at 3. The test deck of 53 cases that Comcast provided at the outset represent actual transactions that Comcast conducts with Verizon. Yet to date, only 15 of those tests will have been completed. In the spirit of cooperation, Comcast has identified three of these remaining 38 tests that should be completed successfully prior to actual cutover, as set forth in the Attachment. Comcast

believes that *all* 38 remaining tests should be conducted eventually, but is willing to work with FairPoint to schedule and create a project plan with milestones for the remaining business typical test cases over a mutually convenient time before or within a reasonable time after cutover.

In addition, in anticipation of FairPoint's success in achieving integration testing as part of Condition 2, Comcast believes it is prudent and necessary to be able to conduct a full transaction life-cycle test on the previously passed test cases to demonstrate successful interoperability. Finally, Comcast applauds FairPoint's commitment to its own continual regression testing. Towards that end, Comcast should also be able to do regression testing with FairPoint after all of the defects in the original test cases have been resolved, to ensure that fixes to one defect do not affect the success of other tests that have previously passed.

Proposed Condition 4: Liberty and/or Staff should continue to monitor required testing and report the status to the state commissions and/or Staff prior to Actual Cutover and remain engaged post-cutover in the event that problems with the systems arise after cutover and defects need to be resolved.

The Commission, through Staff (directly or through Liberty) should assure that the full scope of CLEC testing and interoperability is successfully completed as set forth above. Liberty should report on the status of any additional testing required as Conditions to Cutover Readiness prior to the Actual Cutover. At FairPoint's expense, Liberty should also be retained post cutover to ensure a smooth transition, and to assist in expedited resolution of any problems or defects that may exist as the result of cutover.

Proposed Condition 5: FairPoint should be required to continue to develop and/or test its systems in order to support CLECs with respect to acceptance testing in the manner in which CLECs were supported by Verizon.

As reflected above, Comcast originally submitted a test deck of 53 testing scenarios. These are the types of tests that are reflective of CLEC testing in a typical transactional

environment as exists today with Verizon. Pursuant to Commission Orders, FairPoint is under an obligation to support CLECs in the same manner as Verizon, and at parity with itself. As a condition of Cutover Readiness, the Commission should make clear that the inability to complete the expected variety of user acceptance testing is not acceptable on an ongoing basis. In the future, when FairPoint is on its own systems, FairPoint will be expected to accommodate for CLEC testing in a business as usual manner “that mirrors the historical testing” of transactional testing with Verizon in Northern New England.

Proposed Condition 6: The Commission should provide parties with an opportunity to seek remedies, monetary or otherwise, for costs they incur associated with failures of FairPoint’s systems as a result of unsuccessful testing, required tests that were not executed or for FairPoint’s failure to comply with the above mentioned conditions.

Comcast has dedicated significant resources to the cutover readiness process in order to assure that the e-bonding process for placing and completing orders will work at least as well as the current process used by Verizon. It has notified FairPoint and Liberty of the tests that it believes should be conducted and passed in order to increase the likelihood that FairPoint’s systems will function successfully upon cutover.

In the event that the Commission does not require the successful completion of all test cases identified by Comcast as necessary to perform before actual cutover, integration testing and regression testing (and consistent with Liberty’s position that it would be prudent to conduct this additional testing), or such required testing is not successful prior to actual cutover, Comcast requests that the Commission allow Comcast (and other affected parties) to put into the record evidence of the costs associated with the delay or failure of transactions that should have been successfully tested by FairPoint, but were not. Should the testing not be successfully completed

(or the systems actually fail upon cutover)⁹ Comcast and other carriers should be able to obtain reimbursement from FairPoint. Such reimbursement would include, but not be limited to, costs associated with manual workarounds due to FairPoint system failures and other business related costs due to a manual environment, including delayed installation of customers. Any party seeking damages would be required to present evidence to substantiate its claims. The risk of any uncertainty caused by incomplete or unsuccessful testing should be borne by FairPoint and not its competitors.

III. PROPOSED PORTING INTERVAL POST CUTOVER NOT ACCEPTABLE

Comcast wishes to take this opportunity for written comments to bring an additional item to the Commission's attention. Very recently, FairPoint notified wholesale customers that the beginning of the embargo period and ending in late March 2009, FairPoint will implement intervals for order completion that are much longer than the current industry standards. The standard interval for a simple number port is 4 business days. However, beginning on January 20, 2009 FairPoint is proposing that the interval be increased to 18 business days. If a wholesale customer enters an order on January 20, 2009 FairPoint would not port it until February 13, 2009 (which assumes no jeopardies¹⁰). FairPoint proposes to gradually reduce these order completion intervals. However, it will not return to the standard 4-day interval for LNP until March 26, 2009.

FairPoint's proposed extended intervals constitute a grave impediment to competition and must be shortened significantly. Indeed, a simple order to port a number to a facilities based

⁹ See PUC FairPoint Final Order at p. 78, permitting opportunity for reimbursement substantial or extraordinary costs due to the transition generally.

¹⁰ If the customer needs to reschedule in this environment, another 13 days would attach. These extended intervals impact Comcast's ability to retain customers during this period, impact customers ability to take advantage of multiproduct discounts, as well force Comcast to incur additional costs due extended installation periods, requiring multiple home visits.

carrier like Comcast can be accomplished electronically. Since Comcast is e-bonded with FairPoint and does not require manual intervention or additional resources, there is no business justification for *any* extended intervals. For this reason alone, there is no explanation for the extended interval proposed by FairPoint with respect to e-bonded CLECs.

IV. CONCLUSION

As made clear during the technical sessions and in the Liberty Report, wholesale customers that rely upon the EDI interface rather than the WebGUI are at a serious and potentially costly disadvantage. FairPoint conducted comprehensive end-to-end testing on the web-GUI, yet there were apparently no internal performance and user acceptance testing for EDI. In addition, the test environments created for EDI users were limited and inflexible. FairPoint's failure to perform basic interoperability tests between the EDI gateway and the back office systems shifts the risk of FairPoint system failures to the wholesale customer. A FairPoint system failure could impair the ability of Comcast to transact smoothly with FairPoint – resulting in immediate customer impact. Any delays caused by FairPoint's system failures will harm the competitive environment and increase costs to Comcast and other CLECs. ILECs like FairPoint are uniquely positioned in the marketplace since most competitors, at one point or another, rely on them to compete.

