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April 5, 2001

**Ex Parte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W. – Portals  
Washington, DC 20554

*RE: Bell Atlantic Corp. and GTE Corp., CC Docket No. 98-184*

Dear Ms. Salas:

Yesterday, Verizon filed the enclosed ex parte with attachments. It has since been discovered that Attachment G of that filing contained a typographical error. Therefore, Verizon is enclosing a corrected version of Attachment G. If you have any questions, please do not hesitate to call me.

Sincerely,

  
Attachments

cc: A. Dale  
C. Matthey  
M. Stone

Dee May  
Executive Director  
Federal Regulatory



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April 4, 2001

**Ex Parte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W. – Portals  
Washington, DC 20554

*RE: Bell Atlantic Corp. and GTE Corp., CC Docket No. 98-184*

Dear Ms. Salas:

On December 19 and February 12, Verizon met with Mark Stone and other members of the Common Carrier Bureau staff to conduct the semi-annual review of the Carrier-to-Carrier Performance Assurance Plan as provided for in Condition V, Attachment A, Paragraph 4 of the order approving the merger between Bell Atlantic and GTE ("Merger Order"). In those meetings and through subsequent conversations and correspondence, Verizon recommended changes contained in the red-line of the guidelines contained in Attachment A. Attachments B, C, D, E and F are copies of the letters communicating the recommendations proposed by Verizon. Attachment G provides the summary Verizon provided to the Staff of the changes Verizon has proposed.

Verizon looks forward to implementing the recommended changes following your concurrence. If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in cursive script that reads "Dee May".

Attachments

cc: A. Dale  
C. Matthey  
M. Stone

**Summary of Recommended Changes for Semi-annual Review to FCC Order on Verizon Merger Measures, Standards & Reports**

**Verizon – West (Former GTE States)**

Verizon West  
Summary of Changes proposed by Verizon  
March 29, 2001

Measure #	Measure Name	Change	Reason for Change
All	Any CLEC aggregate measure	<ul style="list-style-type: none"> <li>Exclude Verizon Affiliate Data from CLEC aggregate performance</li> <li>For xDSL Loops reference standard as parity with SDA where using line sharing</li> <li>Disaggregated product listing to a sub-metric level</li> </ul>	<ul style="list-style-type: none"> <li>CA C2C – Ordered</li> <li>CA C2C – Consensus</li> <li>Clarification</li> </ul>
All	Any measure including UNE loop xDSL capable product type	<ul style="list-style-type: none"> <li>Change to UNE 2 wire xDSL</li> </ul>	<ul style="list-style-type: none"> <li>Clarification: Provides consistency with VZ East (VZ West will propose product name change at next CA C2C working group)</li> </ul>
All	Any measure including EEL, subloop, dark fiber as product type	<ul style="list-style-type: none"> <li>Included diagnostic tracking of EELs, subloop, dark fiber</li> </ul>	<ul style="list-style-type: none"> <li>CA C2C – Consensus</li> </ul>
PO-1 PR-6 BI-2	Response Time OSS Ordering Interface Installation Quality Timeliness of Carrier Bill	<ul style="list-style-type: none"> <li>Added clarification to denominators of Calculations</li> </ul>	<ul style="list-style-type: none"> <li>CA C2C – Ordered</li> </ul>
PO-1	Response Time OSS Ordering Interface	<ul style="list-style-type: none"> <li>Report Pre-Order Query Transaction Time</li> <li>Included consensus performance standard of retail plus 5 seconds (PO-1-02 through PO-1-05), and determine performance standard of PO-1-06 at next review period.</li> <li>Changed “Facility Availability” to “Mechanized Loop Qualification”</li> <li>Removed standard for Rejected/Failed Queries</li> </ul>	<ul style="list-style-type: none"> <li>CA C2C – Consensus</li> </ul>

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**Summary of Recommended Changes for Semi-annual Review to FCC Order on Verizon Merger Measures, Standards & Reports**

