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December 1, 2003

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
455 12th Street, S.W. - Portals  
Washington, DC 20554

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

Dear Ms. Dortch:

The enclosed letter was provided to W. Maher of the Wireline Competition Bureau today. If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink that reads "Ann D. Berkowitz".

cc: Carol Matthey  
Peter Young  
Dennis Johnson  
William Dever



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Project Manager – Federal Affairs

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December 1, 2003

William Maher  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
455 12th Street, S.W.  
Washington, DC 20554

Dear Mr. Maher:

Pursuant to Condition V, Attachment A, Paragraph 4 of the order approving the merger between Bell Atlantic and GTE (“Merger Order”), as modified by the Consent Decree (FCC 02-119) released on April 23, 2002, Verizon hereby provides notice that on October 29, 2003 the New York Public Service Commission adopted certain changes to the New York Carrier-to-Carrier Guidelines (the New York “business rules”). Attachment 1 to this letter is a copy of the New York PSC October 29 Order.

The Federal Carrier-to-Carrier Guidelines for Verizon-East, which are based on the New York business rules, are used now only to report performance in the fGTE service areas of Virginia. Over the last year and a half or so, Verizon has been participating in a collaborative effort under the auspices of the Virginia State Corporation Commission (SCC) to develop carrier-to-carrier service quality measurements, standards and financial incentives for the fGTE service areas of Virginia (*see* Attachment 2) . Verizon anticipates filing a unified plan based on the New York business rules with the Virginia SCC within the next ten days. The unified plan would apply to the service areas of both the fGTE Virginia and the fBA Virginia. That filing will reflect changes based on the New York PSC’s October 29 order. Verizon therefore recommends that no immediate changes be made to the federal metrics based on the New York PSC order. Instead, Verizon recommends waiting until the unified Virginia plan has been filed with the Virginia SCC. By December 19, 2003, Verizon will recommend changes to the relevant federal metrics consistent with the New York PSC’s October 29 order, as reflected in the unified Virginia plan.

If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann D. Berkowitz".

cc: Carol Matthey  
Peter Young  
Dennis Johnson  
William Dever

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

At a session of the Public Service  
Commission held in the City of  
Albany on October 22, 2003

COMMISSIONERS PRESENT:

William M. Flynn, Chairman  
Thomas J. Dunleavy  
James D. Bennett  
Leonard A. Weiss  
Neal N. Galvin

CASE 97-C-0139 - Proceeding on Motion of the Commission to  
Review Service Quality Standards for Telephone  
Companies.

ORDER ESTABLISHING MODIFICATIONS TO THE  
INTER-CARRIER SERVICE QUALITY GUIDELINES  
AND DELEGATING AUTHORITY

(Issued and Effective October 29, 2003)

BY THE COMMISSION:

INTRODUCTION

On October 25, 2002, we issued an Order Modifying Existing and Establishing Additional Inter-Carrier Service Quality Guidelines (C2C Guidelines) for Verizon New York Inc. f/k/a New York Telephone Company (Verizon) and Frontier Telephone of Rochester, Inc. (Frontier). That order followed similar adoptions in this case in March 1998; February, June and November 1999; February and December 2000; October 2001; and, April 2002. Since our October 2002 order was issued, the Carrier Working Group (CWG or Group) - whose active membership includes staff, ILECs and CLECs operating in New York State - continued its collaboration and has productively reached consensus on many more issues. This order adopts those

consensus changes to the C2C Guidelines and resolves several other disputed issues.

Notice of our proposed action adopting additional inter-carrier service quality metrics and standards was published in the State Register on June 17, 2003. The comment period expired on August 1, 2003. No comments were received.

#### DISCUSSION

The CWG submitted items for our consideration which are either consensus (where the affected parties have agreed upon the necessity and implementation of standards and metrics) or non-consensus (where full agreement of the CWG has not been reached). We expect that the CWG will continue to monitor performance to insure competitive development in the local market and advise us of the need for further modification of these adopted items and any existing standards and measures.

#### Consensus Changes

The items below were submitted by the CWG as consensus. As they represent agreement among the parties we adopt their recommendations.

1. Administrative Changes to the Carrier to Carrier Guidelines

The CWG suggests clarification of language and correction of minor errors and also indicates changes necessary to conform the Guidelines to current operational practices. These are summarized in Attachment 1 - Section A: Administrative Clarifications to Guidelines - no process change required, and Section B: Changes to Guidelines - process change required. These are reasonable consensus changes, which will help clarify the guidelines and measure more efficient operational processes, and we adopt them.

2. Revisions to the Guideline Appendices

Also submitted as consensus, the Group proposes revisions to several of the Guideline's appendices. These include: Appendix A - Specials and Trunk Maintenance Code Descriptions; Appendix B - Provisioning Codes; Appendix S - Projects Requiring Special Handling; and, Appendix K - Statistical Metric Evaluation Procedures<sup>1</sup>. These appendix revisions have the consensus approval of the entire Group and are adopted. The revised appendices are included in Attachment 2A (Appendix A and Appendix B), Attachment 2B (Appendix K), and Attachment 2C (Appendix S).

3. Proposal for Approval of Future Administrative Changes

As discussed above, the CWG routinely brings to us "administrative changes" for our approval. These changes largely correct clerical errors or make minor, non-substantive changes affecting the reporting of the metrics we adopt. The CWG requests an administrative process whereby these changes can be more efficiently and expeditiously implemented. They request that we delegate the authority to approve administrative changes to the C2C Guidelines to the Director of the Office of Communications.

As these changes more accurately reflect the meaning of the C2C Guidelines and assist incumbents and competitors in monitoring telephone service quality performance, we will approve this request. For definition purposes, "administrative change" will be one that merely clarifies the guidelines, is non-substantive and is agreed to by all. The Director of the Office of Communications will approve such future changes or

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<sup>1</sup> The Appendix K - Statistical Metric Evaluation Procedures also apply to the Frontier Carrier to Carrier Guidelines.

determine that such changes should properly be brought to our attention.

Billing Accuracy and Claims Processing Measurements

In a previous order, the Commission approved interim billing measurements and directed the CWG to review the measurements and recommend necessary changes<sup>2</sup>. Since then, the Billing Subcommittee of the CWG undertook the task of reviewing interim metrics regarding Billing Accuracy and Claims Processing, which measure the promptness with which Verizon acknowledges and resolves CLEC billing adjustment claims. After several meetings and much effort by the parties to produce permanent measures, the Billing Subcommittee was able to reach consensus on the following sub-metrics relating to Billing Accuracy and Claims Processing:

- BI3-04: % CLEC Billing Claims Acknowledged Within Two Business Days;
- BI3-05: % CLEC Billing Claims Resolved Within 28 Calendar Days After Acknowledgement; and,
- BI3-09: % Full or Partial Denials

These sub-metrics, established through consensus of the CWG, are adopted. Other aspects of the Billing Accuracy and Claims Processing metric, including its definition and additional sub-metrics, did not achieve full consensus of the CWG and our findings on those issues are discussed below.

Non-Consensus Changes

The CWG submitted several items that, despite the best efforts of the Group, have not achieved consensus status but are important enough that at least one party recommends that the

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<sup>2</sup> Case 97-C-0139, Order Modifying Existing And Establishing Additional Inter-Carrier Service Quality Guidelines (issued October 29, 2001).

Commission make a determination. For these items, the parties have submitted their positions, and our findings on these non-consensus items are discussed below.

1. Billing Accuracy and Claims Processing Metric Definitions

As mentioned above, the parties were only able to reach partial consensus on Billing Accuracy and Claims Processing metrics. The Group is in disagreement on language that defines several key elements of the billing claims metric respecting its application and operation. Specifically, the Group is at odds over language regarding service applicability, acknowledgement, resolution, closure, appeal and scope of the proposed billing claim sub-metrics. Our determination on these issues is discussed below.

a) Service Applicability and Scope

A fundamental difference among the parties is whether the billing metrics are applied only to wholesale local services, as recommended by Verizon, or if its application should be broadened to include all local services, as the CLECs would like. Verizon states that limiting the metric to wholesale local services only is necessary to exclude its applicability to services that are beyond the scope of the guidelines and may be beyond the jurisdiction of the Commission. The CLECs argue that these billing metrics should be applied to all Verizon wholesale service offerings, including special access.

Verizon and the CLECS are also in dispute on the inclusion of language that would define the scope of services subject to measurement by the billing metrics by creation of an appendix agreed to by Verizon and the CLECs. Verizon believes its opinion on service applicability, i.e., limiting the

application of billing metrics to wholesale local service only, renders additional "scope" definition unnecessary.

At issue here is whether these billing metrics should be applied to all wholesale services, including access services. The CLEC request is overly broad, and there is no persuasive evidence that the current regulatory scheme for measuring inter-carrier performance is inadequate or why these particular metrics should apply beyond the scope of products and services subject to the measuring and reporting requirements in the current guidelines. We conclude that the term "wholesale local" is adequately inclusive of all products and services subject to these guidelines and adopt its inclusion in the metric definition. Likewise, we see no need to include additional language in the metric's scope definition other than what has been agreed to by the parties.

b) Acknowledgement

With regard to billing claims acknowledgement, some of the CLECs want additional, clarifying language on e-mail notification, computing acknowledgement performance, and date stamping. Verizon replies that these terms are redundant and will cause confusion.

While it may be redundant, inclusion of the clarification language sought by the CLECs should not cause confusion as Verizon claims. The clarifying language sought by the CLECs on acknowledgement, i.e., e-mail notification, computing acknowledgement performance, and date stamping, is reasonable and should be included.

c) Resolution

Some CLECs propose specific language on claim resolution that would require Verizon to state reasons for claim denials, identify credit due amounts on granted claims and specify reasoning and credit due amounts on partially granted requests. Verizon claims it may not be able to provide specific

information the CLECs desire and proposes revised resolution language that provides CLECs available information. Also, the CLECs seek to include additional language that clarifies the timeliness of the resolution. Verizon and Time Warner Telecom (Time Warner) believe such language is repetitive and unnecessary.

In this instance, it is not clear that the benefits sought by the CLECs in their proposal to modify the resolution process outweigh the burdens of implementing such a process. While it may not go as far as the CLECs desire, Verizon's proposal represents a reasonable offer to provide all the available information the CLECs request. Verizon's proposed language is adopted.

d) Closure

Verizon is opposed to additional language proposed by the CLECs that specifies a billing claim be closed when credit appears on an invoice or when denial is mutually agreed via e-mail. The CLECs believe such language is necessary, as it is important that Verizon and a CLEC be in agreement as to when a claim is closed. Verizon says it cannot measure when credit appears on an invoice and believes a definition of "closure" is unnecessary.

The inclusion of language that defines when a dispute is "closed" is reasonable, and we adopt the definition proposed by the CLECs.

e) Appeal

As a result of the proposed addition of a sub-metric that measures the timeliness of Verizon's resolution of disputed billing claims (proposed BI3-11, see below), CLECs propose language that would define when the appeal process commences. Because appeals of disputed claims are handled outside the mechanized claims system, Verizon challenges the necessity of such a measurement, and likewise, the necessity of additional

language that defines the starting point of the appeal process. Time Warner is in agreement with Verizon that, without a mechanized process, measurement of the appeals process is impractical.

Further consideration of the appeals definition for a mechanized process is premature until the appeals process is fully developed and mechanized.

2. Non-consensus Billing Accuracy and Claims Processing Sub-metrics

In addition to the three Billing Accuracy and Claims Processing sub-metrics submitted as consensus and approved above, parties have submitted five other billing sub-metrics for our consideration. Absent consensus, the parties commented separately on these sub-metrics. Based on a review of the differing positions, our findings are discussed below.

a) % CLEC Billing Claims Resolved Within 58 Days After Acknowledgement (BI3-06)

The parties have agreed to a performance standard of 95% for billing claims resolved within 28 days of acknowledgement (BI3-05, see above). The CLECs propose here an additional sub-metric designed to ensure that claims which may take longer than 28 days to resolve receive adequate attention, and propose a 99.5% standard for resolution within 58 days of acknowledgement. In support of the CLEC claims, MetTel provided data that it says indicates poor performance by Verizon in the 2002 calendar year for timely resolution of its claims (26.66% resolved in 28 days, and 37.6% in 58 days). Verizon claims that it needs no further incentive to resolve claims greater than 28 days, that imposition of such a metric would be costly and that the CLECs have not substantiated extraordinary circumstances that show that multiple measurement of billing claims resolved is necessary.

It is apparent that improvements to the resolution process are necessary and the desire for CLECs to have a metric that measures the resolution of billing claims that exceed 28 days may have merit. We expect, however, that to achieve the performance standard in BI3-05 (95% within 28 days) Verizon will need to implement improvements to the existing process, and those improvements will undoubtedly reduce the number of claims that exceed the 28-day resolution period. We also expect that existing escalation procedures should adequately handle the 5% of claims expected to exceed the 28-day timeline. Therefore, we will not adopt the sub-metric at this time. We invite the CWG to continue to monitor claims that take more than 28 days to be resolved. Should such long delays persist, we direct the CWG to examine the underlying reasons for such delays and pursue future remedies here, if necessary.

b) % CLEC Billing Claim Credits Not Appearing on the Bill Within 30 days (BI3-07)

The CLECs propose this metric to minimize the potential for Verizon to delay crediting approved amounts owed to CLECs on claims that have been resolved in a timely manner. They claim that without a proposed 2.5% allowable standard, Verizon can make the core resolution metric (billing claims resolved within 28 days of acknowledgement), but then delay the actual credit. MetTel provides data for the 2002 calendar year that it says indicates that only 78.67% of bill credits appeared on the invoice within 30 days. Time Warner proposes that the standard be applied to credits that do not appear within 45 days. Verizon states that it has no mechanized ability to capture the data necessary to perform the desired measurement and that performing such on a manual basis would be costly.

CLECs are justified in their expectation that bill credits appear on the invoice within a reasonable amount of time. Time Warner makes a valid point that to avoid issues

regarding calendar months and bill cycle hold periods, the timeframe should be 45 days. We agree and will adopt the BI3-07 metric with a 45 day timeline. Also, to maintain consistency throughout the guidelines, we direct that this metric be redefined to reflect a performance-met standard (in this case, 97.5%), rather than the proposed performance-missed standard of 2.5%.

- c) % CLEC Billing Claim Credits Appearing on the Bill Without a Resolution Notice Having Been Sent to the CLEC (BI3-08)

The CLECs claim that they have difficulty reconciling their bills because credits owed them are not properly identified. In the case of billing claims, the Notice of Resolution alerts a CLEC to the amount of bill credits that are due. To avoid confusion and frustration in the process, they propose this metric (with a 0.5% allowable standard) to ensure that adequate notice of resolved billing claims is received and credits are processed promptly. As with BI3-07, Verizon claims this metric would require additional expense to implement and that the current billing dispute escalation process is adequate. It counters that the CLECs are in the best position to measure performance in this area. Time Warner comments that the metric proposed in BI3-07 sufficiently addresses the CLECs' billing credit concerns.

The CLECs should have the capability to match bill credits received from Verizon with the underlying causes for credits, for example, Performance Assurance Plan reports. In BI3-07 (see above), we adopt a metric that addresses the CLEC's threshold concern, i.e., the timely receipt of credits. In this case, the determining factor (whether or not a Notice of Resolution was received prior to the credit issuance), lies with the CLEC and not Verizon. It is unreasonable to assume that Verizon could measure the receipt of such notice after-the-

fact without undue burden, and we reject the CLEC proposal. The CLECs have the ability to monitor such performance and should report back to the CWG (with supporting data) should they experience poor performance in this area.

d) % CLEC Billing Claims Not Acknowledged Within Ten Business Days (BI3-10)

In the BI3-04 metric (submitted and approved above as consensus), a standard of 95% is established for billing claims acknowledged within 2 business days. The CLECs claim that an additional metric is necessary to ensure that claims not acknowledged within two days receive prompt attention. They propose a 99.5% standard for claims which should be acknowledged within 10 days. MetTel provides data which shows that while Verizon's 2-day acknowledgement performance was 94.23% in calendar year 2002, only 97.34% were acknowledged after 10 days and 2.37% went unacknowledged. The CLECs claim that inadequate acknowledgement leads to increased monitoring costs and longer resolution periods, resulting in delayed billing credits. VZ claims that this metric is unnecessary as it is repetitive to BI3-04 and would be costly to implement. It also believes that the CLECs have not adequately shown why an additional measurement of acknowledged billing claims is necessary.

