

Received & Inspected

JUN 28 2012

FCC Mail Room

Annual Reporting Requirements pursuant to § 54.313(a)(2)-(6)

WC Docket No. 10-90

§ 54.313(a)(2) – Outage reporting

My company was not required to collect this information in 2011.

My company collected this information pursuant to state utility commission requirement. A copy of the report is attached.

§ 54.313(a)(3) – Unfulfilled service requests

My company was not required to collect this information in 2011.

My company collected this information pursuant to state utility commission requirement. A copy of the report is attached.

§ 54.313(a)(4) – Customer complaints per 1000 connections

My company was not required to collect this information in 2011.

My company collected this information pursuant to state utility commission requirement. A copy of the report is attached.

§ 54.313(a)(5) – Service quality standards and consumer protection rules

I certify that the reporting carrier is in compliance with applicable service quality standards and consumer protection rules.

§ 54.313(a)(6) – Ability to function in emergency situations

I certify that the reporting carrier can function in emergency situations as set forth in 47 CFR §54.202(a)(2). Specifically, the reporting carrier has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

I am authorized to make this certification on behalf of the company named above and, to the best of my knowledge the information reported on this form is accurate. This certification is for the study area(s) listed below. **(Please enter your Company Name, State and Study Area Code)**

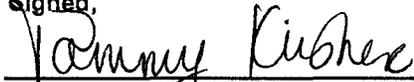
Company Name	State	Study Area Code
Pattersonville Telephone Company	New York	150016

(If necessary, attach a separate list of additional study areas and check this box.)

*[Handwritten signature and date]*



Signed,



[Signature of Corporate Officer]

**Tammy Krisher**

[Printed Name of Corporate Officer]

**President**

[Title of Corporate Officer]

Date: 6/22/2012

Carrier's Name Pattersonville Telephone Company  
Carrier's Address 1309 Main Street, Rotterdam Jct., NY 12150  
Carrier's Telephone Number (518) 887-2121



		Remotes Restored	Remotes on Gen	Remotes on Batt	CO's OOS	Dialtone Restored	Dialtone Out	DSL Restored	DSL Out	Broken Poles	Down Drops	Trouble Tkts	
at	Sep 23, 12PM					850	0						New fiber optic cable across Route 103 Bridge respliced; all customers and wireless cell towers back in service
on	Sep 12, 2PM												
un	Sep 11, 12PM						70	238	0				
at	Sep 10, 8PM					780	70	238	0				Only about 70 remaining in Scotch Church area still OOS
at	Sep 10, 8AM					680	170	0	238				270 in Rotterdam Junction restored; 170 in Scotch Church area to restore later today/tomorrow
ri	Sep 9, 11AM					425	425	0	238				Damage to Rt 103 bridge required fiber/copper cable cut across river; 92 dialtone and all Internet affected
hur	Sep 8, 11AM					525	325	238	0				
Wed	Sep 7, 2PM					525	325	238	0				270 in Rotterdam Junction coming up thru the day as lines are reconnected; 157 in McDougall to restore tomorrow
ues	Sep 6, 8AM					425	425	238	0				3 of 6 DLCs in service; State/Germantown Tel to provide mutual support
on	Sep 5, 8AM					300	550	238	0				
un	Sep 4, 8AM					0	850	194	44				
at	Sep 3, 8AM					0	850	194	44	6			
rf	Sep 2, 8AM					0	850	0	238				
hur	Sep 1, 8AM					0	850	0	238				
Wed	Aug 31, 10 AM					0	850	0	238				
ues	Aug 30, 9AM					0	850	0	238				
on	Aug 29, 3PM					0	850	0	238				
on	Aug 29, 8AM					0	850	0	238				

Hurricane Irene. Received call from Pattersonville that Business Office and switch evacuated due to flooding and County evacuations occurring.

Many residents and repair crews have no access to premises or outside plant facilities. There are sections of road washed away, broken pole lines, and damaged fiber optic cable. Switch destroyed.