**Verizon – West (Former GTE States)**

<b>Measure #</b>	<b>Measure Name</b>	<b>Change</b>	<b>Reason for Change</b>
PO-1	Response Time OSS Ordering Interface	<p>Added language to clarify that:</p> <ul style="list-style-type: none"> <li>• Response time will be measured for WISE/ CORBA/EDI will be based on published system hrs.</li> <li>• Manual CSRs measured in clock hours and exclude non-business days</li> <li>• Excludes queries not completed within reporting period</li> <li>• VZW does not support manual engineering queries for loop qualification</li> </ul>	<ul style="list-style-type: none"> <li>• CA C2C – Consensus</li> </ul>
PO-1	Response Time OSS Ordering Interface	<ul style="list-style-type: none"> <li>• Added Metric numbers to CSRs in performance standard</li> </ul>	<ul style="list-style-type: none"> <li>• Clarification</li> </ul>
PO-1	Response Time OSS Ordering Interface	<ul style="list-style-type: none"> <li>• Added formula for CLEC and Retail</li> </ul>	<ul style="list-style-type: none"> <li>• CA C2C – Consensus</li> </ul>
PO-2	OSS Interface Availability	<ul style="list-style-type: none"> <li>• Performance standard reduced from 99.50% to 99.25%</li> <li>• Added exclusions for scheduled system downtime</li> <li>• Specified that VZW captures data on a national basis and reports results at a state level</li> <li>• Specified that calculation based on interface hours</li> </ul>	<ul style="list-style-type: none"> <li>• CA C2C – Ordered</li> </ul>
PO-2	OSS Interface Availability	<p>Added language to clarify:</p> <p>Scheduled hours for interfaces posted on Verizon WISE support web site.</p>	<ul style="list-style-type: none"> <li>• Clarification</li> </ul>

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**Verizon – West (Former GTE States)**

<b>Measure #</b>	<b>Measure Name</b>	<b>Change</b>	<b>Reason for Change</b>
OR-1 OR-2	<ul style="list-style-type: none"> <li>• Order Confirmation Timeliness (all)</li> <li>• Reject Timeliness (all)</li> </ul>	<ul style="list-style-type: none"> <li>• Exclude DA/DL records associated with provisioning orders</li> <li>• Clarify business day descriptions</li> <li>• Exclude delays for customer reasons</li> <li>• Clarify that elapsed time for fully electronic sub-metrics is tracked during system hours</li> </ul>	<ul style="list-style-type: none"> <li>• DA/DL records - CA C2C – Consensus</li> <li>• CA C2C – Ordered</li> <li>• CA C2C – Consensus</li> <li>• CA C2C – Consensus</li> </ul>
OR-1 OR-2	<ul style="list-style-type: none"> <li>• Order Confirmation Timeliness (all)</li> <li>• Reject Timeliness (all)</li> </ul>	Exclude any projects	Clarification: Projects definition will be proposed at next CA C2C working group
OR-1 OR-2	<ul style="list-style-type: none"> <li>• Order Confirmation Timeliness (all)</li> <li>• Reject Timeliness (all)</li> </ul>	Clarified UNE disaggregation reporting	Clarification
OR-1-06 OR-2-06	<ul style="list-style-type: none"> <li>• Order Confirmation Timeliness</li> <li>• Reject Timeliness</li> </ul>	Clarified submetric for non-designed services	Clarification
OR-1-07 OR-2-07	<ul style="list-style-type: none"> <li>• % On Time LSC <math>\geq</math> 10 Lines (Designed- No Flow Through)</li> <li>• % On Time LSR Reject <math>\geq</math> 10 Lines (Designed- No Flow Through)</li> </ul>	Added measures to address designed services $\geq$ 10 lines for LSCs and rejects	Clarification (Previously included in OR-1-06 and OR-2-06 as standard was same)

