

Pricewaterhouse Coopers (PwC) evaluated the five OSS functions that provide competing LECs access to Verizon's systems and found them to be "identical" in Rhode Island and Massachusetts.<sup>163</sup> In the second instance, KPMG concluded that the systems or interfaces, processes, personnel, facilities, management structures, and performance measures were the same for both Rhode Island and Massachusetts.<sup>164</sup> The Rhode Island Commission also engaged KPMG to conduct three stand-alone tests in connection with Verizon's OSS, reviewing electronic jeopardies, line loss reports, and line sharing.<sup>165</sup> The Rhode Island Commission also concluded that Verizon uses a common OSS in both states.<sup>166</sup>

60. We conclude that Verizon, through the PwC report, its declaratory evidence, and the KPMG report, demonstrates that the OSS in Massachusetts are the same as the OSS in Rhode Island and, therefore, evidence concerning its OSS in Massachusetts is relevant and should be considered in our evaluation of Verizon's OSS in Rhode Island. Verizon's showing enables us to rely, for instance, on findings relating to Verizon's OSS from the *Verizon Massachusetts Order* in our analysis of Verizon's OSS in Rhode Island. In addition, because the OSS are the same in both states, where low volumes in Verizon's performance data in Rhode Island yield only inconclusive and inconsistent statistical findings concerning Verizon's compliance with the competitive checklist, we will examine data reflecting Verizon's performance in Massachusetts.

#### b. Verizon's Loop Qualification Process

61. Based on the evidence in the record, we find, as the Rhode Island Commission did, that Verizon provides access to loop qualification information in a manner consistent with the requirements of the *UNE Remand Order*.<sup>167</sup> Specifically, we find that Verizon provides competitors with access to all of the same detailed information about the loop that is available to itself, and in the same time frame as any of its personnel could obtain it.<sup>168</sup> Verizon provides four ways for competing carriers to obtain loop make-up information: (1) access to loop make-up information in its Loop Facility Assignment and Control System (LFACS) database; (2) manual loop qualification; (3) mechanized loop qualification based on information in its LiveWire database; and (4) engineering record requests. We evaluate all four of these methods below, and we pay particular attention to the permanent OSS Verizon has implemented since the time of the *Verizon Massachusetts Order* to enhance the first two aspects of the OSS described above:

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<sup>163</sup> See PwC Report at 9.

<sup>164</sup> See KPMG Report at 13. Only in a single area, Metrics Change Management, did KPMG conclude that there were existing material differences. KPMG found that these differences reflected enhancements to Verizon's OSS since the time of the Massachusetts test. KPMG Report at 13.

<sup>165</sup> *Id.* at 5.

<sup>166</sup> Rhode Island Commission Comments at 92.

<sup>167</sup> *UNE Remand Order*, 15 FCC Rcd at 3885-87, paras. 427-31 (1999); Rhode Island Commission Comments at 92.

<sup>168</sup> See *Verizon Massachusetts Order*, 15 FCC Rcd at 9016-17, para. 54. Additional support can be found in the PwC and KPMG reports. See PwC Report at 17-18; KPMG Report at 20.

access to loop make-up information in LFACS and manual loop qualification.<sup>169</sup> No commenter has raised concerns with regard to any aspect of Verizon's loop qualification OSS.

62. *Access to LFACS.* Since the adoption of the *Verizon Massachusetts Order*, Verizon has implemented a transaction by which competing LECs can obtain access to the loop make-up information contained in Verizon's LFACS database.<sup>170</sup> Verizon now returns loop make-up information in LFACS to requestors in a parsed format, which permits competing LECs to integrate the information between the pre-ordering and ordering systems. Verizon also now responds to requests for information from LFACS in real time.<sup>171</sup> We commend Verizon for making these improvements to its loop qualification OSS, and we find that Verizon satisfies this element of checklist item two.

63. *Manual Loop Qualification.* Since the time of the *Verizon Massachusetts Order*, Verizon has implemented a pre-order transaction by which competing LECs can request that Verizon perform a manual loop qualification.<sup>172</sup> Using this transaction, competing LECs can request manual loop qualification prior to actually placing their orders for the loops.<sup>173</sup> Verizon consistently responds to manual loop qualification requests within the 48-hour benchmark in Rhode Island.<sup>174</sup> We commend Verizon for implementing these enhancements, and we find that Verizon's manual loop qualification process complies with the requirements of this checklist item.

64. *Mechanized Loop Qualification.* We find that Verizon continues to provide competing LECs with timely and nondiscriminatory access to the mechanized loop qualification

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<sup>169</sup> The Commission stated in the *Verizon Pennsylvania Order* that it intended to evaluate Verizon's permanent loop qualification OSS in section 271 applications Verizon filed after October 2001. *See Verizon Pennsylvania Order*, 16 FCC Rcd at 17447-48, para. 45. This is the first such application.

<sup>170</sup> *See Verizon McLean/Wierzbicki Decl.* at para. 46.

<sup>171</sup> *See Verizon McLean/Wierzbicki Decl.* Tab 2, at 5; Letter from Clint Odom, Director, Federal Regulatory, to Magalie Roman Salas, Secretary, Federal Communications Commission, CC Docket No. 01-324 (filed Jan. 11, 2002) (*Verizon Jan. 11 Ex Parte Letter*). There are no performance measures to illustrate the timeliness of competitive LEC access to the LFACS information. To demonstrate timeliness, Verizon conducted a special study of Loop Make-Up transaction performance for the months of November and December 2001. During this time there were no competitive LEC transactions regarding loop make-up in Rhode Island. Additionally, there were no competitive LEC requests using the CORBA interface for loop make-up information in any area within the former Bell Atlantic footprint. There were 12 requests using EDI and the average response time was 13.16 seconds. There were 544 requests using the Web GUI interface and the average response time for these was 15.06 seconds. *See Verizon Jan. 11 Ex Parte Letter*.

<sup>172</sup> *See Verizon McLean/Wierzbicki Decl.* at para. 45. *Cf. Verizon Massachusetts Order*, 15 FCC Rcd at 9023-24, para. 65.

<sup>173</sup> *Cf. Verizon Massachusetts Order*, 15 FCC Rcd at 9023-24, para. 65.

<sup>174</sup> *See Verizon Guerard/Canny/Abesamis Decl.* Tab 4.

information contained in its LiveWire database.<sup>175</sup> Verizon also continues to provide competing LECs with the ability to obtain loop pre-qualification information “in bulk,” by downloading files from Verizon’s server that contain information on all pre-qualified loops served by a single central office.<sup>176</sup> Thus, we find that this process complies with the requirements of the *UNE Remand Order* and section 271.

65. *Engineering Record Requests.* We find that Verizon continues to offer competing LECs nondiscriminatory access to engineering record requests, as it did at the time of the *Verizon Massachusetts Order*.<sup>177</sup> Accordingly, we find Verizon complies with section 271 in regards to access to engineering records.

### c. Ordering Issues

#### (i) Order Rejection Notices and Order Rejections

66. We find, as the Rhode Island Commission did,<sup>178</sup> that Verizon provides competing carriers with order rejection notices in a manner that allows them a meaningful opportunity to compete. We recognize that, at first glance, Verizon’s performance data do not demonstrate that it notifies competing LECs promptly on rejecting their orders.<sup>179</sup> Verizon explains that, in fact, it has consistently sent rejection notices in a timely fashion, but its data do not reflect this performance because of a software problem that affected how Verizon’s OSS captured its performance data under this metric. Specifically, Verizon incorrectly included some orders for six or more lines (which have a 72-hour benchmark) in the metric for orders of one to five lines (which have a 24-hour benchmark).<sup>180</sup> Verizon states that it corrected this data capture problem

<sup>175</sup> See Verizon McLean/Wierzbicki Decl. Tab 2, at 1-3. Verizon’s Rhode Island performance data demonstrate, in each month for which data exist, that it provides access to LiveWire within the timeframe adopted by the Rhode Island Commission. See PO 1-6-6020 (Facility Availability (Loop Qualification) – EDI), PO 1-6-6030 (Facility Availability (Loop Qualification) – CORBA) (no activity); PO 1-6-6050 (Facility Availability (Loop Qualification) - Web GUI). Because Verizon only began reporting on its EDI interface in Rhode Island in October, we look to the Massachusetts data to support our finding. In Massachusetts, Verizon met the same standard of timely access in all months (July to October). PO-1-6-6020 (Facility Availability (Loop Qualification) – EDI); PO 1-6-6050 (Facility Availability (Loop Qualification) - Web GUI); see also KPMG Report at 25 (POP 1-4-1 Pre-Order Response Timeliness).

<sup>176</sup> See Verizon McLean/Wierzbicki Decl. Tab 2, at 3.

<sup>177</sup> See *Verizon Massachusetts Order*, 15 FCC Rcd at 9020, para. 59; see also Verizon McLean/Wierzbicki Decl. Tab 2, at 6-7. Verizon states that it received no requests for engineering records in July, August, or September in either Rhode Island or Massachusetts. See Verizon McLean/Wierzbicki Decl. at para. 49.

<sup>178</sup> See Rhode Island Commission Comments at 92-95.

<sup>179</sup> Specifically, Verizon has not consistently provided 95% of reject notices within established timeframes, as required by the Rhode Island Commission. See OR-2-04-2320 (resale POTS reject timeliness – 1-5 lines) (showing timeliness rates of 92%, 92%, 93%, and 92%); OR-2-04-2200 (resale specials reject timeliness) (showing timeliness rates of 81%, 100%, 90%, and 90%); OR-2-04-3331 (UNE loop/pre-qualified complex/LNP reject timeliness – 1-5 lines) (showing timeliness rates of 89%, 96%, 82%, and 94%).

<sup>180</sup> See Verizon McLean/Wierzbicki Decl. at para. 72; Verizon Guerard/Canny/Abesamis Decl. at para. 37.

in October; the correction is borne out by the fact that Verizon's November performance consistently satisfies the relevant benchmarks.<sup>181</sup> No commenter has raised any concern regarding Verizon's rejection notices.

## (ii) Jeopardy Information

67. We find that Verizon provides "jeopardy" information to competing LECs – that is, notification that an order may not be provisioned on the designated due date – in substantially the same time and manner as it makes this information available to its retail operations. Verizon provided competing LECs with manual access to jeopardy notices at the time of the Massachusetts filing, but has recently begun also providing active jeopardy notices to competing LECs.<sup>182</sup> Notwithstanding the availability of this new process, Verizon still provides competing LECs with manual access to jeopardy information in Rhode Island. We base our finding of checklist compliance in this instance, as did the Rhode Island Commission, on Verizon's manual jeopardy process.<sup>183</sup> We do not rely on Verizon's electronic process in reaching this conclusion, as the evidence provided by Verizon does not allow us to determine that its electronic process provides competing LECs with sufficient and reliable jeopardy notices. We note that KPMG tested Verizon's new electronic jeopardy process, but found that the results were inconclusive.<sup>184</sup> Verizon does not provide performance data or other evidence to support its claims regarding its electronic jeopardy process.

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<sup>181</sup> In November, Verizon satisfied the relevant benchmarks for all metrics mentioned *supra* n.179. Verizon's performance has been inconsistent under two other metrics that are not affected by the "data capture" problem identified by Verizon. See OR-2-06-3331 (UNE loop/pre-qualified complex/LNP reject timeliness – 6 or more lines) (showing timeliness rates of 94%, 92%, 100%, and 91%); see also OR-2-04-2200 (resale specials reject timeliness) (showing timeliness rates of 81%, 100%, 90%, and 90%). We find that these performance disparities are slight, and note that Verizon's average timeliness rate for the past five months has been 95% and 94% respectively for these two measurements. Because this average performance meets, or is so close to, the 95% benchmark, we do not find Verizon's occasionally late performance in sending out rejection notices as reflected in these metrics to be competitively significant.

<sup>182</sup> See Verizon McLean/Wierzbicki Decl. at paras. 76-83. In the New York and Massachusetts proceedings, Verizon provided evidence that it provided competitive LECs with Open Query System (OQS) reports, which notify competitive LECs that a provisioning order or maintenance appointment may be in jeopardy, and that this system was as good as the system used by Bell Atlantic for its own provisioning and maintenance. The Rhode Island Commission found that Verizon still has this system in place and therefore passes this checklist item. Rhode Island Commission Comments at 68. Electronic jeopardies have not been found by the Commission to be necessary for checklist compliance. See *Bell Atlantic New York Order*, 15 FCC Rcd at 4051, para. 184; see also *Verizon Massachusetts Order*, 16 FCC Rcd at 9034, para. 85.

<sup>183</sup> As we stated in the *Verizon Massachusetts Order*, although Verizon's implementation of a system of active jeopardy notices likely will provide additional benefit to carriers, it is not relevant to our determination here that its current system is nondiscriminatory. See *Verizon Massachusetts Order*, 16 FCC Rcd at 9034 n.264.

<sup>184</sup> The KPMG test analyzed over 400 orders. Only 10 orders required jeopardy notices. A jeopardy notice was provided in 6 of those instances. Of the four for which a jeopardy notice was not issued, Verizon sent a query notice instead of a jeopardy notice three times. See KPMG Report at 29, POP-1-17-1.

68. At this time, we conclude that Verizon complies with this checklist item with regard to electronic jeopardies because of Verizon's past compliance in this area and the absence of any record evidence to the contrary. We certainly encourage BOC innovation in bringing new OSS features to competitive LECs. We also expect, however, that any such changes will operate in a manner that enhances, rather than impairs, competitive LECs' ability to compete. We will continue to monitor this issue and its effect on competitive LECs.

**d. Provisioning Issues**

69. *Average Interval Completed Metrics.* Based on the evidence in the record, we find that Verizon provisions competitive LEC orders for UNE-Platform and resale services in a nondiscriminatory manner. We note that Verizon has demonstrated that the provisioning systems and processes used in Rhode Island for UNE and resale service orders are the same as those the Commission reviewed in the Massachusetts section 271 proceeding. In order to make our determination that Verizon's performance reflects parity, we review performance measures comparable to those we have relied upon in prior section 271 orders.<sup>185</sup>

70. We recognize that Verizon's performance with respect to one specific performance metric, which measures the time it takes Verizon to complete competing LEC orders for UNE-Platform service,<sup>186</sup> appears to be out of parity in Rhode Island for several recent months. We find, however, that Verizon's performance with regard to this metric does not warrant a finding of checklist non-compliance. First, we note that Verizon's performance reflected by another metric measuring provisioning – the “missed appointments” metric – reflects parity performance with respect to UNE-Platform orders for the relevant months.<sup>187</sup> The Commission has given substantial weight to this metric in previous section 271 applications. Second, we note that the “average completed interval” metric, because of the way it is designed, may not be an accurate indicator of Verizon's provisioning performance. Verizon has explained that, while retail and wholesale orders are provisioned according to the same list of “standard intervals,” these intervals vary from product to product.<sup>188</sup> Accordingly, this metric could suggest unequal treatment simply because a competing LEC orders a disproportionate share of products with a longer-than-average standard provisioning interval.<sup>189</sup> Significantly, the Commission has discounted the relevance of this metric in prior section 271 orders where there is evidence of this “order mix” concern.<sup>190</sup> We also take note of the fact that the Carrier Working Group in New

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<sup>185</sup> See Appendix D at para. 37; see also *Verizon Massachusetts Order*, 16 FCC Rcd at 9078-79, para. 162.

<sup>186</sup> OR 2-1-3140 (Average Completed Interval - Av. Completed Interval - Total No Dispatch).

<sup>187</sup> PR 4-4-3140 (Provisioning - Missed Appointments - % Missed Appt. – Verizon – Dispatch).

<sup>188</sup> See Letter from Clint Odom, Director, Federal Regulatory, Verizon, to Magalie Roman Salas, Secretary, Federal Communications Commission, CC Docket No. 01-324 at 2 (filed Jan. 8, 2002) (Verizon Jan. 8 *Ex Parte* Letter).

<sup>189</sup> See Verizon Jan. 8 *Ex Parte* Letter at 2.

<sup>190</sup> See *Verizon Massachusetts Order*, 16 FCC Rcd at 9038-39, para. 92; see also *Bell Atlantic New York Order*, 15 FCC Rcd at 4061-62, paras. 203-05.

York has decided to eliminate the “average interval completed” series of metrics.<sup>191</sup> Finally, even setting aside the questions about the accuracy of this metric, we find that the performance differences reported under this metric are relatively slight and do not appear to be competitively significant to competing LECs.<sup>192</sup> Indeed, no commenter has indicated that UNE-Platform provisioning is a problem in Rhode Island. As the Commission has stated in the past, isolated cases of performance disparity, especially when the margin of disparity is small, generally will not result in a finding of checklist noncompliance.<sup>193</sup>

#### e. Billing

71. We find, as did the Rhode Island Commission, that Verizon provides nondiscriminatory access to the functionality of its billing systems in Rhode Island.<sup>194</sup> Verizon provides competing LECs with usage information necessary to bill their end users, and it provides competing carriers with wholesale bills.<sup>195</sup> Verizon also demonstrates, through the PwC report, the KPMG report, and its declarations, that its billing systems in Rhode Island are the same as its Massachusetts systems, which the Commission found to comply with the requirements of this checklist item.<sup>196</sup> Verizon explains in this proceeding that its billing system in Rhode Island is different from the billing system in Pennsylvania because the relevant aspects of its Rhode Island and Pennsylvania billing systems evolved separately after divestiture in 1984.<sup>197</sup> No commenter has raised concerns with Verizon’s billing OSS in this proceeding.<sup>198</sup>

### 3. UNE Combinations

72. In order to comply with checklist item two, a BOC also must demonstrate that it provides nondiscriminatory access to network elements in a manner that allows requesting carriers to combine such elements and that the BOC does not separate already-combined

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<sup>191</sup> See *infra* para. 86.

<sup>192</sup> PR 2-01-3140 differences of .51 to 1.37 days are reported for the last four months of data.

<sup>193</sup> See *Verizon Massachusetts Order*, 16 FCC Rcd at 9055-56, para. 122.

<sup>194</sup> Rhode Island Commission Comments at 95.

<sup>195</sup> Verizon McLean/Wierzbicki Decl. at paras. 103-05.

<sup>196</sup> PwC Report at 33-41; KPMG Report at 145-89; Verizon McLean/Wierzbicki Decl. at paras. 102-11; Verizon Guerard/Canny/Abesamis Decl. at paras. 68-73.

<sup>197</sup> See Letter from Clint Odom, Director, Federal Regulatory, Verizon, to Magalie Roman Salas, Secretary, Federal Communications Commission, CC Docket No. 01-324 at 1-3 (filed Jan. 7, 2002) (Verizon Jan. 7 *Ex Parte* Letter).

<sup>198</sup> We note that although Z-Tel raised the billing concerns with regard to Verizon’s Pennsylvania section 271 application, the Verizon Massachusetts billing systems was applauded. See Z-Tel Comments on the *Application by Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks, Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Pennsylvania*, CC Docket No. 01-138, at 6 (filed Aug. 6, 2001).

elements, except at the specific request of the competitive carrier.<sup>199</sup> Based upon the evidence in the record, we conclude, as did the Rhode Island Commission, that Verizon demonstrates that it provides nondiscriminatory access to network element combinations as required by the Act and our rules.<sup>200</sup> Additionally, no commenter raised any concerns with Verizon providing nondiscriminatory access to UNE combinations.

## B. Other Items

### 1. Checklist Item 1 – Interconnection

73. Section 271(c)(2)(B)(i) requires the BOC to provide equal-in-quality interconnection on terms and conditions that are just, reasonable and nondiscriminatory in accordance with the requirements of sections 251 and 252.<sup>201</sup> Based on our review of the record, we conclude, as did the Rhode Island Commission,<sup>202</sup> that Verizon complies with the requirements of this checklist item. In reaching this conclusion, we have examined Verizon's performance with respect to collocation and interconnection trunks, as we have done in prior section 271 proceedings.<sup>203</sup> We find that Verizon's performance generally satisfies the applicable benchmark or retail comparison standards.<sup>204</sup> As described below, we also examine Verizon's compliance with the Commission's more recent *Collocation Remand Order*.<sup>205</sup> Finally, we note that no commenter raises issues concerning Verizon's interconnection offering.

74. On August 8, 2001, the Commission released its *Collocation Remand Order*, which changed the collocation obligations of incumbent LECs in response to the D.C. Circuit's remand of certain aspects of the Commission's earlier collocation order.<sup>206</sup> In particular, the

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<sup>199</sup> 47 U.S.C. § 271(c)(2)(B)(ii); 47 C.F.R. § 51.313(b).

<sup>200</sup> Rhode Island Commission Comments at 43.

<sup>201</sup> See Appendix D at para. 17.

<sup>202</sup> Rhode Island Commission Comments at 33.

<sup>203</sup> See, e.g., *Verizon Massachusetts Order*, 16 FCC Rcd at 9092-95, 9098, paras. 183-87, 195.

<sup>204</sup> See Appendix B.

<sup>205</sup> *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, Fourth Report and Order, CC Docket No. 98-147, 16 FCC Rcd 15435 (rel. Aug. 8, 2001) (*Collocation Remand Order*) (on remand from *GTE Service Corp. v. FCC*, 205 F.3d 416 (D.C. Cir. 2000)); *petition for recon. pending, Petition for Partial Clarification or Reconsideration of the Association for Local Telecommunications Services, et al.*, CC Docket No. 98-147 (filed Sept. 19, 2001); *petitions for review pending sub nom. Verizon California Inc., et al. v. FCC*, D.C. Circuit Nos. 01-1371 *et al.* (filed Aug. 23, 2001). We address Verizon's compliance with this order for the first time here, as this is the first section 271 application Verizon has filed since that order took effect.

<sup>206</sup> See *Collocation Remand Order*, 16 FCC Rcd at 15435; see also *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, First Report and Order and Further Notice of Proposed Rulemaking, 14 FCC Rcd 4761, 4773-74, paras. 23-24 (1999), *aff'd in part, vacated and remanded in part sub nom. GTE Service Corp. v. FCC*, 205 F.3d 416 (D.C. Cir. 2000), *on recon., Collocation Reconsideration Order*, 15 FCC Rcd at 17806-39, paras. 1-69;

Commission established the criteria for equipment that is “necessary for interconnection or access” under section 251(c)(6); required incumbents to provide cross-connects between collocated carriers; and established principles for physical collocation space and configuration.<sup>207</sup>

Verizon states that it has modified its Rhode Island collocation offering to comply with the order, and has filed amendments to both its federal and state collocation tariffs to reflect the new order – both of which have gone into effect.<sup>208</sup> Based on the record in this proceeding, we find that Verizon’s collocation offerings in Rhode Island satisfy the new requirements set forth in the *Collocation Remand Order*.

75. Verizon also states that its collocation offering meets the requirements of its September 14, 2001 consent decree with the Commission to assure that Verizon complies with the information posting requirements of the Commission’s collocation rules.<sup>209</sup> We note that the Bell Atlantic-GTE auditing process will assure that Verizon does, and will continue to, fulfill the consent decree and meet the requirements of checklist item one.<sup>210</sup>

## 2. Checklist Item 4 – Unbundled Local Loops

76. Section 271(c)(2)(B)(iv) of the Act requires that a BOC provide “[l]ocal loop transmission from the central office to the customer’s premises, unbundled from local switching or other services.”<sup>211</sup> Based on the evidence in the record, we conclude, as did the Rhode Island Commission, that Verizon provides unbundled local loops in accordance with the requirements of section 271 and our rules.<sup>212</sup> Our conclusion is based on our review of Verizon’s performance for all loop types, which include, as in past section 271 orders, voice grade loops (including hot cut provisioning), xDSL-capable loops, digital loops, and high capacity loops, and our review of Verizon’s processes for line sharing and line splitting. As of September 2001, competitors have acquired and placed into use over 28,000 stand-alone loops (including DSL loops) from Verizon

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<sup>207</sup> *Collocation Remand Order*, 16 FCC Rcd at 15436, para. 2.

<sup>208</sup> See Verizon Application at 23; Lacouture/Ruesterholz Decl. at para. 54 and Attach. 7 at 1, 3, 4, 11 (Rhode Island wholesale tariff); Tariff F.C.C. No. 11, Part 27.

<sup>209</sup> See Verizon Application at 23; Verizon Lacouture/Ruesterholz Decl. at para. 49; *Verizon Communications Inc.*, Order and Consent Decree, File No. EB-01-IH-0236, 16 FCC Rcd 16270 (EB 2001).

<sup>210</sup> See *Application of GTE Corp., Transferor, and Bell Atlantic Corp., Transferee, for Consent To Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application To Transfer Control of a Submarine Cable Landing License*, Order, 15 FCC Rcd 14032, 14327-28, App. D, para. 56 (2000).

<sup>211</sup> 47 U.S.C. § 271(c)(2)(B)(iv); see Appendix D at paras. 48-52 (regarding requirements under checklist item four).

<sup>212</sup> See Rhode Island Commission Comments at 133-36. The Department of Justice concluded that “Verizon has generally succeeded in opening its local markets in Rhode Island to competition.” Department of Justice Evaluation at 6. The Department cites Verizon’s estimate that using all modes of entry, for business and residential customers combined, competitors serve approximately 119,000 lines in Rhode Island, around 16% of all lines in the state. *Id.* at 4.

in Rhode Island.<sup>213</sup> Finally, we note that commenters have not raised any issues with respect to any aspect of Verizon's loop performance.