It is unclear why certain claims take so long to be acknowledged. However, we expect that Verizon's overall performance in the timely acknowledgement of CLEC billing claims will improve with the implementation of BI3-04, thus reducing the amount of claims that take up to 10 days or more to be acknowledged. With lower volumes of unacknowledged claims, the existing escalation process should satisfy CLEC concerns regarding claim acknowledgements greater than 2 days. While we do not adopt the metric at this time, it is without prejudice should claim acknowledgements become severely delayed, i.e.,

significant numbers of claims not acknowledged more than 10 days.

e) Disputed Resolution Claims Finalized in 30 Days (BI3-11)

To establish improvements in the time it takes to complete the appeals process for disputed claims, CLECs want a 95% performance standard within 30 days of when an appeal is requested by a CLEC. They claim that their appeals of claims denied by Verizon take an unreasonable amount of time to be completed. Verizon claims it has no means to measure appeals, and that CLECs are in a better position to monitor appeals and pursue their resolution within the appropriate escalation mechanisms that exist. Time Warner questions whether measuring the appeals process is practical given the interaction among carriers required to complete the appeal.

The resolution of disputed claim decisions is entirely a non-mechanized process that involves personal interaction by both parties. Given the unregimented nature of the process, it is reasonable to assume that the time necessary to complete a claim will vary on a case-by-case basis. While we are not opposed to the inclusion of an appeals process measurement in the guidelines at some point, it is premature to adopt a measurement standard without consideration of all elements involved in the appeals process. Accordingly, we do not adopt the proposed metric at this time but encourage the CWG to develop this item further.

3. Timeliness of Loss of Line Report

Several CLECs jointly propose the addition of a metric to measure UNE-P/Resale loss of line notifications performance. It includes two sub-metrics that measure: a) timeliness (% UNE-P/Resale Line Loss Notifications in Days); and b) accuracy (% UNE-P/Resale Line Loss Notifications Not On Line Loss

Report). In response, Verizon proposes its own version of the Loss of Line metric for our consideration.

a) % UNE-P/Resale Line Loss Notifications in Days

This metric would measure the timeliness of the loss of line notifications, and the CLECs propose a 95% performance standard within 2 calendar days of migration. Verizon disagrees that a metric is necessary but, if found necessary, proposes its own metric with a 95% performance standard within 5 calendar days. The sponsoring CLECs claim this measurement is necessary to ensure that the most efficient method for CLEC notification of a customer migration is achieved. The CLECs state that timely notification is necessary for CLECs to prevent potential double-billing of the CLEC customer and also to ensure Verizon has not over-billed the CLEC. Verizon objects to the proposed metric, claiming that the current notification process is adequate. It claims that a performance measurement is unnecessary at this time; however, the company recommends that if the Commission is to adopt a loss of line reporting process, the CWG should have more opportunity to develop a consensual proposal.

Timely loss of line notifications are vital to CLEC business and the request to measure Verizon's performance in this area has merit. While parties offer differing performance proposals, data supplied by the CLECs and Verizon indicates that a performance standard of 95% within 2 days is reasonable and achievable, and we adopt the CLEC proposal.

b) % UNE-P/Resale Line Loss Notifications Not On Line Loss Report

This metric attempts to measure the accuracy of the loss of line notifications, i.e., the number of actual line losses that appear in the notification report. The CLECs propose a performance standard of no more than 1% of lost lines

not reported on the line loss report. They claim such accuracy is needed to avoid the harmful situation of double-billing its customers as well as to ensure Verizon is not billing them improperly. The CLECs cite instances in the past where inaccurate notification reports caused significant harm to their relationship with customers.

Although reporting accuracy is a vital requirement for a CLEC's business needs, it is not apparent that this aspect of the loss of line metric has been fully developed for our consideration. It remains unclear whether the accuracy of the line loss notification tool is a proper indication of Verizon performance regarding the timely notification of line losses or if other factors contribute to its accuracy. At this time, we will not adopt the accuracy measurement but invite the CWG, if it deems appropriate, to further explore all factors involved with the accuracy of the line loss notification report.

#### 4. Missed Appointments

Verizon proposes modifications to existing metrics: % Completed on Time - 2-Wire xDSL (PR4-14) and % Missed Appointment - Dispatch (PR4-04). The proposal would exclude 2-Wire DSL from the PR4-04 metric and eliminate a sub-metric in PR4-14 that requires a manual process to track serial numbers on DSL orders that were jointly tested. In the joint testing process, order acceptance is confirmed by the existence of a CLEC-transmitted serial number. The revisions preserve Verizon's commitment to joint testing, which are redefined and included as an Appendix to the surviving metric. Verizon argues that manual data collection requirements of the current process are burdensome, and that the PR4-14 measurement is duplicative (orders are already captured in PR4-04). Verizon claims that inadequate 2-Wire xDSL loop provisioning would be indicated in

PR6-01 (% Installation Troubles), and the modifications it seeks would not be harmful to CLECs.

CLECs were not united in their opposition. The CLECs in opposition to the Verizon proposal were MetTel, MCI and AT&T. The opposing CLECs collectively disagree with Verizon's proposal to remove the serial number requirement of the existing PR4-14 metric. They feel the transmittal, collection and reporting of the serial number is a vital part of the joint testing process. The CLECs are not opposed to the development of an automated system, however, until such is deployed they believe Verizon should continue to report PR4-14 performance with its manual serial number requirement. The opposing CLECs are also not convinced that the PR6-01 metric adequately measures 2-Wire xDSL loop provisioning. Covad supports an automated serial number confirmation system, but it is not opposed to Verizon's proposed revisions.

Verizon's proposed modifications, including its commitment to the joint testing process, seek to promote efficiency and should pose no harm to CLECs. Accordingly, we will adopt the proposal and encourage Verizon to continue efforts to improve efficiency through further automation of the joint testing process. That effort should continue to be monitored by the CWG.

##### 5. Timeliness of Bill Completion Notification

Verizon proposes modifications to % BCN Sent within 2 Business Days (OR4-17). This metric measures the percent of Billing Completion Notices (BCNs) sent to the CLEC within 2 days of the provisioning completion date for resale and UNE-P orders received via electronic data interchange (EDI). Verizon claims it is unable to achieve the current standard - 95% of within 2 days - due to orders held in a condition called "bill cycle hold", a requirement of its billing system. It believes the

metric should be modified to reflect that impact. Verizon claims that bill cycle hold is a requirement outside its control, and its proposal would allow service orders held in bill cycle hold a 3 day interval (rather than the existing 2 day period) to be considered on time for measurement purposes.

MCI, AT&T and MetTel object to Verizon's proposal. They argue that the existing standard is reasonable, and that lowering the standard just to meet Verizon performance is not desirable. They believe the goal of the measurement should be to improve performance, and Verizon has not adequately substantiated its claims. MetTel offers a compromise proposal which would require higher performance (96.5%) for unaffected BCNs (issued in a two day interval) and for BCNs in bill cycle hold (issued in a 3 day interval). While MCI supports MetTel's counterproposal, AT&T proposes an even higher standard (98%) for both BCNs issued in 2 days, and those BCNs issued in 3 days impacted by bill cycle hold.

Verizon has not sufficiently supported its request for relief from the performance standard of this metric. Accordingly, we do not adopt the Verizon proposal at this time. However, Verizon is free to explore in greater detail the two CLEC options proposed to determine if a consensus measurement can be achieved.

#### CONCLUSION

The consensus recommendations of the Carrier Working Group, as discussed in and appended to this order, are adopted. The non-consensus metrics and standards are resolved as discussed herein. These revised metrics will, along with the existing guidelines, promote a competitive local exchange market. These modifications shall become effective immediately. Reporting shall begin for the January 2004, metric period reported in February 2004 unless otherwise specified in this

order. As directed, the Carrier Working Group and its subcommittees shall continue to address issues and report findings and recommendations to us as required. Verizon shall file compliance documents with the Commission within fifteen (15) days of the issuance of this order.<sup>3</sup> These and future inter-carrier service quality guidelines do not supercede commitments in existing interconnection agreements unless the contract terms so specify or the contracting parties have otherwise agreed to be bound by the guidelines.

The Commission orders:

1. The revised metrics and standards discussed in this Order and appended to it are adopted.

2. Within 15 days of the date this Order is issued, Verizon New York Inc. shall file with the Acting Secretary (20 copies) and serve upon each party the ordered corrections, changes and additions to the Guidelines Document, with the exception of Appendix N.

3. Within 45 days of the date this Order is issued, Verizon New York Inc. shall file with the Acting Secretary (20 copies) and serve upon each party the ordered corrections, changes and additions to Appendix N of the Guidelines Document.

4. This proceeding is continued.

By the Commission,

(SIGNED)

JACLYN A. BRILLING  
Acting Secretary

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<sup>3</sup> Due to Verizon's internal Change Control review requirements, the company may delay filing of Appendix N - Table of Measures, Sub-Metrics and Product Disaggregation, until 45 days after the issuance of this order.

**Section A: Administrative Changes to the Guidelines Not Requiring Process Changes**

Miscellaneous.

*Change Proposed:*

Add version control information to the C2C guidelines. Additional language as follows:

1. Add the order date on the cover of the guidelines filed for the compliance filing. E.g. August 2003 based on NY PSC 8/xx/03 order.
2. Add footer information indicating the state, Order year, order effective month, (hyphen separation) state, order year and order issue month. For example, if NY issued an order in August 2003 and the effective month was September 2003, the footer for the guidelines would read as follows: NY200309-NY200308

*Rationale:*

Version control information will ensure that all parties have most recent document and are aware of order date, effective date and compliance filing date. All months used in the example above are examples only. They are not based upon actual months.

*Change Proposed:*

Add a matrix for all URLs referenced within the guidelines. Matrix will provide URL info, metrics impacted, and general description of the information found at the URL. For example,

Metric	URL referenced	Information contained
PO-1	<a href="http://www.wholesale.....">http://www.wholesale.....</a>	holiday schedule for current year.

*Rationale:*

Clarification added per CWG 3/28/03 review call. Will contain all URLs in one spot and eliminate existing Appendix L.

*Change Proposed:*

Update the page at the beginning of the C2C guidelines that has TEST Ids and Verizon Affiliate Reporting. Add a Header “General Exclusions”

*Rationale:*

Clarification added per CWG 3/28/03 review call.

*Change Proposed:*

Add an exclusion to General Exclusions (Ordering) for internally generated LSRs and a general exclusion for Provisioning for internally generated service orders.

*Rationale:*

LSRs (for Ordering) or Service Orders (for Provisioning) internally generated by Verizon should not be counted in the CLEC aggregate data because the LSR was generated per Verizon and not per CLEC request. This change was discussed and agreed upon during the 3/28/03 CWG review.

***Miscellaneous, continued******Change Proposed:***

Add product code information table after Retail Analog Compare Table.

***Rationale:***

Product code table matches the four digit extension to the metrics listed on the C2C templates. The product code table provides information about what products are included in the metric. This change was consensus at the 6/5/03 meeting.

***Change Proposed:***

Change any reference to VADI Verizon Advanced...to DSNO (Data Services Network Organization) aka VADI

***Rationale:***

Clarification to new company title.

Retail Compare Table.
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***Change Proposed:***

Update the Provisioning section of the Retail Compare as follows:

Delete UNE POTS Other and its retail compare.

Add UNE POTS Loop New with a retail compare of Retail POTS – Total

***Rationale:***

Clarification to Retail Compare Table.

***Change Proposed:***

Update the Provisioning and Maintenance sections of the Retail Compare as follows:

Change Interconnection Trunks to Interconnection Trunks (CLEC)

***Rationale:***

Clarification to Retail Compare Table.

Global Change for Interconnection Trunks
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***Change Proposed:***

Change any appearance of CLEC Trunks in the Products section for Ordering, Provisioning and Maintenance to Interconnection Trunks (CLEC)

***Rationale:***

Ensures that product is referenced consistently throughout the guidelines.

Global Change for VADI exclusions
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*Change Proposed:*

Remove VADI from the list of Exclusions wherever it appears in the guidelines.

*Rationale:*

VADI exclusion is already cared for in the General Exclusions section of the guidelines.

<b>PO-1</b>	<b>Response Time OSS Pre-Ordering Interface</b>	<b>Products:</b> EDI, CORBA, WEB GUI
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*Change Proposed:*

Change the Exclusions section, second paragraph to reference the 2003 Holiday schedule.

*Rationale:*

Language clarification.

<b>PO-2</b>	<b>OSS Interface Availability</b>	<b>Products:</b> Maintenance Web GUI (RETAS)/ Pre-ordering/Ordering WebGUI, EDI, CORBA, Maintenance – Electronic Bonding Interface
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*Change Proposed:*

Change the Definition section, Scheduled Availability paragraph to read (added text in **bold**):

Scheduled Availability is as follows:

- Prime Time: **06:00:00 to 23:59:59** ~~06:00AM to 12:00AM~~ EST Monday through Saturday, **excluding** major Holidays
- Non-Prime Time: **00:00:00 to 05:59:59** ~~12:01AM to 5:59AM~~ EST Monday through Saturday, and all day Sundays and Holidays.

*Rationale:*

Clarification on the existing process.

**PO-2 continued***Change Proposed:*

Change the Definition section, last paragraph to read (added text in **bold**):

Separate measurements are performed for each of the following: Pre-Ordering/Ordering EDI, Pre-Ordering/Ordering/Maintenance Web GUI (**LSI/W**), CORBA, and Maintenance Electronic Bonding **Interface** (EB). Each availability interface is measured separately with each interface having its own set of processing complexes. A processing complex consists of a set of servers that serve as primary and backup. The number of processing complexes associated with each interface (EDI, CORBA or WEB GUI (**also known as LSI/W**)) varies as needed, however, the metric calculations performed for each interface includes the number of processing complexes associated with the individual interface. For example, when determining the number of Prime-Time minutes scheduled for the month, for the EDI interface, the number of processing complexes associated with EDI is factored **into** ~~in to~~ the calculation. The EnView process will be expanded/updated to monitor and report on future OSS processes.

*Rationale:*

Grammatical correction. Electronic Bonding “Interface” added per CWG 3/28/03 review call. \*This is also a global change\*. All references to Electronic Bonding within the guidelines are changed to Electronic Bonding Interface. Added language to all references to WEB GUI to reference the system name Local Service Interface / Wholesale (LSI/W).

<b>PO-3</b>	<b>Contact Center Availability</b>
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*Change Proposed:*

Update the web-site in the Performance Standard section for center contact information. New URL is: [http://www22.verizon.com/wholesale/clecsupport/content/0,16835,east-wholesale-html-national\\_market\\_centers,00.html](http://www22.verizon.com/wholesale/clecsupport/content/0,16835,east-wholesale-html-national_market_centers,00.html). Add URL to matrix.

*Rationale:*

URL was changed.

<b>PO-6</b>	<b>Software Validation</b>
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*Change Proposed:*

Update the Geography section. Geography is Verizon North.

*Rationale:*

Clarification to existing process. Effective with the June 2003 release, the New York test deck is combined with the New England test deck to form the Verizon East – Northeast Quality Validation Baseline test deck. This combination reduces the number of test decks required to validate Verizon North jurisdictions.