New soft switch installed, fiber and copper cables replaced.

Company reported full network restoration on October 30, 2012



STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE  
THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350

www.dps.ny.gov

PUBLIC SERVICE COMMISSION

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*General Counsel*

JACLYN A. BRILLING  
*Secretary*

May 29, 2012

Ms. Tammy Risher  
President  
Pattersonville Telephone Company  
1309 Main Street  
Rotterdam Junction, NY 12150

Dear Ms. Risher:

At its Session of May 17, 2012, the Commission noted the excellent level of services provided to consumers by your company and its employees during 2011.

On the basis of the recommendation of the Office of Telecommunications set forth in the enclosed memorandum dated May 2, 2012, the Commission commends you for the high quality of telephone service which it provided during 2011.

Congratulations.

By direction of the Commission,

  
JACLYN A. BRILLING  
Secretary

Attachment



STATE OF NEW YORK  
DEPARTMENT OF PUBLIC SERVICE

May 2, 2012

Received & Inspected  
JUN 28 2012  
FCC Mail Room

TO: THE COMMISSION  
FROM: OFFICE OF TELECOMMUNICATIONS  
SUBJECT: CASE 11-C-0173 - In the Matter of Quality of Service provided by Local Exchange Companies in New York State.

Commendations of Local Telephone Companies for Excellent Service Quality During 2011 and 2011 Annual Service Quality Report for Independent Telephone Companies (including Frontier Communications)

SUMMARY

This memorandum includes recommendations from staff on the Commission's Telephone Service Quality Commendation Program. The Commission annually recognizes telephone companies that provide exemplary service. For the year ending December 31, 2011, the Office of Telecommunications recommends that the Commission commend 46 local telephone companies and/or their operating divisions for providing excellent telephone service. Twenty-eight of the 53 incumbent local exchange carriers (ILECs) or operating divisions qualify for a commendation, as do all of the 18 eligible competitive local exchange carriers (CLECs) or their subsidiaries.<sup>1</sup>

In addition, this memorandum reports on the service quality of the incumbents (including Frontier Communications) and competitive local exchange companies during 2011.

SERVICE QUALITY COMMENDATION PROGRAM

BACKGROUND

Since 1988, the Commission has been publicly recognizing local exchange carriers that provide excellent service quality by issuing annual service quality

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<sup>1</sup> To be considered for commendations, competitive local exchange carriers must be facility-based providers and have provided data for each of the months of 2011.

commendations to those carriers who achieve exemplary service quality performance. This year will be the twenty-fourth consecutive year that the Commission will be awarding commendations. To receive a Commission service quality commendation, a company or operating division must meet the following criteria.

1. For the year, 95% or more of all monthly customer trouble report rate (CTRR) measurement opportunities at each central office of a company or within each of a company's operating divisions/subsidiaries must be less than or equal to 3.3 reports per 100 lines (RPHL);<sup>2</sup>
2. For the year, an annual PSC Complaint Rate of 0.075 complaints per 1,000 access lines or less per month;<sup>3</sup>
3. Achievement of all applicable CTRR and PSC complaint rate targets associated with incentive plans, multi-year rate plans, mergers and asset transfers, and formal service quality proceedings;
4. Notwithstanding achievement of the above measures, no separate service quality Commission action must have been taken against the company or operating division during the year.

Staff reviewed the 2011 service quality performance of 53 incumbent local exchange companies and 18 competitive local exchange carriers. Reviewing the performance of the larger telephone companies at the operating division level permits consideration of smaller operating units within larger companies on a more equal footing with the smaller companies. Thus, the 11 operating divisions of Verizon New York Inc. (Verizon) and their CLEC (Verizon Access Transportation Services f/k/a MCI) are considered individually for commendation.<sup>4</sup> Similarly, two operating divisions of

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<sup>2</sup> The Telephone Service Standards, 16 NYCRR 603, only require that each central office perform at a CTRR of 5.5 or less. Thus, the commendation criteria significantly exceed the Commission standards.