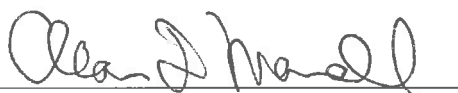
The Commission should assure that the full scope of CLEC testing and verification of interoperability of the EDI gateway are successfully completed as set forth herein and grant all requested Conditions prior to permitting FairPoint to issue its Notice of Cutover Readiness by November 30, 2008. These conditions are required in order to assure that FairPoint's new systems will function and operate at least as well as Verizon's do today and that competition in New Hampshire will not be significantly impaired.

Comcast recognizes the commitment of all parties, including FairPoint, the Commission and Liberty in working towards successful cutover. However, the above referenced conditions are critical to preserving Comcast's ability to serve its customers in New Hampshire and avoiding a step backward from the market-opening steps taken by Verizon. Comcast appreciates the opportunity afforded by the Commission to provide these Comments in advance of the November 25, 2008 hearing in this matter.

Respectfully submitted,

COMCAST PHONE OF NEW HAMPSHIRE, LLC

By its attorney,

A handwritten signature in cursive script, appearing to read "Alan D. Mandl", is written over a horizontal line.

Alan D. Mandl
Smith & Duggan LLP
55 Old Bedford Road
Lincoln, MA 01773
(617) 228-4464

Dated: November 20, 2008

Attachment – Condition 3 – Additional Testing

Three Tests from the Original Test Deck Dated May 31, 2008

1. **LNP Order for residence with 3 or more TNs with DL “as specified.”**
Multi-line ports are common transactions and should be tested.
2. **LNP Order for business with 3 or more TNs with DL covert “as is”**
Multiline ports are critical to support our newly launched Comcast Business Class service, serving small and medium size businesses in NH.
3. **Residential Straight Line Listing with 3 or more lines to demonstrate Local Main Listing (LML); Local Additional Main Listing (LAM); Local Additional Listing (LAL).**
We have been experiencing problems with LAM during testing and an additional test case is reasonable.

Full Transaction Life Cycle Support

The steps below represent the interaction of the FairPoint (“FP”) gateway with Comcast’s e-bonding gateway. A test case should be built to test all of the possible interactions of the system – pre order, ordering and post order confirmation and notifications, which would include the following steps as in the current Verizon East EDI Specifications:

1. Retrieve customer data using the CSR transaction. Go to next step.
2. Create LNP order per customer request and also the customer data returned by the CSR. Go to next step.
3. If FP returns a REJECT, then correct the order and go back to step 2.
4. If FP returns a FOC, then the due date is confirmed and the order is accepted. Go to next step.
5. FP sends a Jeopardy if they encountered any issues with provisioning the order. (IF not, go to 6.) Resolving the problem may require the order to be rescheduled. Go back to step 2 and create a supplemental order to change due date.
6. When provisioning of the order is completed, FP sends a PCN. Go to next step.
7. When the Billing process of the order is completed, FP sends a BCN.

End of test.

Regression Testing

As referenced in the Supplemental Statement Concerning Notice of Cutover Readiness dated November 18, 2008 (p. 4), FairPoint itself has committed to continue its own regression testing, which is industry practice for testing operating systems. Regression testing confirms that “fixes” to the system to correct certain defects do not inadvertently “break” other elements, and cause a defect to a test that had already passed. It is industry standard to engage in such testing to avoid additional defects. To make absolutely certain that there are no defects in the test cases provided by FairPoint, Comcast must be able to conduct regression testing with FairPoint. Final regression testing for Comcast before cutover should include all the 15 test cases under Proposed Condition 1, as well as the three additional pursuant to Proposed Condition 3.



Comcast Cable Communications, Inc.
676 Island Pond Road
Manchester, NH 03109
603.695.1400 Tel
603.628.3303 Fax
www.comcast.com

November 4, 2008

Via Electronic and Overnight Mail

Mr. Brian Lippold
VP, Business and Wholesale Services
FairPoint Communications
155 Gannett Drive
South Portland, ME 04106

Mr. John Antonuk, President
The Liberty Consulting Group
65 Main Street
PO Box 1237
Quentin, PA 17083

Re: Comcast Phone of New Hampshire Comment on FairPoint's EBonding Testing

Dear Mr. Lippold and Mr. Antonuk:

On September 16, 2008, as requested by the Staff of the New Hampshire Public Utilities Commission, Comcast Phone of New Hampshire, LLC (CPNH or Comcast) submitted its Wholesale Customer Cutover Issues List. FairPoint provided its responses on October 7, 2008. On October 16, 2008, CPNH submitted its response to the responses of FairPoint Communications – NNE to CPNH's issues list.¹ FairPoint provided a further response on November 3, 2008.

CPNH would like to take this opportunity to advise you in writing about Comcast's serious concerns about the status of one of the issues on CPNH's issues list, Item 4, FairPoint's EDI (electronic data interface) ebonding wholesale testing². Since the end of May 2008, CPNH has been requesting robust ebonding testing for four types of transactions that are business critical to Comcast – Customer Service Requests (CSR), Address Validation Queries (AVQ), Local Number Portability (LNP) and Directory Listings (DL). These are the types of transactions that are typical between CLECs and Verizon East on behalf of FairPoint. As CPNH has consistently stated in our issues list and previously during the Wholesale User Forum meetings, FairPoint has not provided an adequate number of test cases for CPNH to ensure the proper flow through of wholesale customer transactions. For these most critical functions, FairPoint has provided only a

¹ The Issues Lists were submitted by CPNH at the request of the NH PUC Staff. The concerns raised in this letter and in the Issues Lists apply equally to Comcast Phone of Vermont, LLC.