<b>PO-7</b>	<b>Software Problem Resolution Timeliness</b>
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*Change Proposed:*

1. Update the Definition section to clarify when each PO-7 metric is reported, and when the R3 notation is used. Updates appear in bold text as follows:

For those months that Verizon installs software releases, **(usually February, June and October) the PO-7-04 sub-metric ~~C2C report~~ is populated on the C2C report** with data in accordance with the ~~PO-7 calculations~~ sub-metric definition. **R3 is reported in all other months for PO-7-04 to indicate CLEC-affecting software releases are installed three (3) times per year.**

For sub-metrics PO-7-01, PO-7-02, and PO-7-03, **the C2C report is populated with data in the month following the software release (usually March, July and November). R3 is reported in all other months for PO-7-01, PO-7-02 and PO-7-03 to indicate CLEC affecting software releases are installed three (3) times per year.**

**Note: In the event any of the three major CLEC-affecting software releases are installed outside the usual schedule, the data will be populated in accordance with the rules documented above. For example, if the February release was installed in March, PO-7-04 data would be populated in March, and PO-7-01, PO-7-02 and PO-7-03 would be populated in April.**

*Rationale:*

The definition section states that PO-7-01 is defined as total number of production referrals during the 30 calendar days following a major CLEC-affecting software release. The releases are typically installed on the 3<sup>rd</sup> weekend of the designated months. Therefore, the entire number of production referrals is not available until the month following the software release installation. The same logic applies to PO-7-02 and PO-7-03. This additional language is clearer than what presently exists in the guidelines.

*Change Proposed*

Update the Geography section for PO-7-04. The Geography for PO-7-04 is Verizon North. Remove the Note: re the New England states. Updated language in bold or strikethrough text as follows:

PO-7-04: ~~New York~~ **Verizon North**

~~Note: For the New England states, sub-metric PO-7-04 uses a Verizon New England test deck.~~

*Rationale:*

The geography is updated for PO-7-04 to reflect the combined test deck for the Verizon North states.

<b>PO-8</b>	<b>Manual Loop Qualification</b>
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*Change Proposed:*

Add a Report Dimensions category. Geography is state specific.

*Rationale:*

Additional category makes PO-8 consistent with the rest of the C2C guidelines.

<b>OR-1</b>	<b>Order Confirmation Timeliness</b>
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*Change Proposed:*

Update the Definition section. Remove the paragraph regarding Average Confirmation Response Time. Language being removed in bold text as follows:

**~~Average Confirmation Response Time: The mean of all confirmation response times associated with a product group.~~**

*Rationale:*

This language is no longer necessary. Average metrics were removed with the 10/29/01 NY PSC order.

*Change Proposed:*

Update the Report Dimensions section. Remove the footnote (#8) from CLEC Aggregate.

*Rationale:*

Removes redundant language. The Verizon affiliate exclusion is addressed at the beginning of the guidelines.

*Change Proposed:*

Update the OR-1-19 Products. Change VZ Trunks to Verizon Inbound Augment Trunks.

*Rationale:*

Updated products to be consistent with metric title. Clarifies product measured.

<b>OR-2</b>	<b>Reject Timeliness</b>
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*Change Proposed:*

Update the Definition section. Remove the paragraph regarding Average Reject Response Time. Language being removed in bold text as follows:

**Average Reject Response Time: The mean of all reject response times associated with a product group.**

*Rationale:*

This language is no longer necessary. Average metrics were removed with the 10/29/01 NY PSC order.

*Change Proposed:*

Update the Report Dimensions section. Remove the footnote (#11) from CLEC Aggregate.

*Rationale:*

Removes redundant language. The Verizon affiliate exclusion is addressed at the beginning of the guidelines.

<b>OR-3</b>	<b>Percent Rejects</b>
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*Change Proposed:*

Update the Report Dimensions section. Remove the footnote (#14) from CLEC aggregate.

*Rationale:*

Redundancy. The VADI exclusion is addressed at the beginning of the C2C guidelines.

<b>OR-4</b>	<b>Timeliness of Completion Notification</b>
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*Change Proposed:*

Update the Exclusions section. Update the reference to WEB GUI to include reference to LSI Local Service Interface.

*Rationale:*

New reference is more accurate than WEB GUI.

*Change Proposed:*

Update the Report Dimensions section. Remove the footnote (#15) from CLEC aggregate.

*Rationale:*

Eliminates redundant language. The VADI exclusion is addressed at the beginning of the guidelines.

*Change Proposed:*

Update the OR-4-16 description. Updated language in bold text as follows:

The elapsed time begins with the Provisioning **work** completion (**in WFA as noted** in the Verizon SOP system) of the last service order associated with a specific PON.

*Rationale:*

Clarification on the actual calculation of the metric. R. Brash of PSC staff identified this change, MetTel concurred.

<b>OR-5</b>	<b>Percent Flow Through</b>
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*Change Proposed:*

Update the Definition section to clarify that confirmed orders are measured in Percent Flow Through, and rejected orders are not counted. Also update to clarify the report month. Updated language is in bold text below:

This metric measures the percent of valid orders (**submitted via LSRs in the report month**) received through the electronic interface (example includes: Request Manager) that processed directly **through** to the legacy Service Order Processor System (SOP) **and were confirmed** without manual intervention. These **confirmations Service Orders** require no action by a **Verizon VZ**-service representative to input an order into SOP. This is also known as Ordering flow-through.

**Note:** Rejected Orders (orders failing basic front-end edits) submitted via LSR are not **considered to be a valid confirmed order, and therefore are not** placed in the PON Master File, ~~therefore they are not~~ included in the calculation. ASRs do not flow-through by design, and are not included in the OR-5 metric.

*Rationale:*

Clarification. Additional language clarifies the calculation includes confirmed orders, and does not include rejected orders.

**OR-5, continued***Change Proposed:*

Update the OR-5-01 and OR-5-02 denominator to clarify that the metric includes confirmed orders.

*Rationale:*

Clarification. Additional language clarifies the calculation includes confirmed orders.

<b>OR-6</b>	<b>Service Order Accuracy</b>
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*Change Proposed:*

Update the OR-6-03 % Accuracy – LSRC metric title to remove the Long Term Measure parenthetical statement.

*Rationale:*

Metric is in effect. Reference to Long Term Measure is outdated and should be removed.

<b>OR-7</b>	<b>% Order Confirmation/Rejects sent within three business days</b>
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*Change Proposed:*

Update the Report Dimensions section. Remove the footnote (#16) from CLEC aggregate.

*Rationale:*

Removes language redundancy. The exclusion is addressed at the beginning of the C2C guidelines.

<b>OR-8</b>	<b>Acknowledgement Timeliness</b>
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*Change Proposed:*

Update the Report Dimensions section. Remove the footnote (#17) from CLEC aggregate.

*Rationale:*

Removes language redundancy. The exclusion is addressed at the beginning of the C2C guidelines.

<b>OR-9</b>	<b>Order Acknowledgement Completeness</b>
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*Change Proposed:*

Update the Report Dimensions section. Remove the footnote (#18) from CLEC aggregate.

*Rationale:*

Language redundancy. The exclusion is addressed at the beginning of the C2C guidelines.

<b>OR-10</b>	<b>PON Notifier Exception Resolution Timeliness</b>
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*Change Proposed:*

Update the Report Dimensions section. Remove “(excluding VADI)” from the CLEC Aggregate report dimension.

*Rationale:*

Language redundancy. The exclusion is addressed at the beginning of the C2C guidelines.

<b>PR-1</b>	<b>Average Interval Offered</b>
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*Change Proposed:*

Update the Definition section “Specials” paragraph. Additional text appears in bold:

All Designed circuits which include **(but are not limited to) such services as** high capacity.....

*Rationale:*

Additional language matches glossary definition. “Such services as” was added to the glossary with the 10/29/02 order.

*Change Proposed:*

Update the Definition section “Specials” paragraph to clarify that EEL and IOF are reported separately from Specials in sub-metric PR-1-09. Additional text appears in bold:

EEL and IOF are reported separately **from Specials in sub-metric PR-1-09.**

*Rationale:*

Language clarification.

*Change Proposed:*

Update the Definition and Exclusion sections. Remove the “Orders that are not complete” exclusion from the Exclusion section and state that Orders that are not billing completed are not included in the metric calculation in the Definition section. Updated language to Definition section is as follows:

The PR-1 sub-metric calculations for the report month include Orders that are complete **in the billing system** . (Orders that are not billing completed in the report month are not included in PR-1 calculations).

*Rationale:*

Clarifies that orders must be completed in the billing section.

**PR-1, continued***Change Proposed:*

Update the URL in the performance standard section which references product intervals and add the URL to the URL matrix. The new URL information is as follows:

<http://www22.verizon.com/wholesale/attachments/RESALEINV.pdf>  
[http://www22.verizon.com/wholesale/attachments/UNE\\_INTERVALS.xls](http://www22.verizon.com/wholesale/attachments/UNE_INTERVALS.xls)  
<http://www22.verizon.com/wholesale/attachments/UNE-PstndrdIntvls.pdf>  
[http://www22.verizon.com/wholesale/attachments/Collocation\\_Intervals.xls](http://www22.verizon.com/wholesale/attachments/Collocation_Intervals.xls)

*Rationale:*

URL was changed.

*Change Proposed:*

Update the Report Dimensions section. Remove VADI and its associated footnote (#20).

*Rationale:*

Removed redundant language. The performance standard section states that VADI is the Retail Compare for the xDSL products.

*Change Proposed:*

Update the Report Dimensions section. Remove the footnote (#21) from the CLEC Aggregate line.

*Rationale:*

Removed redundant language. The statement that Verizon excludes VADI from CLEC Aggregate data is covered at the beginning of the Guidelines.

*Change Proposed:*

Update the UNE POTS Loop Product for sub-metrics PR-1-03, PR-1-04, and PR-1-05. Change product reference of POTS Loop to POTS Loop – Total.

*Rationale:*

Clarification made to product to ensure consistency with how product is referenced in the Retail Analog Compare Table.

*Change Proposed:*

Update the Product for sub-metrics PR-1-09. Change product reference as follows (in bold text):

Interconnection Trunks ((CLEC) <= 192 Trunks)  
**Interconnection** Trunks ((CLEC > 192 and Unforecasted Trunks)

*Rationale:*

Clarification made to product to ensure consistency within document.

**PR-1, continued***Change Proposed:*

Update the Resale and UNE Specials product for sub-metric PR-1-12. Change Specials to Specials – Total.

*Rationale:*

Clarification made to product to ensure consistency to Retail Compare Table.

<b>PR-3</b>	<b>Completed within Specified Number of Days (1-5 Lines)</b>
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*Change Proposed:*

Update the Exclusion section. Add language to the Coordinated cut-over exclusion to clarify that it does not apply to PR-3-08 UNE Hot Cut Loops. New language appears in bold text:

Coordinated cut-over Unbundled Network Elements such as loops or number portability orders **(This exclusion applies to all PR-3 sub-metrics except PR-3-08 UNE Hot Cut Loops).**

*Rationale:*

Clarification. PR-3-08 reports UNE Hot Cut Loops.

*Change Proposed:*

Update the Definition and Exclusion sections. Remove the “Orders that are not complete” exclusion from the Exclusion section and state that Orders that are not billing completed are not included in the metric calculation in the Definition section. Updated language to Definition section is as follows:

The PR-3 sub-metric calculations for the report month include Orders that are complete **in the billing system** . (Orders that are not billing completed in the report month are not included in PR-3 calculations). **Note: For PR-3-08 UNE Hot Cut Loops, orders in the calculation are based on physical work completion.**

*Rationale:*

Clarifies that orders have to be completed in the billing system.

**PR-3 continued***Change Proposed:*

Update the URL in the performance standard section which references product intervals and add the URL to the URL matrix. The new URL information is as follows:

<http://www22.verizon.com/wholesale/attachments/RESALEINV.pdf>  
[http://www22.verizon.com/wholesale/attachmentsw/UNE\\_INTERVALS.xls](http://www22.verizon.com/wholesale/attachmentsw/UNE_INTERVALS.xls)  
<http://www22.verizon.com/wholesale/attachments/UNE-PstndrdIntvls.pdf>  
[http://www22.verizon.com/wholesale/attachments/Collocation\\_Intervals.xls](http://www22.verizon.com/wholesale/attachments/Collocation_Intervals.xls)

*Rationale:*

Existing URL was outdated.

*Change Proposed:*

Update the UNE Loop New product in PR-3-06 and PR-3-09. Change reference to POTS Loop – New.

*Rationale:*

Product clarification.

**PR-4****Missed Appointments***Change Proposed:*

Update the Report Dimension section to remove Verizon Retail

*Rationale:*

Verizon does not produce a C2C report for Verizon retail. Verizon retail is used as the retail comparator as outlined in the performance standard section.

*Change Proposed:*

Update the Exclusion section. Add clarification to LNP exclusion. Additional language appears in bold text:

LNP Orders without office equipment which do not have a trigger **placed on the line.**

*Rationale:*

Clarification to existing process. Triggers are no longer placed with an order, instead triggers are done as a message generated by the disconnect order.

***PR-4 continued******Change Proposed:***

Update the Definition and Exclusion sections. Remove the “Orders that are not complete” exclusion from the Exclusions section and state that Orders that are not billing completed are not included in the metric calculation in the Definition section. Updated language to Definition section is as follows:

The PR-4 sub-metric calculations for the report month include Orders that are complete in the billing system. (Orders that are not billing completed in the report month are not included in PR-4 calculations). **Note: This does not apply to the following metrics, which are calculated based on physical work completion: UNE Trunks PR-4-02, PR-4-03, PR-4-15 and the PR-4-14 xDSL Loop metrics.**

***Rationale:***

Clarifies that orders have to be completed in the billing system.

***Change Proposed:***

Update the PR-4-02 description. Add language to indicate that “days” refers to business days. Additional language appears in bold text below:

For orders/trunks missed due to Verizon reasons, the average number of **business** days between the order DD and actual work completion date.

***Rationale:***

Clarifies the interval count. This counting convention is consistent between Retail and Wholesale and also with the way intervals are counted for PR-3 which measures the % completed in five business days.

***Change Proposed:***

Update the PR-4-03 and PR-4-08 Resale and UNE Specials Product. Change Specials to Specials – Total.

***Rationale:***

Ensures consistency with how product appears in the rest of the guidelines.

***PR-4, continued****Change Proposed:*

Update the PR-4-07 LNP description, numerator and denominator sections to reflect Trigger messages and not Trigger orders. Additional language appears in bold text below.

Description change:

Percent of all LNP orders (including both the Trigger **message** and disconnect order).....

Numerator Change:

Number of LNP orders (1 order = Trigger **message**.....)

Denominator Change:

Number of LNP orders completed (1 order = Trigger **message**....)

*Rationale:*

Clarification to reflect existing process. Triggers are no longer placed with an order, instead triggers are done as a message generated by the disconnect order.

**PR-5****Facility Missed Orders***Change Proposed:*

Update the Definition and Exclusion sections. Remove the “Orders that are not complete” exclusion from the Exclusion section, and state that Orders that are not billing completed are not included in the metric calculation in the Definition section. Updated language to Definition section is as follows:

The PR-5 sub-metric calculations for the report month include Orders that are complete in the billing system. (Orders that are not billing completed in the report month are not included in the PR-5 calculations).

*Rationale:*

Clarifies that orders have to be completed in the billing system.

***PR-5, continued****Change Proposed:*

Update the Resale and UNE Products section for metrics PR-5-01, PR-5-02 and PR-5-04.

Change Specials to **Specials – Total**.

*Rationale:*

Clarification. Ensures product is referenced accurately.

<b>PR-6</b>	<b>Installation Quality</b>
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*Change Proposed:*

Update the Definition section. Remove the reference to NORD. Replace the system reference as NMP-Mai.

