

Filed Session of September 17, 2009
Approved as Recommended
and so Ordered
by the Commission

JACLYN A. BRILLING

Secretary

Issued and Effective September 17, 2009

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

September 1, 2009

TO: THE COMMISSION

FROM: Office of Telecommunications, Office of Regulatory
Economics, and Office of Accounting and Finance

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

RECOMMENDATION: It is recommended that the Commission approve
the proposed modifications to the Inter-Carrier
Service Quality Guidelines (C2C Guidelines).
These modifications consist of three
administrative changes and 105 process changes
that delete, add or consolidate specific
performance measurements. These proposed
modifications represent the consensus
recommendation of the Carrier Working Group
(CWG).

BACKGROUND

The C2C Guidelines establish standards and metrics for
measuring and reporting Verizon New York Inc.'s (Verizon) inter-
carrier service quality performance.¹ Since the adoption of the

¹ Case 97-C-0139, supra, Order Adopting Inter-carrier Service
Quality Guidelines (issued February 16, 1999). The Guidelines
provide the metrics and performance standards applicable to
Verizon's state level operating entities. They include
comprehensive explanations of the standard's definitions,
reporting levels, measurement methodologies, geography
covered, current product intervals, and glossary and
appendices that provide explanatory material.

C2C Guidelines in 1999, the CWG, with an active membership that includes Department of Public Service Staff (staff) and major incumbent local exchange carriers (ILEC) and competitive local exchange carriers (CLEC) operating in New York State, continued to work in a collaborative manner to modify the C2C Guidelines when appropriate justification presented by Verizon and/or the CLECs. The recommendations of the CWG are the subject of many past Commission Orders; the last one was December 16, 2008.²

DISCUSSION

Since their inception, the Commission has modified C2C Guidelines to address industry changes, competitive issues, technological improvements, and other factors. In an effort to keep the C2C Guidelines current, numerous proposed modifications are recommended. These proposed modifications will, in some instances, result in streamlining the C2C Guidelines.

The proposed modifications to the C2C Guidelines are classified into two categories: non-process changes of an administrative nature; and, changes that affect the manner in which a performance measurement is processed (i.e., how a measurement is calculated or which products are measured in accordance with the performance measurement). The modifications consist of three administrative changes and 105 process changes that delete, add, or consolidate specific metrics by product. These modifications were discussed and reviewed at a number of CWG sessions. The CWG unanimously reached consensus on the proposed changes.

² Notice of the Commission's intent to modify the C2C Guidelines was published in the State Register on June 24, 2009 (SAPA No. 97-C-0139SP31). No comments were received.

Administrative Changes

The three proposed administrative modifications to the C2C Guidelines, detailed in Section A of Attachment 1 to this Order, renumbers the Average Interval Offered sub-metrics PR-1-06-2210, PR-1-06-3210, and PR-1-07-3211 by specific product (Resale Specials DSO, UNE Specials DSO, and UNE Specials DS1, respectively) consistent with the numbering methodology used for the same products in other performance metrics throughout the C2C Guidelines. The CWG recommends adoption of the re-numbering of these metrics.

Process Changes

The proposed process modifications to the C2C Guidelines, detailed in Section B of Attachment 1 to this Order, include 105 sub-metric changes. These process modifications are organized according to the general categories (Pre-Ordering, Ordering, Provisioning, Maintenance and Repair, and Network Performance) in the C2C Guidelines.

1. Pre-Ordering Performance

The PO-1 (Response Time OSS Pre-Ordering Interface) measures the response time of the operational support system (OSS) pre-ordering interface to a successful pre-order transaction. The CWG reviewed sub-metric PO-1-07 (Average Response Time - Rejected Query)³ which measures the response time of the OSS for rejected pre-order queries. Since the monthly number of rejected queries reported represents a low percentage of the total number of queries, CWG recommends deleting metrics PO-1-07-6020, PO-1-07-6030, and PO-1-07-6050. There have not been any recent response time issues presented to the CWG

³ A rejected query is a query that can not be processed successfully due to incomplete or invalid information submitted by the sender, which results in an error message back to the sender.