77. Consistent with prior section 271 orders, we do not address every aspect of Verizon's loop performance where our review of the record satisfies us that Verizon's performance is in compliance with the parity and benchmark measures established in Rhode Island.<sup>214</sup> Instead, we focus our discussion on those areas where the record indicates minor discrepancies in performance between Verizon and its competitors. As in past section 271 proceedings, in the course of our review, we look for patterns of systemic performance disparities that have resulted in competitive harm or that have otherwise denied new entrants a meaningful opportunity to compete.<sup>215</sup> Isolated cases of performance disparity, especially when the margin of disparity is small, generally will not result in a finding of checklist noncompliance.<sup>216</sup> We note that, when reviewing Verizon's performance with respect to a certain category of loop in a given month, the volume of orders may be too low to provide a meaningful result. Because we find that Verizon uses the same provisioning and maintenance and repair processes in Massachusetts and Rhode Island, we may look to Verizon's performance in Massachusetts to inform our analysis.<sup>217</sup>

78. *xDSL-Capable Loops.* Based on the evidence in the record, we find, as did the Rhode Island Commission, that Verizon demonstrates that it provides stand-alone xDSL-capable loops in accordance with the requirements of checklist item four.<sup>218</sup> Verizon makes available xDSL-capable loops in Rhode Island through interconnection agreements and pursuant to tariffs approved by the Rhode Island Commission.<sup>219</sup> In analyzing Verizon's showing, we review performance measures comparable to those the Commission has relied upon in prior section 271 orders: order processing timeliness, installation timeliness, missed installation appointments, installation quality, and the timeliness and quality of the maintenance and repair functions.<sup>220</sup>

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<sup>213</sup> See Verizon Lacouture/Ruesterholz Decl. at para. 86. As of September, 2001, Verizon had provisioned approximately 28,000 stand-alone loops (including DSL loops), 300 high capacity DS1 loops, approximately 58 digital loops (from July-October) and 4 line sharing arrangements. See Verizon Lacouture/Ruesterholz Decl. at paras. 86, 118, and 175; see also PR 6-03-3341.

<sup>214</sup> See, e.g., *Verizon Connecticut Order*, 16 FCC Rcd at 14151-52, para. 9.

<sup>215</sup> See *Verizon Massachusetts Order*, 16 FCC Rcd at 9055-56, para. 122.

<sup>216</sup> See *id.*

<sup>217</sup> KPMG Consulting found that the systems or interfaces, processes, personnel, facilities, management structures, and performance measures were the same for both Rhode Island and Massachusetts. See KPMG Report at 13.

<sup>218</sup> Rhode Island Commission Comments at 133-36.

<sup>219</sup> Verizon Lacouture/Ruesterholz Decl. at para. 131.

<sup>220</sup> See *Verizon Pennsylvania Order*, 16 FCC Rcd at 17462-63, para. 79; *Verizon Connecticut Order*, 16 FCC Rcd at 15153-56, paras. 15-20; *Verizon Massachusetts Order*, 16 FCC Rcd at 9056, para. 123, and 9059, para. 130; *SWBT Kansas/Oklahoma Order*, 16 FCC Rcd at 6326-27, paras. 181-82. We note that individual states and BOCs may define performance measures in different ways. We look to those measurements, however, that provide data most similar to data we have relied upon in past orders.

Based on our analysis of Verizon's performance under these measures, we conclude that Verizon's performance for competitive LECs has generally met the benchmark and parity standards established in Rhode Island.<sup>221</sup>

79. Upon initial review, the overall level of trouble reports for stand-alone xDSL-capable loops in Rhode Island appears to be out of parity.<sup>222</sup> The current version of the relevant performance metric used in Rhode Island compares competitive LEC troubles to those experienced by Verizon's advanced services affiliate. However, the New York Commission recently established retail POTS service as the applicable comparison group.<sup>223</sup> As described above, the New York Commission developed Verizon's performance measurements, business rules and standards in a collaborative state proceeding with input from competing carriers, and the Rhode Island Commission has adopted these performance measures, business rules and standards.<sup>224</sup> Accordingly, we agree that retail POTS service appears to be a more probative comparison in this context.<sup>225</sup> Verizon has calculated its performance using the revised analogue, and it is in parity.<sup>226</sup>

80. *Digital Loops.* Based on the evidence in the record, we find, as did the Rhode Island Commission, that Verizon's performance with respect to digital loops complies with checklist item four.<sup>227</sup> For the relevant four month period, Verizon provisioned, on average, only 14.5 digital loops per month in Rhode Island.<sup>228</sup> Because these volumes are insufficient upon which to make a finding, we look at Massachusetts data, which show that Verizon's performance

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<sup>221</sup> See *supra* part III.A.2.c(i).

<sup>222</sup> See MR 2-02-3342 (Network Trouble Report Rate – Loop). Since July, Verizon has not achieved parity. See also MR 2-03-3342 (Network Trouble Report Rate – Central Office). Verizon missed parity in July and September. During the months of July through September, 0.56% of DSL loops in Rhode Island reported troubles found in either the outside plant (MR-2-02) or the central office (MR-2-03), compared to 0.09% for the current retail comparison group (VADI).

<sup>223</sup> For the MR-2 through MR-5 metrics, the New York Commission adjusted the retail analogue to compare Verizon's performance for competitors with Verizon's own retail POTS service rather than its DSL service because the Carrier Working Group reached consensus that retail POTS troubles are more similar (than VADI line sharing troubles) to 2-Wire digital and 2-Wire xDSL Loop troubles. See Verizon Application App. N, Tab 6, State of New York Public Service Commission Order Modifying Existing and Establishing Additional Inter-Carrier Service Quality Guidelines at Attach. 1, Section E, page 29 (Oct. 29, 2001) (New York Commission October Order).

<sup>224</sup> See *supra* part II.

<sup>225</sup> In prior section 271 proceedings, the Commission has given deference to business rules developed in a collaborative state proceeding. See *Verizon Massachusetts Order*, 16 FCC Rcd at 9057, para. 126.

<sup>226</sup> During July, August and September, 2001, 1.11% of DSL loops in Rhode Island reported troubles found in either the outside plant or the central office, compared to 1.24% for the retail comparison group (retail POTS service). See Verizon Lacouture/Ruesterholz Decl. at para. 157, Attach. 38.

<sup>227</sup> See Rhode Island Commission Comments at 133-36.

<sup>228</sup> The number of digital loops provisioned on average for July-October was taken from the performance data provided for the PR 6-03-3341 (Percent Installation Troubles Reported Within 30 Days – FOK/TOK/CPE) measure.

with respect to digital loops continues to meet the requirements of checklist item four.<sup>229</sup> We reach this conclusion despite the fact that the measures for Installation Trouble<sup>230</sup> and Repeat Trouble Reports<sup>231</sup> show Verizon's performance to be out of parity for almost every month reported.

81. According to Verizon, however, the disparate performance results are not the result of discriminatory conduct, but rather the result of a flawed metric. Verizon argues that the Installation Trouble measure may not be an accurate indicator of Verizon's performance because the retail comparison group for this metric (Verizon retail) does not provide an "apples-to-apples" comparison.<sup>232</sup> For example, Verizon explains that most of the competitor LEC 2-wire digital loops are provisioned using fiber, while most of the orders in the retail comparison group are provisioned using copper.<sup>233</sup> Verizon also explains that competitive LEC loops are predominantly used for data transmission (IDSL), while the retail comparison group loops are predominantly used for voice transmission (either POTS or ISDN).<sup>234</sup> Accordingly, we agree with Verizon that this metric may appear to suggest unequal treatment simply because of the comparison group used. In addition, we find that Verizon's disparate performance under the Repeat Trouble Report metric apparently is the result of a flawed measurement. First, as explained above, for the MR-2 through MR-5 metrics, the New York Commission recently established retail POTS service as the applicable comparison group for 2-Wire digital and xDSL-

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<sup>229</sup> Verizon's performance for timeliness of order confirmation notices in Massachusetts generally meets or exceeds the benchmark from July through October. See OR 1-02-3331 (Percent On Time LSRC – Flow Through), OR 1-04-3331 (Percent On Time LSRC/ASRC – No Facility Check), and OR 1-06-3331 (Percent On Time LSRC/ASRC – Facility Check). Verizon is also provisioning digital loops in a timely manner in Massachusetts. For PR 4-04-3341 (Percent Missed Appointments – Dispatch) and PR 4-05-3341 (Percent Missed Appointments – No Dispatch), Verizon's performance is at parity for non-dispatch from July through October, and better than parity for dispatch for this same period of time. Also, Verizon's performance for most maintenance and repair functions for digital loops is comparable for Verizon retail customers and competitive LECs. For example, the Mean Time to Repair for digital loops exceeded parity from July through October. See MR 4-01-3341 (Mean Time to Repair – Total). However, between July and October, Network Trouble reports for competitive LECs found in either the outside plant or the central office were reported slightly more often than for Verizon's retail customers, but, on average, still less than 3% of the time (1.55% for MR-2-02 and 0.36% for MR-2-03). See MR 2-02-3341 (Network Trouble Report Rate – Loop) and MR 2-03-3341 (Network Trouble Report Rate – Central Office).

<sup>230</sup> See PR 6-01-3341 (Percent Installation Troubles Within 30 Days). The July-October average for this measure is 12.85% for competitive LECs and 1.28% for Verizon retail.

<sup>231</sup> See MR 5-01-3341 (Percent Repeat Reports Within 30 Days). The July-October average for this measure is 34.46% for competitive LECs and 19.69% for Verizon retail. However, as it did with xDSL-capable loops, the New York Commission has adjusted the retail analogue for digital loops to compare Verizon's performance for competitors with Verizon's own retail POTS service. See *supra* n.223.

<sup>232</sup> See Letter from Clint Odom, Director, Federal Regulatory, Verizon to Magalie Roman Salas, Secretary, Federal Communications Commission, CC Docket No. 01-324 at 1 (filed Jan. 17, 2002) and Verizon Jan. 8 *Ex Parte* Letter at 6.

<sup>233</sup> *Id.*

<sup>234</sup> *Id.*

capable loops.<sup>235</sup> Second, as explained in more detail below, the New York Commission has also further revised the MR-5 measure (the Repeat Trouble Report metric) for all loop types to exclude misdirected dispatches in order to more accurately capture performance for which Verizon is responsible.<sup>236</sup> We believe that these revisions reasonably demonstrate that the current version of the Repeat Trouble Report metric is flawed, which likely accounts for some of the performance disparities.

82. Moreover, given Verizon's generally acceptable performance for all other categories of loops, and recognizing that digital loops represent only a small percentage of overall loop orders in Rhode Island,<sup>237</sup> we do not believe that the uncertain performance for digital loops discussed above merits a finding of checklist noncompliance. Commenters in this proceeding do not criticize Verizon's performance with regard to digital loops.

83. *Hot Cut Activity.* Based on the evidence in the record, we find, as did the Rhode Island Commission, that Verizon is providing voice grade loops through hot-cuts in Rhode Island in accordance with the requirements of checklist item four.<sup>238</sup> Verizon has satisfied its benchmark for on-time performance for hot-cuts for the relevant four month period,<sup>239</sup> and Verizon indicates that trouble reports received within seven days of installation have been fewer than one percent.<sup>240</sup> In addition, Verizon indicates that during July, August and September 2001, it completed hot-cuts in Rhode Island within, on average, 5.19 days, which is just slightly longer than the standard five day interval for orders of one to nine lines.<sup>241</sup> We note, however, that the performance metric that captures Verizon's performance includes orders for both one to nine lines (which have a five day standard provisioning interval) as well as orders for ten or greater lines (which have a negotiated provisioning interval).<sup>242</sup> Accordingly, we find that the difference between Verizon's overall hot-cut performance and the five day benchmark is not competitively significant in these circumstances. No commenter has raised concerns with Verizon's hot-cut provisioning.

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<sup>235</sup> See *supra* para. 79 and n.223.

<sup>236</sup> See *infra* para. 85 and n.247.

<sup>237</sup> In July, Verizon provisioned approximately 28 digital loops for competitors; in August, it provisioned approximately 19 digital loops; in September, it provisioned approximately 5 digital loops; and in October, Verizon provisioned approximately 6 digital loops for competitors. See PR 6-03-3341.

<sup>238</sup> See Rhode Island Commission Comments at 133-36.

<sup>239</sup> See PR 9-01-3520 (Percent On Time Performance – Hot Cut).

<sup>240</sup> See Verizon Lacouture/Ruesterholz Decl. at para. 115; see also PR 6-02-3520 (Percent Installation Troubles Reported Within 7 Days – Hot Cut Loop). Verizon's performance exceeds the benchmark for hot cuts in Rhode Island for July-October.

<sup>241</sup> See Verizon Lacouture/Ruesterholz Decl. at para. 113. See also PR 2-01-3111 (Average Completed Interval-Total No Dispatch – Hot Cut Loop).

<sup>242</sup> See PR 2-01-3111 (Average Completed Interval-Total No Dispatch – Hot Cut Loop).

84. *Voice Grade Loops.* Based on the evidence in the record, we find, as did the Rhode Island Commission, that Verizon provisions voice grade loops in a nondiscriminatory manner.<sup>243</sup> In order to determine that Verizon's performance reflects parity, we review performance measures comparable to those we have relied upon in prior section 271 orders.<sup>244</sup> We note that no commenter has raised an issue relating to provisioning of voice grade loops.

85. We recognize that Verizon's performance with respect to two specific performance metrics appears to be out of parity in Rhode Island for several recent months. We find, however, that this performance does not warrant a finding of checklist noncompliance. First, upon initial review, Verizon's performance with respect to a maintenance and repair measure – the repeat trouble report rate – appears to be out of parity in two of the last four months.<sup>245</sup> According to Verizon, however, when its performance under this metric is recalculated under the new guidelines adopted by the New York Commission, its performance under this measure is at parity.<sup>246</sup> Verizon explains that the New York Commission has recently revised the repeat trouble report rate to account for misdirected dispatches that skew performance results by overstating repeat troubles.<sup>247</sup> We agree that the revised metric will more accurately reflect Verizon's performance.<sup>248</sup>

86. Second, Verizon's performance with respect to a provisioning timeliness metric – the average completed interval metric – appears to be out of parity in Rhode Island for several recent months.<sup>249</sup> We note, however, that Verizon's performance reflected by another

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<sup>243</sup> See Rhode Island Commission Comments at 133-36.

<sup>244</sup> See Appendix D at para. 37; see also *Verizon Massachusetts Order*, 16 FCC Rcd at 9078-79, para. 162.

<sup>245</sup> For repeat trouble reports within 30 days, MR 5-01-3550, Verizon did not achieve parity in July and October.

<sup>246</sup> During July, August, and September 2001, Verizon's repeat trouble report rate in Rhode Island under the new business rules was 16.67% for competitive LECs and 16.63% for the retail comparison group. See *Verizon Lacouture/Ruesterholz Decl.* at para. 104 and Attach. 21.

<sup>247</sup> In its Order, the New York Commission states that the Carrier Working Group reached consensus to exclude misdirected dispatches from the MR-5 metric to more accurately capture performance for which Verizon is responsible. Specifically, the New York Commission modified the guidelines for the MR-5 measure to eliminate the so-called "double-trouble" phenomenon, which occurs when the competitive LEC misdirects Verizon to dispatch a technician either inside or outside the central office and no trouble is found. Verizon explains that when this occurs, the trouble ticket must be closed and the competitive LEC must initiate a second ("double") trouble ticket directing dispatch in the opposite direction. See *New York Commission October Order* at 4; see also *Verizon Lacouture/Ruesterholz Decl.* at para. 104.

<sup>248</sup> See *supra* n.225.

<sup>249</sup> Verizon missed parity from July-October. In July, Verizon completed POTS loop orders of 1-5 lines in 2.40 days for Verizon retail and 4.55 days for competitors. The comparable numbers for August were 2.51 for the Verizon retail affiliate and 6.27 for competitors and 4.28 for Verizon retail and 5.48 for competitors in September and 3.56 for Verizon retail and 4.84 for competitors in October. For November, performance data demonstrate that Verizon provisioned voice grade loops to competitors at parity with its own retail customers. See PR 2-03-3112 (Average Completed Interval – Dispatch (1-5 lines) – Loop).

provisioning timeliness metric – the “missed appointment” metric – satisfies the benchmark for all relevant months.<sup>250</sup> Next, as explained in more detail above, this metric, because of the way it is designed, may not be an accurate indicator of Verizon’s performance.<sup>251</sup> Furthermore, the Carrier Working Group in New York, working through the collaborative process, has agreed to the deletion of this provisioning timeliness metric.<sup>252</sup> Finally, even setting aside the questions about the accuracy of this metric, we find that the performance differences reported under this metric are relatively slight and do not appear to be competitively significant to competing LECs.<sup>253</sup> Indeed, no commenter has indicated that the provisioning of voice grade loops is a problem in Rhode Island. As the Commission has stated in the past, isolated cases of performance disparity, especially when the margin of disparity is small, generally will not result in a finding of checklist noncompliance.<sup>254</sup>

87. *High Capacity Loops.* Based on the record, we find, as did the Rhode Island Commission, that Verizon’s performance complies with the requirements for checklist item four.<sup>255</sup> From July through September, Verizon provisioned approximately ten DS-1 loops in Rhode Island.<sup>256</sup> Because these volumes are insufficient upon which to make a finding, we look at Massachusetts data, which show that Verizon’s performance with respect to high capacity loops meets the requirements of checklist item four.

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<sup>250</sup> See PR 4-04-3113 (Percent Missed Appointment – Dispatch – Loop New). In the *Bell Atlantic New York Order*, the Commission found the missed rate of installation appointments to be the most accurate indicator of Bell Atlantic’s ability to provision unbundled loops. See *Bell Atlantic New York Order*, 15 FCC Rcd at 4103, para. 288.

<sup>251</sup> See *supra* part III.A.2.d.; Verizon Jan. 8 *Ex Parte* Letter at 2-3.

<sup>252</sup> The New York Commission has issued an order eliminating the average interval completed PR-2 measures from the Carrier-to-Carrier Performance Reports. See New York Commission October Order at 3. Specifically, the New York Commission indicates that the Carrier Working Group agreed to eliminate this metric because other metrics capture performance in this area: PR-1 captures the provisioning interval offered, while PR-3 Percent Completed Within X Days and PR-4 Missed Appointments adequately measure success meeting the promised interval. *Id.* In past orders, we have accorded much weight to the judgment of collaborative state proceedings and encouraged carriers to work together in such fora to resolve metrics and other issues. See *Verizon Massachusetts Order*, 16 FCC Rcd at 9057, para. 126.

<sup>253</sup> Verizon explains that the average completed interval for August through November in Rhode Island was 5.28 days for competitive LECs and 3.54 days for the retail comparison group, a difference of only 1.74 days. In addition, competitive LECs’ average completed intervals in Rhode Island have decreased from August-November (6.27, 5.48, 4.84, and 4.80) even as competitive LEC volumes have generally increased (22, 33, 43, and 20). See Verizon Jan. 8 *Ex Parte* Letter at 4.

<sup>254</sup> See *Verizon Massachusetts Order*, 16 FCC Rcd at 9055-56, para. 122.

<sup>255</sup> See Rhode Island Commission Comments at 133-36.

<sup>256</sup> See Verizon Application at 42. High capacity loops in Rhode Island represent less than 1% of all unbundled loops provisioned to competitors. See *id.*

88. We note that Verizon's performance in Massachusetts with respect to high capacity loops has generally improved since grant of section 271 authority in Massachusetts.<sup>257</sup> While the installation troubles reported and network trouble report rate in Massachusetts have been out of parity for competitive LECs for almost all reported months, we find that these disparities are slight and thus not competitively significant.<sup>258</sup> Moreover, given Verizon's generally acceptable performance for all other categories of loops, and recognizing that high capacity loops represent only a small percentage of overall loop orders in Rhode Island and Verizon's improved performance in regard to high capacity loops, we find that Verizon's performance is in compliance with checklist item four. We note that commenters in this proceeding do not criticize Verizon's performance with regard to high capacity loops.

89. *Line Sharing.* Based on the evidence in the record, we find, as did the Rhode Island Commission,<sup>259</sup> that Verizon demonstrates that it provides nondiscriminatory access to the high frequency portion of the loop.<sup>260</sup> Through September 2001, Verizon had completed approximately four line sharing orders in Rhode Island for unaffiliated competitive LECs<sup>261</sup> and the Rhode Island performance data show almost no competitive LEC activity for line shared DSL services in September and October.<sup>262</sup> Although there has been very little ordering activity in Rhode Island for line sharing for the months reported, there has been much ordering activity in Massachusetts during the same period of time.<sup>263</sup> Verizon's Massachusetts performance data

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<sup>257</sup> See *Verizon Massachusetts Order*, 16 FCC Rcd at 9075-76, para. 156.

<sup>258</sup> For PR 6-01-3200 (Percent Installation Troubles Within 30 Days), Verizon performed slightly better for its own retail affiliate from July-September. In October, it performed at parity. For MR 2-01-3200 (Network Trouble Report Rate), Verizon states that during July, August and September, the percentages have generally been under 2%. In October, the percentage was under 2% as well. See also *Verizon Lacouture/Ruesterholz Decl.* at para. 126.

<sup>259</sup> See *Rhode Island Commission Comments* at 133-36.

<sup>260</sup> As part of KPMG's stand-alone testing in Rhode Island, KPMG evaluated Verizon's line sharing installations in Massachusetts to validate that Verizon's technicians performed all of the required tasks defined in the line sharing documentation. KPMG examined line sharing in Massachusetts rather than in Rhode Island because Massachusetts line sharing volumes were greater. See *Verizon Lacouture/Ruesterholz Decl.* at para. 176. Verizon received a "satisfied" rating based on KPMG Consulting evaluation criteria. See *KPMG Report* at 13. Specifically, during 78 ADSL Line Sharing installations, KPMG Consulting observed Verizon-MA technicians execute 624 installation tasks. Verizon-MA technicians executed 615 (99%) of these tasks as defined in their documentation. See *KPMG Report* at 93. We encourage state commissions and BOCs to engage in testing of new or changed aspects of a BOC's OSS. See also *Verizon Lacouture/Ruesterholz Decl.* at paras. 165-66.

<sup>261</sup> See *Verizon Lacouture/Ruesterholz Decl.* at para. 175.

<sup>262</sup> See the PR-6 Installation Quality metrics.

<sup>263</sup> Through September 2001, Verizon had completed over 3,600 line sharing orders for unaffiliated competitive LECs in Massachusetts. See *Verizon Lacouture/Ruesterholz Decl.* at para. 175.

demonstrate that it is provisioning line shared DSL loops to competitors at parity with its own retail provisioning, and that its maintenance and repair performance is also acceptable.<sup>264</sup>

90. *Line Splitting.* Based on the evidence in the record, we find, as did the Rhode Island Commission,<sup>265</sup> that Verizon complies with its line-splitting obligations and provides access to network elements necessary for competing carriers to provide line splitting.<sup>266</sup> Verizon provides access to the same pre-ordering capabilities to carriers that purchase line splitting as it does to carriers that purchase unbundled DSL loops or line sharing.<sup>267</sup> In addition, working with the competitive LECs through the New York DSL Collaborative, Verizon implemented a permanent OSS process for line splitting throughout the Verizon East territory, including Rhode Island, on October 20, 2001.<sup>268</sup> Thus, Verizon has met its goal to implement permanent OSS by October 2001.<sup>269</sup> Competitive LECs have raised no complaints about this new process. We find, therefore, given the record before us, that Verizon's process for line-splitting orders is in compliance with the requirements of this checklist item at this time.<sup>270</sup> As competing LEC needs

<sup>264</sup> See PR 1-01-3343 (Average Interval Offered – Total No Dispatch) and PR 1-02-3343 (Average Interval Offered – Total Dispatch); PR 2-01-3343 (Average Interval Completed – Total No Dispatch) and PR 2-02-3343 (Average Interval Completed – Total Dispatch); and PR 4-05-3343 (Percent Missed Appointments – No Dispatch). For PR 6-01-3343 (Percent Installation Troubles Reported Within 30 Days), Verizon's performance with regard to installation troubles reported within 30 days in Massachusetts is out of parity for September and October, but from July-October, the rate of such installation troubles was less than 2% for both competing LECs and Verizon's own affiliate. See Verizon Lacouture/Ruesterholz Decl. at para. 188; see also MR 2-03-3343 (Network Trouble Report Rate – Central Office) and MR 4-03-3343 (Mean Time to Repair – Central Office Trouble).

<sup>265</sup> See Rhode Island Commission Comments at 133-36.

<sup>266</sup> See *Deployment of Wireline Services Offering Advanced Telecommunications Capabilities and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Third Report and Order on Reconsideration, CC Docket No. 98-147; Fourth Report and Order on Reconsideration, CC Docket No. 96-98; Third Further Notice of Proposed Rulemaking, CC Docket No. 98-147; Sixth Further Notice of Proposed Rulemaking, CC Docket No. 96-98, 16 FCC Rcd 2101, 2111, para. 20. Verizon states, however, that it is not aware of any competitive LECs that are engaging in line splitting in Rhode Island or Massachusetts using existing network elements. See Verizon Lacouture/Ruesterholz Decl. at para. 193.

<sup>267</sup> Competitive LECs have a choice of submitting pre-ordering queries over either the Web GUI, EDI, or CORBA electronic interfaces. See Verizon McLean/Wierzbicki Decl. Attach. 2 at 11.

<sup>268</sup> Specifically, Verizon began offering new OSS functionality that enables a competitor to submit a single Local Service Request (LSR) to add DSL capability to a loop in an existing UNE-Platform arrangement while re-using the same network elements, including the loop, if it is DSL-capable. In addition, Verizon implemented the ability for a competitive LEC to convert from line sharing to line splitting using a single LSR, or drop data from a line-splitting arrangement and revert back to UNE-Platform with a single LSR. See Verizon Lacouture/Ruesterholz Decl. at para. 202; see also Verizon McLean/Wierzbicki Decl. Attach. 2 at 12.

<sup>269</sup> See *Verizon Massachusetts Order*, 16 FCC Rcd at 9091-92, para. 181 (Verizon agreed to an implementation schedule to offer line splitting-specific OSS capabilities under the supervision of the New York Commission in response to concerns raised by WorldCom.).

<sup>270</sup> As of November 9, 2001, Verizon had received 10 commercial line splitting orders from competitive LECs (utilizing the new line splitting OSS capabilities) outside of the pilot. None of these orders was submitted in Rhode Island or Massachusetts. See Verizon Lacouture/Ruesterholz Decl. at para. 202.

continue to evolve, however, we may revisit Verizon's line splitting OSS in a future section 271 proceeding that includes more or different evidence in the record.

### 3. Checklist Item 5 – Transport

91. Section 271(c)(2)(B)(v) of the competitive checklist requires a BOC to provide “[l]ocal transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services.”<sup>271</sup> Based on our review of the record,<sup>272</sup> we conclude, as did the Rhode Island Commission,<sup>273</sup> that Verizon complies with the requirements of this checklist item.