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**Summary of Recommended Changes for Semi-annual Review to FCC Order on Verizon Merger Measures, Standards & Reports**

**Verizon – West (Former GTE States)**

<b>Measure #</b>	<b>Measure Name</b>	<b>Change</b>	<b>Reason for Change</b>
OR-5	Percent Flow Through	<ul style="list-style-type: none"> <li>Specified performance standards with linkage to OR-1 &amp; OR-2 performance</li> <li>Disaggregated UNE to Platform and Loop</li> <li>Removed OR-5-01 % Flow Through Total</li> </ul>	<ul style="list-style-type: none"> <li>Verizon proposal for flow through performance measure (12-19-00)</li> </ul>
OR-5	Percent Flow Through	<ul style="list-style-type: none"> <li>Removed state codes (state of record identification) from calculation</li> </ul>	<ul style="list-style-type: none"> <li>Flexibility to add flow through product types</li> </ul>
PR-3	Completed within 5 Days	<ul style="list-style-type: none"> <li>Clarified definition to reflect “<b>valid, accepted</b>” new, move and change orders</li> </ul>	<ul style="list-style-type: none"> <li>Clarification – (Measure not included in CA C2C)</li> </ul>
PR-5	Facility Missed Orders	<ul style="list-style-type: none"> <li>Clarified definition of lack of facilities</li> </ul>	<ul style="list-style-type: none"> <li>Clarification</li> </ul>
PR-6	Installation Quality	<ul style="list-style-type: none"> <li>Removed “Came Clear” and “Test OK” from exclusions and added to definition</li> </ul>	<ul style="list-style-type: none"> <li>CA C2C – Ordered</li> </ul>
PR-9	Coordinated Conversions	<ul style="list-style-type: none"> <li>Added language to clarify coordinated conversions and coordinated hot cuts</li> <li>Added language to clarify on time performance standard</li> <li>Modified conversion and hot cut line sizes and associated completion intervals</li> </ul>	<ul style="list-style-type: none"> <li>CA C2C – Consensus</li> </ul>
MR-2 MR-3 MR-4 MR-5	<ul style="list-style-type: none"> <li>Trouble Report Rate</li> <li>Missed Repair Commitments</li> <li>Trouble Duration Intervals</li> <li>Repeat Trouble Reports</li> </ul>	<ul style="list-style-type: none"> <li>Removed "Came Clear" and "Test OK" from exclusions and added to definition</li> </ul>	<ul style="list-style-type: none"> <li>CA C2C – Ordered</li> </ul>
MR-2 MR-3 MR-4	<ul style="list-style-type: none"> <li>Trouble Report Rate</li> <li>Missed Repair Commitments</li> <li>Trouble Duration Intervals</li> </ul>	<ul style="list-style-type: none"> <li>Excluded "provisioning trouble reports"</li> </ul>	<ul style="list-style-type: none"> <li>CA C2C – Consensus</li> </ul>
MR-3	Missed Repair Commitments	<ul style="list-style-type: none"> <li>Added interconnection trunks as a product</li> <li>Added “for Verizon reasons”</li> </ul>	<ul style="list-style-type: none"> <li>CA C2C – Ordered</li> </ul>

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**Summary of Recommended Changes for Semi-annual Review to FCC Order on Verizon Merger  
Measures, Standards & Reports**