Verizon committed to: (1) continue to report response times on successful queries for the other sub-metrics⁴ in this performance measurement; and, (2) keep the underlying data available in the event there are issues with the reject response times in the future⁵.

PO-3 (Contact Center Availability) measures the hours of operation for the contact centers that support CLECs for ordering and maintenance issues. Sub-metric PO-3-02 (Percent Answered Within 30 Seconds - Ordering) measures the percent of calls answered within 30 seconds according to its geographic region (Verizon North or Verizon Mid-Atlantic).⁶ Calls to Verizon's contact centers are no longer routed as shown in the Guidelines. CWG recommends consolidating sub-metric PO-3-02 into a single geographic region (Verizon East).

PO-4 (Timeliness of Change Management Notice) measures the timeliness of notices and confirmations sent to CLECs notifying them of scheduled software-affecting changes (Change Management Notices) according to their specific geographic region. These Change Management Notices are categorized into five types: Type 1 - Emergency maintenance, Type 2 - Regulatory

⁴ Verizon will continue to report response times for Customer Service Records (PO-1-01), Due Date Availability (PO-1-02), Address Validation (PO-1-03), Products and Service Availability (PO-1-04), Telephone Number Availability & Reservation (PO-1-05) and Mechanized Loop Qualification - xDSL (PO-1-06).

⁵ For some of the metrics that are recommended for deletion, Verizon noted its prior commitment to keep the underlying data available for analysis purposes.

⁶ Verizon North includes the states of New York, Connecticut, Massachusetts, and Rhode Island. Verizon Mid-Atlantic included the states of Pennsylvania, Delaware, New Jersey, Maryland, Virginia, West Virginia, and the District of Columbia.

changes, Type 3 - Industry standards, Type 4 - Verizon originated and Type 5 - CLEC originated. The sub-metrics for this performance measurement captures the percent of notices sent within a required time frame (PO-4-01) and delayed one to seven days (PO-4-02) or eight or more days (PO-4-03).

Verizon's OSS evolved over time and the number of change management notices declined substantially since the metrics were originally developed. The frequency of software releases has dropped from monthly releases to only three times per year. As a result, the corresponding number of notices to the industry regarding the releases decreased. The total number of Change Management Notifications and confirmations, according to change type (Emergency, Regulatory, Industry, Verizon, and CLEC) for the PO-4 sub-metrics, declined to single digits. The CWG discussed continuing to track the performance for these metrics according to change type and decided it was no longer necessary. CWG agreed to recommend deletion of 12 Change Management metrics⁷ deleted and addition of one metric PO-04-01-6600. PO-04-01-6600 measures the percent on time for "all" change notice types in total, which, in essence, will replace the 12 deleted Change Management metrics. This metric is consolidated into a single geographic region (Verizon East). In the event that PO-4-01-6600 misses its standard, Verizon committed to retain the underlying data to allow analysis of the problem.

PO-7-02-6000 and PO-7-03-6000 metrics measure the timeliness of problems resolved after a CLEC-affecting software release is executed; and, PO-7-04-6000 measures the timeliness

⁷ The Change Management metrics proposed to be deleted are: PO-4-01-6622, PO-4-01-6661, PO-4-01-6662, PO-4-01-6671, PO-4-02-6622, PO-4-02-6661, PO-4-02-6662, PO-4-02-6671, PO-4-03-6622, PO-4-03-6661, PO-4-03-6662, and PO-4-03-6671.

that problems are resolved after test deck transactions.⁸ These metrics are also linked to the frequency of software releases that have declined over the years; and, recent performance suggests that resolution of problems after a release are timely and without delays. The CWG recommends deletion of these three metrics (PO-7-02-6000, PO-7-03-6000, PO-7-04-6000) at this time. Verizon will continue to report sub-metrics PO-7-01 (Percent Software Problem Resolution Timeliness) and PO-6 (Percent Software Validation); and, they respectively capture the overall timeliness of software resolutions and test deck transactions.