² Highlighting a single issue here, Item 4, does not indicate that Comcast's concerns regarding other issues raised in its Issues List have been addressed.

single test case for each: CSR, LNP and DL. As a result of the testing completed thus far, all three test cases are in a defect status. Of the five test cases provided for AVQ, three passed and two have failed. In its October 13 Industry Letter FairPoint indicated additional test scenarios would be issued, however, only two of these additional ten tests were applicable to CPNH. Finally, of most concern to CPNH is that FairPoint has no plans at present to test the most common transaction between Comcast and FairPoint in New Hampshire, Maine and Vermont: LNP with Directory Listing “as specified.”

CPNH is therefore concerned about the volume of tests and types of test planned and the results of the testing thus far, as set forth below. As a result, we have identified testing that, at minimum, we deem as critical to be successfully completed prior to the irrevocable notice of cutover being issued.

Tests Completed:

In total, FairPoint conducted only 85 test cases using the LSOG 9.9.4 test deck. Of those, only 62 were EDI test cases (40 for ordering and 22 for preordering).³ Recently, FairPoint announced it was adding an additional 10 cases based on Verizon’s newly issued LSOG 9.12.1. However, as of today, those test case scenarios have not yet been provided. Thus, in total FairPoint has or will conduct a mere 95 test cases, only approximately 72 of which are for EDI, which Comcast does not consider robust enough to provide CPNH with sufficient confidence that FairPoint’s EDI bonding will work properly. Significantly, only ten of the test cases are responsive to CPNH’s requests as identified through the Wholesale Users’ Forum and the CPNH Issues Lists. In total, FairPoint’s test cases cover only 15 – 20% of the tests CPNH has been requesting since May 2008.

Further, overall the testing that FairPoint has conducted thus far has not been successful. CPNH conducted testing with FairPoint three hours a day from October 27th through October 30th, 2008. CPNH is conducting additional testing on November 4th and November 5th, 2008.

Local Number Portability: To date, there is only a single LNP test in the original 85 tests on the LSOG 9.9.4 test deck originally announced by FairPoint, (OR-25 - Number Portability for a facilities based wholesale customer porting from a single line residential account) that is somewhat responsive to CPNH’s request for LNP testing. However, this residential test case as provided by FairPoint does not address CPNH’s most important testing need, LNP with Directory Listing “as specified” – Comcast’s most common transaction with FairPoint. Based on last week’s testing, the OR-25 test case failed due to an “unexpected response from the WISOR EDI Gateway.” Further, it is our understanding that the OR-25 test with another CLEC also failed.⁴ The test is in defect status and must be completed successfully prior to Notice of cutover. Moreover, as

³ An additional 23 tests were for trouble administration.

⁴ The CLEC received FOC reject with ERR01, Error while processing Wisor Order; TOS field usage should be optional not required

discussed below, FairPoint should also complete a test of LNP with Directory Listing “as specified” prior to Notice of cutover being given.

While FairPoint notified the Industry on October 13 they have added another LNP single test for multi-line business accounts⁵ that is responsive to CPNH’s request for LNP testing, CPNH has not yet been provided with the details of this test case scenario. This test is important to CPNH and we anticipate that testing will occur on November 5, 2008. However, this date may be in jeopardy if the test details are not provided to CPNH in a timely manner.

Customer Service Requests: FairPoint has conducted only one CSR test case (PO-14, Parsed Customer Service Record Retrieval) on a preorder for a single line account. The test failed and is in defect status because the expected service address was not returned. This test must be repeated successfully prior to the Notice of cutover.

Address Verification Queries: Out of the AVQ test cases, five are responsive to CPNH’s requests: PO-1 (Validate an address by using a TN), PO-2 (Address Validation by Partial Address), PO-3 (Validate an address by using a full address), PO-4 (Address Validation - Returns Alternative Address) and PO-17 (Address Validation for Fiber – Full Address Query). PO-1, PO-3 and PO-17, which are “Exact Match” test cases, passed. However, PO-2 and PO-4 are “Partial Match” test cases and they failed because the “partial match reasons” were not returned. No defect has been issued. It is CPNH’s position, however this test should be repeated successfully prior to Notice of cutover, as it indicates an EDI mapping defect.

Directory Listings: FairPoint is conducting only one of the twenty-eight Directory Listing tests requested by CPNH in its original test deck , (OR-34. Directory Listing order to delete one line business listing from a two line listing). This is an ancillary test with respect to the demonstration of directory listing system functionality and does not change or add to the appearance of a complex (business) listing, which are important business needs of CPNH. Further, as evidenced in testing last week with Comcast, this test also failed (“expected response was not returned”) with another CLEC.⁶

Of the ten additional cases, a single DL test (Directory Listing with new business caption listing “OR_yy”) in which a CLEC submits a request to add new business caption listing with sub-caption and with PLA (Place Listing As), is a useful test case to demonstrate DL functionality and configuring the appearance of a complex listing. This testing is to occur on November 5, 2008. However, the test case scenario has not yet been provided to CPNH, which may jeopardize the planned testing.

⁵ OR-xx is a LNP test for a multi-line (6-8) business account with listing “as is” – Caption Indent “as is” ELT=A.

⁶ The test result notes show: “Failed, LASN and LALOC are optional when the ADI field is not equal to "O" and the LACT field = "N" or "I". Otherwise prohibited. The request with these two fields should be rejected by Wisor gateway and we got error from backend stating ERR01, Error while processing Wisor Order”.

Business Critical Tests Should Be Successfully Completed Before Notice of Cutover Readiness.

At minimum, in addition to the retesting of the failed tests referenced above, the following tests should be completed successfully prior to Notice of Cutover Readiness being issued by FairPoint.

Local Number Portability: As discussed above, LNP with DL “as specified” is the most important residential scenario for CPNH, and is the most common transaction between FairPoint and Comcast. It is the most basic interface that Comcast and FairPoint have and is at the cornerstone of customer choice in voice providers. Customers need to port their phone numbers and have correct directory listings. At a minimum prior to announcing cutover readiness, the OR-25 test should be successfully completed with all wholesale customers. In addition, FairPoint should successfully complete two additional tests (a) an LNP test for a multiple line business account (OR-xx) currently scheduled for November 5, 2008; and (b) a test for a LNP order with listing converted “as specified” (ELT= ”E”; DL form or forms are required for “as specified”).