**Verizon – West (Former GTE States)**

<b>Measure #</b>	<b>Measure Name</b>	<b>Change</b>	<b>Reason for Change</b>
MR-4	Trouble Duration Intervals	<ul style="list-style-type: none"> <li>• Eliminated MR-4-07</li> <li>• Added "POTS" to MR-4-08 title</li> </ul>	<ul style="list-style-type: none"> <li>• Not a CA C2C measure</li> <li>• CA C2C – Ordered</li> </ul>
MR-5	Repeat Trouble Reports	Removed UNE Port as a product	<ul style="list-style-type: none"> <li>• Clarification - will be proposed at next CA C2C working group (no activity seen or expected)</li> </ul>
MR-5-01	% Repeat Reports within 30 days	Removed UNE Port as a product	<ul style="list-style-type: none"> <li>• Clarification - will be proposed at next CA C2C working group (no activity seen or expected)</li> </ul>
NP-1	Percent Final Trunk Group Blockage	Added a reference explaining engineering levels for terminating trunks.	Clarification
OR-1 OR-2	<ul style="list-style-type: none"> <li>• Order Confirmation Timeliness (all)</li> <li>• Reject Timeliness (all)</li> </ul>	<ul style="list-style-type: none"> <li>• Add new exclusion, "Excludes orders where type of service cannot be determined."</li> <li>• Add new exclusion, "Excludes rejects where type of service cannot be determined."</li> </ul>	Clarification
OR-1	<ul style="list-style-type: none"> <li>• Order Confirmation Timeliness</li> </ul>	Make exclusion of "Exclude invalid records" applicable to both LSRs and ASRs.	Clarification; CA C2C Consensus
OR-1-02	<ul style="list-style-type: none"> <li>• % On time LSC - Flow Through</li> </ul>	Delete UNE Transport from the products offered	Clarification - included in OR-1-12, as LSC's are not issued for UNE Transport
PR-4	<ul style="list-style-type: none"> <li>• % Missed Due Dates - No Dispatch</li> </ul>	For linesharing, reference standard as parity with SDA	Clarification; CA C2C Consensus
PR-4-01	% Missed Due Dates - Designed Services	Delete UNE Platform from the products offered	Clarification – UNE Platform is not a designed service
PR-5-03	% Orders Held for Facilities > 60 Days	Change definition under numerator to read "...due date is <b>more</b> than 60 days..."	Clarification
MR-2 MR-3	<ul style="list-style-type: none"> <li>• Trouble Report Rate</li> <li>• Missed Repair Commitments</li> </ul>	<ul style="list-style-type: none"> <li>• Change retail comparison on UNE Loop Designed from Disp. Designed Service to</li> </ul>	Clarification - will be proposed at next CA C2C working group

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**Summary of Recommended Changes for Semi-annual Review to FCC Order on Verizon Merger Measures, Standards & Reports**

**Verizon – West (Former GTE States)**

<b>Measure #</b>	<b>Measure Name</b>	<b>Change</b>	<b>Reason for Change</b>
MR-4 MR-5	<ul style="list-style-type: none"> <li>• Trouble Duration Intervals</li> <li>• Repeat Trouble Reports</li> </ul>	Retail POTS Disp. <ul style="list-style-type: none"> <li>• Change retail comparison on UNE Loop Non-designed from Retail Bus. Disp. To Retail POTS Disp.</li> </ul>	
NP-2-01	% On Time Response to Request for Physical Collocation	<ul style="list-style-type: none"> <li>• Change Performance Standard from 95% within 15 days to 95% within 15 calendar days</li> <li>• Change Numerator from "within 15 days" to "within 15 calendar days."</li> </ul>	Clarification; CA C2C Consensus

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**Summary of Recommended Changes for Semi-annual Review to FCC Order on Verizon Merger Measures, Standards & Reports**