<sup>3</sup> Commendations are also granted in cases where only one PSC complaint was charged against the company during the year under review, but the company's PSC complaint rate per 1,000 access lines exceeded 0.075 due to the company's small access line base.

<sup>4</sup> The 11 operating divisions are: Bronx, Brooklyn, Central, Manhattan North, Manhattan South, Midstate, Nassau, Northeast, Queens, Suffolk, and Western. Verizon Access

Windstream New York, Inc. (Windstream),<sup>5</sup> three operating divisions of Frontier Telephone of Rochester, Inc. (FTR),<sup>6</sup> and four subsidiaries of AT&T Inc.<sup>7</sup> are also considered separately for commendation.

DISCUSSION.

In 2011, of the 71 companies and/or operating divisions that were considered for commendation, 46 of these entities (65%) met the commendation criteria. Twenty-five entities failed to meet one or more of the criteria. Specifically:

- ◆ 23 entities did not meet the CTRR criteria;
- ◆ 11 entities did not meet the PSC Complaint Rate criteria; and,
- ◆ 9 entities did not meet both the CTRR and PSC Complaint Rate criteria.

Attachment 1 to this memorandum lists the entities that qualified for a commendation, as well as the underlying performance results. Discussed below are the specific results for Verizon, FTR, other Frontier Communications subsidiaries, the remaining incumbent carriers, and the CLECs.

**Verizon**

Only Verizon Access Services, a CLEC, is recommended for commendation for 2011. This is a decrease of two entities since last year, when both the Bronx Division and the Manhattan South Division were commended. Staff continues to monitor Verizon's service quality and meets with the company monthly to review Verizon's service performance.

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Transportation Services are the former MCI entities which were acquired by Verizon in January 2006 and are assessed separately for commendation.

<sup>5</sup> Fulton and Jamestown.

<sup>6</sup> Metro East, Metro West, and Suburban.

<sup>7</sup> The four subsidiaries are: AT&T Communications, AT&T Local Services, AT&T-ACC Corporation, and SBC Long Distance d/b/a AT&T Long Distance.

### **Frontier Communications**

Frontier Communications consists of Frontier Telephone of Rochester, Inc. (FTR), Frontier Communications of New York (Frontier of NY), Frontier Communications of AuSable Valley (AuSable Valley), Frontier Communications of Seneca-Gorham (Seneca-Gorham), Frontier Communications of Sylvan Lake (Sylvan Lake), Citizens Telecommunications Company of New York, Inc. (Citizens), and Ogden Telephone Company of New York, d/b/a Frontier Ogden Telephone Company (Ogden).

Because of adverse weather conditions experienced across their territory during 2011 (i.e., spring flooding, Hurricane Irene, and Tropical Storm Lee), Frontier Communications petitioned the Commission to exclude some of the service quality results from the severely impacted offices. The Commission granted that Petition,<sup>8</sup> in part, and FTR filed restated performance data.

Two (Metro East and Metro West) of FTR's three divisions along with Ogden and Frontier of NY met the CTRR and PSC complaint commendation criteria. The FTR Suburban division along with Citizens, AuSable Valley, Seneca-Gorham, and Sylvan Lake missed the CTRR commendation criteria.

### **Other Incumbent Local Exchange Carriers**

Twenty four of the remaining incumbent local exchange carriers are recommended to be commended for their 2011 service quality performance. Many of those companies have a long history of consecutive commendations.

### **Competitive Local Exchange Carriers**

To be considered for a commendation, a competitive carrier must be in business and report service quality data for the entire calendar year. All 18 of these carriers met the commendation criteria for their performance during 2011.

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<sup>8</sup> Case 11-C-0588 - Petition of the Frontier Communications Companies requesting that the Commission waive certain service quality reporting results, Order Approving Waiver, in Part (issued March 15, 2012).