Directory Listing: Again, the DL test cases offered and being performed by FairPoint fall short of the testing requested by CPNH and of a level required to demonstrate that the ebonding systems will function effectively on cutover. At a minimum prior to cutover, FairPoint should successfully complete the following tests with CLECs:

- DL order for adding or changing the appearance of a straight line listing (residence)
- DL order for adding or changing the appearance of a SLU listing.
- DL order to change the appearance of the caption listing as identified by OR-yy above (an additional test based on OR-yy).

In conclusion, CPNH continues to be concerned that the testing being performed by FairPoint does not provide CPNH with sufficient assurance that FairPoint’s systems will function effectively on cutover. The testing conducted thus far has resulted in defects and a failing status of many of the test cases. While all of the tests requested by CPNH since May 2008 are important to ensure flow through after cutover certain tests, *at a minimum*, should be conducted *before* FairPoint provides its Notice of Cutover Readiness to Verizon. FairPoint should successfully complete (and retest those tests that have failed) all previously planned and/or executed tests in the original and subsequent test decks. In addition, CPNH has prioritized as business critical the following five tests out of the original request by CPNH in its September 16 Issues List:

1. an additional CSR test case for a multiple line account (residence or business).
2. a LNP order with listing converted “as specified” (ELT= ”E”, DL form or forms are required for “as specified”).
3. a DL order for adding or changing the appearance a straight line listing (residence)
4. a DL order for adding or changing the appearance a SLU listing.

5. a DL order to change the appearance caption listing previously established as OR-yy above.

The remaining tests requested by CPNH in its September 16, 2008 Issues List should also be successfully completed prior to actual cutover.

For your reference, I have attached a more detailed evaluation of the Comcast testing results to date. As this letter addresses technical issues, please address any specific questions to Brenda Bloemke of Comcast, who has been working on the CLEC Wholesale User Forum to address cutover related issues on behalf of Comcast. Brenda can be reached at 720-267-4661.

Comcast appreciates the opportunity to raise these concerns, and is hopeful the upcoming additional testing will be completed successfully. Given the expedited timeline, Comcast felt it appropriate to raise our concerns in a timely manner. We look forward to continuing to work with FairPoint in the coming months to ensure successful testing and cutover.

Sincerely,



James White *JW*
Senior Manger Regulatory Affairs

cc: w/att

Robert V. Falcone, The Liberty Consulting Group
Charles H. King, The Liberty Consulting Group
Kate Bailey, New Hampshire Public Utilities Commission
Chris Campbell, Vermont Department of Public Service
Trina Bragdon, Maine Public Utilities Commission
Alan Mandl, CPNH Counsel

Comcast Summary of FairPoint's CLEC Ebonding Testing (as of 10/31/2008)

Test windows completed: 10/27/08 – 10/30/08 1PM-4PM Mountain Time

Test windows remaining: 11/4/08 1-4PM MT and 11/5/08 1-4PM MT

Test cases completed:

PO-1 – Validate an Address by Using a TN (PASS)

PO-3 - Address Validation by Full Address (PASS)

PO-17 - Address Validation for Fiber - Full Address Query (PASS)

Re-test required:

PO-2 - Address Validation by Partial Address

PO-4 - Address Validation Returns Alternate Address

- Partial Match Reasons (MSG) not returned
- Reported to FairPoint 10/31/08

PO-14 - Parsed Customer Service Record (CSR) Retrieval

- Failed – Service Address not returned
- FairPoint defect ticket issued -FPW OSS Test Tickets #ADV-79580-543

OR-25 - Number Portability - Facility-based CLEC orders number porting from a Residential Retail Account

- Failed – Received Firm Order Confirmation (FOC) and 2 JEOPARDIES
- Retest after fixed – Expected Response not returned
- FairPoint re-opened defect ticket - ticket number unknown
- Note:
 - This residential account test case (LNP with no DL attached) does not represent Comcast's normal scenario (which is LNP with DL). Comcast had to re-configure LNP during testing to accommodate this test case.
 - All order test cases have no corresponding pre-order test cases. Comcast has to manually enter CSR info to accommodate this order test case.

OR-34 - Directory Listing Delete one line Business Listing (from a two line listing)

- Failed – Two REJECT responses instead of one REJECT response
- Comcast fixed their own configuration issues during testing – did not copy VZE Business DL configurations to FairPoint
- Comcast issued own defect ticket on – when LACT = "D", RTY is missing. RTY is always required. CC should be suppressed for the VZE Boston market and FairPoint.
- Retest after fixed – expected response not received
- FairPoint opened a defect ticket - ticket number unknown.

- Note:
 - This is not a representative Directory Listing test case. It does not demonstrate the business rules used to define or change the appearance of a listing.

The Importance of CLEC Testing (e-bonding interoperability testing):

An important goal of e-bonding interoperability testing by wholesale customers is to ensure that data are accurately transformed from the EDI format to FairPoint's internal format. The tests must demonstrate that the transformed data are able to drive both the order and pre-order functionalities of the FairPoint systems. In addition, the WISOR EDI Gateway must comply with the agreed upon industry standards for transaction models in order to support the intended LEC-to-LEC flow-through processes.

The data transformation discussed above is performed by the WISOR EDI Gateway using EDI maps (transformation logics). EDI is a 40 year old technology, and data mapping techniques have not evolved much since inception. It is a common practice to create a monolithic map to transform the 850 transactions into various order product scenarios. Changes made to one order product may impact other order products. Therefore, the additional test cases requested by Comcast are essential to ensure that code changes or fixes made for other CLECs (or products not used by Comcast) will not impact Comcast.

The transaction models mentioned above define the interactions between requests and responses. Verifying that transactions interact as designed is critical to ensure flow-through processes are uninterrupted. An isolated defect of an order product may have an appropriate "work around". However, when flow-through stops, there is no "work around" available.