*Rationale:*

Removed outdated language. Replacing system reference to NMP per CWG 3/28/03 review call.

*Change Proposed:*

Update the Definition section. Add language to clarify the difference between I-Codes and Repeaters. New language appears in bold text below:

This metric measures the percent of lines/circuits/trunks installed where a reported trouble was found in the **Verizon** network within 30 days of order completion. **Any additional trouble received after the initial I-code is closed out, and is within the specified time period (7 or 30 days) is counted as a repeater.**

*Rationale:*

Language clarifies that the initial trouble received within the specified time period (7 or 30 days) is counted as an I-code, and any additional trouble received within the specified time period (7 or 30 days) is counted as a repeater.

*Change Proposed:*

Update the Definition section. Add language to clarify that the PR-6-01 and PR-6-03 UNE POTS Loop – Total products include UNE Loop Hot Cuts. Additional language appears as follows:

For sub-metrics PR-6-01 and PR-6-03 only, the UNE POTS Loop Total product includes UNE Loop Hot Cuts.

*Rationale:*

Clarification .

***PR-6 continued******Change Proposed:***

Update the Definition section. Add language to state that the PR-6 denominator is based on Orders that are billing completed. =Updated language to Definition section is as follows:

**The PR-6 sub-metric calculations for the report month include Orders that are complete in the billing system. (Orders that are not billing completed in the report month are not included in the PR-6 calculations). Note: This does not apply to Hot Cuts and UNE Trunks, which are calculated based on physical work completion.**

***Rationale:***

Clarifies that orders have to be completed in the billing system.

***Change Proposed:***

Update the Products section for sub-metrics PR-6-01 and PR-6-03.

For Resale and UNE: Change Specials to Specials Total

***Rationale:***

Clarification. Ensures product is referenced accurately.

<b>PR-8</b>	<b>Percent Open Orders in a Hold Status</b>
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***Change Proposed:***

Update the Definition section. Add language to clarify that the PR-8 denominators are based upon orders that are billing completed. New language appears as follows:

**The PR-8 sub-metric calculations for the report month include Orders that are complete in the billing system. (Orders that are not billing completed in the report month are not included in the PR-8 calculations). Note: This does not apply to the following metrics, which are calculated based on physical work completion: UNE Trunks PR-8-01, and PR-8-02**

***Rationale:***

Clarifies that orders have to be completed in the billing system.

***Change Proposed:***

Update the Resale and UNE Products section for sub-metrics PR-8-01 and PR-8-02. Change Specials to Specials – Total.

***Rationale:***

Ensures product is referenced accurately.

<b>PR-9</b>	<b>Hot Cut Loops</b>
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*Change Proposed:*

Update the Performance Standard section. Remove the footnote (#24) from the last sentence, and move the footnote language to the Performance standard section.

*Rationale:*

Eliminates confusion when interpreting the guidelines. Moving the language to the performance standard section is clearer.

*Change Proposed:*

Update the PR-9-08 Definition section. Updated language appears below.

**The average repair time (Mean Time to Repair (MTTR)) for Hot Cut Installation troubles ~~troubles called in to the 1-877-HotCuts line.~~**

*Rationale:*

Clarification.

<b>MR-1</b>	<b>Response Time OSS Maintenance Interface</b>
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*Change Proposed:*

Update the Definition Section. Modified language appears in bold and strikethrough text below.

These sub-metrics measure the response time defined as the time, in seconds, that elapses from ~~issuance receipt~~ of a query request to ~~receipt issuance~~ of a response. ~~by the requesting carrier.~~ For CLECs This performance is measured at the access platform. ~~Verizon uses two databases to collect maintenance performance data. Coding specified in this section is largely POTS services. Special Services and Trunks coding descriptions are included in the Appendix A.~~ **Only POTS Total transactions are included in this measure.**

*Rationale:*

The words “receipt” and “issuance” were transposed in this paragraph. Removal of text eliminates extraneous information not relevant to the metric definition. Replaced reference of “largely POTS services” with POTS Total to clarify the product included in the measure.

***MR-1, continued******Change Proposed:***

Update the Exclusions section to provide a detailed description of specific exclusions. Modified language appears in bold text below.

CLEC Create Transactions – complex create trouble transactions not available to retail **including:**

- **Feature fix create**
- **Transactions on circuits with recent change activity requiring service order look-up**
- **Retrieval of trouble ticket number following create**
- **Circuit ownership validation associated with LMOS transactions (circuit ownership validation associated with LMOS replacement system are not excluded from the measure)**

**Other CLEC Transactions – functions not available to Verizon Retail including**

- **Transactions on circuits with recent change activity requiring service-order look-up**
- **Circuit ownership validation associated with LMOS and test transactions. (circuit ownership validation associated with LMOS replacement system are not excluded from the measure).**

***Rationale:***

Language clarifies exclusions. The LMOS application is being phased out. Circuit ownership validation transactions associated with LMOS are excluded from the metric, but the circuit ownership validation transaction associated with the new Trouble Management System are not excluded from MR-1.

***MR-1 continued****Change Proposed:*

Update the Methodology section to remove specific system references and remove any language not relevant to methodology. Updated language appears in bold below.

For VZ retail representatives: Retail performance is reported directly from Common Agent Desktop (CAD). Measurements begin when the CAD server receives a request from the GUI, and end when the CAD server sends a response to the GUI. The create, modify, and request cancellation of trouble transaction measurements, are the sum of the averages of the response times **of the initial inquiry transaction and trouble report transaction.** ~~For the initial inquiry transaction (initiated from the blank Trouble Entry (TE) screen, and the requested create, modify or cancel (initiated from the Trouble Report (TR) screen. The first measurement captures the response time from the time the CAD receives an inquiry request from the user, who enters a TN, and hits the ok button on the TE screen, until the data is received from LMOS and CAD sends a TR screen to the user. The second measurement captures the response time from the time CAD receives an "action" request from the user, to the time the LMOS information is received and sent to the GUI. The "action" request initiated from the TR screen can be a create, modify or cancel. If the user cancels.....~~

For CLEC representatives: Actual response times reported by RETAS. ~~For Create Trouble includes basic create function.~~ **CLEC modify transactions also include end user status transactions and cancel transactions with an error code of 0302 (ticket cannot be closed due to pending work in progress).**

*Rationale:*

Clarifies existing language / process and removes language no longer relevant to the metric.

*Change Proposed:*

Update the Report Dimensions section. Remove the VZ Retail report dimension.

*Rationale:*

Verizon does not produce a Verizon retail C2C report. Retail is the compare where specified in the performance standard section.

*Change Proposed:*

Change the Note in the geography to indicate that all other Verizon East CLEC numbers are reported at a state specific level. Updated language is as follows:

Note: New York CLEC numbers reflect NY and CT. **All other Verizon New England East CLEC numbers are reported at a state specific level.**

*Rationale:*

New language clarifies existing process.

**MR-1 continued***Change Proposed:*

Update the numerator for each MR-1 sub-metric to reference the Verizon access platform. New language appears in bold below:

Sum of all response times from time transaction **is received at the Verizon access platform to the time a response is sent from the Verizon access platform.**

*Rationale:*

Language clarifies existing process.

<b>MR-2</b>	<b>Trouble Report Rate</b>
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*Change Proposed:*

Update Definition section. Updates appear in strike-through or bold text as follows;

This metric measures the total initial customer direct or referred troubles reported, where the trouble disposition was found to be in the network, per 100 lines/circuits/trunks in service. Loop equals Drop Wire plus Outside Plant Loop. Network Trouble means a trouble with a Disposition Codes of 03 (Drop-wire), 04 (Outside Plant Loop), ~~or~~ 05 (Central Office) **FAC, CO and STN.**

~~UNE Loop is defined as 2-Wire analog loop.~~

**Subsequent Reports:** Additional customer trouble calls while an existing trouble report is pending – typically for status or to change or update information.

The Disposition Codes set forth in the CLEC Handbook, Vol III Section 8.87 ~~are included in Appendix G.~~ can be found at <http://www22.verizon.com/wholesale/clecsupport/content/1,16835,East%20east-wholesale-customer docs-verizon east cust docs,00.html>

**Add URL to matrix at beginning of guidelines.**

*Rationale:*

Clarification. Updates reference to CLEC Handbook and provides URL. Removed UNE Loop – information is not needed.

*Change Proposed:*

Modify Report Dimensions to remove VZ retail.

*Rationale:*

Verizon does not produce a separate C2C report for Verizon retail. Verizon retail is used as the comparator where indicated.

**MR-2 continued****Change Proposed:**

Modify MR-2-01 numerator to specify disposition codes FAC, CO and STN. Modify denominator to remove “lines”. Updates are as follows:

Numerator: Number of all trouble reports with found network troubles (**disposition codes FAC, CO, and STN**).

Denominator: Number of ~~Lines or~~ specials or trunks in service.

**Rationale:**

Clarification.

**Change Proposed:**

Modify MR-2-04 numerator and denominator to add FAC, CO and STN. Updated language is as follows:

Numerator: Number of subsequent reports (Field and administrative repeaters for Disposition codes 03, 04, and 05, FAC, CO and STN)

Denominator: Number of Total Disposition Codes 03, 04, and 05, FAC, CO, and STN, troubles reported (Per MR-2-01).

**Rationale:**

Clarification.

**MR-3****Missed Repair Appointments****Change Proposed:**

Modify Exclusion section for redirects. Updates are in bold or strike-through text as follows:

- Sub-metric MR-3-02 POTS Loop Only: exclude *redirected* troubles. A trouble ticket is considered a *redirect* if it was dispatched **IN** and **OUT**, and the trouble was found ~~on the second dispatch (due to a CLEC error in the initial dispatch direction)~~ **in the opposite direction from the CLEC’s reported trouble direction**. Reports with multiple dispatches in the same direction are not excluded.

**Rationale:**

Clarification to existing process.

**Change Proposed:**

Modify Report Dimensions to remove VZ retail.

**Rationale:**

Verizon does not produce a separate C2C report for Verizon retail. Verizon retail is used as the comparator where indicated.

**MR-3 continued***Change Proposed:*

Modify sub-metric MR-3-01 to remove the 3<sup>rd</sup> and 4<sup>th</sup> digits from the numerator calculation description Disposition Codes (03 and 04). Updated text shown in strikethrough below.

Numerator: Number of Loop troubles where clear time is greater than commitment time (missed appointments for (M=X) for Disposition Codes (03~~00~~-04~~99~~))

*Rationale:*

Clarification.

<b>MR-4</b>	<b>Trouble Duration Intervals</b>
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*Change Proposed:*

Modify the Definition section. Update the Out of Service Intervals paragraph. Updated language appears in bold or strike-through text as follows:

**Out of Service Intervals:** The percent of Network Troubles that indicate an Out-Of-Service (OOS) condition which was repaired and cleared more than “y” hours after receipt of trouble report. OOS means that there is no dial tone, the customer cannot call out, or the customer cannot be called. The OOS period commences when the trouble is ~~entered-logged~~ into VZ’s designated ~~trouble-reporting interface~~ **trouble management system after the trouble is entered via a trouble reporting interface**, either directly by the CLEC or by a VZ representative upon notification. OOS intervals are measured using the same duration calculations that apply to Mean Time to Repair metrics for ~~that the~~ products listed above. Includes Disposition Codes 03 (Drop Wire), 04 (Cable) and 05 (Central Office). **Note:** “y” equals hours OOS (2, 4, 12 or 24 hours).

*Rationale:*

Clarification.

*Change Proposed:*

Update the Definition section. Update the Special Services (OOS) paragraph in bold or strike-through text as follows:

**For Special Services:** An OOS condition is defined as follows: Troubles where, in the initial contact with the customer, it is determined that the circuit is completely OOS (**osi = 'y'**) and not just an intermittent problem (~~osi = 'y'~~), and the trouble completion code indicated that a trouble was found within the Verizon network.

*Rationale:*

Language clarification.

***MR-4 continued****Change Proposed:*

Update the Exclusions section MR-4-03 redirect. Updated language in bold or strike-through text as follows:

- Sub-metric MR-4-03 POTS Loop Only: exclude *redirected* troubles. A trouble ticket is considered a *redirect* if it was dispatched **IN** and **OUT**, and the trouble was found ~~on the second dispatch (due to a CLEC error in the initial dispatch direction)~~ **in the opposite direction from the CLEC's reported trouble direction**. Reports with multiple dispatches in the same direction are not excluded.

*Rationale:*

Clarification

*Change Proposed:*

Modify Report Dimensions to remove VZ retail.

*Rationale:*

Verizon does not produce a separate C2C report for Verizon retail. Verizon retail is used as the comparator where indicated.

*Change Proposed:*

Modify sub-metric MR-4-01 numerator and denominator to add FAC, CO and STN.  
Updated language as follows:

Numerator: (Disposition Codes 03, 04, and 05, **FAC, CO, and STN**).

Denominator: Number of Central Office and Loop troubles (Disposition Codes 03, 04, and 05, **FAC, CO and STN**).

*Rationale:*

Clarification.

*Change Proposed:*

Modify MR-4-04 numerator and denominator to specify disposition codes. Updated language in bold text as follows:

Numerator: (**Disposition codes 03, 04, 05, FAC, CO and STN**).

Denominator: Number of Central Office and Loop troubles (Disposition Codes 03, 04, and 05, **FAC, CO and STN**).

*Rationale:*

Clarification.

<b>MR-5</b>	<b>Repeat Trouble Reports</b>
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*Change Proposed:*

Modify Exclusions Section A, 2. Updated text in bold or strike-through as follows:

2. An original report that was closed to No Trouble Found (NTF), Found OK (FOK), or Customer Premises Equipment (CPE) is deemed to have been *misdirected* if the trouble is found in ~~a second report that was dispatched in the opposite direction~~ **in the opposite direction from the trouble direction reported by the CLEC.**

*Rationale:*

Clarification.

*Change Proposed:*

Modify Report Dimensions to remove VZ retail.

*Rationale:*

Verizon does not produce a separate C2C report for VZ retail, rather VZ retail is used as the comparitor where indicated.

*Change Proposed:*

Modify sub-metric MR-5-01 numerator and denominator to include disposition codes FAC, CO and STN. Updated language as follows:

Numerator: ...(Disposition Codes 03, 04, and 05, **FAC, CO, and STN, .....**)

Denominator: ...(Disposition Codes 03, 04, and 05, **FAC, CO, and STN....**)

*Rationale:*

Clarification.

<b>All Maintenance Product Descriptions</b>
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*Change Proposed:*

Replace any appearance of UNE 2 Wire Digital Services with UNE 2-Wire Digital Loop

*Rationale:*

Provides consistency with sub-metric listed products and retail compare table.

<b>NP-2</b>	<b>Collocation Performance</b>
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*Change Proposed:*

Update the definition section to change the URL for collocation application instructions: Add URL to matrix. New URL is:

<http://www22.verizon.com/wholesale/clecsupport/content/0.16835.east-wholesale-resources-resources.00.html#Collocation%20Information>

*Rationale:*

URL was changed.

<b>Glossary</b>	
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*Change Proposed:*

Changed CLEC Trunk Requests to Interconnection Trunks (CLEC) Requests. Add language to clarify that the CLEC placed the order. Additional language in bold text below.

<= 192 Forecasted Trunks are **CLEC** requests for 192 .....

> 192 and Unforecasted Trunks are **CLEC** requests that are for greater .....

*Rationale:*

Clarification. Ensures product is referenced consistently throughout the guidelines. Additional language re: CLEC placement of order added per CWG 3/28/03 review call.

*Change Proposed:*

Update the definition for Orders with > six lines. Changed reference of greater than five lines to Orders > = six lines.

*Rationale:*

Ensures definition is consistent with existing process.

*Change Proposed:*

Update the Test Orders definition. Removed the list of Test CLECs.

*Rationale:*

The list is outdated. CLEC Test IDs are updated periodically.