**ANNUAL SERVICE QUALITY REPORT – INDEPENDENT TELEPHONE COMPANIES**

The 2011 service quality performance provided by the state’s local exchange companies (LECs), each serving less than 500,000 access lines, are reported to the Commission on an annual basis.<sup>9</sup> The discussion that follows begins with an overview of the service quality of the seven Frontier Communications companies, followed by a discussion of the remaining ILECs and some of the specific service quality provisions associated with mergers, multi-year rate plans, and/or other regulatory mandates for these companies. Finally, a review of the service quality for 18 of the State’s competitive local exchange carriers is provided.

**FRONTIER COMMUNICATIONS**

Through its subsidiaries, FTR serves about 494,000 access lines in New York State through 210 central offices. Overall, FTR serves a significant portion – about 7% – of the total traditional access lines in the State, but like most ILECs continues to lose access lines.

<b>Frontier Communications Local Exchange Subsidiaries in New York</b>				
<b>Subsidiary</b>	<b>Access Lines 12/31/08</b>	<b>Access Lines 12/31/09</b>	<b>Access Lines 12/31/10</b>	<b>Access Lines 12/31/11</b>
Citizens	225,850	210,287	196,019	191,738
FTR	315,891	285,057	256,416	234,012
Frontier of NY	49,071	44,877	41,962	39,044
Ogden	14,586	13,355	12,159	10,916
Sylvan Lake	10,799	9,235	8,318	7,456
Seneca-Gorham	7,205	6,667	6,289	5,848
AuSable Valley	5,843	5,558	5,381	5,096
NYS Corporate Total	629,245	575,036	526,544	494,110

**Service Quality Performance**

Under the Commission’s Service Standards, 16 NYCRR 603, LECs serving 500,000 or fewer access lines are only required to report CTRR, and each subsidiary of FTR currently serves fewer than 500,000 lines. Because of adverse weather conditions

<sup>9</sup> Staff reports quarterly to the Commission on Verizon’s Service Quality.

experienced across their territory during 2011 (i.e., spring flooding, Hurricane Irene, and Tropical Storm Lee), FTR petitioned the Commission to exclude some of the service quality results from the severely impacted offices. The Commission granted that Petition<sup>10</sup>, in part, and Frontier Communications filed restated performance data. Based on this restated data, Frontier's overall CTRR is approximately 92%.

### **Service Inquiry Reports**

When service results in a measured entity (e.g., central office) consistently fail to meet the threshold performance level of a given metric, the appropriate subsidiary must submit a Service Inquiry Report<sup>11</sup> detailing the reasons for the poor performance as well as the corrective actions taken. There were six such situations in 2011 for FTR. Citizens and Rochester missed the companywide CTRR metric in which 85% or more COEs are supposed to have a monthly CTRR of 3.3 customer trouble RPHL or less. In addition, four Citizens COEs missed the CTRR metric in which individual COEs are supposed to have a monthly CTRR of 5.5 customer trouble RPHL or less.

### **Major Service Outages**

The standards also enjoin carriers to minimize major service outages, and to report such events to Staff when they occur. Among the FTR, there were 19 total major service outages in 2011, an increase of 5 more than in 2010. Frontier reported all 19 outages which were primarily caused by equipment failures, damaged aerial and underground cable facilities, and weather events.

### **Service Quality Reporting under Frontier's Joint Stipulation and Agreement**

In 2008, the Commission adopted the FTR Joint Stipulation and Agreement

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<sup>10</sup> Case 11-C-0588 - Petition of the Frontier Communications Companies requesting that the Commission waive certain service quality reporting results, Order Approving Waiver, in part (issued March 15, 2012).

<sup>11</sup> Service Inquiry Reports are required under 16 NYCRR 603.4 whenever a Service Standards' metric is not at or better than the threshold for the current month and any two of the previous four months. These reports identify specific regions where improvements are required, detail the reasons for poor performance, describe the corrective action being taken, and identify an expected improvement date.