92. In past orders, the Commission has relied on the missed appointment rate to determine whether a BOC is provisioning transport to its competitors in a nondiscriminatory fashion.<sup>274</sup> The volume of transport orders in Rhode Island is extremely low,<sup>275</sup> but Verizon's performance for this metric in Massachusetts during July through October shows that Verizon missed fewer appointments provisioning transport to its competitors than for its own retail customers.<sup>276</sup>

93. We disagree with CTC's argument that Verizon's dark fiber offering does not comply with the requirements of this checklist item. CTC argues that we should condition Verizon's section 271 authority on Verizon's compliance with a recent Rhode Island Commission order that requires Verizon “to splice dark fiber at any technically feasible point so as to make dark fiber continuous through one or more intermediate central offices without requiring a CLEC to be collocated at any such intermediate office.”<sup>277</sup> We reject CTC's claim. Verizon has amended its tariff in Rhode Island to accommodate these new requirements effective

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<sup>271</sup> 47 U.S.C. § 271(c)(2)(B)(v); *see also* Appendix D at para. 53.

<sup>272</sup> *See* Verizon Application at 46-47, and Exh. A; Verizon Lacouture/Ruesterholz Decl. at paras. 236-47.

<sup>273</sup> Rhode Island Commission Comments at 144.

<sup>274</sup> *See, e.g.,* Verizon Massachusetts Order, 16 FCC Rcd at 9106-07, para. 210.

<sup>275</sup> Verizon provisioned 21 orders to competitors from July through October, but only one retail DS3 order – the accepted retail analogue for this metric – during the same period. *See* PR-4-01-3530 (% missed appointments – Verizon – Total-IOF). It is thus not possible to determine, based on this metric, whether Verizon's transport provisioning has been nondiscriminatory. We note, however, that Verizon missed only 14% of appointments for competitors during this period. *See id.*

<sup>276</sup> *See* PR-4-01-3530 (% missed appointments – Verizon – Total-IOF). In July 2001, Verizon missed 50% of its appointments for its own customers, but only 3.23% of those for its competitors. Figures for August, September and October, 2001, are similar: 66.67% vs. 2.38%; 80% vs. no appointments missed; and 66.67% vs. no appointments missed, respectively.

<sup>277</sup> CTC Comments at 8-9 (quoting Letter from Clint Odom, Director, Federal Regulatory, Verizon, to Magalie Roman Salas, Secretary, Federal Communications Commission, CC Docket No. 01-324 (filed Dec. 4, 2001), Attach. at 19 (*Rhode Island PUC Dec. 3 Order*)).

February 1, 2002,<sup>278</sup> and the time to appeal the order in Rhode Island has elapsed.<sup>279</sup> CTC also argues generally that Verizon's dark fiber offering does not satisfy section 251(c)(3).<sup>280</sup> CTC does not, however, support its assertions with references to our rules or precedent. We will not find noncompliance based on such vague assertions.

#### 4. Checklist Item 14 – Resale

94. Section 271(c)(2)(B)(xiv) of the Act requires that a BOC make “[t]elecommunications services . . . available for resale in accordance with the requirements of section 251(c)(4) and section 252(d)(3).<sup>281</sup> Based on the record in this proceeding, we conclude, as did the Rhode Island Commission,<sup>282</sup> that Verizon satisfies the requirements of this checklist item in Rhode Island.<sup>283</sup> Importantly, none of the commenting parties questions Verizon's showing of compliance with the requirements of this checklist item, including the area of resale of Verizon Advanced Data Inc.'s (VADI) retail DSL-based telecommunications service offering (DSL resale).<sup>284</sup>

95. We conclude that Verizon demonstrates current compliance with the checklist requirements with regard to DSL resale as articulated in our recent section 271 orders.<sup>285</sup> First, Verizon already offers the resale of DSL services when Verizon provides voice services on the line involved.<sup>286</sup> Second, in accordance with the United States Court of Appeals decision in *ASCENT v. FCC*, VADI has made enhancements to its federal tariff. Specifically, VADI has

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<sup>278</sup> See Letter from Clint Odom, Director, Federal Regulatory, Verizon, to Magalie Roman Salas, Secretary, Federal Communications Commission, CC Docket No. 01-324 (filed Dec. 19, 2001) (*Verizon New England Inc. Rates and Charges Effective in the State of Rhode Island PUC RI No. 18*), at Part 10.2.1.G (“The Telephone Company will not require collocation at an intermediate office if it can provide intermediate cross connections between fiber distribution frames or can splice fibers at any technically feasible point in the intermediate office(s).”).

<sup>279</sup> “We note that the time for VZ-RI to appeal our decision on dark fiber has expired pursuant to R.I.G.L. § 39-5-1. In addition, on December 14, 2001, VZ-RI made a compliance filing in conformity with our order regarding dark fiber.” Rhode Island Commission Reply at 4 (footnotes omitted).

<sup>280</sup> See CTC Comments at 11.

<sup>281</sup> 47 U.S.C. § 271(c)(2)(B)(xiv); see Appendix D at para. 67.

<sup>282</sup> See Rhode Island Commission Comments at 186-88.

<sup>283</sup> Verizon has a concrete and specific legal obligation in its interconnection agreements and tariffs to make its retail services available for resale to competing carriers at wholesale rates. See Verizon Application at 56, n.52; Verizon Lacouture/Ruesterholz Decl. at para. 386.

<sup>284</sup> In this proceeding, unlike in the *SWBT Arkansas/Missouri Order*, no party, including Verizon, has questioned the applicability of § 251(c)(4) to VADI's DSL resale service. Cf. *SWBT Arkansas/Missouri Order*, 16 FCC Rcd at 20758-59, paras. 79-81.

<sup>285</sup> See *Verizon Pennsylvania Order*, 16 FCC Rcd at 17471, para. 94; *Verizon Connecticut Order*, 16 FCC Rcd at 14164-65, para. 39.

<sup>286</sup> See Verizon F.C.C. Tariff No. 20, Section 5.1.

made resold DSL over resold voice lines, Verizon's expanded DSL resale offering, available in Rhode Island.<sup>287</sup> This offering became effective November 21, 2001 and is the same as that in Connecticut and Pennsylvania except for certain implementation details.<sup>288</sup> Verizon has also implemented OSS changes that enable Verizon to receive VADI's expanded DSL resale orders via the EDI interface and to track those orders through the provisioning process.<sup>289</sup>

96. We also conclude that Verizon has appropriate resold DSL order processing procedures in place. In the *Verizon Connecticut Order*, the Commission indicated that several aspects of Verizon's expanded DSL resale OSS should be revised as Verizon develops permanent order processing procedures.<sup>290</sup> Verizon addresses each of these issues, but concedes that its permanent ordering procedures continue to evolve.<sup>291</sup> As a result, it has not yet developed permanent ordering procedures that fully satisfy all three expectations in Rhode Island. Because no carrier has placed an order for resold DSL in Rhode Island, however, and no carrier commented on this issue in this proceeding, we have no basis for evaluating whether the absence of these changes has any impact on competition. Moreover, as explained below, we accept Verizon's explanation regarding why it has not fully implemented these changes, for the purpose of this proceeding. In particular, the Commission expected that Verizon's performance in providing an expanded DSL resale offering would be reflected in its performance data.<sup>292</sup> Verizon indicates that it has implemented enhancements to its systems to allow it to capture performance data for its resold DSL over resold voice lines offering, and it will begin reporting data after performance measures are developed by the states.<sup>293</sup> The Commission also expected that permanent ordering procedures would eliminate Verizon's requirement that it disconnect resold DSL service if the customer switches from the reseller back to Verizon as the underlying voice provider.<sup>294</sup> Verizon indicates that, to date, it has not received any such requests, but it confirms

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<sup>287</sup> *Association of Communications Enterprises v. FCC*, 235 F.3d 662 (D.C. Cir. 2000); see also Tariff Revision filed by VADI to VADI F.C.C. Tariff F.C.C. No. 1 under Transmittal Number 22 (Nov. 20, 2001).

<sup>288</sup> See Verizon Lacouture/Ruesterholz Decl. at para. 416. Verizon uses the same checklist-compliant processes and procedures to provide this new service as it uses in Pennsylvania, except that, in Rhode Island, Verizon has not placed any limits on the number of orders that Verizon will commit to process each day. See Verizon Application at 57-58.

<sup>289</sup> Verizon Lacouture/Ruesterholz Decl. at para. 417. Despite these enhancements in the former Bell Atlantic states where VADI operates, no reseller has submitted orders – other than test orders – to Verizon for resold DSL over resold voice lines service. Only six test orders were submitted and they were completed successfully by Verizon. See Letter from Clint E. Odom, Director, Federal Regulatory, Verizon to Magalie Roman Salas, Secretary, Federal Communications Commission, CC Docket No. 01-324 at 3 (filed Jan. 7, 2002) (Verizon Jan. 7 *Ex Parte* Letter).

<sup>290</sup> See *Verizon Connecticut Order*, 16 FCC Rcd at 14166, para. 42.

<sup>291</sup> See Verizon Jan. 7 *Ex Parte* Letter at 3-4.

<sup>292</sup> See *Verizon Connecticut Order*, 16 FCC Rcd at 14166, para. 42.

<sup>293</sup> See Verizon Jan. 7 *Ex Parte* Letter at 4. However, as Verizon also notes, performance measures specific to resold DSL over resold voice lines have yet to be developed in the state collaboratives. *Id.*

<sup>294</sup> See *Verizon Connecticut Order*, 16 FCC Rcd at 14166, para. 42.

that it will work to avoid any disconnection when it begins receiving orders.<sup>295</sup> Lastly, the Commission expected that permanent order processing procedures would eliminate Verizon's requirement that the reseller must already be the voice provider on the line involved before Verizon can process orders for DSL resale.<sup>296</sup> According to Verizon, however, the voice service must be established first because the data provider is considered a "sub-tenant" on the line involved.<sup>297</sup> Verizon indicates that this is true whether Verizon, a competitive LEC, or a reseller is the voice provider.<sup>298</sup>

### C. Remaining Checklist Items (3, 6-13)

97. In addition to showing that it is in compliance with the requirements discussed above, an applicant under section 271 must demonstrate that it complies with checklist item 3 (access to poles, ducts, and conduits),<sup>299</sup> item 6 (unbundled local switching),<sup>300</sup> item 7 (911/E911 access and directory assistance/operator services),<sup>301</sup> item 8 (white pages directory listings),<sup>302</sup> item 9 (numbering administration),<sup>303</sup> item 10 (databases and associated signaling),<sup>304</sup> item 11 (number portability),<sup>305</sup> item 12 (local dialing parity),<sup>306</sup> and item 13 (reciprocal compensation).<sup>307</sup> Based on the evidence in the record, we conclude that Verizon demonstrates that it is in compliance with these checklist items in Rhode Island.<sup>308</sup> We also note that the Rhode Island

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<sup>295</sup> According to Verizon, "[it] has not received any orders where an end user seeks to switch its voice service back to Verizon while retaining the reseller providing DSL service. Nevertheless, if such an order were received, Verizon would endeavor to complete the order without disconnection of the DSL service." See Verizon Jan. 7 *Ex Parte* Letter at 4

<sup>296</sup> *Id.*

<sup>297</sup> According to Verizon, "when voice and data are established on a single line, the voice provider controls the line, and the data provider is a sub-tenant. As a result, the voice service must be established first." *Id.*

<sup>298</sup> *Id.*

<sup>299</sup> 47 U.S.C. § 271(c)(2)(B)(iii).

<sup>300</sup> *Id.* § 271(c)(2)(B)(vi).

<sup>301</sup> *Id.* § 271(c)(2)(B)(vii).

<sup>302</sup> *Id.* § 271(c)(2)(B)(viii).

<sup>303</sup> *Id.* § 271(c)(2)(B)(ix).

<sup>304</sup> *Id.* § 271(c)(2)(B)(x).

<sup>305</sup> *Id.* § 271(c)(2)(B)(xi).

<sup>306</sup> *Id.* § 271(c)(2)(B)(xii).

<sup>307</sup> *Id.* § 271(c)(2)(B)(xiii).

<sup>308</sup> See Verizon Application at 49 (checklist item 3), 45 (checklist item 6), 49-51 (checklist item 7), 52-53 (checklist item 8), 53 (checklist item 9), 53-54 (checklist item 10), 54-55 (checklist item 11), 55 (checklist items 12 and 13); Lacouture/Ruesterholz Decl. at paras. 268-91 (checklist item 3), paras. 211-35 (checklist item 6), paras. 292-324 (continued....)

Commission concludes that Verizon complies with the requirements of each of these checklist items.<sup>309</sup> None of the commenting parties challenges Verizon's compliance with these checklist items.

#### IV. COMPLIANCE WITH SECTION 271(c)(1)(A)

98. In order for the Commission to approve a BOC's application to provide in-region, interLATA services, a BOC must first demonstrate that it satisfies the requirements of either section 271(c)(1)(A) (Track A) or section 271(c)(1)(B) (Track B).<sup>310</sup> To qualify for Track A, a BOC must have interconnection agreements with one or more competing providers of "telephone exchange service . . . to residential and business customers."<sup>311</sup>

99. We conclude, as the Rhode Island Commission did,<sup>312</sup> that Verizon satisfies the requirements of Track A in Rhode Island. We base this decision on interconnection agreements Verizon has with Cox Communications, Inc. (Cox), Network Plus, Choice One, WorldCom, Conversent, and AT&T.<sup>313</sup> Cox and Network Plus provide telephone exchange service to a substantial number of residential and business subscribers in Rhode Island predominantly over their own facilities.<sup>314</sup> Choice One, WorldCom, Conversent, and AT&T serve business customers.

100. We conclude that a sufficient number of residential and business customers are being served by competing LECs through the use of their own facilities to demonstrate that there is an actual commercial alternative in Rhode Island. Verizon has shown that facilities-based carriers serve more than a *de minimis* number of residential and business customers in Rhode Island.<sup>315</sup> No commenter has challenged Verizon's assertion that it satisfies the requirements for Track A in Rhode Island.

(Continued from previous page) \_\_\_\_\_

(checklist item 7), paras. 325-41 (checklist item 8), paras. 342-46 (checklist item 9), paras. 347-72 (checklist item 10), paras. 373-76 (checklist item 11), paras. 378-82 (checklist item 12), paras. 383-86 (checklist item 13); *see also* Appendices B and C.

<sup>309</sup> *See* Rhode Island Commission Comments at 95-102 (checklist item 3), 145-54 (checklist item 6), 154-62 (checklist item 7), 162-64 (checklist item 8), 165-66 (checklist item 9), 166-71 (checklist item 10), 172-74 (checklist item 11), 174-77 (checklist item 12), 177-80 (checklist item 13).

<sup>310</sup> 47 U.S.C. § 271(d)(3)(A).

<sup>311</sup> 47 U.S.C. § 271(c)(1)(A).

<sup>312</sup> Rhode Island Commission Comments at 10.

<sup>313</sup> Verizon Application at 7-11; Verizon Local Competition Report (*citing confidential portion*) paras. 31-32, 35-44.

<sup>314</sup> *Id.*

<sup>315</sup> Verizon Application at 7-11; Verizon Local Competition Report (*citing confidential portion*) paras. 31-32, 35-44. *Cf. SWBT Oklahoma Order*, 12 FCC Rcd at 8695, para. 14.

## V. SECTION 272 COMPLIANCE

101. Section 271(d)(3)(B) provides that the Commission shall not approve a BOC's application to provide interLATA services unless the BOC demonstrates that the "requested authorization will be carried out in accordance with the requirements of section 272."<sup>316</sup> Based on the record, we conclude that Verizon has demonstrated that it will comply with the requirements of section 272.<sup>317</sup> Significantly, Verizon provides evidence that it maintains the same structural separation and nondiscrimination safeguards in Rhode Island as it does in Pennsylvania, New York, Connecticut, and Massachusetts – states in which Verizon has already received section 271 authority.<sup>318</sup> No party challenges Verizon's section 272 showing.<sup>319</sup>

## VI. PUBLIC INTEREST ANALYSIS

102. Apart from determining whether a BOC satisfies the competitive checklist and will comply with section 272, Congress directed the Commission to assess whether the requested authorization would be consistent with the public interest, convenience, and necessity.<sup>320</sup> At the same time, section 271(d)(4) of the Act states in full that "[t]he Commission may not, by rule or otherwise, limit or extend the terms used in the competitive checklist set forth in subsection (c)(2)(B)."<sup>321</sup> Accordingly, although the Commission must make a separate determination that approval of a section 271 application is "consistent with the public interest, convenience, and necessity," it may neither limit nor extend the terms of the competitive checklist of section 271(c)(2)(B). Thus, the Commission views the public interest requirement as an opportunity to review the circumstances presented by the application to ensure that no other relevant factors

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<sup>316</sup> 47 U.S.C. § 271(d)(3)(B); Appendix D at paras. 68-69.

<sup>317</sup> See Verizon Application at 73-78; Verizon Application App. A, Vol. 3, Tab E, Declaration of Susan C. Browning at para 4. (Verizon Browning Decl.).

<sup>318</sup> *Verizon Pennsylvania Order*, 16 FCC Rcd at 17486, para. 124; *Verizon Connecticut Order*, 16 FCC Rcd at 14179, para. 73; *Verizon Massachusetts Order*, 16 FCC Rcd at 9114-17, paras. 226-31; *Bell Atlantic New York Order*, 15 FCC Rcd at 4152-61, paras. 401-21; Verizon Application at 73-78; Verizon Browning Decl. at paras. 4-17.

<sup>319</sup> We recognize that the first independent audit of Verizon's section 272 compliance conducted pursuant to section 53.209 of the Commission's rules is now complete. See Letter from PricewaterhouseCoopers LLP to Magalie Roman Salas, Secretary, Federal Communications Commission (June 11, 2001) (transmitting audit report). While the audit raises issues that may require further investigation, the audit results are not a legal determination of Verizon's section 272 compliance. Parties were required to submit comments on the audit report no later than January 24, 2002. See *Accounting Safeguards Under the Telecommunications Act of 1996*, Order, 16 FCC Rcd 20301 (2001) (extending deadline for filing comments). Because the Commission will not have had the opportunity to complete its own review of the audit results before it is required to issue a decision on this section 271 application, and because no party cites the audit findings as evidence of noncompliance (or even challenges Verizon's showing generally), there is no reason to consider the audit as evidence of shortcomings in Verizon's section 272 compliance.

<sup>320</sup> 47 U.S.C. § 271(d)(3)(C); Appendix D at paras. 70-71.

<sup>321</sup> *Id.* § 271(d)(4).

exist that would frustrate the congressional intent that markets be open, as required by the competitive checklist, and that entry will serve the public interest as Congress expected.

103. We conclude that approval of this application is consistent with the public interest. From our extensive review of the competitive checklist, which embodies the critical elements of market entry under the Act, we find that barriers to competitive entry in the local exchange markets have been removed and the local exchange markets today are open to competition. We further find that the record confirms our view, as noted in prior section 271 orders, that BOC entry into the long distance market will benefit consumers and competition if the relevant local exchange market is open to competition consistent with the competitive checklist.<sup>322</sup>

104. We disagree with commenters that assert that under our public interest standard, we must consider the market share of each entry strategy for each type of service. Sprint argues that low levels of residential UNE and resale service in Rhode Island indicate that meaningful competition does not exist in Rhode Island.<sup>323</sup> Given an affirmative showing that the competitive checklist has been satisfied, low customer volumes in any one particular mode of entry or in general do not necessarily undermine that showing. As the Commission has said in previous section 271 orders, factors beyond the control of the BOC, such as individual competitive LEC entry strategies, might explain a low residential customer base.<sup>324</sup>

105. We also disagree with Sprint's argument that Cox does not provide meaningful competition with respect to customers who do not subscribe to Cox's cable or data services, since the price for cable telephony to those customers exceeds Verizon's price for local service.<sup>325</sup> Sprint notes that Cox currently offers cable telephony at a low price for its cable or data subscribers.<sup>326</sup> Customers who want cable telephony without Cox's cable or data offering pay a higher price for this service.<sup>327</sup> We are not persuaded by Sprint's argument. Cox has the capability to provide cable telephony service to 75 to 95 percent of Rhode Island customers, and a substantial number of those potential customers have in fact chosen Cox as their local telephone carrier.<sup>328</sup> The fact that a substantial number of residential customers have chosen Cox to provide their local phone service provides us with assurance that Cox is a meaningful competitor to Verizon.<sup>329</sup>

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<sup>322</sup> See *SWBT Texas Order*, 15 FCC Rcd at 18558-89, para. 419.

<sup>323</sup> See Sprint Comments at 7-11.

<sup>324</sup> See *Verizon Pennsylvania Order*, 16 FCC Rcd at 17487, para. 126.

<sup>325</sup> Sprint Comments at 8-9.

<sup>326</sup> *Id.* at 9.

<sup>327</sup> *Id.* at 8-9.

<sup>328</sup> Verizon Application at 9-10 (citing confidential portions).

<sup>329</sup> See Verizon Local Competition Report (citing confidential portion), paras. 31-32.

106. Sprint also argues that the fact that the BOCs have generally chosen not to compete against each other out of region (particularly against Verizon in Rhode Island) and the continuing bankruptcy of competitive LECs mean that the public interest is not served by granting Verizon section 271 approval in Rhode Island.<sup>330</sup> We reject these arguments. Factors beyond the control of the applicant, such as a weak economy, individual competing LEC and out-of-region BOC business plans, or poor business planning by potential competitors can explain the lack of entry into a particular market.

#### A. Price Squeeze Arguments

107. Given Verizon's substantial voluntary reduction of its Rhode Island switching rates, we find that AT&T, WorldCom, and ASCENT have not established the existence of a price squeeze in Rhode Island such that grant of Verizon's application would violate section 271's public interest requirement.<sup>331</sup> In *Sprint Communications Co. L.P. v. FCC*,<sup>332</sup> the Court of Appeals for the D.C. Circuit remanded to the Commission for further consideration how allegations of a price squeeze by a BOC should be examined as part of a section 271 application's public interest analysis. In the Commission's *SWBT Kansas/Oklahoma Order*, the Commission declined to consider allegations that a section 271 applicant should fail the 14-point checklist because competitors are unable to make a profit in the residential market via the UNE-Platform.<sup>333</sup> We need not address the issues raised in these proceedings in this order. We have examined AT&T and WorldCom's price squeeze claims<sup>334</sup> and, determined that, even if we accept their assertion that a price squeeze analysis is mandated by section 271's public interest requirement and their framework for determining whether a price squeeze exists, there is no price squeeze in Rhode Island. Using AT&T and WorldCom's calculation of anticipated profit margins on UNE-Platform-based, residential service in Rhode Island, these profit margins are significantly higher when recalculated using the new Rhode Island rates. Neither AT&T, WorldCom, nor ASCENT argued that there was a price squeeze in Rhode Island when the Rhode Island Commission adopted Verizon's February 21 switching rates. Therefore, we conclude that Verizon's Rhode Island UNE rates do not create a price squeeze such that grant of its section 271 application would not be in the public interest.

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<sup>330</sup> Sprint Comments at 4-7.

<sup>331</sup> AT&T Comments at 17, AT&T Reply Comments at 4-9; Letter from Peter D. Keisler, Sidley Austin Brown & Wood, LLP, to William F. Caton, Acting Secretary, Federal Communications Commission dated Feb. 8, 2002 at 2-13 and Supplemental Declaration of Michael Lieberman at 2-11, paras. 3-26 and various Exhibits; WorldCom Reply Comments at 1-5 and Reply Declaration of Vijetha Huffman at 3-4, paras. 7-9 and Attachment 1; ASCENT Comments at 2-4.

<sup>332</sup> *Sprint Communications Co. L.P. v. FCC*, 274 F.3d 549 (D.C. Cir. 2001).

<sup>333</sup> *SWBT Kansas/Oklahoma Order*, 16 FCC Rcd at 6269, para. 65 and 6280-81, para. 92.

<sup>334</sup> While ASCENT also raised price squeeze concerns, it did not supply specific alleged profit margins that we can evaluate in this proceeding.

## B. Assurance of Future Compliance

108. As set forth below, we find that the performance assurance plan (“PAP”) currently in place in Rhode Island will provide assurance that the local market will remain open after Verizon receives section 271 authorization.<sup>335</sup> We have examined certain key aspects of Verizon’s PAP and we find that the plan falls within a zone of reasonableness and is likely to provide incentives that are sufficient to foster post-entry checklist compliance. The Rhode Island Commission adopted a self-executing PAP, modeled on the PAP adopted in Massachusetts and New York, that exposes Verizon to the same level of liability as in Massachusetts.<sup>336</sup> While the Massachusetts and New York PAPs form the basis for the Rhode Island PAP, the Rhode Island PAP differs from those PAPs in certain details to reflect the specific concerns of competitive LECs doing business in Rhode Island.<sup>337</sup> The Rhode Island Commission decided to distribute penalty amounts differently among the metrics, including placing penalties on missed critical billing metrics and doubling the penalty amount allocated to UNE flow through. Additionally, the Rhode Island Commission ordered the creation of several new metrics including a critical measure for 2-wire digital loops and 2-wire xDSL loops. Also, the Rhode Island PAP has created small sample size tables for benchmark metrics with standards of 80 percent, 85 percent, 90 percent, and 95 percent, while the other PAPs only include such a table for metrics with a benchmark standard of 95 percent. We conclude that the Rhode Island modifications appear reasonable and do not detract from the overall effectiveness of the plan. The Rhode Island Commission also has the authority to reallocate the monthly distribution of bill credits among any provisions of the PAP and adopt new metrics if there is a specific concern to Rhode Island competitive LECs.<sup>338</sup>

109. As in prior section 271 orders, our conclusions are based on a review of several key elements in any performance remedy plan: total liability at risk in the plan; performance measurement and standards definitions; structure of the plan; self-executing nature of remedies in the plan; data validation and audit procedures in the plan; and accounting requirements.<sup>339</sup> We discuss only those elements that commenters have raised in the record before us.

110. We disagree with AT&T that the Rhode Island Commission’s PAP does not adequately address the issue of small samples. Specifically, AT&T is concerned that Verizon is temporarily using less accurate statistical tests (t tests and binomial tests) that are easier to

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<sup>335</sup> *Ameritech Michigan Order*, 12 FCC Rcd at 20748-50, paras. 393-98. We note that in all of the previous applications that we have granted to date, the applicant was subject to an enforcement plan administered by the relevant state commission to protect against backsliding after BOC entry into the long-distance market.