*Change Proposed:*

Update the VADI definition. Change Verizon Affiliate Data Incorporated to Data Services Network Organization (DSO (aka VADI))

*Rationale:*

Name was outdated.

***Glossary continued******Change Proposed:***

Added entry UNE POTS Total.

UNE POTS Total. This product group includes UNE POTS Loop and UNE POTS Platform, and excludes UNE Hot Cut Loops.

***Rationale:***

Clarification.

***Change Proposed:***

Update the Special Services definition consistent with the change in PR-1. Additional language is in bold text below.

These services include **(but are not limited to)** such services as.....

***Rationale:***

Additional language clarifies that the services listed are not the only services included. This change added per CWG 3/28/03 review call.

***Change Proposed:***

Update the Basic Edits definition to clarify how Verizon identifies orders that failed edits.

***Rationale:***

This change added per CWG 3/28/03 review call.

***Change Proposed:***

Modify definition of Front End Close-Out by replacing “Disposition Codes: 0741(RE<10), 0747, 0706(CP=291)” with “Disposition codes are set forth in the CLEC Handbook, Vol. III Section 8.7 and can be found at [http://www22.verizon.com/wholesale/clecsupport/content/1,16835,East%20east-wholesale-customer\\_docs-verizon\\_east\\_cust\\_docs,00.html](http://www22.verizon.com/wholesale/clecsupport/content/1,16835,East%20east-wholesale-customer_docs-verizon_east_cust_docs,00.html) Add URL to matrix.

***Rationale:***

Ensures reference is to most current list of disposition codes.

***Change Proposed:***

Modify definition of Network Troubles by appending the first sentence with “ or trouble codes of CO (Central Office), FAC (Facility) or STN (Station).

***Rationale:***

Clarification. Ensure consistency with guidelines definition.

***Change Proposed:***

Add definitions for Line Sharing, Line Splitting and 2-Wire Digital

***Rationale:***

Clarification.

<b>Product Identification</b>	<b>Special Services</b>
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*Change Proposed:*

Refer to Appendix A for definition on Special Services.

*Rationale:*

Language is redundant with Appendix A.

<b>Product Identification</b>	<b>Complex</b>
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*Change Proposed:*

Update the Provisioning ISDN Basic Rate definition. Updated language is shown below in bold or strike-through text.

ISDN Basic Rate: **Secondary** Service Code Modifier (SCM~~2~~) **begins with IB** ~~is not blank~~.

*Rationale:*

Provides clarification on the ISDN BRI SCM .

<b>Appendix A</b>	<b>Specials and Trunk Maintenance Code Descriptions</b>
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*Change Proposed:*

Update Appendix A with language. Updates are included in a redlined attachment to this document.

*Rationale:*

Clarification.

<b>Appendix B</b>	<b>Provisioning Codes</b>
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*Change Proposed:*

Update reference to SORD with NMP Provisioning.

*Rationale:*

Refers to new metrics system.

*Change Proposed:*

Replace title in Service Code Modifier (SCM) table of “SORD FIELD” with “NMP Provisioning Field”

*Rationale:*

Refers to new metrics system.

<b>Appendix H</b>	<b>Flow Through Order Scenarios</b>
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*Change Proposed:*

Update Appendix H with the most recent list of FlowThrough scenarios.

*Rationale:*

Clarification. The existing Appendix H is outdated. Updates will be consistent with the Appendix H found on URL:

[http://www.verizon.com/wholesale/clecsupport/east/wholesale/html/pdfs/change\\_mgmt/hours\\_corrections\\_revisions\\_05-20-2003.pdf](http://www.verizon.com/wholesale/clecsupport/east/wholesale/html/pdfs/change_mgmt/hours_corrections_revisions_05-20-2003.pdf) Add URL to matrix. Also add language to indicate that Verizon and the CLECs work to update this list with additional items that flow-through. Changes are based upon the change management process.

<b>Appendix K</b>	<b>Statistical Metric Evaluation Procedures</b>
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*Change Proposed:*

Reformat Appendix K

*Rationale:*

More states are adopting Appendix K. The format of Appendix K had engendered numerous questions regarding the statistical evaluations used in the C2C guidelines. Appendix K was reformatted with the goal of making it easier to understand.

*Change Proposed:*

Update Appendix K to reflect consensus on use of permutation test for statistical evaluations when reasonably performable in an automated fashion. The permutation test will replace the LCUG modified test for large sample size measured variable comparisons.

*Rationale:*

Verizon's implementation of its new data warehouse allows for the permutation test procedure to be automated for all statistical C2C report evaluations.

<b>Appendix S</b>	<b>Projects Requiring Special Handling</b>
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*Change Proposed:*

Update Appendix S with language to indicate what occurs when metrics being excluded are under dispute, and add language to indicate that projects will proceed in the event Table B metrics are under discussion without total agreement. Updated language appears below in bold text.

Should Verizon and the project requesting CLEC not agree on metrics to be excluded, **Verizon will initiate the Wholesale Metrics Change Control and the project will proceed.** Verizon and the CLEC will attempt to resolve the **metrics** issue on a business to business basis. Absent agreement, the parties will use the EDR process to resolve the issue.

Projects requiring special handling will be excluded from the following metrics if circumstances warrant. This will be determined on a case by case basis **and/or at the CLEC's request when the**

**project is being negotiated.** Verizon will notify the CLEC **of the metric exclusion** through the Metrics Change Control process ~~and at the CLECs request when the project is being negotiated.~~

*Rationale:*

Additional language discussed at June 2003 CWG meeting and agreed upon by all parties.  
Language clarifies that projects will proceed.

<b>OR-1</b>	<b>Order Confirmation Timeliness</b>
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*Change Proposed:*

Update the Definition section. Add language to state that when a CLEC designates RPONs, Verizon uses the FOC time stamp when the last associated RPON is received. Updated language appears as follows:

**When a CLEC designates RPONs, the FOC/LSC time stamp used for receipt of all RPONs is the date/time the last RPON is received. The FOC/LSC returned date/time would be the actual returned date/time of each RPON.**

*Rationale:*

CLECs can provide RPONs. The timestamp used for the notification should be the date when the last RPON is received.

<b>OR-2</b>	<b>Reject Timeliness</b>
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Update the Definition section. Add language to state that when a CLEC designates RPONs, Verizon uses the reject/query time stamp when the last associated RPON is received. Updated language appears as follows:

**When a CLEC designates RPONs, the reject/query time stamp used for receipt of all RPONs is the date/time the last RPON is received. The reject returned date/time would be the actual returned date/time of each RPON.**

*Rationale:*

CLECs can provide RPONs. The timestamp used for the notification should be the date when the last RPON is received.

<b>OR-7</b>	<b>% Order Confirmation/Rejects sent within three business days</b>
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Update the Definition section. Add language to state that when a CLEC designates RPONs, Verizon measures uses the reject/query time stamp when the last associated RPON is received. Updated language appears as follows:

**When a CLEC designates RPONs, the reject/query time stamp used for receipt of all RPONs is the date/time the last RPON is received. The reject returned date/time would be the actual returned date/time of each RPON.**

*Rationale:*

CLECs can provide RPONs. The timestamp used for the notification should be the date when the last RPON is received.

<b>OR-10</b>	<b>PON Notifier Exception Resolution Timeliness</b>
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*Change Proposed:*

Update the Report Dimensions section. Remove VADI and the note “(for commission viewing only)” from the VADI report dimension.

*Rationale:*

VADI is no longer reported separately. It is now included in the Verizon retail total. No need to produce a separate report for commission viewing only.

[Need approval from PSC Staff on this change.](#)

<b>BI-1</b>	<b>Timeliness of Daily Usage Feed</b>
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*Change Proposed:*

Add an Exclusion for long duration calls and a definition of long duration calls. Updated language appears in bold text below.

Exclusion

**Long Duration Calls Note: Long duration calls are defined as those calls that remain connected through two successive midnights. On all such calls, the call assembly process may output up to three record types indicating the beginning, continuation, or end of a long duration call. An annual study will be performed each December to determine the current volume of long duration calls.**

*Rationale:*

Long duration calls should not be included in the BI-1 metric because Verizon cannot determine if the DUF was sent on time or was missed and therefore Verizon scores everything as a miss for this metric, when in fact the DUF could actually be a met because it was sent on time.

<b>Appendix N</b>	<b>Table of Measures, Sub-Metrics and Product Disaggregation</b>
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*Change Proposed:*

Eliminate appendix N.

*Rationale:*

Appendix N presently shows targeted implementation date for metrics. With the implementation of metrics change control notification to the CLECs, appendix N is not necessary since CLECs will receive notification on metric implementation through the Wholesale Metrics Change Control process.

## Specials and Trunk Maintenance Code Descriptions

**Trunk Maintenance:**

Included are all Message Trunk troubles reported by the customer that were caused by a problem within the Verizon network. This does not include troubles for (Special Access) circuits under the Access tariff.

Criteria for inclusion is Circuit format (cfmt) is 'M' as defined by Bellcore standard, report category (rpt\_cat) is "CR" indicating a Customer Reported trouble, trouble code (TROUBLE\_CD) is either "FAC" or "CO" indicating the trouble was found in the Facility-cable (from Central Office to customers location) or in the Central Office (the trouble was found within the Verizon central office), Maintenance center (MCTR) is not training or blank which excludes troubles entered for employee training purposes, Subsequent calls on the same trouble are not included in these metrics.

Measure Trunks:	criteria
total lines	Count of all Message Trunks that are currently working...I.e. provisioning work is complete.
total network troubles	trouble close out code indicates the trouble was found in the facility or central office part of the Verizon Network - trbl_cd is "FAC" or "CO" .
Network trouble report rate	total network troubles divided by total working lines then multiply by 100
mean time to repair	average (mean) of all duration times for receipt of the trouble within the Verizon Operating Support System to the time the circuit was restored to service to the customer ....avg(ACTUAL_DURATION_STOP) ....the ACTUAL_DURATION_STOP field does not contain any time where the Verizon technician could not gain access to the customer location.
out of service	This is used as the divisor for all of the out of service metrics.....upon initial contact with the customer it is determined that the circuit is completely out of service and not just intermittent problem (osi = 'y') and that the trouble completion code indicated that a trouble was found within the Verizon network (trbl_cd is "FAC" or "CO")
out of service over 24	The trouble report entry indicated that the circuit was out of service (osi is 'y') to the customer and that the trouble was reported more than 24hours before it was resolved (ACTUAL_DURATION_STOP is > 1440 minutes or 24 hrs) and that the trouble close out code indicates that a trouble was found within the Verizon Facility or Central office network (trbl_cd is "FAC" or "CO").
% out of service over 24	total troubles out of service more than 24 hours divided by total troubles that were out of service to the customer then multiply by 100

repeats	Total troubles entered - where a previous trouble report on the same circuit occurred within the previous 30 days. Trouble is scored as a "repeat". Count of all repeats (rpr_flag is 'y') where trouble close out code indicates trouble was found within the Verizon Network.
% repeats	Total repeated troubles divided by total troubles...then multiply by 100.

Trunks:

<b>trouble code</b>	the code that identifies the type of trouble found
Repeat	The flag indicates that this trouble report was received within 30 days of the restoral date of the last trouble reported on the circuit.
out of service indicator	The flag is set to 'y' if the circuit was out of service when the report was taken, or was scored as out of service during the life of the trouble. <b>For designed circuits the flag is always set to y</b>

**Specials Services Maintenance:**

Included are all special service troubles reported by the customer that were caused by a problem within the Verizon network. This does not include troubles for special access circuits under the Access tariff. However, access circuits ordered by a retail customer are included.

Criteria for inclusion (for line count and trouble tickets) is report category (rpt\_cat) is "CR" indicating a Customer Reported trouble, circuit ID does not indicate (fourth character of circuit id for a length of 2) "TK", "IB", "DI", "DO" because these are considered POTS, 7th character of circuit id does not indicate official Verizon line as defined by Bellcore standard practice, trouble code (trbl\_cd) is either "FAC", "CO" or "STN" indicating a network trouble. Maintenance center (MCTR) is not training or blank which excludes troubles entered for employee training purposes, Subsequent calls on the same trouble are not included in these metrics, Troubles/lines are excluded where circuit id (ctkid character 4 for a length of 2) indicates non-UNE access circuit, as defined in the C2C Guidelines glossary.

Measure Special Services:	Criteria
total lines	count circuits where center (MCTR) is not blank, not an official service (CKT_ID 8,1) is not z (lines are in a different data base than specials and the circuit id field has a different layout),and only count 1 end of a point to point circuit (CKLEND='z') z indicates customer location.
total network troubles	trouble close out code indicates the trouble was found in the facility or central office piece of the special services circuit - TROUBLE_ID is "FAC", "CO" or STN.
Network trouble report rate	total network troubles divided by total working lines then multiply by 100.
total troubles loop	trouble close out code indicates the trouble was found in the facility portion of the Verizon Network - (TROUBLE_CD is "FAC")

network trouble report rate- loop	total troubles loop divided by total lines multiply by 100
total troubles "CO"	trouble close out code indicates the trouble was found in the central office portion of the Verizon Network - (TROUBLE_CD is "CO").
network trouble report rate - co	total troubles central office divided by total lines then multiply by 100.
mean time to repair	Average (mean) of all duration times for receipt of the trouble within the Verizon Operating Support System to the time the circuit was restored to service to the customer ....avg (ACTUAL_DURATION_STOP)...the ACTUAL_DURATION_STOP field does not contain any time where the Verizon technician could not gain access to the customer location.