(Agreement). The Agreement considers the overall service quality of the combined FTR local exchange subsidiaries, and included a dividend suspension and customer rebates should service quality fall below an acceptable level. Under the Agreement, no FTR local exchange subsidiaries would be able to make dividend payments to the parent holding company if service quality fell below a certain level.

For purposes of the Agreement,<sup>12</sup> service quality is measured and reported monthly on a combined company basis and the customer rebate system is based on the total number of “measurement opportunities” on a 12-month rolling basis. A measurement opportunity is the monthly CTRR performance of each central office. A customer rebate equal to 25% of the flat monthly basic service charge will be applied to bills when the companies fail to achieve 90% of their offices at or lower than 3.3 reports per 100 access lines over a 12-month average. During periods when performance thresholds are missed, the rebate will double to 50% of the monthly service charge for each office where the CTRR measurement exceeds the higher threshold of 5.5 CTRR per 100 access lines. The 50% rebate is payable when the 25% rebate would have been payable. In addition to the customer rebates, dividends will be suspended if service quality fails, as measured by FTRs’ CTRR level falling below the 90% performance threshold for three consecutive months. The suspension will end when the carriers meet the performance threshold for three consecutive months.

Frontier petitioned the Commission to exclude certain service quality results from those entities severely impacted by severe weather conditions during certain months of 2011. The Commission agreed that the adverse weather conditions were beyond Frontier’s control and, to an extent, impacted their ability to achieve the Commission’s service quality standards. Service quality results from 14 offices were impacted by severe flooding for the month of May. Similarly, service quality results from 29 offices significantly impacted by Hurricane Irene and Tropical Storm Lee were

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<sup>12</sup> While the Agreement provides that the CTRR thresholds for rebates and dividend restrictions be calculated on a company-wide basis, Frontier will continue to report CTRR to Staff on a company-by-company basis.

waived for the period beginning in late August with Hurricane Irene and extending through the month of September.<sup>13</sup> Accordingly, Frontier Communications resubmitted its service quality data consistent with the Commission Order and achieved a CTRR level of 92% on a 12-month rolling basis for all of 2011. Thus, no customer rebates have been applied during this time period.

#### **OTHER INCUMBENT LOCAL EXCHANGE CARRIERS**

The 32 other ILECs serve lines in 82 central offices, and represent approximately 3% of the ILEC market in the state. Very few PSC complaints are received from the customers of these companies.

#### **Adjustment for Hurricane Irene/Tropical Storm Lee**

Hurricane Irene and the closely following Tropical Storm Lee had a significant adverse impact on service quality, particularly in portions of southern and eastern New York. As previously discussed, the Commission decided in Case 11-C-0588 to waive Frontier Communications service quality results (in part) for September due to the impact of these storms. Further, in Case 10-C-0202, some of Verizon's September service quality results were adjusted for those storms. Several other LECs fell just short of achieving a service commendation because of service issues caused by these storms. In recognition of the Commission's decisions relative to Frontier Communications and Verizon, Staff recommends that service quality results for Chautauqua and Erie, Deposit, Edwards, Nicholville, Oriskany Falls, Pattersonville, Taconic, Trumansburg, Vernon, and Warwick Valley be similarly adjusted to exclude September results.<sup>14</sup> Based on this exclusion, Oriskany Falls, Pattersonville, and Vernon would qualify for a service quality commendation. In contrast, Chautauqua and Erie, Deposit, Edwards, Nicholville, Taconic, Trumansburg, and Warwick Valley do not qualify for a service quality commendation, even after this exclusion.

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<sup>13</sup> Case 11-C-0588, supra.

<sup>14</sup> Pattersonville's October results are also excluded because their switch was destroyed in the flooding and needed replacement which was not completed until October.