<sup>336</sup> *Rhode Island PUC C2C and PAP Order* at 35. The Massachusetts and Rhode Island PAPs place 39% of Verizon’s yearly net income for each state at risk.

<sup>337</sup> Rhode Island Commission Comments at 189.

<sup>338</sup> *Rhode Island PUC C2C and PAP Order* at 10, 44-45.

<sup>339</sup> See, e.g., *Verizon Massachusetts Order*, 16 FCC Rcd at 9121-25, paras. 240-49; *SWBT Kansas/Oklahoma Order*, 16 FCC Rcd at 6377-81, paras. 273-80.

administer, rather than the permutation test, which is computationally more difficult but is more accurate.<sup>340</sup> Additionally, AT&T questions why permutation tests are not being done in Rhode Island, given that AT&T believes that Verizon is currently doing permutation tests in an automated fashion in other states.<sup>341</sup> In its reply, Verizon clarifies that it is not currently using an automated permutation test in New York or any other former Bell Atlantic state.<sup>342</sup> Verizon further clarifies that it currently uses permutation tests in a manual, or case-by-case basis, when appropriate.<sup>343</sup> Verizon plans to automate the permutation test by the end of 2002.<sup>344</sup> Moreover, there is an exception provision in the Rhode Island PAP that “allows a CLEC to raise issues relating to a metric with a small sample size.”<sup>345</sup> And we are reassured by the Rhode Island Commission’s determination that it “will accept Verizon’s proposed statistical methodology but reserves the right to modify it in the future.”<sup>346</sup>

## VII. SECTION 271(d)(6) ENFORCEMENT AUTHORITY

111. Section 271(d)(6) of the Act requires Verizon to continue to satisfy the “conditions required for . . . approval” of its section 271 application after the Commission

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<sup>340</sup> “If the performance is worse for the CLEC than Verizon-RI, Verizon RI will use the t distribution or binomial (counted or measured) until such time as a permutation test can be run in an automated fashion.” Letter from Bruce P. Beausejour, Vice President and General Counsel – New England, Verizon, to Luly E. Massaro, Commission Clerk, Rhode Island Public Utilities Commission, Docket No. 3256 at Appendix D, 2. (filed Dec. 6, 2001) (*RI PAP*).

<sup>341</sup> “It is AT&T’s understanding that Verizon is currently running automated permutation tests for its wholesale operations in New York.” AT&T Comments at 18.

<sup>342</sup> Verizon Reply, App. A, Reply Declaration of Elaine M. Guerard, Julie A. Canny, and Beth A. Abesamis at para. 8 (Verizon Guerard/Canny/Abesamis Reply Decl.).

<sup>343</sup> Verizon Guerard/Canny/Abesamis Reply Decl. at paras. 7-8. And as Verizon further explained:

If Verizon’s performance for the CLECs is worse than Verizon’s performance for the retail comparison group, then:

- For average measurements (measured variables), Verizon will run a permutation test whenever the sample size for the CLEC observations or the retail comparison group is less than 30
- For percentage measurements (counted variables), Verizon will employ Fisher’s Exact Test, whenever the result of the equation  $n \cdot p(1-p)$  is less than 5 for either the CLECs or the retail comparison group (where  $n$  is the number of observations and  $p$  is the reported percentage).

Letter from Clint E. Odom, Director, Federal Regulatory, Verizon, to Magalie Roman Salas, Secretary, Federal Communications Commission, CC Docket No. 01-324 at 2 (filed Jan. 17, 2002).

<sup>344</sup> Verizon Guerard/Canny/Abesamis Reply Decl. at para. 9.

<sup>345</sup> *Rhode Island PUC C2C and PAP Order* at 43.

<sup>346</sup> *Rhode Island PUC C2C and PAP Order* at 43.

approves its application.<sup>347</sup> Thus, the Commission has a responsibility not only to ensure that Verizon is in compliance with section 271 today, but also that it remains in compliance in the future. As the Commission has already described the post-approval enforcement framework and its section 271(d)(6) enforcement powers in detail in prior orders, it is unnecessary to do so again here.<sup>348</sup>

112. Working in concert with the Rhode Island Commission, we intend to monitor closely Verizon's post-approval compliance for Rhode Island to ensure that Verizon does not "cease[] to meet any of the conditions required for [section 271] approval."<sup>349</sup> We stand ready to exercise our various statutory enforcement powers quickly and decisively in appropriate circumstances to ensure that the local market remains open in Rhode Island. We are prepared to use our authority under section 271(d)(6) if evidence shows market opening conditions have not been maintained.

113. We require Verizon to report to the Commission all Rhode Island carrier-to-carrier performance metrics results and Performance Assurance Plan monthly reports beginning with the first full month after the effective date of this Order, and for each month thereafter for one year unless extended by the Commission. These results and reports will allow us to review, on an ongoing basis, Verizon's performance to ensure continued compliance with the statutory requirements. We are confident that cooperative state and federal oversight and enforcement can address any backsliding that may arise with respect to Verizon's entry into the Rhode Island long distance market.<sup>350</sup>

## VIII. CONCLUSION

114. For the reasons discussed above, we GRANT Verizon's application for authorization under section 271 of the Act to provide in-region, interLATA services in the State of Rhode Island and Providence Plantations.

## IX. ORDERING CLAUSES

115. Accordingly, IT IS ORDERED that, pursuant to sections 4(i), 4(j), and 271 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), and 271, Verizon's

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<sup>347</sup> 47 U.S.C. § 271(d)(6).

<sup>348</sup> See, e.g., *SWBT Kansas/Oklahoma Order*, 16 FCC Rcd at 6382-84, paras. 283-85; *SWBT Texas Order*, 15 FCC Rcd at 18567-68, paras. 434-36; *Bell Atlantic New York Order*, 15 FCC Rcd at 4174-77, paras. 446-53.

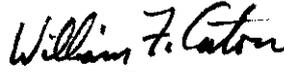
<sup>349</sup> 47 U.S.C. § 271(d)(6)(A).

<sup>350</sup> See, e.g., *Bell Atlantic-New York, Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, Order, 15 FCC Rcd 5413-23 (2000) (adopting consent decree between the Commission and Bell Atlantic that included provisions for Bell Atlantic to make a voluntary payment of \$3,000,000 to the United States Treasury, with additional payments if Bell Atlantic failed to meet specific performance standards and weekly reporting requirements to gauge Bell Atlantic's performance in correcting the problems associated with its electronic ordering systems).

application to provide in-region, interLATA service in the State of Rhode Island and Providence Plantations, filed on November 26, 2001, IS GRANTED.

116. IT IS FURTHER ORDERED that this Order SHALL BECOME EFFECTIVE March 4, 2002.

FEDERAL COMMUNICATIONS COMMISSION



William F. Caton  
Acting Secretary

**Appendix A**  
**Commenters in CC Docket No. 01-324**

**Comments**

Association of Communications Enterprises  
AT&T  
CTC Communications Corporation  
Department of Justice  
Rhode Island Public Utilities Commission  
Sprint Communications Company  
WorldCom

**Abbreviation**

ASCENT  
AT&T  
CTC  
Department of Justice  
Rhode Island Commission  
Sprint  
WorldCom

Letter Commenters in CC Docket No. 01-324

Rhode Island Urban-League  
Honorable Patrick J. Kennedy, Congressman  
Honorable Lincoln Almond, Governor of the State of Rhode Island  
Honorable Charles J. Fogarty, Lieutenant Governor of Rhode Island  
Sheldon Whitehouse, Attorney General of the State of Rhode Island

Reply Commenters

**Replies**

AT&T  
Rhode Island Public Utilities Commission  
Verizon  
WorldCom

AT&T  
Rhode Island Commission  
Verizon  
WorldCom

Supplemental Reply Comments

AT&T  
Association of Communications Enterprises

AT&T  
ASCENT



## Appendix B

### Rhode Island Performance Metrics

All data included here is taken from the Rhode Island Carrier-to-Carrier Reports. This table is provided as a reference tool for the convenience of the reader. No conclusions are to be drawn from the raw data contained in this table. Our analysis is based on the totality of the circumstances, such that we may use non-metric evidence, and may rely more heavily on some metrics more than others, in making our determination. The inclusion of these particular metrics in this table does not necessarily mean that we relied on all of these metrics nor that other metrics may not also be important in our analysis. Some metrics that we have relied on in the past and may rely on for a future application were not included here because there was no data provided for them (usually either because there was no activity, or because the metrics are still under development). Metrics with no retail analog provided are usually compared with a benchmark. Note that for some metrics during the period provided there may be changes in the metric definition, or changes in the retail analog applied, making it difficult to compare the data over time.

## AGGREGATE METRICS

Metric No.	Metric Name
<b>Preorder and OSS Availability:</b>	
MR-1-01	Create Trouble
MR-1-02	Status Trouble
MR-1-03	Modify Trouble
MR-1-04	Request Cancellation of Trouble
MR-1-05	Trouble Report History (by TN/Circuit)
MR-1-06	Test Trouble (POTS Only)
OR-1-02	% On Time LSRC – Flow Through
OR-1-04	% On Time LSRC/ASRC No Facility Check
OR-1-06	% On Time LSRC/ASRC - Facility Check
OR-1-08	% On Time ASRC No Facility Check (Non DS0, DS1 & DS3)
OR-1-10	% On Time ASRC Facility Check DS0
OR-1-12	% On Time FOC
OR-1-13	% On Time Design Layout Record (DLR)
OR-1-19	% On Time Resp. - Request for Inbound Augment Trunks
PO-1-01	Customer Service Record
PO-1-02	Due Date Availability
PO-1-03	Address Validation
PO-1-04	Product & Service Availability
PO-1-05	Telephone Number Availability & Reservation
PO-1-06	Facility Availability (Loop Qualification)
PO-1-07	Rejected Query
PO-1-08	% Timeouts
PO-1-09	Parsed CSR
PO-2-01	OSS Interf. Avail. – Total
PO-2-02	OSS Interf. Avail - Prime Time - Electronic Bonding
PO-2-03	OSS Interf. Avail - Non-Prime - Electronic Bonding
PO-4-01	% Notices Sent on Time - CLEC Orig.
PO-4-02	Change Mgmt. Notice - Delay 1-7 Days - CLEC Orig.
PO-8-01	Average Response Time - Manual Loop Qualification
PO-8-02	Average Response Time - Engineering Record Request

Metric No.	Metric Name
<b>Change Management, Billing, OS/DA, Interconnection and Collocation:</b>	
BI-1-02	% DUF in 4 Business Days
BI-2-01	Timeliness of Carrier Bill
BI-3-01	% Billing Adjustments - Dollars Adjusted
BI-3-02	% Billing Adjustments - Number of Adjustments
NP-1-01	% Final Trunk Groups Exceeding Blocking Standard
NP-1-02	% FTG Exceeding Blocking Std. –(No Exceptions)
NP-1-03	Number FTG Exceeding Blocking Std. – 2 Months
NP-1-04	Number FTG Exceeding Blocking Std. – 3 Months
NP-2-01	% On Time Response to Request for Physical Collocation
NP-2-02	% On Time Response to Request for Virtual Collocation
NP-2-03	Average Interval – Physical Collocation
NP-2-04	Average Interval – Virtual Collocation
NP-2-05	% On Time – Physical Collocation
NP-2-06	% On Time – Virtual Collocation
NP-2-07	Average Delay Days – Physical Collocation
NP-2-08	Average Delay Days – Virtual Collocation
<b>Ordering:</b>	
OR-2-02	% On Time LSR Reject – Flow Through
OR-2-04	% On Time LSR/ASR Reject No Facility Check
OR-2-06	% On Time LSR/ASR Reject Facility Check
OR-2-08	% On Time ASR Reject No Facility Check
OR-2-10	% On Time ASR Reject Facility Check
OR-2-11	Average Trunk ASR Reject Time
OR-2-12	% On Time Trunk ASR Reject
OR-3-01	% Rejects
OR-4-02	Completion Notice (BCN) – % On Time
OR-4-05	Work Completion Notice (PCN) – % On Time
OR-5-01	% Flow Through - Total
OR-5-03	% Flow Through Achieved
OR-6-01	% Accuracy – Order

Metric No.	Metric Name
OR-6-02	% Accuracy – Opportunities
OR-6-03	% Accuracy – LSRC
OR-7-01	% Order Confirmation/Rejects sent within 3 Business Days
<b>Provisioning:</b>	
PR-1-09	Av. Interval Offered – Total - EEL – Backbone
PR-2-01	Av. Interval Completed – Total No Dispatch
PR-2-02	Av. Interval Completed – Total Dispatch
PR-2-03	Average Interval Completed – Dispatch (1-5 Lines)
PR-2-04	Average Interval Completed - Dispatch (6-9 Lines)
PR-2-05	Average Interval Completed - Dispatch (>= 10 Lines)
PR-2-06	Av. Interval Completed – DS0
PR-2-07	Av. Interval Completed – DS1
PR-2-08	Av. Interval Completed – DS3
PR-2-09	Av. Interval Completed – Total - EEL – Loop
PR-2-18	Av. Interval Completed - Disconnects
PR-4-01	% Missed Appointment – Verizon – DS0
PR-4-02	Average Delay Days – Total
PR-4-03	% Missed Appointment – Customer
PR-4-04	% Missed Appointment – Verizon – Dispatch
PR-4-05	% Missed Appointment – Verizon – No Dispatch
PR-4-07	% On Time Performance – LNP Only
PR-4-08	% Missed Appt. – Customer – Due to Late Order Conf.
PR-4-14	% Completed On Time (with Serial Number)
PR-5-01	% Missed Appointment – Verizon – Facilities
PR-5-02	% Orders Held for Facilities > 15 Days
PR-5-03	% Orders Held for Facilities > 60 Days
PR-6-01	% Installation Troubles reported within 30 Days
PR-6-02	% Installation Troubles reported within 7 Days
PR-6-03	% Inst. Troubles reported w/ in 30 Days - FOK/TOK/CPE
PR-8-01	Open Orders in a Hold Status > 30 Days
PR-8-02	Open Orders in a Hold Status > 90 Days
PR-9-01	% On Time Performance – Hot Cut
PR-9-08	Average Duration of Service Interruption

Metric No.	Metric Name
<b>Maintenance and Repair:</b>	
MR-2-01	Network Trouble Report Rate
MR-2-02	Network Trouble Report Rate - Loop
MR-2-03	Network Trouble Report Rate - Central Office
MR-2-04	% Subsequent Reports
MR-2-05	% CPE/TOK/FOK Trouble Report Rate
MR-3-01	% Missed Repair Appointment – Loop
MR-3-02	% Missed Repair Appointment – Central Office
MR-3-03	% CPE/TOK/FOK - Missed Appointment
MR-3-04	% Missed Repair Appointment - No Double Dispatch
MR-3-05	% Missed Repair Appointment - Double Dispatch
MR-4-01	Mean Time To Repair – Total
MR-4-02	Mean Time To Repair – Loop Trouble
MR-4-03	Mean Time To Repair – Central Office Trouble
MR-4-04	% Cleared (all troubles) within 24 Hours
MR-4-05	% Out of Service > 2 Hours
MR-4-06	% Out of Service > 4 Hours
MR-4-07	% Out of Service > 12 Hours
MR-4-08	% Out of Service > 24 Hours
MR-5-01	% Repeat Reports within 30 Days

## DISAGGREGATED METRICS

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>PRE-ORDERING &amp; OSS AVAILABILITY</b>												
<b>PO-1 - Response Time OSS Ordering Interface</b>												
PO-1-01-6020	Customer Service Record - EDI	1.39	2.56	1.42	4.79	1.41	2.92	1.31	2.81	1.33	2.58	
PO-1-01-6030	Customer Service Record - CORBA	1.39	0.88	1.42	0.8	1.41	0.81	1.31	0.64	1.33	0.68	
PO-1-01-6050	Customer Service Record - Web GUI	1.39	2.98	1.42	2.8	1.41	2.84	1.31	2.65	1.33	2.63	
PO-1-02-6020	Due Date Availability - EDI	0.09	NA	0.09	NA	0.09	NA	0.07	NA	0.07	NA	
PO-1-02-6030	Due Date Availability - CORBA	0.09	NA	0.09	NA	0.09	NA	0.07	NA	0.07	NA	
PO-1-02-6050	Due Date Availability - Web GUI	0.09	2.32	0.09	2.34	0.09	2.47	0.07	2.19	0.07	2.26	
PO-1-03-6020	Address Validation - EDI	4.34	4.97	4.42	4.96	4.34	4.33	4.07	5.58	3.85	5.42	
PO-1-03-6030	Address Validation - CORBA	4.34	3.97	4.42	3.63	4.34	3.69	4.07	2.89	3.85	3.16	
PO-1-03-6050	Address Validation - Web GUI	4.34	4.35	4.42	4.44	4.34	4.88	4.07	4.43	3.85	4.89	
PO-1-04-6020	Product & Service Availability - EDI	9.9	NA	10.11	NA	10.07	NA	9.02	NA	8.48	NA	
PO-1-04-6030	Product & Service Availability - CORBA	9.9	NA	10.11	NA	10.07	NA	9.02	NA	8.48	NA	
PO-1-04-6050	Product & Service Availability - Web GUI	9.9	6.88	10.11	7.25	10.07	6.6	9.02	6.21	8.48	5.98	4
PO-1-05-6020	Telephone Number Availability & Reservation - EDI	5.26	NA	5.35	NA	5.23	NA	4.95	NA	5.37	NA	
PO-1-05-6030	Telephone Number Availability & Reservation - CORBA	5.26	NA	5.35	NA	5.23	3.12	4.95	3.69	5.37	3.52	3,4,5
PO-1-05-6050	Telephone Number Availability & Reservation - Web GUI	5.26	5.76	5.35	6.27	5.23	6.53	4.95	5.91	5.37	6.13	
PO-1-06-6020	Facility Availability (Loop Qualification) - EDI	2.45	NA	7.54	NA	2.58	NA	3.02	3.63	3.51	4.36	
PO-1-06-6030	Facility Availability (Loop Qualification) - CORBA	2.45	NA	7.54	NA	2.58	NA	3.02	NA	3.51	NA	
PO-1-06-6050	Facility Availability (Loop Qualification) - Web GUI	2.45	4.78	7.54	4.69	2.58	4.99	3.02	4.52	3.51	4.65	
PO-1-07-6020	Rejected Query - EDI	0.05	2.73	0.05	2.64	0.05	2.69	0.04	2.62	0.04	2.14	
PO-1-07-6030	Rejected Query - CORBA	0.05	0.64	0.05	0.68	0.05	0.68	0.04	0.6	0.04	0.61	
PO-1-07-6050	Rejected Query - Web GUI	0.05	3.44	0.05	3.51	0.05	3.52	0.04	3.38	0.04	3.2	
PO-1-08-6020	% Timeouts - EDI		0.52		0.95		0		0		0.23	
PO-1-08-6030	% Timeouts - CORBA		0		0		0		0		0	
PO-1-08-6050	% Timeouts - Web GUI		0.31		0.63		0.97		0.32		0.04	
PO-1-09-6020	Parsed CSR - EDI	1.39	4.03	1.42	2.25	1.41	2.06	1.31	1.85	1.33	1.77	
PO-1-09-6030	Parsed CSR - CORBA	1.39	0.28	1.42	0.3	1.41	0.32	1.31	0.31	1.33	0.27	
<b>PO-2 - OSS Interface Availability</b>												
PO-2-01-6020	OSS Interf. Avail. - Total - EDI		99.77		99.99		99.97		99.97		100	
PO-2-01-6030	OSS Interf. Avail. - Total - CORBA		99.89		99.98		99.9		99.95		99.96	
PO-2-01-6040	OSS Interf. Avail. - Total - Maint. Web GUI (RETAS)		99.07		99.96		96.05		99.4		99.85	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
PO-2-01-6050	OSS Interf. Avail. - Total - Pre-order/Order WEB GUI		99.07		99.96		96.05		99.4		99.85	
PO-2-01-6060	OSS Interf. Avail. - Total - Electronic Bonding		99.93		99.93		100		100		100	
PO-2-02-6020	OSS Interf. Avail. - Prime Time - EDI		100		100		99.99		100		100	
PO-2-02-6030	OSS Interf. Avail. - Prime Time - CORBA		100		100		99.99		100		100	
PO-2-02-6040	OSS Interf. Avail. - Prime Time - Maint. Web GUI (RETAS)		99.93		100		98.12		99.54		100	
PO-2-02-6050	OSS Interf. Avail. - Prime Time - Pre-order/Order WEB GUI		99.93		100		98.12		99.54		100	
PO-2-02-6060	OSS Interf. Avail. - Prime Time - Electronic Bonding		99.89		99.9		100		100		100	
PO-2-03-6020	OSS Interf. Avail. - Non-Prime - EDI		99.41		99.96		99.93		99.91		100	
PO-2-03-6030	OSS Interf. Avail. - Non-Prime - CORBA		99.71		99.94		99.76		99.86		99.89	
PO-2-03-6040	OSS Interf. Avail. - Non-Prime - Maint. Web GUI (RETAS)		97.75		99.88		92.94		99.14		99.59	
PO-2-03-6050	OSS Interf. Avail. - Non-Prime - Pre-order/Order WEB GUI		97.75		99.88		92.94		99.14		99.59	
PO-2-03-6060	OSS Interf. Avail. - Non-Prime - Electronic Bonding		100		100		100		100		100	
<b>PO-8 - Manual Loop Qualification</b>												
PO-8-01-2000	Average Response Time - Manual Loop Qualification		UD		UD		NEF		NEF		NEF	
PO-8-02-2000	Average Response Time - Engineering Record Request		NA		NA		NA		NA		NA	
<b>Change Notification</b>												
<b>PO-4 - Timeliness of Change Management Notice</b>												
PO-4-01-6611	% Notices Sent on Time - Emergency Maint.		100		100		100		100		100	1,2,3,4
PO-4-01-6621	% Notices Sent on Time - Regulatory		100		100		NA		NA		NA	1,2
PO-4-01-6631	% Notices Sent on Time - Industry Standard		NA		100		NA		NA		NA	
PO-4-01-6641	% Notices Sent on Time - Verizon Orig.		NA		100		NA		NA		NA	2
PO-4-01-6651	% Notices Sent on Time - CLEC Orig.		100		NA		NA		NA		NA	1
<b>Change Confirmation</b>												
<b>PO-4 - Timeliness of Change Management Notice</b>												
PO-4-02-6622	Change Mgmt. Notice - Delay 1-7 Days - Regulatory		NA		NA		NA		NA		NA	
PO-4-02-6632	Change Mgmt. Notice - Delay 1-7 Days - Ind. Std.		NA		NA		NA		NA		NA	
PO-4-02-6642	Change Mgmt. Notice - Delay 1-7 Days - Verizon Orig.		NA		NA		NA		NA		NA	
PO-4-02-6652	Change Mgmt. Notice - Delay 1-7 Days - CLEC Orig.		NA		NA		NA		NA		NA	
<b>Trouble Reporting (OSS)</b>												
<b>MR-1 - Response Time OSS Maintenance Interface</b>												
MR-1-01-2000	Create Trouble	6.52	6.47	6.8	6.62	6.84	6.45	7.03	6.06	7.19	3.47	
MR-1-02-2000	Status Trouble	5.05	NA	5.22	3.47	4.98	NA	4.79	NA	4.9	0.61	2
MR-1-03-2000	Modify Trouble	6.47	NA	6.72	NA	6.76	NA	6.93	NA	7.05	NA	
MR-1-04-2000	Request Cancellation of Trouble	7.65	8.42	7.89	5.88	7.94	NA	8.14	NA	8.36	NA	1,2
MR-1-05-2000	Trouble Report History (by TN/Circuit)	0.61	1.7	0.65	1.89	0.62	1.96	0.46	1.63	0.41	0.92	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
MR-1-06-2000	Test Trouble (POTS Only)-RETAIL only	58.8	49.59	57.04	52.76	62.41	52.13	62.6	55.44	56.04	45.64	
<b>BILLING</b>												
<b>BI-1 - Timeliness of Daily Usage Feed</b>												
BI-1-02-2030	% DUF in 4 Business Days		98.75		99.93		99.79		99.58		99.93	
<b>BI-2 - Timeliness of Carrier Bill</b>												
BI-2-01-2000	Timeliness of Carrier Bill		99.36		100							
BI-2-01-2030	Timeliness of Carrier Bill						98.05		99.4		99.44	
<b>BI-3 - Billing Accuracy</b>												
BI-3-01-2030	% Billing Adjustments - Dollars Adjusted					0.3	0	0.64	0.56	0.72	0.08	
BI-3-02-2000	% Billing Adjustments - Number of Adjustments	0.25	0.08	0.23	0.03							
BI-3-02-2030	% Billing Adjustments - Number of Adjustments					0.21	0	0.23	0.09	0.2	0.08	
<b>RESALE Ordering</b>												
<b>POTS &amp; Pre-qualified Complex - Electronically Submitted</b>												
<b>OR-1 - Order Confirmation Timeliness</b>												
OR-1-02-2320	% On Time LSRC - Flow Through		99.68		99.64		99.33		100		99.4	
OR-1-04-2100	% On Time LSRC/ASRC No Facility Check		96.86		99.27		97.38		98.53		100	
OR-1-06-2320	% On Time LSRC/ASRC Facility Check		100		100		100		100		100	
<b>OR-2 - Reject Timeliness</b>												
OR-2-02-2320	% On Time LSR Reject - Flow Through		98.55		100		99.7		100		99.44	
OR-2-04-2320	% On Time LSR/ASR Reject No Facility Check		92.15		91.75		93.2		91.52		100	
OR-2-06-2320	% On Time LSR/ASR Reject Facility Check		100		0		100		100		100	1,2,3
<b>2 Wire Digital Services</b>												
<b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b>												
OR-1-04-2341	% On Time LSRC/ASRC No Facility Check		92.31		100		100		100		100	2,3,4,5
OR-1-06-2341	% On Time LSRC/ASRC Facility Check		NA		NA		100		NA		NA	3
<b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>												
OR-2-04-2341	% On Time LSR/ASR Reject No Facility Check		100		100		100		100		100	2,4,5
OR-2-06-2341	% On Time LSR/ASR Reject Facility Check		NA		NA		NA		NA		NA	
<b>POTS / Special Services - Aggregate</b>												
<b>OR-3 - Percent Rejects</b>												
OR-3-01-2000	% Rejects		35.68		30.79		29.25		29.56		34.35	