Special Services:

mean time to repair loop	average (mean) of all duration times for receipt of the loop trouble within the Verizon Operating Support System to the time the circuit was restored to service to the customer ....avg (ACTUAL_DURATION_STOP) and TROUBLE_CD is "FAC"....the ACTUAL_DURATION_STOP field does not contain any time where the Verizon technician could not gain access to customer location
mean time to repair co	average (mean) of all duration times from receipt of the CO trouble within the Verizon Operating Support System to the time the circuit was restored to service to the customer .. avg(ACTUAL_DURATION_STOP) and TROUBLE_CD is "CO"...the ACTUAL_DURATION_STOP field does not contain any time where the Verizon Technician could not gain access to the customer location or the customer was verifying the status of the circuit.
out of service	This is used as the divisor for all of the out of service metrics.....upon initial contact with the customer it is determined that the circuit is completely out of service (OUT_OF_SERVICE_IND = "y" and not just intermittent problem and that the trouble completion code indicated that a trouble was found within the Verizon network (TROUBLE_CD is "FAC" "CO", or "STN").
out of service loop	This is used as the divisor for all of the loop out of service metrics.....upon initial contact with the customer it is determined that the circuit is completely out of service (OUT_OF_SERVICE_IND="y") and not just intermittent problem and that the trouble completion code indicated a trouble was found within the LOOP piece of the Verizon network (TROUBLE_CD is "FAC").
out of service co	This is used as the divisor for all of the CO out of service metrics.....upon initial contact with the customer it is determined that the circuit is completely out of service (OUT_OF_SERVICE_IND = "y") and not just intermittent problem and that the trouble completion code indicated that a trouble was found within the CO piece of the Verizon network (TROUBLE_CD is "CO").

out of service over 24	The trouble report entry indicated that the circuit was out of service (OUT_OF_SERVICE_IND = 'y') to the customer and that the trouble was reported more than 24hours before it was resolved (ACTUAL_DURATION_STOP is > 1440 minutes or 24 hrs) and that the trouble close out code indicates that a trouble was found within the Verizon Facility or Central office network (TROUBLE_CD is "FAC" "CO", or "STN").
% out of service over 24	total troubles out of service more than 24 hours divided by total troubles that were out of service to the customer then multiply by 100.
out of service over 24- loop	The trouble report entry indicated that the circuit was out of service (OUT_OF_SERVICE_IND = 'y') to the customer and that the trouble was reported more than 24hours before it was resolved (ACTUAL_DURATION_STOP is > 1440 minutes or 24 hrs) and that the trouble close out code indicates that a trouble was found within the Verizon Facility network (TROUBLE_CD is "FAC").
% out of service over 24 loop	total troubles out of service more than 24 hours loop divided by total troubles that were out of service - loop to the customer then multiply by 100.
out of service over 24- CO	The trouble report entry indicated that the circuit was out of service (OUT_OF_SERVICE_IND = 'y') to the customer and that the trouble was reported more than 24hours before it was resolved (ACTUAL_DURATION_STOP is > 1440 minutes or 24 hrs) and that the trouble close out code indicates that a trouble was found within the Verizon Central Office network (TROUBLE_CD is "CO").
% out of service over 24 CO	total troubles out of service more than 24 hours CO divided by total troubles that were out of service - CO to the customer then multiply by 100.
repeats	total troubles entered - where a previous trouble report on the same circuit occurred within the previous 30 days. Trouble is scored as a "repeat". Count of all repeats (RPR_RPT_30DAY_IND = "y" ) where trouble close out code indicates trouble was found within the Verizon Network.
% repeats	Total repeated troubles divided by total troubles...then multiply by 100.
<b>trouble code</b>	the code that identifies the type of trouble found
Repeat	The flag indicates that this trouble report was received within 30 days of the restoral date of the last trouble reported on the circuit.
out of service indicator	The flag is set to 'y' if the circuit was out of service when the report was taken, or was scored as out of service during the life of the trouble. <b>For designed circuits the flag is always set to y</b>

Example of Actual coding for Out of Service Specials:

stop oos le 3 (5)	ACTUAL_DURATION_STOP is le 003:00 (hrs/min) and osi is y and trbl_cd is co
% stop oos le3(5)	stop oos le 3(5) / total oos 5 * 100
stop oos le 4(5)	ACTUAL_DURATION_STOP is le 004:00 (hrs/min) and osi is y and trbl_cd is co
% stop oos le 4(5)	stop oos le 4(5) / total oos 5 * 100
stop oos le 4 (3,4)	ACTUAL_DURATION_STOP is le 004:00 (hrs/min) and osi is y and trbl_cd is fac
% stop oos le4(3,4)	stop oos le 4(3,4) / total oos 3/4 * 100
stop oos le 16(3,4)	ACTUAL_DURATION_STOP is le 016:00 (hrs/min) and osi is y and trbl_cd is fac
% stop oos le 16(3,4)	stop oos le 16(3,4) / total oos 3/4 * 100

**NMP Provisioning Tables:)**

**ORDER TYPE:**

Defines what type of service is requested

N	New Service
T	The "To" portion when a customer moves From one address To another address
C	Change request to existing service (add or remove features/services)
R	Record Change
D	Disconnect of entire service
F	Disconnect portion of an outside move from the "From" location

**Appointment Type Code (ATC):**

This code identifies how the appointment date was derived

W	The customer accepted the company's offered due date
X	The customer requested a due date that was greater than the company's offered Due date
S	The customer requested a due date that was earlier than the company's offered due date
C	The customer requested a special due date to coordinate a hot cut.
R	A due date could not be applied due to company or customer reasons.
K	Used on Billing Record Orders where a service order is issued for billing rearrangements.
Y	Verizon Initiated Customer Affecting
Z	Verizon Initiated Customer Non-Affecting

**Missed Appointment Code (MAC):**

When the original scheduled due date is missed a code is applied to the order to identify the reason for the miss

**Customer Missed Appointment:**

SA	Access could not be obtained to the customers premises( customer not at home)
SR	Customer was not ready to receive the new service
SO	Any other customer caused reason for the delay (e.g., unsafe working conditions at the customer site)
SL	Customer requested a later appointment date prior to the due date
SP	Customer requested an earlier appointment date prior to the due date
SC	CLEC Not Ready
—	Under Development: CLEC Not Ready – due to late FOC

**Company (VZ) Missed Appointment:**

CA	The cable pair from the VZ central office to the customer premises could not be Assigned by the due date due to any reason, including assignment load. If after the due date it is determined that no facilities were available, a CF miss is applied.
CB	The VZ business office taking the request caused the delay (misplaced the order)
CC	A Common Cause that affected a large area caused the delay (Hurricanes/work stoppages)
CF	The assigned cable facility was bad
CL	Not enough VZ technicians to complete the work on a given day
CO	Any other delay caused by the Company not listed here (e.g., Technicians truck broke down)
CS	The VZ Central office work was not complete (line not programmed)

**SWO:**

A code applied when the order is completed to identify the service grouping

NR	Residence service
NL	Small business (2 lines or less)
NV	Large business (3 lines or more)
NF & NC	Internal VZ service
NS	Special services
NP	VZ Coin services
NI	Private Public Pay Phone (not VZ)

**SELLER TYPE**

A code used to identify orders for Wholesale/Resale/UNE

1	VZ Retail
R	Resale
A or C	UNE
P	COIN

**RID**

The presence of a Record Inventory Date (RID) indicates a Special Services order.

**Service Code Modifier (SCM):**

Identifies the service grouping of a special service circuit.

<i>ITEM</i>	<i>SERVICE ORDER</i>	<i>NMP Provisioning Field</i>	<i>VALUE</i>
Dispatch	OCB in STAT section	OCB_COC	= 'O'
No Dispatch	N0 OCB in STAT section	OCB_COC	<> 'O'
Dispatch	Number of times dispatched by the WFA/DO system	WFA_NUM_DO	> 0
No Dispatch	Number of times dispatched by the WFA/DO system	WFA_NUM_DO	= 0
Offered Interval	Elapsed business days between the application date and due date in Header Section	APPINTV	INTERGER
Completion Interval	Elapsed business days between the application date and completion date in header section	CMPINTV	INTERGER
Status complete		STATUS	= '55B'
Company services	Line of Business (LOB) indicator	LOB	'09000'
Seller	RSID or AECN in ID CCAR section	SELLER_NAME	
ATC	Appointment type code after due date in header section	ATC	W' OR 'X'
Service Code Modifier	Position 3-4 of circuit ID in S&E section	SCM	SEE DS TABLE
Customer Missed Appointment	Follows "SD/" after due date in Header Section	CISR_MAC Company	COMPANY BEGINS WITH 'C'. CUSTOMER = SA, SR,SO, SL

**SERVICE CODE MODIFIER (SCM) TABLE FOR DS LEVEL REPORTING**

SCM	TYPE	LEVEL	ACCESS	SCM	TYPE	LEVEL	ACCESS	SCM	TYPE	LEVEL	ACCESS
AA	ANALOG	DS0	N	LE	ANALOG	DS0	A	WF	DIGITAL	DS0	A
AB	DIGITAL	DS0	N	LF	ANALOG	DS0	A	WG	ANALOG	DS0	N
AD	ANALOG	DS0	N	LG	ANALOG	DS0	A	WI	ANALOG	DS0	N
AF	ANALOG	DS0	N	LH	ANALOG	DS0	A	WJ	ANALOG	DS0	A
AI	ANALOG	DS0	N	LJ	ANALOG	DS0	A	WL	ANALOG	DS0	A
AL	ANALOG	DS0	N	LK	ANALOG	DS0	A	WN	ANALOG	DS0	A
AN	ANALOG	DS0	N	LL	ANALOG	DS0	N	WO	ANALOG	DS0	N
AP	ANALOG	DS0	N	LN	ANALOG	DS0	A	WP	ANALOG	DS0	A
AQ	DIGITAL	DS0	N	LP	ANALOG	DS0	A	WQ	ANALOG	DS0	A
AR	DIGITAL	DS0	N	LQ	ANALOG	DS0	A	WR	ANALOG	DS0	A
AT	ANALOG	DS0	N	LR	ANALOG	DS0	A	WS	ANALOG	DS0	N
AU	ANALOG	DS0	N	LS	ANALOG	DS0	N	WU	ANALOG	DS0	N
BA	LCL SPL	DS0	N	LT	ANALOG	DS0	N	WV	ANALOG	DS0	N
BL	ANALOG	DS0	N	LV	ANALOG	DS0	A	WX	ANALOG	DS0	N
BS	ANALOG	DS0	N	LY	ANALOG	DS0	A	WY	ANALOG	DS0	N
CA	ANALOG	DS0	N	LZ	ANALOG	DS0	A	WZ	ANALOG	DS0	N
CC	DIGITAL	DS0	N	MA	ANALOG	DS0	N	XA	DIGITAL	DS0	A
CE	ANALOG	DS0	N	MC	ANALOG	DS0	N	XB	DIGITAL	DS0	A
CF	ANALOG	DS0	N	ML	ANALOG	DS0	N	XC	DIGITAL	DS0	A
CG	ANALOG	DS0	N	MQ	ANALOG	DS0	A	XD	DIGITAL	DS0	A
CI	ANALOG	DS0	N	MR	ANALOG	DS0	A	XE	DIGITAL	DS0	A
CK	ANALOG	DS0	N	MS	ANALOG	DS0	N	XF	DIGITAL	DS0	A
CL	LCL SPL	DS0	N	MT	ANALOG	DS0	N	XG	DIGITAL	DS0	A
CN	ANALOG	DS0	N	NA	ANALOG	DS0	N	XH	DIGITAL	DS0	A
CP	ANALOG	DS0	N	NC	ANALOG	DS0	N	XI	DIGITAL	DS0	A
CR	ANALOG	DS0	N	ND	LCL SPL	DS0	N	XJ	DIGITAL	DS0	A
CS	ANALOG	DS0	N	NQ	ANALOG	DS0	A	XL	ANALOG	DS0	A
CT	ANALOG	DS0	N	NT	ANALOG	DS0	A	XR	DIGITAL	DS0	A
CV	ANALOG	DS0	N	NU	ANALOG	DS0	A	XX	ANALOG	DS0	N
CW	ANALOG	DS0	N	NV	ANALOG	DS0	A	YG	DIGITAL	DS0	A
CX	ANALOG	DS0	N	NW	ANALOG	DS0	A	YN	DIGITAL	DS0	A
CZ	ANALOG	DS0	N	NY	ANALOG	DS0	A	ZA	COMPANY CKTS	DS0	N
DA	DIGITAL	DS0	N	OC	ANALOG	DS0	N	ZC	COMPANY CKTS	DS0	N
DC	DIGITAL	DS0	N	OI	ANALOG	DS0	N	ZD	COMPANY CKTS	DS0	N
DD	ANALOG	DS0	N	ON	ANALOG	DS0	N	ZE	COMPANY CKTS	DS0	N
DI	LCL SPL	DS0	N	OP	ANALOG	DS0	N	ZF	COMPANY CKTS	DS0	N
DJ	ANALOG	DS0	N	OS	ANALOG	DS0	N	ZM	COMPANY CKTS	DS0	N
DK	ANALOG	DS0	N	PA	ANALOG	DS0	N	ZP	COMPANY CKTS	DS0	N
DL	ANALOG	DS0	N	PB	ANALOG	DS0	A	ZQ	COMPANY CKTS	DS0	N
DM	DIGITAL	DS0	N	PC	DIGITAL	DS0	N	ZS	COMPANY CKTS	DS0	N
DO	LCL SPL	DS0	N	PD	ANALOG	DS0	N	ZT	COMPANY CKTS	DS0	N
DP	DIGITAL	DS0	N	PE	ANALOG	DS0	A	ZV	COMPANY CKTS	DS0	N
DQ	DIGITAL	DS0	N	PF	ANALOG	DS0	A	ZZ	COMPANY CKTS	DS0	N
DR	DIGITAL	DS0	N	PG	ANALOG	DS0	N				
DS	DIGITAL	DS0	N	PI	ANALOG	DS0	N				
DT	ANALOG	DS0	N	PJ	ANALOG	DS0	A	AC	HIGHCAP	DS1	A
DU	ANALOG	DS0	N	PK	ANALOG	DS0	A	AH	HIGHCAP	DS1	A
DW	DIGITAL	DS0	N	PL	ANALOG	DS0	N	AS	HIGHCAP	DS1	N
DX	DIGITAL	DS0	N	PM	ANALOG	DS0	N	CH	HIGHCAP	DS1	N
DY	DIGITAL	DS0	N	PN	ANALOG	DS0	A	DB	HIGHCAP	DS1	N
DZ	DIGITAL	DS0	N	PQ	ANALOG	DS0	A	DF	HIGHCAP	DS1	N
EA	ANALOG	DS0	N	PR	ANALOG	DS0	N	DG	HIGHCAP	DS1	N
EB	ANALOG	DS0	N	PS	ANALOG	DS0	N	DH	HIGHCAP	DS1	N
EC	ANALOG	DS0	N	PT	ANALOG	DS0	N	FL	HIGHCAP	DS1	N
EE	ANALOG	DS0	N	PV	ANALOG	DS0	N	HC	HIGHCAP	DS1	A
EF	ANALOG	DS0	N	PW	ANALOG	DS0	N	HJ	HIGHCAP	DS1	A
EG	ANALOG	DS0	N	PX	LCL SPL	DS0	N	HK	HIGHCAP	DS1	N
EL	ANALOG	DS0	N	PZ	ANALOG	DS0	N	HL	HIGHCAP	DS1	N
EM	ANALOG	DS0	N	QB	DIGITAL	DS0	N	HN	HIGHCAP	DS1	N