The EDI eBonding Interface is a multi-layer architecture which consists of the Internet/VPN layer, Interactive Agent layer, and EDI translator layer. These component layers are also tested in conjunction with the test cases above.

The test cases mentioned above collectively evaluate the entire WISOR EDI Gateway functionality as follows:

Internet/VPN layer connectivity testing

This layer is the underlying transport mechanism which was established, tested and passed in June. The VPN connectivity was again tested on 10/23/08 immediately before the scheduled test windows shown above.

Interactive Agent (IA) Transport testing

IA is used to transport EDI transactions. IA is based on an industry standard protocol published by the Alliance of Telecommunications Industry Solutions (ATIS) - Interactive Agent Specifications Issue 2.

IA transactions and IA receipts were logged. The IA logs were reviewed to ensure digital certificate authentications were performed. The transaction flows driven by the test cases were verified and deemed successful.

EDI Translator (EDI formatted data translation to FairPoint internal data) testing

The 850/860 group of EDI transactions are based on the ANSI ASC X12 EDI Standards. The EDI LSOG Mechanization Specifications (ELMS) provides mapping of LSOG business rules to EDI formatted data. It also provides the recommended business and transaction models. (ELMS is an industry standard published by ATIS). Verizon/FairPoint also provides EDI specifications to add their own customization to the ELMS standards.

Most ILECs/CLECs use off-the-shelf EDI translators to implement the above standards by coding the translation logics into a pre-order map, an order map and a post-order response map. The test cases evaluated the translation accuracy of the pre-order, order and their responses. For example, PO-2 and PO-4 demonstrated that the MSG field is not mapped correctly by the WISOR EDI Gateway.

The test mentioned above also shows that the WISOR EDI Gateway is not in compliance with the ELMS transaction models. An order transaction only requires a single response (see OR-34 test results). Response to an order request can be a Firm Order Confirmation (FOC) or a REJECT but not both (see OR-25 test results). An unsolicited response such as JEOPARDY should only be sent after a FOC has been received and acknowledged by the CLEC (see OR-25).

An EDI envelope defines the trading partner relationships such as sender and receiver, as well as processing rules. The test cases mentioned above identified an incorrect EDI envelope returned by the WISOR EDI Gateway (Incorrect "Trading Partner ID Qualifier"). This error caused Comcast's EDI translator to reject inbound transactions and disrupted flow-through.

Overall assessment of the test results as of 10/31/2008

FairPoint has conducted internal system testing (534 test cases), as well as UAT. However, it's questionable if the WISOR EDI Gateway was included in FairPoint's system testing, as there are significant defects that still occur, as witnessed by Comcast and other CLECs. Therefore, CLEC interoperability testing becomes the vehicle to ensure effective LEC-to-LEC flow-through local services ordering processes. CLEC

*Comcast – Summary of FairPoint's CLEC Ebonding Testing
As of 10/31/2008*

testing also provides opportunities for the CLECs to identify their own defects and to make necessary configuration changes.

As the test results indicated, the WISOR EDI Gateway is not interoperable. Unexpected responses are detected by Comcast and other CLECs. This is a definite barrier for a successful cutover from Verizon systems to FairPoint systems.

In sum, several factors currently raise serious concerns about FairPoint's cutover readiness: FairPoint's reluctance to provide an adequate number of test cases to ensure effective LEC-to-LEC flow-through processes; the limited number of remaining test windows, as the testing period ends in November; and, the fact that FairPoint's test results to date indicate the WISOR EDI Gateway is not interoperable.

REPORT PREPARED BY:

Bennet Pang

Comcast Cable Corporation

(720) 267-2520

bennet_pang@cable.comcast.com

Comcast Summary of FairPoint's CLEC Ebonding Testing - as of 11/18/2008

Test windows completed: 10/27/08 – 10/30/08 1PM-4PM Mountain Time (MT)
 11/4/08 1-4PM MT, 11/5/08 1-4PM MT, 11/6/08 1-4PM MT
 11/10/08 1-4PM, 11/12/08 1-4PM MT, 11/13/08 9 AM -12:00PM
 MT, 11/17/08 1PM -4:00PM MT, 11/18/08 1PM -4:00PM MT

Next Test window: 11/20/08 9AM-Noon MT.

Summary of Test Results:

The following is a summary of the Pre-order test results:

Pre-order <ul style="list-style-type: none"> • Test Case # • Pre-order type 	Test Case Description	Test Result	Impact* *Pre-Order Validation (all tests below) reduces the likelihood that the order will reject /fallout during the provisioning process
<ul style="list-style-type: none"> • PO-1 • Address Validation Query (AVQ) 	Validate an Address by Using a TN	PASS - An "Exact Match" and the address of the TN were returned.	AVQ reduces DL order rejects by 60%
<ul style="list-style-type: none"> • PO-2 • Address Validation Query (AVQ) 	Address Validation by Using a Partial Address	PASS – The missing "Partial Match Reasons" (MSG Field) is not cutover impacting. FairPoint agreed to submit change request to add "Partial Match Reasons" post cutover.	Same as above
<ul style="list-style-type: none"> • PO-3 • Address Validation Query (AVQ) 	Address Validation by Using a Full Address	PASS - An "Exact Match" and the exact address were returned.	Same as above
<ul style="list-style-type: none"> • PO-4 • Address Validation Query (AVQ) 	Address Validation Returns Alternate Address	PASS – The missing "Partial Match Reasons" (MSG Field) is not cutover impacting. FairPoint agreed to submit change request to add "Partial Match Reasons" post cutover.	Same as above
<ul style="list-style-type: none"> • PO-17 • Address Validation Query (AVQ) 	Address Validation for Fiber – by Using a Full Address	PASS - An "Exact Match" and the exact address were returned.	Same as above
<ul style="list-style-type: none"> • PO-14 	Parsed	PASS – The CSR Response was	CSR reduces LNP