Metric Number	Metric Name	July		August		September		October		November		Notes	
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC		
<b>OR-4 - Timeliness of Completion Notification</b>													
OR-4-02-2000	Completion Notice (BCN) - % On Time		98.29		98.81		98.69		83.78		86.44		
OR-4-05-2000	Work Completion Notice (PCN) - % On Time		99.85		100		99.85		100		99.86		
<b>OR-5 - Percent Flow-Through</b>													
OR-5-01-2000	% Flow Through - Total		54.54		49.26		50.81		56.52		46.24		
OR-5-03-2000	% Flow Through Achieved		93.32		97.09		97.95		97.24		97.41		
<b>OR-6 - Order Accuracy</b>													
OR-6-01-2000	% Accuracy - Orders		90.26		93.61		93.31		93.7		90.29		
OR-6-02-2000	% Accuracy - Opportunities		98.12		99.04		99.23		99.2		98.57		
OR-6-03-2000	% Accuracy - LSRC		99.29		100		100		99.77		99.5		
<b>OR-7 - Order Completeness</b>													
OR-7-01-2000	% Order Confirmation/Rejects sent within 3 Business Days		99.84		99.63		99.59		99.56		99.45		
<b>Special Services - Electronically Submitted</b>													
<b>OR-1 - Order Confirmation Timeliness</b>													
OR-1-04-2210	% On Time LSRC/ASRC No Facility Check DS0		NA		NA		NA		NA		NA		
OR-1-04-2211	% On Time LSRC/ASRC No Facility Check DS1		NA		NA		NA		NA		NA		
OR-1-04-2213	% On Time LSRC/ASRC No Facility Check DS3		NA		NA		NA		NA		NA		
OR-1-04-2214	% On Time LSRC/ASRC No Facility Check (Non DS0, DS1, & DS3)		94.12		100		100		100		100		
OR-1-06-2210	% On Time LSRC/ASRC Facility Check DS0		NA		NA		NA		NA		NA		
OR-1-06-2211	% On Time LSRC/ASRC Facility Check DS1		NA		NA		NA		NA		NA		
OR-1-06-2213	% On Time LSRC/ASRC Facility Check DS3		NA		NA		NA		NA		NA		
OR-1-06-2214	% On Time LSRC/ASRC Facility Check (Non DS0, DS1, & DS3)		100		100		100		75		100	1,2,3,4,5	
<b>OR-2 - Reject Timeliness</b>													
OR-2-04-2200	% On Time LSR/ASR Reject No Facility Check		81.25		100		90.48		90		100		
OR-2-06-2200	% On Time LSR/ASR Reject Facility Check		NA		NA		NA		NA		NA		
<b>POTS - Provisioning - Total</b>													
<b>PR-2 - Average Completed Interval</b>													
PR-2-04-2100	Average Interval Completed - Dispatch (6-9 Lines)		7.5	6	3	7	2	8.67	3.5	NA	3.13	4.33	1,2,3
PR-2-05-2100	Average Interval Completed - Dispatch (>= 10 Lines)		NA	5.75	3	3	4.33	NA	3.5	7.67	NA	4	1,2,4,5
<b>PR-4 - Missed Appointments</b>													
PR-4-02-2100	Average Delay Days - Total		1.82	1.8	2.27	13.5	2.17	1	3.65	NA	2.51	NA	1,2,3
PR-4-03-2100	% Missed Appointment - Customer		1.39	0.95	1.24	1.32	1.47	1.1	1.18	1.64	1.44	1.72	
PR-4-04-2100	% Missed Appointment - Verizon - Dispatch		3.23	5.56	3.85	2.27	4.63	1.12	3.47	0	2.41	0	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
PR-4-05-2100	% Missed Appointment – Verizon – No Dispatch	0.06	0	0.04	0	0.02	0	0.02	0	0	0	
PR-4-08-2100	% Missed Appt. – Customer – Late Order Conf.		0		0		0		0		0	
<b>PR-6 - Installation Quality</b>												
PR-6-01-2100	% Installation Troubles reported within 30 Days	4.55	2.39	3.78	2.16	4.06	2.05	4.49	1.57	3.56	2.43	
PR-6-02-2100	% Installation Troubles reported within 7 Days	2.52	1.04	2.19	1.35	2.38	0.92	2.74	1.05	2.17	1.79	
PR-6-03-2100	% Inst. Troubles reported w/ in 30 Days - FOK/TOK/CPE	3.06	2.24	3.22	1.71	3.13	1.64	3.07	2.17	2.86	2.68	
<b>PR-8 - Open Orders in a Hold Status</b>												
PR-8-01-2100	Open Orders in a Hold Status > 30 Days	0	1.91	0	0.83	0	0.78	0	0.15	0	0	
PR-8-02-2100	Open Orders in a Hold Status > 90 Days	0	1.91	0	0.83	0	0.78	0	0.15	0	0	
<b>POTS - Business</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-01-2110	Average Interval Completed – Total No Dispatch	0.27	1.95	0.23	1.37	0.45	1.68	0.48	1.38	0.47	1.1	
PR-2-03-2110	Average Interval Completed – Dispatch (1-5 Lines)	2.4	3.95	2.51	5.63	4.28	5.19	3.56	4.57	3.5	3.76	
<b>POTS - Residence</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-01-2120	Average Interval Completed – Total No Dispatch	0.36	0.6	0.35	0.74	0.38	1.26	0.33	1.05	0.29	0.8	
PR-2-03-2120	Average Interval Completed – Dispatch (1-5 Lines)	3.51	4.58	3.55	5.86	3.36	7.05	3.59	8.45	3.11	4.87	
<b>POTS &amp; Complex Aggregate</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-18-2103	Average Interval Completed – Disconnects	0.29	0.12	2.89	1.97	3.01	2.11	2.85	1.89	2.81	2.06	
<b>2-Wire Digital Services</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-01-2341	Average Interval Completed – Total No Dispatch	0.94	1	0.25	NA	1.5	0.5	0.73	1.5	2	1.67	1,3,4,5
PR-2-02-2341	Average Interval Completed – Total Dispatch	NA	12	12	6.5	3.57	NA	5.5	5.67	5.38	NA	1,2,4
<b>PR-4 - Missed Appointments</b>												
PR-4-02-2341	Average Delay Days – Total	NA	NA	3	NA	1	NA	2.5	7	2.67	NA	4
PR-4-03-2341	% Missed Appointment – Customer	4	0	16.22	0	21.05	16.67	11.43	16.67	12.5	0	
PR-4-04-2341	% Missed Appointment – Verizon – Dispatch	0	0	4.17	0	0	0	8.33	25	6.25	0	1,2,3,4,5
PR-4-05-2341	% Missed Appointment – Verizon – No Dispatch	0	0	0	0	0	0	0	0	0	0	1,2,3,4,5
PR-4-08-2341	% Missed Appt. – Customer – Late Order Conf.		0		0		0		0		0	1,2,3,4,5
<b>PR-6 - Installation Quality</b>												
PR-6-01-2341	% Install. Troubles Reported within 30 Days	0	0	5.88	0	0	0	0	0	0	0	1,2
PR-6-03-2341	% Install. Troubles Reported w/in 30 Days - FOK/TOK/CPE	0	0	6.72	25	6.12	0	0.85	0	2.59	100	1,2

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Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>PR-8 - Open Orders in a Hold Status</b>												
PR-8-01-2341	Open Orders in a Hold Status > 30 Days	0	0	0	0	0	0	0	0	0	0	1,2,3,4,5
PR-8-02-2341	Open Orders in a Hold Status > 90 Days	0	0	0	0	0	0	0	0	0	0	1,2,3,4,5
<b>Special Services - Provisioning</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-01-2200	Average Interval Completed - Total No Dispatch	55.3	NA	6.2	NA	15	NA	13.18	1	33.5	10	4,5
PR-2-02-2200	Average Interval Completed - Total Dispatch	12.7	10	19.58	12.5	12.96	NA	16.33	9.5	18.1	NA	1,2,4
PR-2-06-2200	Average Interval Completed - DS0	7.4	11	12.12	12.5	9.77	NA	12.09	6.67	11.75	10	1,2,4,5
PR-2-07-2200	Average Interval Completed - DS1	16.4	NA	27.06	NA	15.68	NA	18.23	NA	25.13	NA	
PR-2-08-2200	Average Interval Completed - DS3	146	NA	NA	NA	NA	NA	NA	NA	NA	NA	
PR-2-18-2200	Average Interval Completed - Disconnects	NA	NA	13.83	8.5	10.85	6	10.45	6	10.33	5.33	2,3,4,5
<b>PR-4 - Missed Appointments</b>												
PR-4-01-2200	% Missed Appointment - Verizon - Total	12.5	0	15.25	0							1,2
PR-4-01-2210	% Missed Appointment - Verizon - DS0	0	0	0	0	4.76	NA	0	0	4.76	0	1,2,4,5
PR-4-01-2211	% Missed Appointment - Verizon - DS1	11.1	NA	45	NA	7.14	0	22.03	NA	8.33	0	3
PR-4-01-2213	% Missed Appointment - Verizon - DS3	100	NA	NA	NA	NA	NA	NA	NA	NA	NA	
PR-4-01-2214	% Missed Appointment - Verizon - Special Other	14.3	0	0	NA	NA	NA	0	NA	NA	NA	1
PR-4-02-2200	Average Delay Days - Total	28.6	NA	12.33	NA	6.33	NA	139.3	NA	26.5	NA	
PR-4-03-2200	% Missed Appointment - Customer	20	0	10.17	25	14.29	100	17.65	0	45.45	50	
PR-4-08-2200	% Missed Appt. - Customer - Due to Late Order Conf.		0		0		0		0		0	1,2,3,4,5
<b>PR-6- Installation Quality</b>												
PR-6-01-2200	% Installation Troubles reported within 30 Days	1.4	0	4.15	0	1.42	1.92	2.01	23.53	8.15	4	1,2
PR-6-03-2200	% Inst. Troubles reported w/ in 30 Days - FOK/TOK/CPE	3.26	0	0.38	37.5	0.41	1.92	0.4	5.88	5.19	12	1,2
<b>PR-8 - Open Orders in a Hold Status</b>												
PR-8-01-2200	Open Orders in a Hold Status > 30 Days	35	0	20.34	0	24.49	0	1.96	0	0	0	1,2,3,4,5
PR-8-02-2200	Open Orders in a Hold Status > 90 Days	35	0	18.64	0	22.45	0	0.98	0	0	0	1,2,3,4,5
<b>POTS - Maintenance</b>												
<b>MR-2 - Trouble Report Rate</b>												
MR-2-02-2100	Network Trouble Report Rate - Loop	1.15	0.45	1.31	0.5	1.01	0.38	1	0.45	0.76	0.37	
MR-2-03-2100	Network Trouble Report Rate - Central Office	0.09	0.06	0.09	0.05	0.06	0.07	0.07	0.03	0.07	0.04	
MR-2-04-2100	% Subsequent Reports	17.1	5.52	18.13	7.87	15.11	4.93	11.07	4.11	12.95	7.63	
MR-2-05-2100	% CPE/TOK/FOK Trouble Report Rate	0.91	0.49	1.08	0.45	0.79	0.35	0.7	0.28	0.57	0.32	
<b>MR-3 - Missed Repair Appointments</b>												
MR-3-01-2110	% Missed Repair Appointment - Loop Bus.	8.44	7.69	9.41	11.46	6.95	1.32	7.85	1.39	6.78	3.57	
MR-3-01-2120	% Missed Repair Appointment - Loop Res.	8.32	1.69	7.64	3.85	5.03	5.26	3.97	5.08	4.63	1.89	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
MR-3-02-2110	% Missed Repair Appointment – Central Office Bus.	9.33	0	8	0	10.38	0	5.43	0	3.42	11.11	4
MR-3-02-2120	% Missed Repair Appointment – Central Office Res.	3.54	50	5.36	0	2.14	0	2.95	0	2.79	0	1,2,3,4,5
MR-3-03-2100	% CPE/TOK/FOK - Missed Appointment	5.2	2.68	4.86	3.73	3.62	4.85	2.97	2.41	3.79	2.15	
MR-3-04-2100	% Missed Repair Appointment - No Double Dispatch	6.29	2.14	5.33	3.68	3.56	1.65	2.98	2.5	3.37	1.82	
MR-3-05-2100	% Missed Repair Appointment - Double Dispatch	38.1	44.44	33.55	40	25.7	11.11	26.46	9.09	27.11	22.22	
<b>MR-4 - Trouble Duration Intervals</b>												
MR-4-01-2100	Mean Time To Repair – Total	23.8	15.45	23.09	16.86	22.44	15.33	14.8	12.28	16.28	11.29	
MR-4-02-2110	Mean Time To Repair – Loop Trouble - Bus.	14.4	12.31	11.79	15.78	11.45	13.52	10.59	11.77	11.01	11.71	
MR-4-02-2120	Mean Time To Repair – Loop Trouble - Res.	26.6	22.28	25.86	23.36	25.18	25.08	16.17	14.51	18.27	12.82	
MR-4-03-2110	Mean Time To Repair – Central Office Trouble - Bus.	7.91	2.39	7.5	2.75	8.19	3.97	6.69	2.52	5.17	3.19	4
MR-4-03-2120	Mean Time To Repair – Central Office Trouble - Res.	8.56	34.41	11.86	0.45	10.04	5.55	7.1	0.23	5.83	0.42	1,2,3,4,5
MR-4-04-2100	% Cleared (all troubles) within 24 Hours	58.7	79.87	61.24	79.88	65.74	83.7	82.46	89.29	81.52	92.56	
MR-4-06-2100	% Out of Service > 4 Hours	85.3	71.54	81.99	79.84	79.76	64.71	69.14	59.68	70.23	55.21	
MR-4-07-2100	% Out of Service > 12 Hours	65.2	52.31	61.83	60.47	58.87	45.38	46.7	46.77	51.22	37.5	
MR-4-08-2110	% Out of Service > 24 Hours - Bus.	12.1	9.33	8.04	13.25	8.08	8.54	7.25	5.8	8.24	5.08	
MR-4-08-2120	% Out of Service > 24 Hours - Res.	45.5	34.55	42.5	39.13	36.99	32.43	18.3	16.36	19.76	10.81	
<b>MR-5 - Repeat Trouble Reports</b>												
MR-5-01-2100	% Repeat Reports within 30 Days	17.4	12.34	16.51	10.98	15.95	8.15	15.61	12.86	13.64	13.22	
<b>2-Wire Digital Services - Maintenance</b>												
<b>MR-2 - Trouble Report Rate</b>												
MR-2-02-2341	Network Trouble Report Rate – Loop	0.77	1.21	0.67	0.61	0.31	0	0.21	0	0.42	1.12	
MR-2-03-2341	Network Trouble Report Rate – Central Office	0.15	0	0.41	0	0.21	1.18	0.16	0	0.26	0.56	
MR-2-04-2341	% Subsequent Reports	21.7	0	19.23	0	16.67	33.33	12.5	NA	27.78	25	1,2,3
MR-2-05-2341	% CPE/TOK/FOK Trouble Report Rate	1.33	0.61	2.52	3.03	2.27	2.37	3.16	0.59	2	6.18	
<b>MR-3 - Missed Repair Appointments</b>												
MR-3-01-2341	% Missed Repair Appointment – Loop	40	0	15.38	100	50	NA	75	NA	50	50	1,2
MR-3-02-2341	% Missed Repair Appointment – Central Office	0	NA	37.5	NA	0	0	33.33	NA	20	0	3
MR-3-03-2341	% CPE/TOK/FOK - Missed Appointment	19.2	0	18.37	0	4.55	0	6.56	0	13.16	0	1,2,3,4
MR-3-04-2341	% Missed Repair Appointment - No Double Dispatch	28.6	NA	14.29	NA	25	0	0	NA	25	0	3
MR-3-05-2341	% Missed Repair Appointment - Double Dispatch	50	0	50	100	50	NA	80	NA	57.14	50	1,2
<b>MR-4 - Trouble Duration Intervals</b>												
MR-4-01-2341	Mean Time To Repair – Total	25.9	12.12	15.22	74.38	13.7	1.12	19.2	NA	14.44	21.23	1,2,3
MR-4-02-2341	Mean Time To Repair – Loop Trouble	30.5	12.12	17.35	74.38	20.25	NA	25.88	NA	18.79	24.62	1,2
MR-4-03-2341	Mean Time To Repair – Central Office Trouble	2.85	NA	11.76	NA	3.87	1.12	10.28	NA	7.47	14.43	3
MR-4-04-2341	% Cleared (all troubles) within 24 Hours	72.2	100	80.95	0	80	100	57.14	NA	69.23	66.67	1,2,3