**Verizon – East (Former Bell Atlantic States)**

Verizon East  
Summary of Changes Proposed by Verizon  
March 29, 2001

Measure #	Measure Name	Change	Reason for Change
All	Any CLEC aggregate measure	<ul style="list-style-type: none"> <li>Exclude Verizon Affiliate Data from CLEC aggregate performance</li> <li>For xDSL Loops reference standard as parity with SDA where SDA is using line sharing</li> </ul>	NY C2C
PO-1	OSS Response Time (applies to all PO-1) (applies to all interfaces)	CLEC transactions will be actual production times	NY C2C
PO-1	OSS Response Time (applies to all PO-1) – WEB GUI	Performance standard fixed at retail plus 7 seconds (except PO-1-04)	NY C2C
PO-1-04	Average Response Time – Product & Service Availability	Performance Standard changed to retail plus 10 seconds	NY C2C
PO-1-05	Average Response Time – Telephone Number Availability & Reservation	Reduced time-out limit to 60 seconds	NY C2C
PO-2-02	OSS Availability – Prime Time	Added exclusion for scheduled interface outages for major releases	NY C2C
OR-1	Order Confirmation Timeliness (all)	Added language to clarify that the note regarding resent confirmations is dependent upon Verizon's capability to identify reasons for resent confirmations	Explained to FCC in previous correspondence on 10/2/00
OR-1 OR-2	<ul style="list-style-type: none"> <li>Order Confirmation Timeliness</li> <li>Reject Timeliness</li> </ul> (all)	<ul style="list-style-type: none"> <li>Clarified language that performance is based upon orders confirmed/rejected in the month.</li> <li>Added clarifying language with respect to Pre-Qualified complex</li> </ul>	NY C2C
OR-1 OR-2	<ul style="list-style-type: none"> <li>Order Confirmation Timeliness</li> <li>Reject Timeliness</li> </ul>	Disaggregated UNE POTs/Pre-qualified Complex to Loop and Platform	To be consistent with Attachment A-5a
OR-1	Order Confirmation Timeliness (all)	Clarified that Verizon will exclude orders where CLEC requests an exclusion for special handling (projects)	Clarification Consistent with NY practice

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**Verizon – East (Former Bell Atlantic States)**

<b>Measure #</b>	<b>Measure Name</b>	<b>Change</b>	<b>Reason for Change</b>
OR-1	Order Confirmation Timeliness (all) for 2 wire Digital and 2 wire xDSL services	Add exclusion for orders requiring loop conditioning.	New issue to be addressed via C2C. Order confirmation (with real due date) is provided upon completion of conditioning which takes longer than existing intervals.
OR-1-02 OR-2-02	<ul style="list-style-type: none"> <li>• % on Time LSRC – Flow Through</li> <li>• % on Time LSR Reject – Flow Through</li> </ul>	Add exclusion for expansion of scheduled SOP downtime during major releases	NY C2C
OR-1-04 OR-2-04	<ul style="list-style-type: none"> <li>• % On Time LSRC/ASRC &lt; 6 Lines (Electronic No flow through)</li> <li>• % On time LSR/ASR Reject &lt; 6 Lines (Electronic No Flow through)</li> </ul>	<ul style="list-style-type: none"> <li>• Changed line size breakout to &lt; 6 from &lt; 10</li> <li>• Added ASR to name</li> </ul>	NY C2C
OR-1-06 OR-2-06	<ul style="list-style-type: none"> <li>• % On Time LSRC/ASRC ≥ 6 Lines (Electronic)</li> <li>• % On Time LSR/ASR Reject ≥ 6 Lines (Electronic)</li> </ul>	<ul style="list-style-type: none"> <li>• Changed line size breakout to ≥ 6 from ≥ 10</li> <li>• Added ASR to name</li> </ul>	NY C2C
OR-1-12	% On Time FOC	Removed reference to CLEC Trunks > 192 and unforecasted	To be consistent with Attachment A-5a
OR-5	% Flow Through	<ul style="list-style-type: none"> <li>• Specified performance standards with linkage to OR-1 &amp; OR-2 performance</li> <li>• Disaggregated UNE to Platform and Loop</li> <li>• Removed OR-5-03 Flow through achieved</li> </ul>	Verizon 12/19/00 Proposal for flow through performance measure.
PR-3	Completed within Specified number of Days (1-5 lines)	<ul style="list-style-type: none"> <li>• Clarified business day cut off of 5PM</li> <li>• Referenced Web-site for specific state holidays</li> <li>• Specified that Verizon will correct appointment type codes (X and W code)</li> </ul>	Language clarification