<ul style="list-style-type: none"> Customer Service Record (CSR) 	Customer Service Record (CSR) Retrieval for a single line account	received. Comcast is investigating the error encountered while loading the response to their system.	order fallout by 70%
This test case was requested in the November 4 th Letter to FairPoint	Parsed Customer Service Record (CSR) Retrieval for a multi-line account	FairPoint is creating this test case and plan to test it 11/18/08 AM. This test case will be provided to Comcast after FairPoint verified it in their systems. 11/18/08 - FairPoint advised that this test case is not ready.	Same as above OUTSTANDING ITEM

The following is a summary of the Order test results:

Order <ul style="list-style-type: none"> • Test Case # • Order type 	Test Case Description	Test Result	Impact* *Order tests test the specific transactions between Comcast and FairPoint
<ul style="list-style-type: none"> • OR-25 • Local Number Portability (LNP) Order 	Facility-based CLEC orders – Port a number from a <u>single line Residential Retail Account</u> , and at the same time, delete existing Directory Listing.	PASS (Conditional) based on only one value for each field. Test did not encompass field values typically used by Comcast and allowed under the current VZ East business rules. A FOC was received upon changing the values of TOS (type of service), DFDT (Desired Frame Due Time - identifies desired frame cutover time and the frame disconnect time) and TDT (Ten Digit Trigger which indicates the request for activation of a 10-digit trigger for local routing number portability) fields as requested by FairPoint due to the restricted nature of the test case. The Supplement Order Requests were successful.	Comcast processes approximately [proprietary] LNP orders per week (most involve setting up DL in the test case requested below).
<ul style="list-style-type: none"> • OR-30 • Directory Listing (DL) Order 	Establish a New Straight Line (SL) Listing for a Residential Account.	PASS – A FOC was returned. FairPoint suppressed the return of completion notifications this time. However, completion notification process needs to be verified.	Comcast processes approximately [proprietary] Residential DL orders per week
<ul style="list-style-type: none"> • OR-33 • Directory Listing (DL) Order 	Directory Listing Change Order to add an additional listing to an existing main listing of a residential account. This is a straight line listing.	PASS – A Firm Order Confirmation (FOC) was returned.	Same as above

<ul style="list-style-type: none"> • OR-34 • Directory Listing (DL) Order 	Directory Listing Change Order to delete an additional listing and to retain the main listing of a Business Account.	PASS – A Firm Order Confirmation (FOC) was returned.	
<ul style="list-style-type: none"> • OR-53 • Directory Listing (DL) Order 	Directory Listing New Order to establish a Straight Line Under (SLU) Listing. The main listing is a header with a sub-listing of a “Fax Telephone Number”. The sub-listing is indented by one degree. This is a residential account listing.	PASS – A Firm Order Confirmation (FOC) was received.	SLU is business listing. Same as above
<ul style="list-style-type: none"> • OR-66 • Local Number Port (1 line) and Directory Listing Order 	Local Number Port with Directory Listing “as specified” Order for a single line residence account	PASS – A FOC was received.	Comcast processes approximately [proprietary] LNP orders per week. Most common Comcast order.
<ul style="list-style-type: none"> • OR-67 • Local Number Port (2 lines) and Directory Listing Order • Provisioning Completion Notifications (PCN) and Billing Completion Notifications (BCN) 	Local Number Port with Directory Listing “as specified” Order for a multi-line (2 lines) residence account. This test case is also used to verify PCN and BCN	PASS – A FOC was received and TOS (type of service) issue - “residence multi-line flat rate (2AF-)” - was resolved, and Local Additional Main Listing capability was provided. PCN/BCN – testing in progress. Required fields for the BCN (Service Order ID and Service Order Billing TN) were not returned. Defect ticket will be issued.	Comcast processes approximately [proprietary] LNP orders per week. Most common Comcast order. PCN/BCN Testing OUTSTANDING
<ul style="list-style-type: none"> • OR-64 • Directory Listing Order – new caption listing 	Directory Listing Order -Establish a new Caption Listing for Business.	PASS – A FOC was received and the Alphanumeric Listing Identifier (ALI) defect was resolved. FairPoint also provided a	

		Jeopardy Notification for this order. The "IP" Jeopardy was reviewed and verified.	
<ul style="list-style-type: none">• OR-65• Directory Listing Order – Change caption listing	Directory Listing Order – Change the appearance of a Caption Listing.	PASS – A FOC was received.	

Docket No. 07-011
Comcast Phone of New Hampshire, LLC
Response to Staff Request for Wholesale Customer Issues List
Item #4 - Ebond Testing

Comcast / FairPoint Scenarios Matrix

PREORDER/CSI

Comcast Request Date: 5/28/2008

#	TXNUM	TYPE OF TRANSACTION	CCNA/CC/STATE	Scenario Description
1		CSI		Pull a CSR on a Residential single line account
2		CSI		Pull a CSR on a Residential multiple-line account
3		CSI		Pull a CSR on a Business single line account
4		CSI		Pull a CSR on a Business I multiple-line account

Docket No. 07-011
 Comcast Phone of New Hampshire, LLC
 Response to Staff Request for Wholesale Customer Issues List
 Item #4 - Ebond Testing

Comcast / FairPoint Scenarios Matrix

PREORDER/AVQ

Comcast Request: 5/28/2008

#	TXNUM	TYPE OF TRANSACTION	CCNA/CC/STATE	TXACT	Scenario Description
1		AVI			Pull AVI - Address Validation using full address Need a test address:Exact match
2		AVI			Pull AVI - Address Validation using full address Need a test address:Partial match
3		AVI			Pull AVI - Address Validation using full address Need a test address:Error
4		AVI			Pull AVI - Address Validation using a TN Need a test TN

Docket No. 07-011
 Comcast Phone of New Hampshire, LLC
 Response to Staff Request for Wholesale Customer Issues List
 Item #4 - Ebond Testing