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
MR-4-07-2341	% Out of Service > 12 Hours	100	0	100	NA	25	0	50	NA	100	NA	1,3
MR-4-08-2341	% Out of Service > 24 Hours	50	0	0	NA	25	0	50	NA	0	NA	1,3
<b>MR-5 - Repeat Trouble Reports</b>												
MR-5-01-2341	% Repeat Reports within 30 Days	44.4	50	23.81	0	40	0	28.57	NA	38.46	33.33	1,2,3
<b>Special Services - Maintenance</b>												
<b>MR-2 - Trouble Report Rate</b>												
MR-2-01-2200	Network Trouble Report Rate	0.29	0.27	0.29	0.3	0.2	0.21	0.27	0.33	0.23	0.2	
MR-2-05-2200	% CPE/TOK/FOK Trouble Report Rate	0.44	0.37	0.34	0.64	0.24	0.21	0.33	0.63	0.33	0.2	
<b>MR-4 - Trouble Duration Intervals</b>												
MR-4-01-2200	Mean Time To Repair – Total	5.5	3.31	5.39	4.74	5.44	7.16	5.04	6.53	4.99	6.21	1,3,5
MR-4-04-2200	% Cleared (all troubles) within 24 Hours	98.2	100	100	100	99.1	100	98.64	100	100	100	1,3,5
MR-4-06-2200	% Out of Service > 4 Hours	43.6	25	55.28	28.57	47.27	66.67	46.58	55.56	50	83.33	1,2,3,5
MR-4-08-2200	% Out of Service > 24 Hours	1.84	0	0	0	0.91	0	1.37	0	0	0	1,2,3,5
<b>MR-5 - Repeat Trouble Reports</b>												
MR-5-01-2200	% Repeat Reports within 30 Days	23.8	25	18.52	33.33	24.32	16.67	22.45	10	20.77	0	1,3,5
<b>UNBUNDLED NETWORK ELEMENTS (UNEs)</b>												
<b>UNE Ordering</b>												
<b>Platform</b>												
<b>OR-1 - Order Confirmation Timeliness</b>												
OR-1-02-3143	% On Time LSRC – Flow Through		99.1		98.98		99.56		100		99.71	
OR-1-04-3143	% On Time LSRC/ASRC No Facility Check		95.45		98.88		94.32		97.22		95.31	
OR-1-06-3143	% On Time LSRC/ASRC Facility Check		100		100		100		100		100	1,2,3,4
<b>OR-2 - Reject Timeliness</b>												
OR-2-02-3143	% On Time LSR Reject – Flow Through		99.24		98.87		100		99.4		93.63	
OR-2-04-3143	% On Time LSR/ASR Reject No Facility Check		100		98.8		100		100		100	
OR-2-06-3143	% On Time LSR/ASR Reject Facility Check		NA		NA		100		100		100	3,4,5
<b>OR-6 - Order Accuracy</b>												
OR-6-01-3143	% Accuracy - Orders		90.16		94.26		97.64		93.4		90.28	
OR-6-02-3143	% Accuracy - Opportunities		98.09		99.36		99.75		98.97		98.61	
OR-6-03-3143	% Accuracy - LSRC		98.33		99.32		99.43		98.62		89.47	
<b>OR-7 - Order Completeness</b>												
OR-7-01-3143	% Order Confirmation/Rejects sent within 3 Business Days		99.74		100		100		99.03		99.67	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>Loop/Pre-qualified Complex/LNP</b>												
<b>OR-1 - Order Confirmation Timeliness</b>												
OR-1-02-3331	% On Time LSRC – Flow Through		99.74		99.45		99.91		99.92		99.81	
OR-1-04-3331	% On Time LSRC/ASRC No Facility Check		98.4		99.19		96.79		98.92		99.13	
OR-1-06-3331	% On Time LSRC/ASRC Facility Check		99.15		100		98.82		100		97.89	
<b>OR-2 - Reject Timeliness</b>												
OR-2-02-3331	% On Time LSR Reject – Flow Through		100		99.8		100		99.81		100	
OR-2-04-3331	% On Time LSR/ASR Reject No Facility Check		89.15		95.5		81.78		93.9		100	
OR-2-06-3331	% On Time LSR/ASR Reject Facility Check		94.44		91.67		100		91.18		100	3
<b>OR-6 - Order Accuracy</b>												
OR-6-01-3331	% Accuracy - Orders										95.47	
OR-6-01-3332	% Accuracy - Orders		93.92		98.35		98.56		98.27			
OR-6-02-3331	% Accuracy – Opportunities										99.12	
OR-6-02-3332	% Accuracy – Opportunities		98.84		99.75		99.79		99.63			
OR-6-03-3331	% Accuracy – LSRC										100	
OR-6-03-3332	% Accuracy – LSRC		94.29		99.78		99.74		99.54			
<b>OR-7 - Order Completeness</b>												
OR-7-01-3331	% Order Confirmation/Rejects sent within 3 Business Days		99.94		99.85		99.9		99.83		99.82	
<b>2 Wire Digital Services</b>												
<b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b>												
OR-1-04-3341	% On Time LSRC/ASRC No Facility Check		93.88		100		81.82		100		100	5
OR-1-06-3341	% On Time LSRC/ASRC Facility Check		NA		NA		NA		NA		NA	
<b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>												
OR-2-04-3341	% On Time LSR/ASR Reject No Facility Check		100		100		100		100		100	3,4,5
OR-2-06-3341	% On Time LSR/ASR Reject Facility Check		NA		NA		NA		NA		NA	
<b>2 Wire xDSL Loops</b>												
<b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b>												
OR-1-04-3342	% On Time LSRC/ASRC- No Facility Check		98.53		97.73		97.78		100		100	
OR-1-06-3342	% On Time LSRC/ASRC - Facility Check		NA		NA		NA		NA		NA	
<b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>												
OR-2-04-3342	% On Time LSR/ASR Reject- No Facility Check		100		100		100		92.86		100	
OR-2-06-3342	% On Time LSR/ASR Reject Facility Check		NA		NA		NA		NA		NA	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>2 Wire xDSL Line Sharing</b>												
<b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b>												
OR-1-04-3343	% On Time LSRC/ASRC - No Facility Check		NA		NA		NA		NA		NA	
OR-1-06-3343	% On Time LSRC/ASRC - Facility Check		NA		NA		NA		NA		NA	
<b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>												
OR-2-04-3343	% On Time LSR/ASR Reject- No Facility Check		NA		NA		NA		NA		NA	
OR-2-06-3343	% On Time LSR/ASR Reject Facility Check		NA		NA		NA		NA		NA	
<b>POTS / Special Services - Aggregate</b>												
<b>OR-3 - Percent Rejects</b>												
OR-3-01-3000	% Rejects (ASRs + LSRs)		18.03		16.64		15.6		16.48		17.6	
<b>OR-4 - Timeliness of Completion Notification</b>												
OR-4-02-3000	Completion Notice (BCN) - % On Time		99.85		99.74		99.75		99.04		99.36	
OR-4-05-3000	Work Completion Notice (PCN) - % On Time		100		100		100		100		100	
<b>OR-5 - Percent Flow-Through</b>												
OR-5-01-3000	% Flow Through - Total (ASRs + LSRs)		60.99		69.7		72.32		76.38		79.7	
OR-5-03-3000	% Flow Through Achieved		94.23		97.46		97.13		97.66		97.78	
<b>Special Services - Electronically Submitted</b>												
<b>OR-1 - Order Confirmation Timeliness (ASRs + LSRs)</b>												
OR-1-04-3210	% On Time LSRC/ASRC No Facility Check DS0		NA		NA		NA		NA		NA	
OR-1-04-3211	% On Time LSRC/ASRC No Facility Check DS1		NA		NA		NA		NA		NA	
OR-1-04-3213	% On Time LSRC/ASRC No Facility Check DS3		NA		NA		NA		NA		NA	
OR-1-04-3214	% On Time LSRC/ASRC No Facility Check (Non DS0, DS1, & DS3)		100		100		100		98.94		98.43	1,2
OR-1-06-3210	% On Time LSRC/ASRC Facility Check DS0		NA		NA		NA		NA		NA	
OR-1-06-3211	% On Time LSRC/ASRC Facility Check DS1		72.73		80		92.86		78.57		100	
OR-1-06-3213	% On Time LSRC/ASRC Facility Check DS3		NA		NA		NA		100		NA	4
OR-1-06-3214	% On Time LSRC/ASRC Facility Check (Non DS0, DS1 & DS3)		100		NA		100		100		97.87	1,3
<b>OR-2 - Reject Timeliness (ASRs + LSRs)</b>												
OR-2-04-3200	% On Time LSR/ASR Reject No Facility Check		100		NA		66.67		100		100	1,3
OR-2-06-3200	% On Time LSR/ASR Reject Facility Check		85.71		100		100		100		100	1,2,3
<b>Special Services - FAX/MAIL Submitted</b>												
<b>OR-1 - Order Confirmation Timeliness</b>												
OR-1-08-3210	% On Time ASRC No Facility Check DS0		NA		NA		NA		NA		NA	
OR-1-08-3211	% On Time ASRC No Facility Check DS1		NA		NA		NA		NA		NA	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
OR-1-08-3213	% On Time ASRC No Facility Check DS3		NA		NA		NA		NA		NA	
OR-1-08-3214	% On Time ASRC No Facility Check (Non DS0, DS1 & DS3)		NA		NA		NA		NA		NA	
OR-1-10-3210	% On Time ASRC Facility Check DS0		NA		NA		NA		NA		NA	
OR-1-10-3211	% On Time ASRC Facility Check DS1		NA		NA		NA		NA		NA	
OR-1-10-3213	% On Time ASRC Facility Check DS3		NA		NA		NA		NA		NA	
OR-1-10-3214	% On Time ASRC Facility Check (Non DS0, DS1 & DS3)		NA		NA		NA		NA		NA	
<b>OR-2 - Reject Timeliness</b>												
OR-2-08-3200	% On Time ASR Reject No Facility Check		NA		NA		NA		NA		NA	
OR-2-10-3200	% On Time ASR Reject Facility Check		NA		NA		NA		NA		NA	
<b>POTS - Provisioning</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-01-3111	Av. Completed Interval - Total No Dispatch - Hot Cut Loop		5.15		5.11		5.37		5.27		5.08	
PR-2-01-3122	Av. Completed Interval - Total No Dispatch - Other (UNE Switch & INP)	0.27	NA	0.23	NA	0.45	NA	0.48	NA	0.47	NA	
PR-2-01-3140	Av. Completed Interval - Total No Dispatch - Platform	0.27	0.78	0.23	1.33	0.45	1.82	0.48	1.44	0.47	0.93	
PR-2-03-3112	Av. Completed Interval - Dispatch (1-5 Lines) - Loop	2.4	4.55	2.51	6.27	4.28	5.48	3.56	4.84	3.5	4.8	
PR-2-03-3140	Av. Completed Interval - Dispatch (1-5 Lines) - Platform	2.4	4	2.51	4.86	4.28	4.8	3.56	4.25	3.5	3.33	1
PR-2-04-3112	Av. Completed Interval - Dispatch (6-9 Lines) - Loop	7.5	6	3	7	2	NA	3.5	5	3.13	NA	1,2,4
PR-2-04-3140	Av. Completed Interval - Dispatch (6-9 Lines) - Platform	7.5	NA	3	NA	2	5	3.5	NA	3.13	NA	3
PR-2-05-3112	Av. Completed Interval - Dispatch (>= 10 Lines) - Loop	NA	NA	3	NA	4.33	NA	3.5	7.5	NA	2	4,5
PR-2-05-3140	Av. Completed Interval - Dispatch (>= 10 Lines) - Platform	NA	NA	3	NA	4.33	28	3.5	NA	NA	NA	3
<b>PR-4 - Missed Appointments</b>												
PR-4-02-3100	Average Delay Days - Total	1.82	4	2.27	10	2.17	1.5	3.65	4.4	2.51	3.67	1,2,3,4,5
PR-4-03-3100	% Missed Appt. - Customer	1.39	7.28	1.24	4.55	1.47	4.03	1.18	1.72	1.44	5.53	
PR-4-04-3113	% Missed Appt. - Verizon - Dispatch - Loop New	3.23	2.02	3.85	0.93	4.63	1.1	3.47	2.01	2.41	1.89	
PR-4-04-3140	% Missed Appt. - Verizon - Dispatch - Platform	3.23	14.29	3.85	0	4.63	3.7	3.47	7.14	2.41	4.35	1
PR-4-04-3520	% Missed Appt. - Verizon - Dispatch - Hot Cut Loop	3.23	1.35	3.85	1.09	4.63	0	3.47	0	2.41	0	
PR-4-05-3111	% Missed Appt. - Verizon - No Dispatch - Hot Cut Loop	0.06	0	0.04	0	0.02	0	0.02	0	0	0	
PR-4-05-3121	% Missed Appt. - Verizon - No Dispatch - Other	0.06	NA	0.04	NA	0.02	NA	0.02	NA	0	NA	
PR-4-05-3140	% Missed Appt. - Verizon - No Dispatch - Platform	0.06	0	0.04	0	0.02	0	0.02	0	0	0	
<b>PR-6 - Installation Quality</b>												
PR-6-01-3100	% Installation Troubles reported within 30 Days - Loop	4.55	2.08	3.78	1.76	4.06	2.2	4.49	1.58	3.56	1.86	
PR-6-01-3121	% Installation Troubles reported within 30 Days - Platform	4.55	1.24	3.78	1.11	4.06	0.75	4.49	0.58	3.56	0.89	
PR-6-02-3112	% Installation Troubles reported within 7 Days - Loop	2.52	1.22	2.19	0.8	2.38	1.34	2.74	0.76	2.17	1.08	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
PR-6-02-3121	% Installation Troubles reported within 7 Days - Platform	2.52	0.77	2.19	0.64	2.38	0.45	2.74	0.29	2.17	0.38	
PR-6-02-3520	% Installation Troubles reported within 7 Days - Hot Cut Loop		0.83		0.38		0.51		0.37		0.48	
PR-6-03-3112	% Installation Troubles reported within 30 Days - FOK/TOK/CPE - Loop	3.06	2.44	3.22	2.41	3.13	2.6	3.07	2.67	2.86	3.01	
PR-6-03-3121	% Installation Troubles reported within 30 Days - FOK/TOK/CPE - Platform	3.06	1.24	3.22	1.27	3.13	0.45	3.07	0.87	2.86	0.63	
<b>PR-8 - Open Orders in a Hold Status</b>												
PR-8-01-3100	Open Orders in a Hold Status > 30 Days	0	0	0	0	0	0.27	0	0	0	0	
PR-8-02-3100	Open Orders in a Hold Status > 90 Days	0	0	0	0	0	0	0	0	0	0	
<b>PR-9- Hot Cuts</b>												
PR-9-01-3520	% On Time Performance - Hot Cut		98.89		99.06		96.74		99.53		98.88	
PR-9-08-3520	Average Duration of Service Interruption		10.48		19.29		18.06		4.07		21.84	2,3,4,5
<b>POTS &amp; Complex Aggregate</b>												
<b>PR-2 - Average Completed Interval</b>												
<b>2-Wire Digital Services</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-01-3341	Av. Interval Completed - Total No Dispatch	0.94	NA	0.25	NA	1.5	NA	0.73	NA	2	NA	
PR-2-02-3341	Av. Interval Completed - Total Dispatch	NA	5	12	5.5	3.57	5	5.5	4.5	5.38	6	1,2,3,4,5
<b>PR-4 - Missed Appointments</b>												
PR-4-02-3341	Average Delay Days - Total	NA	4	3	3.5	1	NA	2.5	NA	2.67	NA	1,2
PR-4-03-3341	% Missed Appointment - Customer	4	10.71	16.22	5.26	21.05	20	11.43	0	12.5	0	
PR-4-04-3341	% Missed Appointment - Verizon - Dispatch	0	0	4.17	6.25	0	0	8.33	0	6.25	0	3,4,5
PR-4-05-3341	% Missed Appointment - Verizon - No Dispatch	0	0	0	0	0	NA	0	NA	0	NA	1,2
<b>PR-6 - Installation Quality</b>												
PR-6-01-3341	% Install. Troubles Reported within 30 Days	0	10.71	5.88	36.84	0	60	0	33.33	0	0	3,4,5
PR-6-03-3341	% Install. Troubles Reported within 30 Days - FOK/TOK/CPE	0	10.71	6.72	31.58	6.12	20	0.85	16.67	2.59	42.86	3,4,5
<b>PR-8 - Open Orders in a Hold Status</b>												
PR-8-01-3341	Open Orders in a Hold Status > 30 Days	0	0	0	0	0	0	0	0	0	0	3,4,5
PR-8-02-3341	Open Orders in a Hold Status > 90 Days	0	0	0	0	0	0	0	0	0	0	3,4,5
<b>2-Wire xDSL Loops</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-01-3342	Av. Interval Completed - Total No Dispatch		NA		NA		NA		NA		NA	
PR-2-02-3342	Av. Interval Completed - Total Dispatch		6		6		6		6.77		5.25	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>PR-4 - Missed Appointments</b>												
PR-4-02-3342	Average Delay Days – Total	NA	3	NA	5	1	NA	NA	3	4	2	1,2,4,5
PR-4-03-3342	% Missed Appointment – Customer	0	7.02	0.64	4.48	0.29	4.29	0.17	2.38	0.29	5.97	
PR-4-04-3342	% Missed Appointment – Verizon – Dispatch		1.82		1.56		0		2.41		0	
PR-4-05-3342	% Missed Appointment – Verizon – No Dispatch											
PR-4-14-3342	% Completed On Time (with Serial Number)		96.23		98.48		100		96		98.61	
<b>PR-6 – Installation Quality</b>												
PR-6-01-3342	% Install. Troubles Reported within 30 Days	4.55	0	3.78	0	4.06	0	4.49	0	3.56	0	
PR-6-03-3342	% Install. Troubles Reported within 30 Days - FOK/TOK/CPE	3.06	10.53	3.22	12.86	3.13	12.86	3.07	11.76	2.86	11.94	
<b>PR-8 – Open Orders in a Hold Status</b>												
PR-8-01-3342	Open Orders in a Hold Status > 30 Days	0	0	2.86	0	4.76	0	0	0	0	0	
PR-8-02-3342	Open Orders in a Hold Status > 90 Days	0	0	2.86	0	4.76	0	0	0	0	0	
<b>2-Wire xDSL Line Sharing</b>												
<b>PR-2 – Average Completed Interval</b>												
PR-2-01-3343	Av. Interval Completed – Total No Dispatch	2.99	NA	2.88	3	2.99	NA	2.98	NA	3.04	3	2
PR-2-02-3343	Av. Interval Completed – Total Dispatch	NA	NA	3.2	NA	3.03	NA	3.09	NA	3	NA	
<b>PR-4 - Missed Appointments</b>												
PR-4-02-3343	Average Delay Days – Total	1	NA	2	NA	1.67	NA	1.5	NA	3.58	NA	
PR-4-03-3343	% Missed Appointment – Customer	0	NA	0.64	0	0.29	NA	0.17	0	0.29	0	
PR-4-04-3343	% Missed Appointment – Verizon – Dispatch	NA	NA	3.85	NA	6.06	NA	1.39	NA	1.92	NA	
PR-4-05-3343	% Missed Appointment – Verizon – No Dispatch	0.17	NA	0	0	0.1	NA	0.09	0	0.84	0	2,4,5
<b>PR-6 – Installation Quality</b>												
PR-6-01-3343	% Install. Troubles Reported within 30 Days	0.69	NA	0.48	0	0.1	NA	0.67	0	0.37	0	2,4,5
PR-6-03-3343	% Install. Troubles Reported within 30 Days - FOK/TOK/CPE	4.32	NA	4.15	0	1.83	NA	3.88	0	2.51	0	2,4,5
<b>PR-8 – Open Orders in a Hold Status</b>												
PR-8-01-3343	Open Orders in a Hold Status > 30 Days	0	NA	0	0	0	NA	0	0	0	0	2,4,5
PR-8-02-3343	Open Orders in a Hold Status > 90 Days	0	NA	0	0	0	NA	0	0	0	0	2,4,5
<b>Special Services - Provisioning</b>												
<b>PR-2 – Average Completed Interval</b>												
PR-2-01-3200	Av. Interval Completed – Total No Dispatch	55.3	NA	6.2	NA	15	NA	13.18	NA	33.5	20	
PR-2-02-3200	Av. Interval Completed – Total Dispatch	12.7	26.29	19.58	16.5	12.96	22	16.33	18	18.1	30	1,2,3,4,5
PR-2-06-3200	Av. Interval Completed – DS0	7.4	NA	12.12	NA	9.77	NA	12.09	NA	11.75	NA	
PR-2-07-3200	Av. Interval Completed – DS1	16.4	26.29	27.06	16.5	15.68	22	18.23	17.4	25.13	29.33	1,2,3,4,5

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Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
PR-2-08-3200	Av. Interval Completed – DS3	146	NA	NA	NA	NA	NA	NA	NA	NA	NA	
PR-2-09-3512	Av. Interval Completed – Total - EEL – Loop		UD		UD		NA		21		32	4,5
<b>PR-4 - Missed Appointments</b>												
PR-4-01-3200	% Missed Appointment – Verizon – Total	12.5	0	15.25	0							2
PR-4-01-3210	% Missed Appointment – Verizon – DS0	0	NA	0	NA	4.76	NA	0	NA	4.76	NA	
PR-4-01-3211	% Missed Appointment – Verizon – DS1	11.1	0	45	0	7.14	0	22.03	11.76	8.33	0	2,3
PR-4-01-3213	% Missed Appointment – Verizon – DS3	100	NA	NA	NA	NA	NA	NA	NA	NA	NA	
PR-4-01-3214	% Missed Appointment – Verizon –Special Other	14.3	NA	0	NA	NA	NA	0	NA	NA	NA	
PR-4-01-3510	% Missed Appointment – Verizon – Total - EEL	11.1	UD	45	UD	7.14	NA	22.03	0	8.33	50	4,5
PR-4-01-3530	% Missed Appointment – Verizon – Total- IOF	100	25	NA	16.67	NA	0	NA	0	NA	25	1,2,3,4,5
PR-4-02-3200	Average Delay Days – Total	28.6	NA	12.33	NA	6.33	NA	139.3	9	26.5	NA	4
PR-4-02-3510	Average Delay Days – Total - EEL	1	UD	12.33	UD	9	NA	139.3	NA	49	8	
PR-4-02-3530	Average Delay Days – Total - IOF	134	20	NA	63	NA	NA	NA	NA	NA	12	1,2
PR-4-03-3200	% Missed Appointment – Customer	20	31.25	10.17	42.86	14.29	37.5	17.65	43.48	45.45	50	
PR-4-03-3510	% Missed Appointment – Customer - EEL	NA	UD	NA	UD	NA	NA	NA	0	NA	0	
PR-4-08-3200	% Missed Appt. – Customer – Late Order Conf.		0		0		0		0		4.17	2,3
<b>PR-6 - Installation Quality</b>												
PR-6-01-3200	% Installation Troubles reported within 30 Days	1.4	4	4.15	23.08	1.42	0	2.01	0	8.15	4.17	3
PR-6-03-3200	% Inst. Troubles reported w/ in 30 Days - FOK/TOK/CPE	3.26	0	0.38	0	0.41	0	0.4	0	5.19	0	3
<b>PR-8 - Open Orders in a Hold Status</b>												
PR-8-01-3200	Open Orders in a Hold Status > 30 Days	35	0	20.34	0	24.49	0	1.96	0	0	0	2,3
PR-8-02-3200	Open Orders in a Hold Status > 90 Days	35	0	18.64	0	22.45	0	0.98	0	0	0	2,3
<b>UNE Maintenance</b>												
<b>Maintenance - POTS Loop</b>												
<b>MR-2 - Trouble Report Rate</b>												
MR-2-02-3550	Network Trouble Report Rate – Loop	1.15	0.77	1.31	0.67	1.01	0.51	1	0.53	0.76	0.54	
MR-2-03-3550	Network Trouble Report Rate – Central Office	0.09	0.05	0.09	0.04	0.06	0.02	0.07	0.05	0.07	0.06	
<b>MR-3 - Missed Repair Appointments</b>												
MR-3-01-3550	% Missed Repair Appointment – Loop	8.35	5.95	7.91	4.68	5.27	2.24	4.57	3.42	4.92	1.97	
MR-3-02-3550	% Missed Repair Appointment – Central Office	5.13	0	5.97	0	4.38	0	3.9	0	2.96	12.5	3
<b>MR-4 - Trouble Duration Intervals</b>												
MR-4-01-3550	Mean Time To Repair – Total	23.8	16.88	23.09	16.14	22.44	13.86	14.8	12.51	16.28	16.84	
MR-4-02-3550	Mean Time To Repair – Loop Trouble	25	17.28	23.89	16.9	23.26	14.41	15.36	13.22	17.24	15.4	
MR-4-03-3550	Mean Time To Repair – Central Office Trouble	8.4	10.28	10.84	1.56	9.56	1.49	7.09	4.52	5.67	30.53	3
MR-4-07-3550	% Out of Service > 12 Hours	65.2	64.24	61.83	54.1	58.87	46.67	46.7	44.64	51.22	51.22	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
MR-4-08-3550	% Out of Service > 24 Hours	40.5	19.87	37.23	14.75	32.53	6.67	16.45	6.25	17.89	9.76	
<b>MR-5 – Repeat Trouble Reports</b>												
MR-5-01-3550	% Repeat Reports within 30 Days	17.4	27.04	16.51	20	15.95	17.86	15.61	28.3	13.64	22.02	
<b>Maintenance - POTS Platform</b>												
<b>MR-2 – Trouble Report Rate</b>												
MR-2-02-3140	Network Trouble Report Rate – Platform	1.15	0.84	1.31	1.61	1.01	0.86	1	1	0.76	0.86	
MR-2-03-3140	Network Trouble Report Rate – Central Office	0.09	0.16	0.09	0.26	0.06	0.33	0.07	0.05	0.07	0.2	
MR-2-04-3140	% Subsequent Reports	17.1	0	18.13	18.18	15.11	7.41	11.07	8	12.95	6.9	
MR-2-05-3140	% CPE/TOK/FOK Trouble Report Rate	0.91	1.31	1.08	1.15	0.79	0.91	0.7	0.91	0.57	1.01	
<b>MR-3 – Missed Repair Appointments</b>												
MR-3-01-3144	% Missed Repair Appointment – Platform Bus.	8.44	14.29	9.41	5	6.95	6.67	7.85	0	6.78	5.88	
MR-3-01-3145	% Missed Repair Appointment – Platform Res.	8.32	0	7.64	0	5.03	0	3.97	0	4.63	0	1,3,4,5
MR-3-02-3144	% Missed Repair Appointment – Central Office Bus.	9.33	0	8	0	10.38	0	5.43	0	3.42	0	1,2,3,4,5
MR-3-02-3145	% Missed Repair Appointment – Central Office Res.	3.54	0	5.36	0	2.14	NA	2.95	NA	2.79	NA	1,2
MR-3-03-3140	% CPE/TOK/FOK - Missed Appointment - Platform	5.2	4	4.86	4.55	3.62	5.26	2.97	0	3.79	0	
MR-3-04-3140	% Missed Repair Appointment - No Double Dispatch	6.29	5.56	5.33	0	3.56	4.76	2.98	0	3.37	4.17	
MR-3-05-3140	% Missed Repair Appointment - Double Dispatch	38.1	100	33.55	20	25.7	0	26.46	NA	27.11	0	1,2,3
<b>MR-4 – Trouble Duration Intervals</b>												
MR-4-01-3140	Mean Time To Repair – Total	23.8	16.44	23.09	19.32	22.44	13.09	14.8	6.1	16.28	6.27	
MR-4-02-3144	Mean Time To Repair – Loop Trouble - Platform - Bus.	14.4	13.75	11.79	15.75	11.45	14.77	10.59	5.36	11.01	8.23	
MR-4-02-3145	Mean Time To Repair – Loop Trouble - Platform - Res.	26.6	48.15	25.86	32.41	25.18	19.45	16.17	12.72	18.27	5.34	1,3,4,5
MR-4-03-3144	Mean Time To Repair – Central Office Trouble - Bus.	7.91	2.06	7.5	0.93	8.19	6.77	6.69	0.23	5.17	0.52	1,2,3,4,5
MR-4-03-3145	Mean Time To Repair – Central Office Trouble - Res.	8.56	19.48	11.86	10.67	10.04	NA	7.1	NA	5.83	NA	1,2
MR-4-04-3140	% Cleared (all troubles) within 24 Hours	58.7	84.21	61.24	80.56	65.74	84	82.46	100	81.52	100	
MR-4-06-3140	% Out of Service > 4 Hours	85.3	60	81.99	78.57	79.76	55.56	69.14	43.75	70.23	33.33	
MR-4-07-3140	% Out of Service > 12 Hours	65.2	46.67	61.83	60.71	58.87	50	46.7	6.25	51.22	19.05	
MR-4-08-3144	% Out of Service > 24 Hours - Bus.	12.1	7.14	8.04	5.88	8.08	13.33	7.25	0	8.24	0	
MR-4-08-3145	% Out of Service > 24 Hours - Res.	45.5	100	42.5	54.55	36.99	33.33	18.3	0	19.76	0	1,3,4,5
<b>MR-5 – Repeat Trouble Reports</b>												
MR-5-01-3140	% Repeat Reports within 30 Days	17.4	21.05	16.51	19.44	15.95	24	15.61	13.04	13.64	14.81	
<b>2-Wire Digital Services - Maintenance</b>												
<b>MR-2 – Trouble Report Rate</b>												
MR-2-02-3341	Network Trouble Report Rate - Loop	0.77	1.5	0.67	5.28	0.31	1.16	0.21	1.74	0.42	1.16	
MR-2-03-3341	Network Trouble Report Rate - Central Office	0.15	0	0.41	0.29	0.21	0.58	0.16	0	0.26	0	
MR-2-04-3341	% Subsequent Reports	21.7	28.57	19.23	0	16.67	33.33	12.5	25	27.78	0	1,4,5

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>MR-3 – Missed Repair Appointments</b>												
MR-3-01-3341	% Missed Repair Appointment – Loop	40	0	15.38	0	50	25	75	0	50	0	1,3,4,5
MR-3-02-3341	% Missed Repair Appointment – Central Office	0	NA	37.5	0	0	0	33.33	NA	20	NA	2,3
<b>MR-4 – Trouble Duration Intervals</b>												
MR-4-01-3341	Mean Time To Repair - Total	25.9	14.51	15.22	9.77	13.7	13.83	19.2	17.78	14.44	4.8	1,3,4,5
MR-4-02-3341	Mean Time To Repair - Loop Trouble	30.5	14.51	17.35	10.24	20.25	20.35	25.88	17.78	18.79	4.8	1,3,4,5
MR-4-03-3341	Mean Time To Repair - Central Office Trouble	2.85	NA	11.76	1.3	3.87	0.78	10.28	NA	7.47	NA	2,3
MR-4-07-3341	% Out of Service > 12 Hours	100	60	100	21.43	25	75	50	20	100	0	1,3,4,5
MR-4-08-3341	% Out of Service > 24 Hours	50	0	0	7.14	25	25	50	0	0	0	1,3,4,5
<b>MR-5 – Repeat Trouble Reports</b>												
MR-5-01-3341	% Repeat Reports within 30 Days	44.4	20	23.81	31.58	40	33.33	28.57	50	38.46	50	1,3,4,5
<b>2-Wire xDSL Loops - Maintenance</b>												
<b>MR-2 – Trouble Report Rate</b>												
MR-2-02-3342	Network Trouble Report Rate - Loop	0.15	1.27	0.13	0.88	0.12	0.84	0.17	0.81	0.07	0.67	
MR-2-03-3342	Network Trouble Report Rate - Central Office	0.04	0.15	0.04	0.07	0.04	0.14	0.13	0.07	0.03	0.07	
<b>MR-3 – Missed Repair Appointments</b>												
MR-3-01-3342	% Missed Repair Appointment – Loop	0	4.76	14.29	16.67	0	7.14	35.71	0	0	0	
MR-3-02-3342	% Missed Repair Appointment – Central Office	0	0	50	0	66.67	0	16.67	0	0	0	1,2,3,4,5
<b>MR-4 – Trouble Duration Intervals</b>												
MR-4-02-3342	Mean Time To Repair - Loop Trouble	25.8	17.57	23.59	9.5	18.24	20.06	37.33	14.47	13.15	10.79	
MR-4-03-3342	Mean Time To Repair - Central Office Trouble	4.08	9.88	11.05	0.93	37.41	2.46	16.41	2	12.97	0.65	1,2,3,4,5
MR-4-07-3342	% Out of Service > 12 Hours	53.9	54.55	80	22.22	66.67	35.29	64	25	66.67	27.27	
MR-4-08-3342	% Out of Service > 24 Hours	23.1	22.73	20	11.11	44.44	5.88	28	16.67	8.33	0	
<b>MR-5 – Repeat Trouble Reports</b>												
MR-5-01-3342	% Repeat Reports within 30 Days	30.8	42.31	45.45	30.77	33.33	52.63	61.54	33.33	33.33	30.77	
<b>2-Wire xDSL Line Sharing - Maintenance</b>												
<b>MR-2 – Trouble Report Rate</b>												
MR-2-02-3343	Network Trouble Report Rate - Loop	0.15	0	0.13	0	0.12	0	0.17	0	0.07	0	1,2,3,4,5
MR-2-03-3343	Network Trouble Report Rate - Central Office	0.04	0	0.04	0	0.04	0	0.13	0	0.03	0	1,2,3,4,5
<b>MR-3 – Missed Repair Appointments</b>												
MR-3-01-3343	% Missed Repair Appointment – Loop	0	NA	14.29	NA	0	NA	35.71	NA	0	NA	
MR-3-02-3343	% Missed Repair Appointment – Central Office	0	NA	50	NA	66.67	NA	16.67	NA	0	NA	
<b>MR-4 – Trouble Duration Intervals</b>												
MR-4-02-3343	Mean Time To Repair - Loop Trouble	25.8	NA	23.59	NA	18.24	NA	37.33	NA	13.15	NA	
MR-4-03-3343	Mean Time To Repair - Central Office Trouble	4.08	NA	11.05	NA	37.41	NA	16.41	NA	12.97	NA	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
MR-4-04-3343	% Cleared (all troubles) within 24 Hours	76.9	NA	72.73	NA	55.56	NA	69.23	NA	91.67	NA	
MR-4-07-3343	% Out of Service > 12 Hours	53.9	NA	80	NA	66.67	NA	64	NA	66.67	NA	
MR-4-08-3343	% Out of Service > 24 Hours	23.1	NA	20	NA	44.44	NA	28	NA	8.33	NA	
<b>MR-5 – Repeat Trouble Reports</b>												
MR-5-01-3343	% Repeat Reports within 30 Days	30.8	NA	45.45	NA	33.33	NA	61.54	NA	33.33	NA	
<b>Special Services - Maintenance</b>												
<b>MR-2 – Trouble Report Rate</b>												
MR-2-01-3200	Network Trouble Report Rate	0.29	1.55	0.29	3.31	0.2	0.93	0.27	1.52	0.23	1.49	
MR-2-05-3200	% CPE/TOK/FOK Trouble Report Rate	0.44	1.55	0.34	2.26	0.24	1.24	0.33	3.03	0.33	1.34	
<b>MR-4 – Trouble Duration Intervals</b>												
MR-4-01-3200	Mean Time To Repair – Total	5.5	10.35	5.39	5.77	5.44	6.64	5.04	6.75	4.99	5.95	3
MR-4-04-3200	% Cleared (all troubles) within 24 Hours	98.2	90	100	100	99.1	100	98.64	100	100	100	3
MR-4-06-3200	% Out of Service > 4 Hours	43.6	77.78	55.28	63.64	47.27	83.33	46.58	66.67	50	50	3
MR-4-08-3200	% Out of Service > 24 Hours	1.84	11.11	0	0	0.91	0	1.37	0	0	0	3
<b>MR-5 – Repeat Trouble Reports</b>												
MR-5-01-3200	% Repeat Reports within 30 Days	23.8	20	18.52	31.82	24.32	16.67	22.45	10	20.77	30	3
<b>TRUNKING</b>												
<b>Ordering</b>												
<b>OR 1 – Order Confirmation Timeliness</b>												
OR-1-12-5020	% On Time FOC (<= 192 Forecasted Trunks)		100		100		NA		100		100	1,2,4,5
OR-1-12-5030	% On Time FOC (> 192 and Unforecasted Trunks)		83.33		100		100		81.82		100	1,2,5
OR-1-13-5020	% On Time Design Layout Record (DLR)		100		100		100		100		100	1,2,5
OR-1-19-5020	% On Time Resp. - Request for Inbound Augment Trunks (<= 192 Forecasted Trunks)		NA		NA		NA		100		100	4,5
OR-1-19-5030	% On Time Resp. - Request for Inbound Augment Trunks (> 192 Forecasted Trunks)		NA		NA		NA		NA		NA	
<b>OR-2 - Reject Timeliness</b>												
OR-2-11-5000	Average Trunk ASR Reject Time (<= 192 Forecasted Trunks)		NA		NA		1		1		1	
OR-2-12-5000	% On Time Trunk ASR Reject (<= 192 Forecasted Trunks)		NA		NA		100		100		100	3,4,5
<b>Provisioning</b>												
<b>PR-1 - Average Interval Offered</b>												
PR-1-09-5020	Av. Interval Offered – Total (<= 192 Forecasted Trunks)	14.7	17.5	24	18	NA	NA	18	NA	NA	11	1,2
PR-1-09-5030	Av. Interval Offered – Total (> 192 & Unforecasted Trunks)	18	NA	18	16	21	NA	163	NA	NA	NA	2