SERVICE CODE MODIFIER (SCM) TABLE FOR DS LEVEL REPORTING, continued

SCM	TYPE	LEVEL	ACCESS	SCM	TYPE	LEVEL	ACCESS	SCM	TYPE	LEVEL	ACCESS
EN	ANALOG	DS0	N	QD	DIGITAL	DS0	N	HU	HIGHCAP	DS1	N
EO	ANALOG	DS0	N	QE	DIGITAL	DS0	N	HX	HIGHCAP	DS1	A
EP	ANALOG	DS0	N	QJ	DIGITAL	DS0	N	IP	HIGHCAP	DS1	N
EQ	ANALOG	DS0	N	QK	DIGITAL	DS0	N	JE	HIGHCAP	DS1	A
ES	ANALOG	DS0	N	QL	DIGITAL	DS0	N	QA	HIGHCAP	DS1	N
EV	ANALOG	DS0	N	QR	DIGITAL	DS0	N	QG	HIGHCAP	DS1	N
EW	ANALOG	DS0	N	QS	DIGITAL	DS0	N	SY	HIGHCAP	DS1	A
EX	ANALOG	DS0	N	QU	ANALOG	DS0	N	TD	HIGHCAP	DS1	A
FA	ANALOG	DS0	N	QY	DIGITAL	DS0	N	TE	HIGHCAP	DS1	A
FD	ANALOG	DS0	N	RA	ANALOG	DS0	N	UF	HIGHCAP	DS1	N
FE	DIGITAL	DS0	N	RC	DIGITAL	DS0	N	UH	HIGHCAP	DS1	N
FF	DIGITAL	DS0	N	RD	ANALOG	DS0	N	UM	HIGHCAP	DS1	N
FP	ANALOG	DS0	N	RE	ANALOG	DS0	N	VS	HIGHCAP	DS1	N
FQ	ANALOG	DS0	N	RG	ANALOG	DS0	N	VW	HIGHCAP	DS1	N
FR	ANALOG	DS0	N	RL	ANALOG	DS0	N	VX	HIGHCAP	DS1	N
FT	ANALOG	DS0	N	RO	ANALOG	DS0	N	VY	HIGHCAP	DS1	N
FV	ANALOG	DS0	N	RS	ANALOG	DS0	N	YB	HIGHCAP	DS1	A
FW	ANALOG	DS0	N	RT	ANALOG	DS0	N	ED	HIGHCAP	DS3	A
FX	ANALOG	DS0	N	SA	ANALOG	DS0	N	EH	HIGHCAP	DS3	A
FZ	ANALOG	DS0	N	SB	ANALOG	DS0	A	EJ	HIGHCAP	DS3	A
GA	DIGITAL	DS0	N	SC	ANALOG	DS0	N	EK	HIGHCAP	DS3	A
GB	DIGITAL	DS0	N	SD	ANALOG	DS0	A	FI	HIGHCAP	DS3	N
GC	DIGITAL	DS0	N	SE	ANALOG	DS0	A	GW	HIGHCAP	DS3	N
GD	DIGITAL	DS0	N	SF	ANALOG	DS0	A	HD	HIGHCAP	DS3	A
GE	DIGITAL	DS0	N	SG	ANALOG	DS0	N	HE	HIGHCAP	DS3	A
GF	DIGITAL	DS0	N	SJ	ANALOG	DS0	A	HF	HIGHCAP	DS3	A
GG	DIGITAL	DS0	N	SK	ANALOG	DS0	N	HG	HIGHCAP	DS3	A
GH	DIGITAL	DS0	N	SL	LCL_SPL	DS0	N	HH	HIGHCAP	DS3	A
GI	DIGITAL	DS0	N	SM	ANALOG	DS0	N	HI	HIGHCAP	DS3	N
GJ	DIGITAL	DS0	N	SN	ANALOG	DS0	N	HT	HIGHCAP	DS3	A
GK	DIGITAL	DS0	N	SQ	ANALOG	DS0	N	HZ	HIGHCAP	DS3	N
GL	DIGITAL	DS0	N	SS	ANALOG	DS0	N	JI	HIGHCAP	DS3	A
GM	DIGITAL	DS0	N	ST	DIGITAL	DS0	N	LI	HIGHCAP	DS3	N
GN	DIGITAL	DS0	N	SV	ANALOG	DS0	A	LM	HIGHCAP	DS3	N
GO	DIGITAL	DS0	N	SZ	ANALOG	DS0	A	LO	HIGHCAP	DS3	N
GP	DIGITAL	DS0	N	TA	ANALOG	DS0	N	LU	HIGHCAP	DS3	N
GQ	DIGITAL	DS0	N	TB	ANALOG	DS0	N	LW	HIGHCAP	DS3	N
GR	DIGITAL	DS0	N	TC	ANALOG	DS0	N	LX	HIGHCAP	DS3	A
GS	DIGITAL	DS0	N	TF	ANALOG	DS0	N	MB	HIGHCAP	DS3	N
GT	DIGITAL	DS0	N	TG	ANALOG	DS0	N	MD	HIGHCAP	DS3	N
GU	DIGITAL	DS0	N	TK	LCL_SPL	DS0	N	MF	HIGHCAP	DS3	N
GV	DIGITAL	DS0	N	TL	ANALOG	DS0	N	MI	HIGHCAP	DS3	N
GX	ANALOG	DS0	N	TM	ANALOG	DS0	N	MM	HIGHCAP	DS3	N
GZ	DIGITAL	DS0	N	TN	ANALOG	DS0	N	OA	HIGHCAP	DS3	A
H	ANALOG	DS0	N	TO	ANALOG	DS0	N	OE	HIGHCAP	DS3	A
HA	DIGITAL	DS0	N	TQ	ANALOG	DS0	A	QC	HIGHCAP	DS3	N
HB	DIGITAL	DS0	N	TR	ANALOG	DS0	N	QH	HIGHCAP	DS3	N
HM	DIGITAL	DS0	N	TT	ANALOG	DS0	N	QI	HIGHCAP	DS3	N
HP	DIGITAL	DS0	N	TU	ANALOG	DS0	N	TV	HIGHCAP	DS3	A
HQ	DIGITAL	DS0	N	TW	ANALOG	DS0	A	TZ	HIGHCAP	DS3	A
HR	DIGITAL	DS0	N	TX	ANALOG	DS0	N	VR	HIGHCAP	DS3	N
HS	DIGITAL	DS0	A	TY	ANALOG	DS0	N	YH	HIGHCAP	DS3	A
HV	ANALOG	DS0	N	UN	ANALOG	DS0	N	YI	HIGHCAP	DS3	A
HW	DIGITAL	DS0	N	US	DIGITAL	DS0	N	JJ	HIGHCAP	Other	A
HY	DIGITAL	DS0	N	VF	ANALOG	DS0	N	JK	HIGHCAP	Other	A
IA	DIGITAL	DS0	A	VH	ANALOG	DS0	N	ME	HIGHCAP	Other	N
IB	DIGITAL	DS0	N	VI	ANALOG	DS0	N	MG	HIGHCAP	Other	N
ID	DIGITAL	DS0	N	VM	ANALOG	DS0	N	MH	HIGHCAP	Other	N
IO	ANALOG	DS0	N	VN	ANALOG	DS0	N	MJ	HIGHCAP	Other	N
IT	ANALOG	DS0	N	VT	ANALOG	DS0	N	MK	HIGHCAP	Other	N
KC	ANALOG	DS0	A	WA	ANALOG	DS0	A	MP	HIGHCAP	Other	N
LA	ANALOG	DS0	N	WB	DIGITAL	DS0	A	OB	HIGHCAP	Other	A
LB	ANALOG	DS0	A	WC	DIGITAL	DS0	A	OD	HIGHCAP	Other	A
LC	ANALOG	DS0	A	WD	DIGITAL	DS0	A	OF	HIGHCAP	Other	A
LD	ANALOG	DS0	A	WE	DIGITAL	DS0	A	OG	HIGHCAP	Other	A

## **New York Carrier to Carrier Statistical Metric Evaluation Procedures<sup>1</sup>**

Statistical evaluation is used here as a tool to assess whether the Incumbent Local Exchange Company's (ILEC) wholesale service performance to the Competitive Local Exchange Companies (CLECs) is at least equal in quality to the service performance that the ILEC provides to itself (i.e., parity). Carrier-to-Carrier (C2C) measurements having a parity standard are metrics where both the CLEC and ILEC performance are reported.<sup>2</sup>

### **A. Statistical Framework**

The statistical tests of the null hypothesis of parity against the alternative hypothesis of non-parity defined in these guidelines use ILEC and CLEC observational data. The ILEC and CLEC observations for each month are treated as random samples drawn from operational processes that run over multiple months. The null hypothesis is that the CLEC mean performance is at least equal to or better than the ILEC mean performance.

Statistical tests should be performed under the following conditions.

- 1) The data must be reasonably free of measurement/reporting error.
- 2) The ILEC to CLEC comparisons should be reasonably like to like.
- 3) The minimum sample size requirement for statistical testing is met. (Section B)
- 4) The observations are independent. (Section D)

These conditions are presumed to be met until contrary evidence indicates otherwise.

To the extent that the data and/or operational analysis indicate that additional analysis is warranted, a metric may be taken to the Carrier Working Group for investigation.

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<sup>1</sup> The procedures in this Appendix will go into effect for the November 2003 C2C report month.

<sup>2</sup> Section 251(c)(2)(C) of the Telecommunications Act of 1996 states that facilities should be provided to CLECs on a basis "that is at least equal in quality to that provided by the local exchange carrier to itself." Paragraph 3 of Appendix B of FCC Opinion 99-404 states, "Statistical tests can be used as a tool in determining whether a difference in the measured values of two metrics means that the metrics probably measure two different processes, or instead that the two measurements are likely to have been produced by the same process."

## **B. Sample Size Requirements**

The assumptions that underlie the C2C Guidelines statistical models include the requirement that the two groups of data are comparable. With larger sample sizes, differences in characteristics associated with individual customers are more likely to average out. With smaller sample sizes, the characteristics of the sample may not reasonably represent those of the population. Meaningful statistical analysis may be performed and confident conclusions may be drawn, if the sample size is sufficiently large to minimize the violations of the assumptions underlying the statistical model.

The following sample size requirements, based upon both statistical considerations and also some practical judgment, indicate the minimum sample sizes above which parity metric test results (for both counted and measured variables) may permit reasonable statistical conclusions.

The statistical tests defined in these guidelines are valid under the following conditions:

*If there are only 6 of one group (ILEC or CLEC), the other must be at least 30.*

*If there are only 7 of one, the other must be at least 18.*

*If there are only 8 of one, the other must be at least 14.*

*If there are only 9 of one, the other must be at least 12.*

*Any sample of at least 10 of one and at least 10 of the other is to be used for statistical evaluation.*

When a parity metric comparison does not meet the above sample size criteria, it may be taken to the Carrier Working Group for alternative evaluation. In such instances, a statistical score (Z score equivalent) will not be reported, but rather an “SS” (for Small Sample) will be recorded in the statistical score column; however, the means (or proportions), number of observations and standard deviations (for means only) will be reported.

## **C. Statistical Testing Procedures**

Parity metric measurements that meet the sample size criteria in Section B will be evaluated according to the one-tailed permutation test procedure defined below.

Combine the ILEC and CLEC observations into one group, where the total number of observations is  $n_{ilec} + n_{clec}$ . Take a sufficiently large number of random samples of size  $n_{clec}$  (e.g., 500,000). Record the mean of each re-sample of size  $n_{clec}$ . Sort the re-sampled means from best to worst (left to right) and compare where on the distribution of re-sampled means the original CLEC mean is located. If 5% or less of the means lie to the

right of the reported CLEC mean, then reject the null hypothesis that the original CLEC sample and the original ILEC sample came from the same population.

If the null hypothesis is correct, a permutation test yields a probability value (*p value*) representing the probability that the difference (or larger) in the ILEC and CLEC sample means is due to random variation.

Permutation test *p values* are transformed into “Z score equivalents.” These “Z score equivalents” refer to the standard normal Z score that has the same probability as the *p*-values from the permutation test. Specifically, this statistical score equivalent refers to the inverse of the standard normal cumulative distribution associated with the probability of seeing the reported CLEC mean, or worse, in the distribution of re-sampled permutation test means. A Z score of less than or equal to  $-1.645$  occurs at most 5% of the time under the null hypothesis that the CLEC mean is at least equal to or better than the ILEC mean. A Z score greater than  $-1.645$  (*p*-value greater than 5%) supports the belief that the CLEC mean is at least equal to or better than the ILEC mean. For reporting purposes, Z score equivalents equal to or greater than 5.0000 are displayed on monthly reports as 5.0000. Similarly, values for a Z statistics equal to or less than  $-5.0000$  are displayed as  $-5.0000$ .

Alternative computational procedures (i.e., computationally more efficient procedures) may be used to perform measured and counted variable permutation tests so long as those procedures produce the same *p*-values as would be obtained by the permutation test procedure described above. The results should not vary at or before the fourth decimal place to the Z score equivalent associated with the result generated from the exact permutation test. (i.e., the test based upon the exact number of combinations of  $n_{clec}$  from the combined  $n_{ilec} + n_{clec}$ ).

**Measured Variables (i.e., metrics of intervals, such as mean time to repair or average delay days):**

The following permutation test procedure is applied to measured variable metrics:

1. Compute and store the mean for the original CLEC data set.
2. Combine the ILEC and CLEC data to form one data set.
3. Draw a random sample without replacement of size  $n_{clec}$  (sample size of original CLEC data) from the combined data set.
  - a) Compute the test statistic (re-sampled CLEC mean).
  - b) Store the new value of test statistic for comparison with the value obtained from the original observations.
  - c) Recombine the data set.

4. Repeat Step 3 enough times such that if the test were re-run many times the results would not vary at or before the fourth decimal place of the reported Z score equivalent (e.g., draw 500,000 re-samples per Step 3).
5. Sort the CLEC means created and stored in Step 3 and Step 4 in ascending order (CLEC means from best to worst).
6. Determine where the original CLEC sample mean is located relative to the collection of re-sampled CLEC sample means. Specifically, compute the percentile of the original CLEC sample mean.
7. Reject the null hypothesis if the percentile of the test statistic (original CLEC mean) for the observations is less than .05 (5%). That is, if 95% or more of the re-sampled CLEC means are better than the original CLEC sample mean, then reject the null hypothesis that the CLEC mean is at least equal to or better than the ILEC mean. Otherwise, the data support the belief that the CLEC mean is at least equal to or better than the ILEC mean.
8. Generate the C2C Report "Z Score Equivalent," known in this document as the standard normal Z score that has the same percentile as the test statistic.

**Counted Variables (i.e., metrics of proportions, such as percent measures):**

A hypergeometric distribution based procedure (a.k.a., Fisher's Exact test)<sup>3</sup> is an appropriate method to evaluate performance for counted metrics where performance is measured in terms of success and failure. Using sample data, the hypergeometric distribution estimates the probability (*p value*) of seeing **at least** the number of failures found in the CLEC sample. In turn, this probability is converted to a Z score equivalent using the inverse of the standard normal cumulative distribution.

The hypergeometric distribution is as follows:

$$p \text{ value} = 1 - \left\{ \sum_{i=\max(0, \{[n_{ilec} p_{ilec} + n_{clec} p_{clec}] - [n_{clec}] - [n_{ilec} + n_{clec}]\})}^{n_{clec} p_{clec} - 1} \frac{\binom{[n_{clec} p_{clec} + n_{ilec} p_{ilec}]}{i} \binom{[n_{clec} + n_{ilec}] - [n_{clec} p_{clec} + n_{ilec} p_{ilec}]}{n_{clec} - i}}{\binom{[n_{clec} + n_{ilec}]}{n_{clec}}} \right\}$$

Where:

*p value* = the probability that the difference in the ILEC and CLEC sample proportions could have arisen from random variation, assuming the null hypothesis

<sup>3</sup> This procedure produces the same results as a permutation test of the equality of the means for the ILEC and CLEC distributions of 1s and 0s, where successes are recorded as 0s and failures as 1s.

$n_{clec}$  and  $n_{ilec}$  = the CLEC and ILEC sample sizes (i.e., number of failures + number of successes)

$p_{clec}$  and  $p_{ilec}$  = the proportions of CLEC and ILEC failed performance, for percentages 10% translates to a 0.10 proportion = number of failures / (number of failures + number of successes)

Either of the following two equations can be used to implement a hypergeometric distribution-based procedure:

The probability of observing **exactly**  $f_{clec}$  failures is given by:

$$\Pr(i = f_{clec}) = \frac{\binom{(f_{clec} + f_{ilec})}{f_{clec}} \binom{(n_{clec} + n_{ilec}) - (f_{clec} + f_{ilec})}{n_{clec} - f_{clec}}}{\binom{(n_{clec} + n_{ilec})}{n_{clec}}}$$

Where:

$f_{clec}$  = CLEC failures in the chosen sample =  $n_{clec} p_{clec}$

$f_{ilec}$  = ILEC failures in the chosen sample =  $n_{ilec} p_{ilec}$

$n_{clec}$  = size of the CLEC sample

$n_{ilec}$  = size of the ILEC sample

Alternatively, the probability of observing **exactly**  $f_{clec}$  failures is given by:

$$\Pr(i = f_{clec}) = \frac{n_{clec}! n_{ilec}! f_{total}! s_{total}!}{(n_{clec} + n_{ilec})! f_{clec}! (n_{clec} - f_{clec})! (f_{total} - f_{clec})! (n_{ilec} - f_{total} + f_{clec})!}$$

Where:

$s_{clec}$  = the number of CLEC successes =  $n_{clec} (1 - p_{clec})$

$s_{ilec}$  = the number of ILEC successes =  $n_{ilec} (1 - p_{ilec})$

$f_{total} \equiv f_{clec} + f_{ilec}$

$s_{total} \equiv s_{clec} + s_{ilec}$

The probability of observing  $f_{clec}$  **or more** failures [ $\Pr(i \geq f_{clec})$ ] is calculated according to the following steps:

1. Calculate the probability of observing exactly  $f_{clec}$  using either of the equations above.
2. Calculate the probability of observing all more extreme frequencies than  $i = f_{clec}$ , conditional on the
  - a. total number of successes ( $S_{total}$ ),
  - b. total number of failures ( $f_{total}$ ),
  - c. total number of CLEC observations ( $n_{clec}$ ), and the
  - d. total number of ILEC observations ( $n_{ilec}$ ) remaining fixed.
3. Sum up all of the probabilities for  $Pr(i \geq f_{clec})$ .
4. If that value is less than or equal to 0.05, then the null hypothesis is rejected.