**Service Quality Provisions Associated with Acquisitions or Other Programs**

Two other groups of companies (the Fairport-owned companies and Windstream New York, Inc.) must achieve certain CTRR and PSC complaint rate targets associated with acquisitions. Both the Fairport companies and Windstream met their performance targets during 2011.

**COMPETITIVE LOCAL EXCHANGE CARRIERS**

During 2011, there were 18 competing local exchange carriers and/or operating divisions that reported CTRR results. These carriers serve 72 central offices. All 18 of the CLECs met the commendation criteria during 2011.

**CONCLUSION**

Many of the small ILECs and all eligible CLECs qualify for commendations for providing excellent telephone service during 2011. Two divisions of FTR (Metro East and Metro West), Ogden, and Windstream's Fulton division are also recommended to receive commendations, thus making a total of 46 companies and/or operating divisions who qualify for commendations for 2011 service performance.

**RECOMMENDATION**

It is recommended that the Secretary to the Commission issue a letter to each of the 46 companies and/or operating divisions listed on Attachment 1, commending them for excellent telephone service quality provided during 2011.

Respectfully submitted,

THOMAS J. BURKE  
Utility Analyst 3

Reviewed by,

JOHN A. FRANCE  
Utility Specialist IV  
Office of Telecommunications

Approved by,

MICHAEL J. ROWLEY  
Chief, Network Reliability  
Office of Telecommunications  
Attachment

<i>2011 Service Quality Commendations for Telephone Companies and/or Various Operating Divisions</i>			
<b>Company</b>	<b>Threshold CTRR</b>	<b>PSC Complaint Rate</b>	<b>Incentive Plan</b>
Armstrong	100	0	N/A
AT&T-ACC Corporation	100	0	N/A
AT&T-AT&T Communications	100	0	N/A
AT&T-Local Services	100	0	N/A
AT&T-Long Distance	100	0	N/A
Broadview Networks	100	0	N/A
Cablevision Lightpath	97.2	0	N/A
Cassadaga	100	0	N/A
Champlain	100	0	N/A
Chazy & Westport	97.2	0	N/A
Choice One Communications	100	0	N/A
Citizens of Hammond	100	0	N/A
Crown Point	100	0	N/A
Delhi	100	0	N/A
Dunkirk & Fredonia	100	0	N/A
Empire	97.2	0	N/A
Fishers Island	100	0	N/A
Frontier Comm. Of America	100	0	N/A
Frontier of NY	96.8	0	N/A
FTR - Metro West	95.8	0.038	Met
FTR - Metro East	97.7	0.043	Met
Germantown	100	0	N/A
Global Crossing Local Services	100	0	N/A
Hancock	100	0	N/A
Margaretville	100	0	N/A
Middleburgh	97.2	0.03	N/A
Newport	100	0	N/A
Ogden	100	0	N/A
Oneida County	100	0	N/A
Ontario	100	0	N/A
Oriskany Falls	100*	0	N/A
PAETEC Business Services	100	0	N/A
PAETEC Communications	100	0	N/A
Pattersonville	100*	0	N/A
Port Byron	100	0	N/A
Primelink, Inc.	100	0	N/A
RCN Telecom	100	0	N/A
State	100	0	N/A

Tech Valley Communications	100	0	N/A
Township	97.2	0	N/A
tw telecom	100	0	N/A
Verizon Access Trans Services	100	0	N/A
Vernon	95.8	0	N/A
Windstream (Fulton)	97.2	0	Met
Westelcom Networks	100	0	N/A
XO Communications	100	0	N/A
Customer Trouble Report Rate (CTRR) threshold requires that 95% or more of a company/division's central offices achieve a monthly CTRR. below 3.3 rphl			
PSC Complaint Rate = annual complaints per 1,000 access lines; commendation level is 0.075 or less.			
Incentive plan includes any service-related requirements of a multi-year rate plan, incentive plan, or Commission Order directing service improvements.			
* Adjusted to exclude impact of Hurricane Irene/Tropical Storm Lee			