Comcast / FairPoint Scenarios Matrix

LNP ORDER

Comcast Request: 5/28/2008

#	PON	CCNA/CC/STATE	REQTYP	ACT	BUS/RES	Scenario Description
1			CB	V	RES	Port a single line account with DL: ELT=E Test Address and TN needed
1a			CB	V	RES	SUP2 to change the due date
1b			CB	V	RES	SUP1 to Cancel
2			CB	V	RES	Port a multi- line account with DLs: ELT=E Test Address and TNs needed
2a			CB	V	RES	SUP2 to change the due date
2b			CB	V	RES	SUP3 to change the listing name
2c			CB	V	RES	SUP1 to Cancel
3			CB	V	BUS	Port a 6 to 8 lines Straight line account as is: ELT=A Test Address and TNs needed
3a			CB	V	BUS	SUP2 to change the due date
3b			CB	V	BUS	SUP3 to change the listing name
3c			CB	V	BUS	SUP1 to Cancel
4			CB	V	BUS	Port a 6 to 8 lines Caption Indent account as is: ELT=A Test Address and TNs needed
4a			CB	V	BUS	SUP2 to change the due date
4b			CB	V	BUS	SUP1 to Cancel
5			CB	V	BUS	Port a 6 to 8 lines SLU account as is: ELT=A Test Address and TNs needed
5a			CB	V	BUS	SUP2 to change the due date
5b			CB	V	BUS	SUP1 to Cancel

Docket No. 07-011
 Comcast Phone of New Hampshire, LLC
 Response to Staff Request for Wholesale Customer Issues List
 Item #4 - Ebond Testing

Comcast / Verizon Scenarios Matrix
 DL ORDER

Last Update: 5/28/2008

#	PON	CCNA/CC/S	REQTYP	ACT	BUSIRE	Style code	Scenario Description	Visual details example LEGEND: (n) where n = degree of indent
1		JB	N	RES	RES	SL	Establish a new single line residential account	
2		JB	N	RES	RES	SL	Establish a new multi-lines residential account	
3		JB	D	RES	RES	SL	Disconnect an existing single line residential account	
4		JB	D	RES	RES	SL	Disconnect an existing Multi-Line residential account	
5		JB	C	RES	RES	SL	Change the listing name on an existing listing	
6		JB	C	RES	RES	SL	Delete the LAM from an existing account	
7		JB	C	RES	RES	SL	Add an LAM to an existing account	
8		JB	C	RES	RES	SL	Change LAM TN	
9		JB	N	BUS	BUS	SL	Establish a straight line business account and populate the YPH and YPHY fields	
10		JB	N	BUS	BUS	SL	Establish a straight line business account without yellow page listing. Multiple TNS	
11		JB	N	BUS	BUS	SL and SI	Establish a new business listing(SLU) without yellow page info	Visual Detail: (0) Wilson R W Co <Address> 508 541-1087 (1) Warehouse <Address> 508 541-1089
12		JB	N	BUS	BUS	SL and SI	Establish a new business listing(SLU) with yellow page info	Visual Detail Amy Pet Co 413 245-0125 (1) Catering 413 245-0128 (1) Sales 413 532-0938 (1) Warehouse 413 245-0176
13		JB	N	BUS	BUS	SL and SI	Establish End User Listing Account(SLU) with Yellow page info	Visual Detail (0) Best Food Shop <Address> 413 532-0878 (1) Catering <Address> 413 532-0938
14		JB	N	BUS	BUS	Ci	Establish a new Caption Listing without sub-caption	Visual Detail Acme Paper Co (1) Customer Service <Address> 413 245-0125 (1) New Orders <Address> 413 245-0128 (1) Repair <Address> 413 245-0176

Docket No. 07-011

Comcast Phone of New Hampshire, LLC

Response to Staff Request for Wholesale Customer Issues List

Item #4 - Ebond Testing

Comcast / Verizon Scenarios Matrix

DL ORDER

Last Update: 5/28/2008

#	PON	CCNA/CC/S	REQTYP	ACT	BUS/IRE	Style code	Scenario Description	Visual details example LEGEND: (n) where n = degree of indent
15			JB	N	BUS	CI	Establish a new Caption Listing with sub-caption	Visual Detail: Verizon College (1) Information (2) Eventis Hotline <Address> 781 933-4371 (2) Class Schedules <Address> 781 933-4586 (1) Residence Halls <Address> 781 933-4601 (2) Dormitories (3) Alfred Hall <Address> 781 933-4653 (3) Dana Hall <Address> 781 933-4603 (0)
16			JB	N	BUS	CI	Establish a new Caption Listing with sub-caption and with PLA	Order Details: New Listing -Establish a new Caption Listing which has number in the Caption Header Visual Detail: 24 hour fitness (1) East (2) Aroua <Address> 617 342-1513 Parker <Address> 617 428-7579 (1) West (2) Highlands ranch <Address> 617 428-7596 (2) Littleton <Address> 617 790-2708 (0)
17			JB	D	BUS	SL	Disconnect a Straight line business account	
18			JB	D	BUS	SL and Si	Disconnect a SLU business account	
19			JB	D	BUS	CI	Disconnect a Caption indent business account	
20			JB	C	BUS	SL	Change the listing name on an existing listing	

Docket No. 07-011
 Comcast Phone of New Hampshire, LLC
 Response to Staff Request for Wholesale Customer Issues List
 Item #4 - Ebond Testing

Comcast / Verizon Scenarios Matrix
 DL ORDER

Last Update: 5/28/2008

#	PON	CCNA/CC/S	REQTYP	ACT	BUSIRE	Style code	Scenario Description	Visual details example LEGEND: (n) where n = degree of indent
21			JB	C	BUS	SI	Change the listing name on an existing listing	Visual Detail: Change From (0) Wilson R W Co <Address> 508 541-1087 (1) Warehouse <Address> 508 541-1089 Change To (0) Wilson R W Co <Address> 508 541-1087 (1) Sales <Address> 508 541-1089
22			JB	C	BUS	CI	Add(1) Degree Indent Add indent "Warehouse" with telephone number -Position new indent between existing listings	Visual Detail: Change From: (0) Braun H S (1) Orders 781 729-3431 (1) Repair & Svc 781 729-3470 To: (0) Braun H S (1) Orders 781 729-3431 (1) Warehouse 781 729-3474 (1) Repair & Svc 781 729-3470
23			JB	C	BUS	CI	Add(1) Degree Indent End User Request Add indent "Personnel" To an existing Caption	D3 Order Details: Visual Detail Acme Paper Co (1) Sales <address> 781 729-1046 Personnel 781 729-1086 (0) (1)