#### D. Root Cause/Exceptions

**Root Cause:** If the permutation test shows an “out-of-parity” condition, the ILEC may perform a root cause analysis to determine cause. Alternatively, the ILEC may be required by the Carrier Working Group to perform a root cause analysis. If the cause is the result of “clustering” within the data, the ILEC will provide such documentation.

**Clustering Exceptions:** Due to the definitional nature of the variables used in the performance measures, some comparisons may not meet the requirements for statistical testing. Individual data points may not be independent. The primary example of such non-independence is a cable failure. If a particular CLEC has fewer than 30 troubles and all are within the same cable failure with long duration, the performance will appear out of parity. However, for all troubles, including the ILEC’s troubles, within that individual event, the trouble duration is identical.

Another example of clustering is if a CLEC has a small number of orders in a single location with a facility problem. If this facility problem exists for all customers served by that cable and is longer than the average facility problem, the orders are not independent and clustering occurs.

Finally, if root cause shows that the difference in performance is the result of CLEC behavior, the ILEC will identify such behavior and work with the respective CLEC on corrective action.

Another assumption underlying the statistical models used here is the assumption that the data are independent. In some instances, events included in the performance measures of provisioning and maintenance of telecommunication services are not independent. The lack of independence contributes to “clustering” of data. Clustering occurs when individual items (orders, troubles, etc.) are clustered together as one single event. This being the case, the ILEC will have the right to file an exception to the performance scores

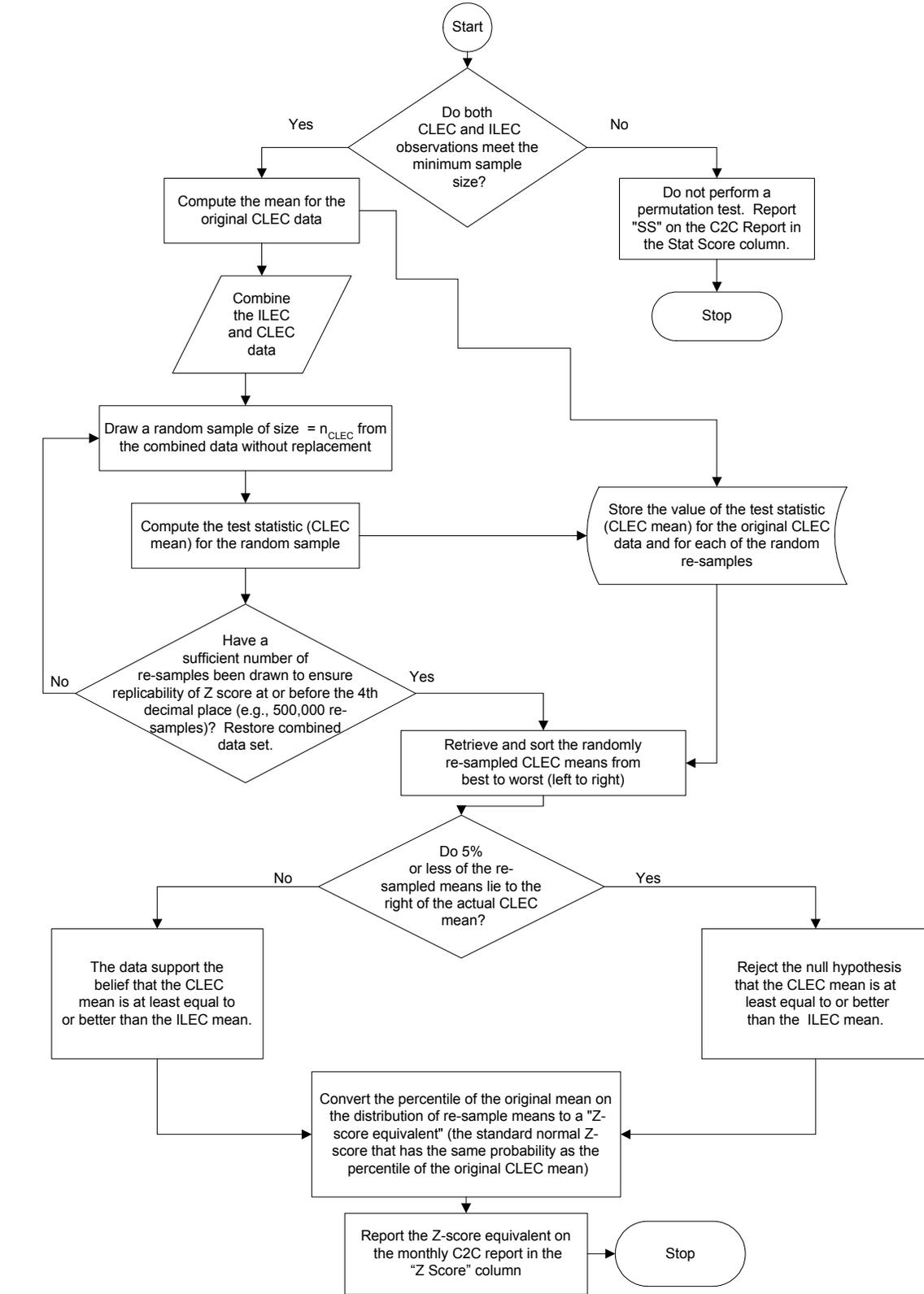
in the Performance Assurance Plan if the following events occur:

- a. Event-Driven Clustering - Cable Failure: If a significant proportion (more than 30%) of a CLEC's troubles are in a single cable failure, the ILEC may provide data demonstrating that all troubles within that failure, including the ILEC troubles, were resolved in an equivalent manner. Then, the ILEC also will provide the repair performance data with that cable failure performance excluded from the overall performance for both the CLEC and the ILEC and the remaining troubles will be compared according to normal statistical methodologies.
- b. Location-Driven Clustering - Facility Problems: If a significant proportion (more than 30%) of a CLEC's missed installation orders and resulting delay days were due to an individual location with a significant facility problem, the ILEC will provide the data demonstrating that the orders were "clustered" in a single facility shortfall. Then, the ILEC will provide the provisioning performance with that data excluded. Additional location-driven clustering may be demonstrated by disaggregating performance into smaller geographic areas.
- c. Time-Driven Clustering - Single Day Events: If a significant proportion (more than 30%) of CLEC activity, provisioning, or maintenance occurs on a single day within a month, and that day represents an unusual amount of activity in a single day, the ILEC will provide the data demonstrating the activity is on that day. The ILEC will compare that single day's performance for the CLEC to the ILEC's own performance. Then, the ILEC will provide data with that day excluded from overall performance to demonstrate "parity."

CLEC Actions: If performance for any measure is impacted by unusual CLEC behavior, the ILEC will bring such behavior to the attention of the CLEC to attempt resolution. Examples of CLEC behavior impacting performance results include order quality, causing excessive missed appointments; incorrect dispatch identification, resulting in excessive multiple dispatch and repeat reports, inappropriate X coding on orders, where extended due dates are desired; and delays in rescheduling appointments, when the ILEC has missed an appointment. If such action negatively impacts performance, the ILEC will provide appropriate detailed documentation of the events and communication to the individual CLEC and the Commission.

Documentation: The ILEC will provide all necessary detailed documentation to support its claim that an exception is warranted, ensuring protection of customer proprietary information, to the CLEC(s) and Commission. ILEC and CLEC performance details include information on individual trouble reports or orders. For cable failures, the ILEC will provide appropriate documentation detailing all other troubles associated with that cable failure.

**Permutation Test for Equality of  
Average ILEC and CLEC Performance**  
*For Measured and Counted Variables*



## Projects Requiring Special Handling

Verizon customers have the opportunity to request special handling for unique or large-volume order activity that requires a particular type of coordination which results in defined deviation from normal business practices and system edits on the part of both the customer and Verizon. This special handling is called a “project”<sup>1</sup> and exists both on the Retail and Wholesale sides of the business. In Retail, a project could be a large POTS to Centrex or PBX conversion that would require coordination between the customer, the Verizon business office, the Verizon downstream provisioning forces (central office and field) and Verizon site support. Negotiated critical dates, times, and customized provisioning and feature packages are part of the effort. In addition to this scenario, examples of Projects requiring special handling for CLECs also include: migrations of many end users to the CLEC’s platform acquired simultaneously from either Verizon or another CLEC in a business acquisition such as a bankruptcy (however this process is described in detail in the NY PSC Case 00-C-0188 Order dated December 4, 2001 (<http://www.dps.state.ny.us/fileroom/doc10880.pdf>) and is not part of this appendix); line or feature changes to an entire CLEC customer base (for example, hundreds of thousands of changes to the PIC or LPIC or blocking of certain types of services); high volumes of hot-cuts in the same central office where special handling and communication between the CLEC and Verizon is critical; and large jobs involving a large, sensitive customer such as a hospital or government agency. This special handling/coordination is of great benefit to the customer and ensures timely installation on the negotiated due dates and accurate provisioning of requested services associated with a large request or unusual circumstances. This special handling is also of benefit to Verizon in controlling and managing potentially disrupting workflow.

To serve the CLECs in this area, each Verizon Wholesale National Market Center (NMC) has established a “project group” staffed by representatives and managers. These groups are expert in provisioning these large, complex and sensitive requests. They act as the Single Point of Contact to the CLEC and provide the CLEC a conduit for communications throughout the entire project. The project team works the project LSRs in aggregate, as opposed to random distribution throughout the general NMC representative population. This level of service can provide the CLEC specialized instruction, directions for completing LSRs, up-to-the-minute status, and can eliminate delay and re-work that might normally arise out of a query on an incorrectly filled out LSR. To that end, order information is typically organized and scrubbed to ensure accuracy. This specialized support also facilitates real time correction of facilities issues such as “working pairs” and “no dial tone” situations on a hot-cut.

To the extent that this specialized project support causes Verizon to miss certain metrics, Verizon will exclude the PONS associated with the project from specific ordering and provisioning metrics. For example, a CLEC might elect to transmit all orders for the entire project at once yet, schedule the implementation and resulting due dates at varying later times.

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<sup>1</sup> This project description does not apply to those orders that Verizon unilaterally requires a project be established (e.g. routine CLEC to CLEC migrations).

Upon agreement from both Verizon and the CLEC that the work will be handled as a project the CLEC will transmit either electronically or in writing the following information:

1. A list of PONs to be associated with the project.
2. A unique PON identifier.
3. Start date
4. Approximate completion date
5. A definition of the special handling to be required by the project and the requested deviations from standard business practices due to the project.

Verizon will exclude such PONs from specific metrics as shown in Table A. Table B lists measurements that would only be excluded if circumstances warrant. The metrics and the circumstances for exclusion are identified below.

Based on the project specifications, including completion criteria, that Verizon personnel receive (or based on a copy of the CLEC project specifications forwarded by CLEC metrics personnel), Verizon will at the CLECs request alert the CLEC of potential Table B metric issues as early in the project planning as possible.

Verizon will provide the affected CLEC and the Commission staff notification of the exclusions via the metrics change control notification process. The change control notification identifies:

1. A list of the specific project PONs to be excluded from the Table B metrics (on a metric by metric basis) associated with the project along with sufficient data to justify the exclusion
2. The data months for which the exclusions will apply.

Should Verizon and the project requesting CLEC not agree on metrics to be excluded, Verizon will initiate the Wholesale Metrics Change Control and the project will proceed. Verizon and the CLEC will attempt to resolve the metrics issue on a business to business basis. Absent agreement, the parties will use the EDR process to resolve the issue.

**Projects requiring special handling will be excluded from the following metrics as appropriate:**

TABLE A

<i>Metric #</i>	<i>Metric Name</i>	<i>Circumstances for exclusion</i>
OR-1	Order Confirmation Timeliness	For manually handled orders. Any special handling will require special resources and handling within Verizon's NMC. Orders that flow through will not be excluded from OR-1.
OR-2	Reject Timeliness	For manually handled orders. Any special handling will require special resources and handling within Verizon's NMC. Orders that automatically reject (flow through) will not be excluded from OR-2.
OR-7	Order Confirmation/Rejects	For manually handled orders. Any special handling will require special resources and handling within Verizon's NMC. Orders that flow through will not be excluded from OR-7.
PR-1 (PR-2 where it still exists)	Average Interval Offered	Special handling frequently results in longer than standard intervals. Verizon may not be able to exclude these via "X" coding per normal process. A PON specific exclusion may be redundant, but will ensure that the longer interval is excluded.
PR-3	Completed within Specified number of Days	Special handling frequently results in longer than standard intervals

**Projects requiring special handling will be excluded from the following metrics if circumstances warrant. This will be determined on a case by case basis and/or at the CLEC's request when the project is being negotiated. Verizon will notify the CLEC of the metric exclusion through the Metrics Change Control process.**

TABLE B

<i>Metric #</i>	<i>Metric Name</i>	<i>Circumstances for exclusion</i>
OR-4	Timeliness of Completion Notification	If the nature of the project or unique circumstances of the account will cause fall out for Post Completion Discrepancy (PCD), orders will be excluded from relevant metrics. For example, if a CLEC knows that it is providing incorrect address information, and requests that the LSRs not be rejected, the order will fall out for correction as a PCD.
OR-5	Percent Flow Through	An order that would in normal circumstances flow through, but does not because manual handling is required for the special project would be excluded
PR-6	Installation Quality	In situations where testing or cooperative testing can not occur through the normal process

## COMMONWEALTH OF VIRGINIA

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DIVISION OF COMMUNICATIONS

July 19, 2002

Mr. Stephen C. Spencer  
Director - Regulatory  
Verizon South Inc.  
P. O. Box 27241  
600 East Main Street  
Richmond, Virginia 23261

RE: Performance Standards and  
Remedies for Verizon South

Dear Mr. Spencer:

The Collaborative Committee established by the Virginia State Corporation Commission in Case No. PUC-2000-00026 initially required both Verizon Virginia Inc. ("Verizon VA") and Verizon South Inc. ("Verizon South") to submit proposed Carrier Performance Standards and an associated remedy plan for payments to CLECs for unsatisfactory performance (see my letter dated June 28, 2000). Much has been accomplished since these initial proposals were filed. In particular, the Performance Standards/Remedy Plans Subcommittee ("Subcommittee") has reached agreement on Performance Standards and a Performance Assurance Plan ("PAP") for Verizon VA.

The Subcommittee next intends to address Performance Standards and a PAP for Verizon South. Verizon South has now completed its transition to Verizon VA's Operations Support Systems. It is my understanding that Verizon South has agreed to use the same Performance Standards as those adopted for Verizon VA. Therefore, I am requesting that Verizon South submit its revised proposed Performance Standards no later than August 30, 2002. It is our expectation that the Subcommittee should be able expeditiously to review and comment on the proposed Verizon South Performance Standards in order to implement them in Virginia as soon as possible.

Once Performance Standards for Verizon South have been established, we hope that the Subcommittee quickly can reach agreement on a PAP for Verizon South. I trust that Verizon South is mindful of the Commission's stated goals for this Collaborative Committee, that is, establishing Virginia-specific performance standards and remedies for both Verizon VA and Verizon South. To the extent that Performance Standards and a PAP have now been adopted for Verizon VA, we can see no reason that such would not be appropriate for Verizon South as well.

Mr. Stephen C. Spencer  
July 19, 2002  
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We look forward to continuing working with Verizon VA and Verizon South in the collaborative effort.

Very truly yours,



William Irby

W/KC:js

c: Performance Standards/Remedy Plan Subcommittee (electronically distributed)