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>PR-2 - Average Interval Completed</b>												
PR-2-09-5020	Av. Interval Completed – Total (<= 192 Forecasted Trunks)	NA	NA	NA	NA	NA	NA	15	NA	NA	NA	
PR-2-09-5030	Av. Interval Completed – Total (> 192 & Unforecasted Trunks)	NA	NA	NA	NA	21	NA	190	NA	NA	NA	
<b>PR-4 - Missed Appointment</b>												
PR-4-01-5000	% Missed Appointment – Verizon – Total	0	0	0	0	0	0	0	0	0	0	
PR-4-02-5000	Average Delay Days - Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
PR-4-03-5000	% Missed Appointment – Customer	55.4	28.35	79.41	13.14	0	36.15	4.65	56.12	0	22.22	
PR-4-07-3540	% On Time Performance – LNP Only		99.92		99.84		99.9		99.5		99.63	
<b>PR-5 – Facility Missed Orders</b>												
PR-5-01-5000	% Missed Appointment – Verizon – Facilities	0	0	0	0	0	0	0	0	0	0	
PR-5-02-5000	% Orders Held for Facilities > 15 Days	0	0	0	0	0	0	0	0	0	0	
PR-5-03-5000	% Orders Held for Facilities > 60 Days	0	0	0	0	0	0	0	0	0	0	
<b>PR-6 – Installation Quality</b>												
PR-6-01-5000	% Installation Troubles reported within 30 Days	0	0	0	0	0	0	0	0	0	0	
PR-6-03-5000	% Inst. Troubles reported within 30 Days - FOK/TOK/CPE	0	0	0	0	0	0	0	0	0	0	
<b>PR-8 – Open Orders in a Hold Status</b>												
PR-8-01-5000	Open Orders in a Hold Status > 30 Days	0	0	0	0	0	0	0	0	0	0	
PR-8-02-5000	Open Orders in a Hold Status > 90 Days	0	0	0	0	0	0	0	0	0	0	
<b>Maintenance</b>												
<b>MR-2 – Trouble Report Rate</b>												
MR-2-01-5000	Network Trouble Report Rate	0	0	0	0	0	0	0	0	0	0	
<b>MR-4 – Trouble Duration Intervals</b>												
MR-4-01-5000	Mean Time To Repair – Total	NA	NA	0.17	0.3	NA	2.65	0.97	NA	1.45	NA	2,3
MR-4-04-5000	% Cleared (all troubles) within 24 Hours	NA	NA	100	100	NA	100	100	NA	100	NA	2,3
MR-4-05-5000	% Out of Service > 2 Hours	NA	NA	0	0	NA	100	0	NA	0	NA	2,3
MR-4-06-5000	% Out of Service > 4 Hours	NA	NA	0	0	NA	0	0	NA	0	NA	2,3
MR-4-07-5000	% Out of Service > 12 Hours	NA	NA	0	0	NA	0	0	NA	0	NA	2,3
MR-4-08-5000	% Out of Service > 24 Hours	NA	NA	0	0	NA	0	0	NA	0	NA	2,3
<b>MR-5 – Repeat Trouble Report Rates</b>												
MR-5-01-5000	% Repeat Reports within 30 Days	NA	NA	0	0	NA	100	0	NA	0	NA	2,3
<b>NETWORK PERFORMANCE</b>												
<b>NP-1 – Percent Final Trunk Group Blockage</b>												
NP-1-01-5000	% Final Trunk Groups Exceeding Blocking Standard	0	0	0	0	0	0	0	0	0	0	
NP-1-02-5000	% FTG Exceeding Blocking Std. – (No Exceptions)	0	0	0	5.88	0	0	0	0	0	5.88	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
NP-1-03-5000	Number FTG Exceeding Blocking Std. – 2 Months		0		0		0		0		0	
NP-1-04-5000	Number FTG Exceeding Blocking Std. – 3 Months		0		0		0		0		0	
<b>NP-2 – Collocation Performance – New</b>												
NP-2-01-6701	% On Time Response to Request for Physical Collocation		NA		NA		100		NA		NA	3
NP-2-02-6701	% On Time Response to Request for Virtual Collocation		NA		NA		NA		NA		NA	
NP-2-03-6701	Average Interval – Physical Collocation		150.5		172		109.5		NA		NA	
NP-2-04-6701	Average Interval – Virtual Collocation		NA		NA		NA		NA		NA	
NP-2-05-6701	% On Time – Physical Collocation		100		100		100		NA		NA	1,2,3
NP-2-06-6701	% On Time – Virtual Collocation		NA		NA		NA		NA		NA	
NP-2-07-6701	Average Delay Days – Physical Collocation		NA		NA		NA		NA		NA	
NP-2-08-6701	Average Delay Days – Virtual Collocation		NA		NA		NA		NA		NA	
<b>NP-2 – Collocation Performance – Augment</b>												
NP-2-01-6702	% On Time Response to Request for Physical Collocation		NA		100		100		100		100	2,3,4,5
NP-2-02-6702	% On Time Response to Request for Virtual Collocation		NA		NA		NA		NA		NA	
NP-2-03-6702	Average Interval – Physical Collocation		65.5		NA		46.67		47		66	
NP-2-04-6702	Average Interval – Virtual Collocation		NA		NA		NA		NA		NA	
NP-2-05-6702	% On Time – Physical Collocation		100		NA		100		100		100	1,4,5
NP-2-06-6702	% On Time – Virtual Collocation		NA		NA		NA		NA		NA	
NP-2-07-6702	Average Delay Days – Physical Collocation		NA		NA		NA		NA		NA	
NP-2-08-6702	Average Delay Days – Virtual Collocation		NA		NA		NA		NA		NA	

**Abbreviations:**

NA = No Activity.

UD = Under Development.

NEF = No Existing Functionality

blank cell = No data provided.

VZ = Verizon retail analog. If no data was provided, the metric may have a benchmark.

**Notes:**

1 = Sample Size under 10 for July.

2 = Sample Size under 10 for August.

3 = Sample Size under 10 for September.

4 = Sample Size under 10 for October.

5 = Sample Size under 10 for November.

## Appendix C

### **Massachusetts Performance Metrics**

All data included here is taken from the Massachusetts Carrier-to-Carrier Reports. This table is provided as a reference tool for the convenience of the reader. No conclusions are to be drawn from the raw data contained in this table. Our analysis is based on the totality of the circumstances, such that we may use non-metric evidence, and may rely more heavily on some metrics more than others, in making our determination. The inclusion of these particular metrics in this table does not necessarily mean that we relied on all of these metrics nor that other metrics may not also be important in our analysis. Some metrics that we have relied on in the past and may rely on for a future application were not included here because there was no data provided for them (usually either because there was no activity, or because the metrics are still under development). Metrics with no retail analog provided are usually compared with a benchmark. Note that for some metrics during the period provided there may be changes in the metric definition, or changes in the retail analog applied, making it difficult to compare the data over time.

## AGGREGATE METRICS

Metric No.	Metric Name
<b>Preorder and OSS Availability:</b>	
MR-1-01	Create Trouble
MR-1-02	Status Trouble
MR-1-03	Modify Trouble
MR-1-04	Request Cancellation of Trouble
MR-1-05	Trouble Report History (by TN/Circuit)
MR-1-06	Test Trouble (POTS Only)
OR-1-02	% On Time LSRC - Flow Through
OR-1-04	% On Time LSRC/ASRC No Facility Check
OR-1-06	% On Time LSRC/ASRC - Facility Check
OR-1-08	% On Time ASRC No Facility Check (Non DS0, DS1 & DS3)
OR-1-10	% On Time ASRC Facility Check DS0
OR-1-12	% On Time FOC
OR-1-13	% On Time Design Layout Record (DLR)
OR-1-19	% On Time Resp. - Request for Inbound Augment Trunks
PO-1-01	Customer Service Record
PO-1-02	Due Date Availability
PO-1-03	Address Validation
PO-1-04	Product & Service Availability
PO-1-05	Telephone Number Availability & Reservation
PO-1-06	Facility Availability (Loop Qualification)
PO-1-07	Rejected Query
PO-1-08	% Timeouts
PO-1-09	Parsed CSR
PO-2-01	OSS Interf. Avail. - Total
PO-2-02	OSS Interf. Avail - Prime Time - Electronic Bonding
PO-2-03	OSS Interf. Avail - Non-Prime - Electronic Bonding
PO-4-01	% Notices Sent on Time - CLEC Orig.
PO-4-02	Change Mgmt. Notice - Delay 1-7 Days - CLEC Orig.
PO-8-01	Average Response Time - Manual Loop Qualification
PO-8-02	Average Response Time - Engineering Record Request

Metric No.	Metric Name
<b>Change Management, Billing, OS/DA, Interconnection and Collocation:</b>	
BI-1-02	% DUF in 4 Business Days
BI-2-01	Timeliness of Carrier Bill
BI-3-01	% Billing Adjustments - Dollars Adjusted
BI-3-02	% Billing Adjustments - Number of Adjustments
NP-1-01	% Final Trunk Groups Exceeding Blocking Standard
NP-1-02	% FTG Exceeding Blocking Std. - (No Exceptions)
NP-1-03	Number FTG Exceeding Blocking Std. - 2 Months
NP-1-04	Number FTG Exceeding Blocking Std. - 3 Months
NP-2-01	% On Time Response to Request for Physical Collocation
NP-2-02	% On Time Response to Request for Virtual Collocation
NP-2-03	Average Interval - Physical Collocation
NP-2-04	Average Interval - Virtual Collocation
NP-2-05	% On Time - Physical Collocation
NP-2-06	% On Time - Virtual Collocation
NP-2-07	Average Delay Days - Physical Collocation
NP-2-08	Average Delay Days - Virtual Collocation
<b>Ordering:</b>	
OR-2-02	% On Time LSR Reject - Flow Through
OR-2-04	% On Time LSR/ASR Reject No Facility Check
OR-2-06	% On Time LSR/ASR Reject Facility Check
OR-2-08	% On Time ASR Reject No Facility Check
OR-2-10	% On Time ASR Reject Facility Check
OR-2-11	Average Trunk ASR Reject Time
OR-2-12	% On Time Trunk ASR Reject
OR-3-01	% Rejects
OR-4-02	Completion Notice (BCN) - % On Time
OR-4-05	Work Completion Notice (PCN) - % On Time
OR-5-01	% Flow Through - Total
OR-5-03	% Flow Through Achieved
OR-6-01	% Accuracy - Order

Metric No.	Metric Name
OR-6-02	% Accuracy – Opportunities
OR-6-03	% Accuracy – LSRC
OR-7-01	% Order Confirmation/Rejects sent within 3 Business Days
<b>Provisioning:</b>	
PR-1-09	Av. Interval Offered – Total - EEL – Backbone
PR-2-01	Av. Interval Completed – Total No Dispatch
PR-2-02	Av. Interval Completed – Total Dispatch
PR-2-03	Average Interval Completed – Dispatch (1-5 Lines)
PR-2-04	Average Interval Completed - Dispatch (6-9 Lines)
PR-2-05	Average Interval Completed - Dispatch (>= 10 Lines)
PR-2-06	Av. Interval Completed – DS0
PR-2-07	Av. Interval Completed – DS1
PR-2-08	Av. Interval Completed – DS3
PR-2-09	Av. Interval Completed – Total - EEL – Loop
PR-2-18	Av. Interval Completed - Disconnects
PR-4-01	% Missed Appointment – Verizon – DS0
PR-4-02	Average Delay Days – Total
PR-4-03	% Missed Appointment – Customer
PR-4-04	% Missed Appointment – Verizon – Dispatch
PR-4-05	% Missed Appointment – Verizon – No Dispatch
PR-4-07	% On Time Performance – LNP Only
PR-4-08	% Missed Appt. – Customer – Due to Late Order Conf.
PR-4-14	% Completed On Time (with Serial Number)
PR-5-01	% Missed Appointment – Verizon – Facilities
PR-5-02	% Orders Held for Facilities > 15 Days
PR-5-03	% Orders Held for Facilities > 60 Days
PR-6-01	% Installation Troubles reported within 30 Days
PR-6-02	% Installation Troubles reported within 7 Days
PR-6-03	% Inst. Troubles reported w/ in 30 Days - FOK/TOK/CPE
PR-8-01	Open Orders in a Hold Status > 30 Days
PR-8-02	Open Orders in a Hold Status > 90 Days
PR-9-01	% On Time Performance – Hot Cut
PR-9-08	Average Duration of Service Interruption

**Maintenance and Repair:**

Metric No.	Metric Name
MR-2-01	Network Trouble Report Rate
MR-2-02	Network Trouble Report Rate - Loop
MR-2-03	Network Trouble Report Rate - Central Office
MR-2-04	% Subsequent Reports
MR-2-05	% CPE/TOK/FOK Trouble Report Rate
MR-3-01	% Missed Repair Appointment – Loop
MR-3-02	% Missed Repair Appointment – Central Office
MR-3-03	% CPE/TOK/FOK - Missed Appointment
MR-3-04	% Missed Repair Appointment - No Double Dispatch
MR-3-05	% Missed Repair Appointment - Double Dispatch
MR-4-01	Mean Time To Repair – Total
MR-4-02	Mean Time To Repair – Loop Trouble
MR-4-03	Mean Time To Repair – Central Office Trouble
MR-4-04	% Cleared (all troubles) within 24 Hours
MR-4-05	% Out of Service > 2 Hours
MR-4-06	% Out of Service > 4 Hours
MR-4-07	% Out of Service > 12 Hours
MR-4-08	% Out of Service > 24 Hours
MR-5-01	% Repeat Reports within 30 Days

## DISAGGREGATED METRICS

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>PRE-ORDERING &amp; OSS AVAILABILITY</b>												
<b>PO-1 - Response Time OSS Ordering Interface</b>												
PO-1-01-6020	Customer Service Record - EDI	1.4	3.06	1.4	3.22	1.4	3.1	1.3	2.73	1.3	2.78	
PO-1-01-6030	Customer Service Record - CORBA	1.4	0.74	1.4	0.8	1.4	0.9	1.3	0.73	1.3	0.78	
PO-1-01-6050	Customer Service Record - Web GUI	1.4	2.82	1.4	2.76	1.4	2.89	1.3	2.6	1.3	2.62	
PO-1-02-6020	Due Date Availability - EDI	0.1	2.79	0.1	NA	0.1	2.22	0.1	1.65	0.1	2.75	1,3,4,5
PO-1-02-6030	Due Date Availability - CORBA	0.1	NA	0.1	NA	0.1	NA	0.1	NA	0.1	NA	
PO-1-02-6050	Due Date Availability - Web GUI	0.1	2.3	0.1	2.35	0.1	2.32	0.1	2.2	0.1	2.18	
PO-1-03-6020	Address Validation - EDI	4.3	4.7	4.4	4.94	4.3	4.84	4.1	4.65	3.9	5.42	
PO-1-03-6030	Address Validation - CORBA	4.3	3.82	4.4	3.46	4.3	4.08	4.1	3.47	3.9	3.71	
PO-1-03-6050	Address Validation - Web GUI	4.3	4.76	4.4	4.85	4.3	5.04	4.1	4.79	3.9	5.42	
PO-1-04-6020	Product & Service Availability - EDI	9.9	NA	10	NA	10	NA	9	NA	8.5	NA	
PO-1-04-6030	Product & Service Availability - CORBA	9.9	NA	10	NA	10	NA	9	NA	8.5	NA	
PO-1-04-6050	Product & Service Availability - Web GUI	9.9	5.8	10	7.11	10	7.74	9	5.51	8.5	5.75	
PO-1-05-6020	Telephone Number Availability & Reservation - EDI	5.3	6.77	5.4	5.6	5.2	NA	5	4.93	5.4	10.3	1,2,4,5
PO-1-05-6030	Telephone Number Availability & Reservation - CORBA	5.3	NA	5.4	5.98	5.2	3.52	5	3.65	5.4	4.28	2,3
PO-1-05-6050	Telephone Number Availability & Reservation - Web GUI	5.3	5.64	5.4	5.8	5.2	5.8	5	5.69	5.4	5.97	
PO-1-06-6020	Facility Availability (Loop Qualification) - EDI	2.5	3.73	7.5	3.59	2.6	4.06	3	3.62	3.5	3.98	
PO-1-06-6030	Facility Availability (Loop Qualification) - CORBA	2.5	NA	7.5	NA	2.6	NA	3	NA	3.5	NA	
PO-1-06-6050	Facility Availability (Loop Qualification) - Web GUI	2.5	4.92	7.5	4.87	2.6	4.61	3	5.21	3.5	4.61	
PO-1-07-6020	Rejected Query - EDI	0.1	2.73	0.1	2.64	0.1	2.69	0	2.62	0	2.14	
PO-1-07-6030	Rejected Query - CORBA	0.1	0.64	0.1	0.68	0.1	0.68	0	0.6	0	0.61	
PO-1-07-6050	Rejected Query - Web GUI	0.1	3.44	0.1	3.51	0.1	3.52	0	3.38	0	3.2	
PO-1-08-6020	% Timeouts - EDI		0.65		6.2		0.9		0.17		0.09	
PO-1-08-6030	% Timeouts - CORBA		0		0.01		0		0		0.05	
PO-1-08-6050	% Timeouts - Web GUI		0.22		0.67		1.23		0.21		0.09	
PO-1-09-6020	Parsed CSR - EDI	1.4	1.96	1.4	1.95	1.4	2.07	1.3	1.88	1.3	1.91	
PO-1-09-6030	Parsed CSR - CORBA	1.4	0.29	1.4	0.33	1.4	0.36	1.3	0.31	1.3	0.29	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>PO-2 - OSS Interface Availability</b>												
PO-2-01-6020	OSS Interf. Avail. - Total - EDI		99.8		100		99.97		99.97			1,2,3,4,5
PO-2-01-6030	OSS Interf. Avail. - Total - CORBA		99.9		100		99.9		99.95			1,2,3,4,5
PO-2-01-6040	OSS Interf. Avail. - Total - Maint. Web GUI (RETAS)		99.1		100		96.05		99.4			1,2,4,5
PO-2-01-6050	OSS Interf. Avail. - Total - Pre-order/Order WEB GUI		99.1		100		96.05		99.4			1,2,4,5
PO-2-01-6060	OSS Interf. Avail. - Total - Electronic Bonding		99.9		99.9		100		100			1,2,3,4,5
PO-2-02-6020	OSS Interf. Avail. - Prime Time - EDI		100		100		99.99		100		100	1,2,3,4,5
PO-2-02-6030	OSS Interf. Avail. - Prime Time - CORBA		100		100		99.99		100		100	1,2,3,4,5
PO-2-02-6040	OSS Interf. Avail. - Prime Time - Maint. Web GUI (RETAS)		99.9		100		98.12		99.54		100	1,2,3,4,5
PO-2-02-6050	OSS Interf. Avail. - Prime Time - Pre-order/Order WEB GUI		99.9		100		98.12		99.54		100	1,2,3,4,5
PO-2-02-6060	OSS Interf. Avail. - Prime Time - Electronic Bonding		99.9		99.9		100		100		100	1,2,3,4,5
PO-2-03-6020	OSS Interf. Avail. - Non-Prime - EDI		99.4		100		99.93		99.91		100	1,2,3,4,5
PO-2-03-6030	OSS Interf. Avail. - Non-Prime - CORBA		99.7		99.9		99.76		99.86		99.9	1,2,3,4,5
PO-2-03-6040	OSS Interf. Avail. - Non-Prime - Maint. Web GUI (RETAS)		97.8		99.9		92.94		99.14		99.6	1,2,4,5
PO-2-03-6050	OSS Interf. Avail. - Non-Prime - Pre-order/Order WEB GUI		97.8		99.9		92.94		99.14		99.6	1,2,4,5
PO-2-03-6060	OSS Interf. Avail. - Non-Prime - Electronic Bonding		100		100		100		100		100	1,2,3,4,5
<b>PO-8 - Manual Loop Qualification</b>												
PO-8-01-2000	Average Response Time - Manual Loop Qualification		UD		UD		NEF		NEF		UD	1,2,3,4,5
PO-8-02-2000	Average Response Time - Engineering Record Request		NA		NA		NA		NA		NA	
<b>Change Notification</b>												
<b>PO-4 - Timeliness of Change Management Notice</b>												
PO-4-01-6611	% Notices Sent on Time - Emergency Maint.		100		100		100		100			1,2,3,4,5
PO-4-01-6621	% Notices Sent on Time - Regulatory		100		100		NA		NA			1,2
PO-4-01-6631	% Notices Sent on Time - Industry Standard		NA		100		NA		NA			
PO-4-01-6641	% Notices Sent on Time - Verizon Orig.		NA		100		NA		NA			2
PO-4-01-6651	% Notices Sent on Time - CLEC Orig.		100		NA		NA		NA			1
<b>Change Confirmation</b>												
<b>PO-4 - Timeliness of Change Management Notice</b>												

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
PO-4-02-6622	Change Mgmt. Notice - Delay 1-7 Days - Regulatory		NA		NA		NA		NA		NA	
PO-4-02-6632	Change Mgmt. Notice - Delay 1-7 Days - Ind. Std.		NA		NA		NA		NA		NA	
PO-4-02-6642	Change Mgmt. Notice - Delay 1-7 Days - Verizon Orig.		NA		NA		NA		NA		NA	
PO-4-02-6652	Change Mgmt. Notice - Delay 1-7 Days - CLEC Orig.		NA		NA		NA		NA		NA	
<b>Trouble Reporting (OSS)</b>												
<b>MR-1 - Response Time OSS Maintenance Interface</b>												
MR-1-01-2000	Create Trouble	5.4	6.33	5.8	6.36	5.9	6.3	6.1	5.72	6	3.92	
MR-1-02-2000	Status Trouble	4.5	3.41	4.8	3.49	4.7	3.24	5	1.45	5.6	0.45	
MR-1-03-2000	Modify Trouble	5.3	6	5.7	NA	5.9	6	6	8.03	5.9	8.62	1,3,4,5
MR-1-04-2000	Request Cancellation of Trouble	6.4	8.46	6.9	8.52	7	8.13	7.2	7.97	7.1	6.02	
MR-1-05-2000	Trouble Report History (by TN/Circuit)	0.4	1.8	0.4	1.9	0.6	2.59	0.4	1.75	0.3	1.01	
MR-1-06-2000	Test Trouble (POTS Only)-RETAIL only	59	47.8	57	47.4	62	47.15	63	45.25	56	45	
<b>BILLING</b>												
<b>BI-1 - Timeliness of Daily Usage Feed</b>												
BI-2-01-2000	Timeliness of Carrier Bill		99.3		98.8							
BI-1-02-2030	% DUF in 4 Business Days		99.8		99.8		99.88		99.54		99.9	1,2,3,4
<b>BI-2 - Timeliness of Carrier Bill</b>												
BI-2-01-2030	Timeliness of Carrier Bill						98.46		98.78		99.1	
<b>BI-3 - Billing Accuracy</b>												
BI-3-01-2030	% Billing Adjustments - Dollars Adjusted					0.6	0.02	1.3	0.79			5
BI-3-02-2000	% Billing Adjustments - Number of Adjustments	0.3	0.13	0.3	0.04							
BI-3-02-2030	% Billing Adjustments - Number of Adjustments					0.2	0.01	0.3	0.01			5
<b>RESALE ORDERING</b>												
<b>POTS &amp; Pre-qualified Complex - Electronically Submitted</b>												
<b>OR-1 - Order Confirmation Timeliness</b>												
OR-1-02-2320	% On Time LSRC - Flow Through		99.7		99.5		99.55		99.72		99.6	
OR-1-04-2100	% On Time LSRC/ASRC No Facility Check		95		97.4		95.35		97.44		99.4	
OR-1-06-2320	% On Time LSRC/ASRC Facility Check		98		99.2		98.9		99.36		99.7	
<b>OR-2 - Reject Timeliness</b>												
OR-2-02-2320	% On Time LSR Reject - Flow Through		99.6		99.8		99.53		99.92		99.8	
OR-2-04-2320	% On Time LSR/ASR Reject No Facility Check		90.5		94.4		92.58		93.72		99.9	
OR-2-06-2320	% On Time LSR/ASR Reject Facility Check		71.4		75		100		98.3		100	1,2,3
<b>2 Wire Digital Services</b>												
<b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b>												