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**Verizon – East (Former Bell Atlantic States)**

Measure #	Measure Name	Change	Reason for Change
PR-4	% Missed Appointment	Specify retail analogs or standards for EEL, IOF, DSL	NY C2C
PR-4-01	% Missed Appointment – Verizon Total	Disaggregated Specials into DS0, DS1, DS3 and other	NY C2C
PR-4-02	Average Delay Days	Disaggregated UNE POTS into Loop and Platform	To be consistent with Attachment A-5a
PR-4-04	% Missed Appointment – Verizon - Dispatch	Moved 2 wire digital from PR-4-10 to PR-4-04	NY C2C
PR-4-05	% Missed Appointment – Verizon – No Dispatch	Added DSL Line Sharing to product disaggregation	NY C2C and as previously adopted by FCC on 9/18/00
PR-4-07	% On time Performance – LNP Only	Clarified language for % on time	Clarification
PR-4-14	% Completed on Time – 2 Wire xDSL Loops	<ul style="list-style-type: none"> <li>• Changed metric number</li> <li>• Removed reference to Due Date minus 2 testing and combined all performance to one metric</li> </ul>	NY C2C and as communicated to FCC in previous correspondence on 10/2/00
PR-5	Facility Missed Orders	Added “dispatched” to metric definition	NY C2C
PR-6	Installation Quality	Clarified language for denominator to be orders lines/circuits/trunks installed in calendar month	NY C2C
PR-6-01	% Installation Troubles reported within 30 Days - xDSL	Added exclusion for false acceptances via cooperative testing.	CLEC testing issue
PR-6-01	% Installation Troubles reported within 30 Days	Added retail disaggregation for ISDN and POTS to provide retail analog for 2 wire Digital and 2 wire xDSL, respectively	NY C2C
PR-9	Hot Cut Loops	Language clarification on successful hot cut definition and performance standard.	NY C2C
MR-2-02 MR-2-03	<ul style="list-style-type: none"> <li>• Network Trouble Report Rate – Loop</li> <li>• Network Trouble Report Rate – Central Office</li> </ul>	<ul style="list-style-type: none"> <li>• For 2 Wire xDSL – Add exclusion for installation troubles</li> <li>• Disaggregate POTS/Complex into POTS, 2 wire Digital and 2 Wire xDSL</li> </ul>	NY C2C

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<b>Measure #</b>	<b>Measure Name</b>	<b>Change</b>	<b>Reason for Change</b>
MR-3-01 MR-4-08	<ul style="list-style-type: none"> <li>• % Missed Repair Appointment – Loop</li> <li>• % Missed Repair Appointment – Central Office</li> <li>• % Out of Service &gt; 24 Hours</li> </ul>	Disaggregate POTS/Complex into Residence POTS, Business POTS, 2 wire Digital and 2 Wire xDSL	NY C2C
MR-4	Trouble Duration Intervals	Add exclusion for troubles where the CLEC does not accept the first available appointment.	CLEC scheduling issue. (Verizon will propose at next C2C working group)
MR-4-01 MR-4-02 MR-4-03	<ul style="list-style-type: none"> <li>• Mean Time to Repair – Total</li> <li>• Mean Time to Repair – Loop Trouble</li> <li>• Mean Time to Repair – Central Office Trouble</li> </ul>	Removed, except for MR-4-01 Specials, MR-4-02 and 4-03 where Resale POTS was disaggregated into Res and Bus	To be consistent with Attachment A-5a
MR-5-01	% Repeat Reports within 30 days	Disaggregate POTS/Complex into POTS, 2 wire Digital and 2 Wire xDSL	NY C2C
NP-1	Percent Final Trunk Group Blockage	Removed reference to retail trunks.	Language clarification. Retail is not included in performance reports
PR-5-03	% Orders Held for Facilities > 60 Days	Change definition under numerator to read "...due date is <b>more</b> than 60 days..."	Clarification

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