Docket No. 07-011
 Comcast Phone of New Hampshire, LLC
 Response to Staff Request for Wholesale Customer Issues List
 Item #4 - Ebond Testing

Comcast / Verizon Scenarios Matrix
 DL ORDER

Last Update: 5/28/2008

#	PON	CCNA/CC/S	REQ/TYP	ACT	BUS/IRE	Style code	Scenario Description	Visual details example
			JB	C	S BUS	CI	Add (3) Degree Indent	Visual details example LEGEND: (n) where n= degree of indent Visual Detail: Add the Smith Hall Change from: (0) Boston College (1) Bursar 781 729-3485 (1) Information (2) Class Schedules 781 729-3487 (2) Events Hotline 781 729-3492 (1) Residence Halls 781 729-3496 (2) Dormitories (3) Alfred Hall 781 729-3509 (3) Dana Hall 781 729-3523 To: Visual Detail (0) Boston College (1) Bursar 781 729-3485 (1) Information (2) Class Schedules 781 729-3487 (2) Events Hotline 781 729-3492 (1) Residence Halls 781 729-3496 (2) Dormitories (3) Alfred Hall 781 729-3509 (3) Dana Hall 781 729-3523 (3) Smith Hall 781 729-3050

Docket No. 07-011
 Comcast Phone of New Hampshire, LLC
 Response to Staff Request for Wholesale Customer Issues List
 Item #4 - Ebond Testing

Comcast / Verizon Scenarios Matrix
 DL ORDER

Last Update: 5/28/2008

#	PON	CCNA/CCIS	REQTYP	ACT	BUSIRE	Style code	Scenario Description	Visual details example
			JB	C	S	CI	Change Name in listing	LEGEND: (n) where n = degree of indent -End User request phrase "Executive Offices" be changed to "Headquarters" -All remaining information to stay the same Visual Detail Change from: (0) Ricardo Entertainment (1) Executive Offices 781 729-1301 (1) Fax Number 781 729-1326 To: (0) Ricardo Entertainment (1) Headquarters 781 729-1301 (1) Fax Number 781 729-1326

Docket No. 07-011
 Comcast Phone of New Hampshire, LLC
 Response to Staff Request for Wholesale Customer Issues List
 Item #4 - Ebond Testing

Comcast / Verizon Scenarios Matrix
 DL ORDER

Last Update: 5/28/2008

#	PON	CCNA/CCS	REQTYP	ACT	BUS/RE S	Style code	Scenario Description	Visual details example LEGEND: (n) where n= degree of indent
			JB	C	BUS	CI	Change Sub Caption	D9 Order Details: End User Request change to Sub Caption Information -Existing Caption -Issue Correction for all indents under Sub Caption Visual Detail: Change from: (0) Comcast College (1) Bursar 781 729-3013 (1) Information (2) Class Schedules 781 729-3173 (2) Events Hotline 781 729-3180 (1) Residence Halls 781 729-3209 (2) Dormitories (3) Alfred Hall 781 729-3212 (3) Dana Hall 781 729-3214 To: (0) Comcast College (1) Bursar 781 729-3013 (1) Class Information (2) Class Schedules 781 729-3173 (2) Events Hotline 781 729-3180 (1) Residence Halls 781 729-3209 (2) Dormitories (3) Alfred Hall 781 729-3212 (3) Dana Hall 781 729-3214

Docket No. 07-011
 Comcast Phone of New Hampshire, LLC
 Response to Staff Request for Wholesale Customer Issues List
 Item #4 - Ebond Testing

Comcast / Verizon Scenarios Matrix
 DL ORDER

Last Update: 5/28/2008

#	PON	CCNA/CCIS	REQTYP	ACT	BUS/RE	Style code	Scenario Description	Visual details example
	TATE		JB	C	S BUS	CI	Delete (2) degree indent and delete (3) degree indent	Visual details example LEGEND: (n) where n = degree of indent Order Details: End User Request change to delete <Class Schedules> and <Alfred Hall> -Existing Caption -Issue Correction for all indents under Sub Caption Visual Detail: Change from: (0) Teacher College (1) Bursar 781 729-3269 (1) Information (2) Class Schedules 781 729-3281 (2) Events Hotline 781 729-3290 (1) Residence Halls 781 729-3293 (2) Dormitories (3) Alfred Hall 781 729-3296 (3) Dana Hall 781 729-3408 To: (0) Teacher College (1) Bursar 781 729-3269 (1) Information (2) Class Schedules 781 729-3281 (2) Events Hotline 781 729-3290 (1) Residence Halls 781 729-3293 (2) Dormitories (3) Alfred Hall 781 729-3296 (3) Dana Hall 781 729-3408

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#	PON	CCNA/CC/S	REQ/TYP	ACT	BUS/IRE	Style code	Scenario Description	Visual details example
			JB	C	S BUS	CI	Change the Caption header	LEGEND: (n) where n= degree of indent Order Details: End User Request change to change the Caption header -Existing Caption -Issue Correction for all indents under Sub Caption Visual Detail: from: (0) Junior College (1) Bursar 781 729-3415 (1) Information (2) Class Schedules 781 729-3439 (2) Events Hotline 781 729-3454 (1) Residence Halls 781729-3465 (2) Dormitories (3) Alfred Hall 781 729-3476 (3) Dana Hall 781 729-3481 To: (0) Comcast College (1) Bursar 781 729-3415 (1) Information (2) Class Schedules 781 729-3439 (2) Events Hotline 781 729-3454 (1) Residence Halls 781729-3465 (2) Dormitories (3) Alfred Hall 781 729-3476 (3) Dana Hall 781 729-3481