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
OR-1-04-2341	% On Time LSRC/ASRC No Facility Check		95.5		96.6		100		98.15		100	
OR-1-06-2341	% On Time LSRC/ASRC Facility Check		100		100		100		100		100	1,2,3
<b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>												
OR-2-04-2341	% On Time LSR/ASR Reject No Facility Check		97.9		100		100		98.91		100	
OR-2-06-2341	% On Time LSR/ASR Reject Facility Check		100		NA		NA		100		100	1,4
<b>POTS / Special Services - Aggregate</b>												
<b>OR-3 - Percent Rejects</b>												
OR-3-01-2000	% Rejects		47		47.7		46.19		40.85		34.9	
<b>OR-4 - Timeliness of Completion Notification</b>												
OR-4-02-2000	Completion Notice (BCN) - % On Time		96.1		97.7		98.78		84.65			5
OR-4-05-2000	Work Completion Notice (PCN) - % On Time		99.9		100		99.79		100			5
<b>OR-5 - Percent Flow-Through</b>												
OR-5-01-2000	% Flow Through - Total		50.5		49.4		52.47		52.11		48.5	
OR-5-03-2000	% Flow Through Achieved		90.9		93.9		94.58		94.47		96.6	
<b>OR-6 - Order Accuracy</b>												
OR-6-01-2000	% Accuracy - Orders		90.3		93.6		93.31		93.7		90.3	
OR-6-02-2000	% Accuracy - Opportunities		98.1		99		99.23		99.2			5
OR-6-03-2000	% Accuracy - LSRC		99.3		100		100		99.77		0.1	
<b>OR-7 - Order Completeness</b>												
OR-7-01-2000	% Order Confirmation/Rejects sent within 3 Business Days		99.3		99.5		99.42		99.6		99.5	
<b>Special Services - Electronically Submitted</b>												
<b>OR-1 - Order Confirmation Timeliness</b>												
OR-1-04-2210	% On Time LSRC/ASRC No Facility Check DS0		NA		NA		NA		NA		NA	
OR-1-04-2211	% On Time LSRC/ASRC No Facility Check DS1		NA		NA		NA		NA		NA	
OR-1-04-2213	% On Time LSRC/ASRC No Facility Check DS3		NA		NA		NA		NA		NA	
OR-1-04-2214	% On Time LSRC/ASRC No Facility Check (Non DS0, DS1, & DS3)		97.8		99.3		96.73		97.12		99.2	
OR-1-06-2210	% On Time LSRC/ASRC Facility Check DS0		NA		NA		NA		NA		NA	
OR-1-06-2211	% On Time LSRC/ASRC Facility Check DS1		NA		NA		NA		NA		NA	
OR-1-06-2213	% On Time LSRC/ASRC Facility Check DS3		NA		NA		NA		NA		NA	
OR-1-06-2214	% On Time LSRC/ASRC Facility Check (Non DS0, DS1, & DS3)		100		88.5		100		100		94.4	
<b>OR-2 - Reject Timeliness</b>												
OR-2-04-2200	% On Time LSR/ASR Reject No Facility Check		96.2		98.6		96.82		96.95		100	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
OR-2-06-2200	% On Time LSR/ASR Reject Facility Check		75		100		100		100		100	1,2,3,4
<b>POTS - Provisioning - Total</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-04-2100	Average Interval Completed - Dispatch (6-9 Lines)	5.4	4.82	4.2	5.87	4.7	4.5	4.2	3.4			3,4,5
PR-2-05-2100	Average Interval Completed - Dispatch (>= 10 Lines)	4.2	7.94	4.3	9.09	3.5	7	5.3	8.83			5
<b>PR-4 - Missed Appointments</b>												
PR-4-02-2100	Average Delay Days - Total	3	2.17	3.2	2.35	3.1	2.08	3.3	3.42	2.8	2.5	
PR-4-03-2100	% Missed Appointment - Customer	1.5	2.43	1.7	1.86	1.8	2.65	1.5	1.91	1.6	2.61	1,2,3,4,5
PR-4-04-2100	% Missed Appointment - Verizon - Dispatch	5.7	4.37	6	3.3	6	5.21	5.8	5.63	5.2	3.58	
PR-4-05-2100	% Missed Appointment - Verizon - No Dispatch	0.1	0	0.1	0.03	0	0.04	0	0.03	0	0	
PR-4-08-2100	% Missed Appt. - Customer - Late Order Conf.		0.03		0		0		0.04			5
<b>PR-6 - Installation Quality</b>												
PR-6-01-2100	% Installation Troubles reported within 30 Days	3.6	2.56	3.3	2.49	4	2.65	3.3	2.22	3.1	2.45	
PR-6-02-2100	% Installation Troubles reported within 7 Days	2	1.33	1.9	1.51	2.6	1.5	2.1	1.51			5
PR-6-03-2100	% Inst. Troubles reported w/ in 30 Days - FOK/TOK/CPE	2.6	1.87	2.8	2.92	3.1	2.07	2.7	1.32	2.5	1.92	
<b>PR-8 - Open Orders in a Hold Status</b>												
PR-8-01-2100	Open Orders in a Hold Status > 30 Days	0	0	0	0	0	0	0	0	0	0	
PR-8-02-2100	Open Orders in a Hold Status > 90 Days	0	0	0	0	0	0	0	0	0	0	
<b>POTS - Business</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-01-2110	Average Interval Completed - Total No Dispatch	0.6	1.51	0.6	1.53	0.7	1.26	0.6	0.86			5
PR-2-03-2110	Average Interval Completed - Dispatch (1-5 Lines)	4.1	4.34	3.8	4.16	3.7	4.57	3.6	3.95			5
<b>POTS - Residence</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-01-2120	Average Interval Completed - Total No Dispatch	0.5	1.13	0.5	1.29	0.5	1.27	0.4	1.22			5
PR-2-03-2120	Average Interval Completed - Dispatch (1-5 Lines)	4.1	4.18	3.8	4.17	3.7	4.38	3.5	4.31			5

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>POTS &amp; Complex Aggregate</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-18-2103	Average Interval Completed – Disconnects	0.3	0.25	3.9	2.52	3.8	3.42	3.4	2.4			5
<b>2-Wire Digital Services</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-01-2341	Average Interval Completed – Total No Dispatch	1.3	2.05	1.5	2.47	1.8	1.65	1.8	2.28			5
PR-2-02-2341	Average Interval Completed – Total Dispatch	5.4	8.46	4.8	7.5	4.4	5.63	4.5	6.43			2,3,4,5
<b>PR-4 - Missed Appointments</b>												
PR-4-02-2341	Average Delay Days – Total	4.9	NA	4.7	8	7.4	NA	6.3	3	4.3	3.5	2,4,5
PR-4-03-2341	% Missed Appointment – Customer	9.8	0	11	3.45	11	3.33	8.8	1.69	10	0	1,2,3,4,5
PR-4-04-2341	% Missed Appointment – Verizon – Dispatch	7.9	0	5.4	0	9.9	0	7.1	5.26	5.5	10	
PR-4-05-2341	% Missed Appointment – Verizon – No Dispatch	0.8	0	0.4	0	0.4	0	0	0	0	1.69	
PR-4-08-2341	% Missed Appt. – Customer – Late Order Conf.		0		0		0		0		0	
<b>PR-6 - Installation Quality</b>												
PR-6-01-2341	% Install. Troubles Reported within 30 Days	0.8	1.48	1	1.9	1.9	2.76	1.4	2.06	1.3	1.18	
PR-6-03-2341	% Install. Troubles Reported w/in 30 Days - FOK/TOK/CPE	2.2	0.99	2.4	1.43	4.1	1.66	3.7	3.09	2.4	0.59	
<b>PR-8 - Open Orders in a Hold Status</b>												
PR-8-01-2341	Open Orders in a Hold Status > 30 Days	0	0	0	0	0	0	0	0	0	0	
PR-8-02-2341	Open Orders in a Hold Status > 90 Days	0	0	0	0	0	0	0	0	0	0	
<b>Special Services - Provisioning</b>												
<b>PR-2 - Average Completed Interval</b>												
PR-2-01-2200	Average Interval Completed – Total No Dispatch	14	9.25	9.4	8.6	15	7.86	30	9.83			1,2,3,4,5
PR-2-02-2200	Average Interval Completed – Total Dispatch	25	15.5	19	14.2	17	15.56	16	21.91			5
PR-2-06-2200	Average Interval Completed – DS0	9.8	10.1	11	9.42	13	9.69	16	9.77			5
PR-2-07-2200	Average Interval Completed – DS1	33	24	27	21.5	22	17.8	17	29.31			1,2,5
PR-2-08-2200	Average Interval Completed – DS3	72	NA	26	NA	99	NA	53	NA			
PR-2-18-2200	Average Interval Completed – Disconnects	0	NA	15	6.15	11	6.5	10	6.65			5
<b>PR-4 - Missed Appointments</b>												
PR-4-01-2200	% Missed Appointment – Verizon – Total	16	2.86	12	0							
PR-4-01-2210	% Missed Appointment – Verizon – DS0	0	0	2.5	0	2.9	0	11	0	3.5	5	
PR-4-01-2211	% Missed Appointment – Verizon – DS1	31	8.33	21	0	24	6.25	22	5.56	15	0	
PR-4-01-2213	% Missed Appointment – Verizon – DS3	50	NA	67	NA	80	NA	67	NA	57	NA	
PR-4-01-2214	% Missed Appointment – Verizon – Special Other	4.8	0	9.4	0	5.4	0	18	0	7.3	0	1,2,3,4,5
PR-4-02-2200	Average Delay Days – Total	30	31	29	NA	23	7	20	146	10	16	1,3,4,5

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
PR-4-03-2200	% Missed Appointment – Customer	28	17.1	29	22.2	22	11.11	22	15.38	21	24.2	1,2,3,4,5
PR-4-08-2200	% Missed Appt. – Customer – Due to Late Order Conf.		0		0		0		0		3.03	
<b>PR-6- Installation Quality</b>												
PR-6-01-2200	% Installation Troubles reported within 30 Days	2.5	2.65	1.7	3.74	2.1	4.95	2.3	7.69	1.8	4.01	
PR-6-03-2200	% Inst. Troubles reported w/ in 30 Days - FOK/TOK/CPE	1.6	1.32	1.3	0.86	1	0	1	5.13	1.9	2.19	
<b>PR-8 - Open Orders in a Hold Status</b>												
PR-8-01-2200	Open Orders in a Hold Status > 30 Days	13	2.86	8.3	2.78	4.6	2.78	1.4	0	0.7	0	
PR-8-02-2200	Open Orders in a Hold Status > 90 Days	6.9	2.86	4.9	2.78	2.8	2.78	0.9	0	0.2	0	
<b>POTS - Maintenance</b>												
<b>MR-2 - Trouble Report Rate</b>												
MR-2-02-2100	Network Trouble Report Rate – Loop	1.4	0.49	1.4	0.48	1.1	0.39	1	0.37	0.8	0.34	
MR-2-03-2100	Network Trouble Report Rate – Central Office	0.1	0.05	0.1	0.06	0.1	0.05	0.1	0.06	0.1	0.05	
MR-2-04-2100	% Subsequent Reports	20	9.55	20	9.08	18	4.92	17	5.96	15	8.72	
MR-2-05-2100	% CPE/TOK/FOK Trouble Report Rate	1.1	0.44	1.2	0.43	0.9	0.36	0.8	0.32	0.7	0.29	
<b>MR-3 - Missed Repair Appointments</b>												
MR-3-01-2110	% Missed Repair Appointment – Loop Bus.	15	9.35	15	7.92	12	5.87	13	7.14	9.6	9.83	
MR-3-01-2120	% Missed Repair Appointment – Loop Res.	12	7	10	6.14	9.1	4.11	8.2	3.4	8.3	4.78	
MR-3-02-2110	% Missed Repair Appointment – Central Office Bus.	12	9.45	12	4.76	12	13.13	14	11.57	15	13	
MR-3-02-2120	% Missed Repair Appointment – Central Office Res.	8.1	0	5.9	3.7	6.5	3.23	8.5	3.33	8.7	11.1	
MR-3-03-2100	% CPE/TOK/FOK - Missed Appointment	7	6.73	5.9	5.84	5.9	6.79	5.7	10.53	5.9	7.31	
MR-3-04-2100	% Missed Repair Appointment - No Double Dispatch	8.3	4.01	6.9	2.61	5.5	3.11	4.9	3.32			5
MR-3-05-2100	% Missed Repair Appointment - Double Dispatch	43	39.2	43	36.1	43	30.09	41	30.97			5
<b>MR-4 - Trouble Duration Intervals</b>												
MR-4-01-2100	Mean Time To Repair – Total	24	15.3	23	16.1	21	13.91	19	13.22	17	13	
MR-4-02-2110	Mean Time To Repair – Loop Trouble - Bus.	15	13.7	14	14.2	14	13.07	14	12.48	12	12.9	
MR-4-02-2120	Mean Time To Repair – Loop Trouble - Res.	27	21.9	26	23.9	23	17.63	21	15.8	19	15.4	
MR-4-03-2110	Mean Time To Repair – Central Office Trouble - Bus.	9.8	10.8	9.6	8.94	11	9.74	10	10.91	9.2	9.6	
MR-4-03-2120	Mean Time To Repair – Central Office Trouble - Res.	13	5.97	11	12.6	12	11.28	13	16.48	11	6.44	
MR-4-04-2100	% Cleared (all troubles) within 24 Hours	60	82.1	61	80.3	70	85.1	74	87.32	78	87.3	
MR-4-06-2100	% Out of Service > 4 Hours	86	74.3	85	72.9	82	71.83	80	70.45	77	68.8	
MR-4-07-2100	% Out of Service > 12 Hours	67	47.1	65	48.2	61	46.05	58	42.73	56	41.3	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
MR-4-08-2110	% Out of Service > 24 Hours - Bus.	16	13.4	16	14	16	12.67	14	10.53	10	10.8	
MR-4-08-2120	% Out of Service > 24 Hours - Res.	44	31.9	42	37.8	33	21.54	28	17.48	24	17	
<b>MR-5 - Repeat Trouble Reports</b>												
MR-5-01-2100	% Repeat Reports within 30 Days	21	16.8	21	17.5	20	17.84	19	14.25	17	18	
<b>2-Wire Digital Services - Maintenance</b>												
<b>MR-2 - Trouble Report Rate</b>												
MR-2-02-2341	Network Trouble Report Rate – Loop	0.3	0.25	0.3	0.25	0.3	0.58	0.3	0.48	0.2	0.53	
MR-2-03-2341	Network Trouble Report Rate – Central Office	0.1	0.11	0.1	0.14	0.2	0.07	0.1	0.11	0.2	0.23	
MR-2-04-2341	% Subsequent Reports	26	9.09	23	8.33	27	18.18	28	20	31	0	
MR-2-05-2341	% CPE/TOK/FOK Trouble Report Rate	1	1.46	1	0.75	0.9	1.26	1	1.99	0.8	0.94	
<b>MR-3 - Missed Repair Appointments</b>												
MR-3-01-2341	% Missed Repair Appointment – Loop	40	71.4	43	28.6	36	37.5	42	23.08	48	21.4	1,2
MR-3-02-2341	% Missed Repair Appointment – Central Office	24	33.3	41	50	35	0	45	33.33	23	33.3	1,2,3,4,5
MR-3-03-2341	% CPE/TOK/FOK - Missed Appointment	25	14.6	23	33.3	22	31.43	27	48.15	17	12	
MR-3-04-2341	% Missed Repair Appointment - No Double Dispatch	24	57.1	26	25	22	20	22	25			1,2,4,5
MR-3-05-2341	% Missed Repair Appointment - Double Dispatch	61	100	75	50	67	50	69	40			1,2,3,4,5
<b>MR-4 - Trouble Duration Intervals</b>												
MR-4-01-2341	Mean Time To Repair – Total	33	30.2	33	22	27	30.05	35	17.96	25	35.6	
MR-4-02-2341	Mean Time To Repair – Loop Trouble	38	31.1	34	22.7	29	32.75	36	19.21	30	25.5	1,2
MR-4-03-2341	Mean Time To Repair – Central Office Trouble	22	28	28	20.9	23	8.45	34	12.54	18	59.2	1,2,3,4,5
MR-4-04-2341	% Cleared (all troubles) within 24 Hours	60	40	58	72.7	66	61.11	58	75	68	65	
MR-4-07-2341	% Out of Service > 12 Hours	54	100	57	100	41	70	46	40	46	66.7	1,2,5
MR-4-08-2341	% Out of Service > 24 Hours	38	33.3	33	0	27	40	28	10	21	66.7	1,2,5
<b>MR-5 - Repeat Trouble Reports</b>												
MR-5-01-2341	% Repeat Reports within 30 Days	24	10	22	0	18	33.33	14	25	20	5	
<b>Special Services - Maintenance</b>												
<b>MR-2 - Trouble Report Rate</b>												
MR-2-01-2200	Network Trouble Report Rate	0.3	0.26	0.3	0.24	0.2	0.19	0.2	0.2	0.2	0.16	
MR-2-05-2200	% CPE/TOK/FOK Trouble Report Rate	0.4	0.37	0.4	0.32	0.3	0.23	0.3	0.33	0.3	0.23	
<b>MR-4 - Trouble Duration Intervals</b>												
MR-4-01-2200	Mean Time To Repair – Total	8.2	8.05	7.1	6.64	6.9	7.87	7.8	7.01			5
MR-4-04-2200	% Cleared (all troubles) within 24 Hours	95	96.9	97	97.8	98	98.67	97	97.4			5
MR-4-06-2200	% Out of Service > 4 Hours	67	76.7	63	64.7	61	73.77	59	75.41			5
MR-4-08-2200	% Out of Service > 24 Hours	4.4	3.49	2.7	2.35	2.1	1.64	2.5	0			5
<b>MR-5 - Repeat Trouble Reports</b>												

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
MR-5-01-2200	% Repeat Reports within 30 Days	23	27.1	19	17.6	18	14.67	17	19.48	18	22.6	
<b>UNBUNDLED NETWORK ELEMENTS (UNEs)</b>												
<b>UNE Ordering</b>												
<b>Platform</b>												
<b>OR-1 - Order Confirmation Timeliness</b>												
OR-1-02-3143	% On Time LSRC – Flow Through		99.3		98.9		99.64		99.94		97.4	
OR-1-04-3143	% On Time LSRC/ASRC No Facility Check		96.4		97.5		92.66		96.96		98	
OR-1-06-3143	% On Time LSRC/ASRC Facility Check		95.7		99.1		96.15		100		99.4	
<b>OR-2 - Reject Timeliness</b>												
OR-2-02-3143	% On Time LSR Reject – Flow Through		99.7		99.6		99.14		99.93		99.3	
OR-2-04-3143	% On Time LSR/ASR Reject No Facility Check		98.8		98.3		95.34		98.44		99.8	
OR-2-06-3143	% On Time LSR/ASR Reject Facility Check		100		100		100		100		100	1,2,3
<b>OR-6 - Order Accuracy</b>												
OR-6-01-3143	% Accuracy - Orders		90.2		94.3		97.64		93.4		90.3	
OR-6-02-3143	% Accuracy – Opportunities		98.1		99.4		99.75		98.97			5
OR-6-03-3143	% Accuracy – LSRC		98.3		99.3		99.42		98.62		0	
<b>OR-7 - Order Completeness</b>												
OR-7-01-3143	% Order Confirmation/Rejects sent within 3 Business Days		99.9		99.9		99.86		99.89		99.9	
<b>Loop/Pre-qualified Complex/LNP</b>												
<b>OR-1 - Order Confirmation Timeliness</b>												
OR-1-02-3331	% On Time LSRC – Flow Through		99.4		99.2		99.06		99.76		99.7	
OR-1-04-3331	% On Time LSRC/ASRC No Facility Check		98		93.6		94.19		98.88		99.3	
OR-1-06-3331	% On Time LSRC/ASRC Facility Check		99.3		97.2		93.1		99		99.2	
<b>OR-2 - Reject Timeliness</b>												
OR-2-02-3331	% On Time LSR Reject – Flow Through		99.4		99.4		99.88		99.95		99.8	
OR-2-04-3331	% On Time LSR/ASR Reject No Facility Check		92		92.7		91.98		98.72		99.6	
OR-2-06-3331	% On Time LSR/ASR Reject Facility Check		100		100		96.15		100		100	
<b>OR-6 - Order Accuracy</b>												
OR-6-01-3332	% Accuracy - Orders		93.9		98.4		98.56		98.27			5
OR-6-02-3332	% Accuracy – Opportunities		98.8		99.8		99.79		99.63			5
OR-6-03-3332	% Accuracy – LSRC		94.3		99.8		99.74		99.54			5
<b>OR-7 - Order Completeness</b>												
OR-7-01-3331	% Order Confirmation/Rejects sent within 3 Business Days		99.8		99.2		99.8		99.82		99.8	

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>2 Wire Digital Services</b>												
<b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b>												
OR-1-04-3341	% On Time LSRC/ASRC No Facility Check		99		99.1		98.72		98.7		99.4	
OR-1-06-3341	% On Time LSRC/ASRC Facility Check		NA		NA		NA		NA		NA	
<b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>												
OR-2-04-3341	% On Time LSR/ASR Reject No Facility Check		100		98.3		100		99		100	
OR-2-06-3341	% On Time LSR/ASR Reject Facility Check		NA		NA		NA		NA		NA	
<b>2 Wire xDSL Loops</b>												
<b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b>												
OR-1-04-3342	% On Time LSRC/ASRC- No Facility Check		99.3		98.5		98.9		98.05		99	
OR-1-06-3342	% On Time LSRC/ASRC - Facility Check		NA		NA		NA		100		NA	4,5
<b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>												
OR-2-04-3342	% On Time LSR/ASR Reject- No Facility Check		100		99.2		100		100		100	
OR-2-06-3342	% On Time LSR/ASR Reject Facility Check		NA		NA		NA		NA		NA	
<b>2 Wire xDSL Line Sharing</b>												
<b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b>												
OR-1-04-3343	% On Time LSRC/ASRC- No Facility Check		NA		80		100		95.12			2,3,5
OR-1-06-3343	% On Time LSRC/ASRC - Facility Check		NA		NA		NA		NA			
<b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>												
OR-2-04-3343	% On Time LSR/ASR Reject- No Facility Check		NA		100		100		100			2,3,4,5
OR-2-06-3343	% On Time LSR/ASR Reject Facility Check		NA		NA		NA		NA			
<b>POTS / Special Services - Aggregate</b>												
<b>OR-3 - Percent Rejects</b>												
OR-3-01-3000	% Rejects (ASRs + LSRs)		24.9		28.6		27.72		23.24		19.9	
<b>OR-4 - Timeliness of Completion Notification</b>												
OR-4-02-3000	Completion Notice (BCN) - % On Time		99.3		98.9		99.2		98.65			5
OR-4-05-3000	Work Completion Notice (PCN) - % On Time		100		100		99.99		100			5

Metric Number	Metric Name	July		August		September		October		November		Notes
		VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	VZ	CLEC	
<b>OR-5 - Percent Flow-Through</b>												
OR-5-01-3000	% Flow Through - Total (ASRs + LSRs)		57		55.3		59.19		73.51		72.9	
OR-5-03-3000	% Flow Through Achieved		94.6		95.7		97.1		96.87		97.5	
<b>Special Services - Electronically Submitted</b>												
<b>OR-1 - Order Confirmation Timeliness (ASRs + LSRs)</b>												
OR-1-04-3210	% On Time LSRC/ASRC No Facility Check DS0		NA		NA		NA		NA		NA	
OR-1-04-3211	% On Time LSRC/ASRC No Facility Check DS1		NA		NA		NA		NA		NA	
OR-1-04-3213	% On Time LSRC/ASRC No Facility Check DS3		NA		NA		NA		NA		NA	
OR-1-04-3214	% On Time LSRC/ASRC No Facility Check (Non DS0, DS1, & DS3)		99.2		96.9		98.92		96.13		98.8	
OR-1-06-3210	% On Time LSRC/ASRC Facility Check DS0		NA		NA		NA		NA		NA	
OR-1-06-3211	% On Time LSRC/ASRC Facility Check DS1		85.6		82.4		74.05		86.88		91.2	
OR-1-06-3213	% On Time LSRC/ASRC Facility Check DS3		50		100		100		42.86		83.3	1,2,3,5
OR-1-06-3214	% On Time LSRC/ASRC Facility Check (Non DS0, DS1 & DS3)		100		100		100		96.34		98.2	3
<b>OR-2 - Reject Timeliness (ASRs + LSRs)</b>												
OR-2-04-3200	% On Time LSR/ASR Reject No Facility Check		95.5		98.5		100		100		100	
OR-2-06-3200	% On Time LSR/ASR Reject Facility Check		86.3		85.2		92.16		95.21		96.5	
<b>Special Services - FAX/MAIL Submitted</b>												
<b>OR-1 - Order Confirmation Timeliness</b>												
OR-1-08-3210	% On Time ASRC No Facility Check DS0		NA		NA		NA		NA		NA	
OR-1-08-3211	% On Time ASRC No Facility Check DS1		NA		NA		NA		NA			
OR-1-08-3213	% On Time ASRC No Facility Check DS3		NA		NA		NA		NA			
OR-1-08-3214	% On Time ASRC No Facility Check (Non DS0, DS1 & DS3)		NA		NA		NA		NA			
OR-1-10-3210	% On Time ASRC Facility Check DS0		NA		NA		NA		NA			
OR-1-10-3211	% On Time ASRC Facility Check DS1		0		NA		NA		100		NA	1,4,5
OR-1-10-3213	% On Time ASRC Facility Check DS3		100		NA		NA		NA		NA	1
OR-1-10-3214	% On Time ASRC Facility Check (Non DS0, DS1 & DS3)		NA		NA		NA		NA		NA	
<b>OR-2 - Reject Timeliness</b>												
OR-2-08-3200	% On Time ASR Reject No Facility Check		NA		NA		NA		NA		NA	
OR-2-10-3200	% On Time ASR Reject Facility Check		NA		NA		NA		NA		NA	