PO-8-02-6000 (Percent On Time - Engineering Record Request) metric measures the timeliness of receiving engineering records within 72 hours. At the onset of this metric, the process to provide this information was manual. Today, it is fully mechanized. This metric has had no activity in New York for the last six months of 2008⁹. CWG agreed to recommend deletion of this metric.

2. Ordering Performance

OR-1 (Order Confirmation Timeliness) measures the amount of time elapsed between receipt of a valid order request and receipt of a service order confirmation acknowledgement. There are many sub-metrics associated with this metric that have product specific deviations (e.g., Resale Specials DSO, DS1, DS3

⁸ Verizon created and maintains Test Decks of pre-order and order transactions that will be used to test new releases. Prior to a CLEC-affecting software release, these test deck scenarios are available to the CLECs to use during the testing period.

⁹ The CWG commenced its discussion and review of the entire metrics package during the first quarter of 2009. Verizon pulled data associated with these metrics from the last six months of 2008, hence, the reference. The CWG did not review subsequent data.

and UNE Specials DSO, DS1, DS3, 2-Wire xDSL Loop, Non-DSO, DS1 & DS3). Depending on the specific product, an order request with six or more associated lines may or may not require a physical facility check.

The CWG reviewed sub-metrics OR-1-04-2210, OR-1-04-2211, OR-1-04-2213 (Percent On Time LSRC/ASRC - No Facility Check) and OR-1-06-2210, OR-1-06-2211, and OR-1-06-2213 (Percent On Time LSRC/ASRC - Facility Check) for the Resale Special products (DSO, DS1 and DS3) and determined that this product is rarely ordered by the CLEC community, if at all, and, in the last six months of 2008, there has been no metric activity in New York. The CWG agreed to recommend deletion of these sub-metrics.

In addition, CWG reviewed OR-1-06-3210, OR-1-06-3214, and OR-1-06-3342 (Percent On Time Local Service Request Confirmation (LSRC)/Access Service Request Confirmation (ASRC) - Facility Check - No Flow Through) for UNE Special products (DSO; Non-DSO, DS1, DS3; and 2-Wire xDSL Loops) and determined that these sub-metrics had very little activity over the last six months of 2008 in New York. The CWG concluded that these metrics for "no-flow-through" are no longer needed because these products flow through the OSS system electronically. The CWG agreed to recommend deletion of these sub-metrics.

The CWG also reviewed the OR-1 sub-metrics that captured order requests when CLECs submit an order by facsimile and mail. Specifically, the CWG discussed OR-1-08-3210 (Percent On Time ASRC - No Facility Check); OR-1-10-3210, OR-1-10-3211, OR-1-10-3213, and OR-1-10-3214 (Percent On Time ASRC - Facility Check) for the UNE Special products (DSO, DS1, DS3 and Non DSO, DS1, DS3). These metrics have had no activity in New York for the last six months of 2008. The CWG indicated that they rarely submit orders using facsimile or mail, if at all, and do not

expect to do so in the future. The CWG agreed to recommend deletion of these sub-metrics.

The OR-2 (Reject Timeliness) metrics measure the amount of elapsed time between receipt of a valid order request and the receipt of a service order reject acknowledgement. The CWG reviewed sub-metrics OR-2-08-3200 (Percent On Time Reject - No Facility Check - Fax for UNE Specials), OR-2-10-3200 (Percent On Time Reject - Facility Check - Fax for UNE Specials) and OR-2-06-3342 (Percent On Time LSR/ASR Reject - Facility Check - No Flow Through for UNE 2-Wire xDSL Loops). The CWG determined that OR-2-08-3200 and OR-2-10-3200 capture facsimile orders which the CLECs indicated they rarely use any more; OR-2-06-3342 is no longer needed now that most "no flow through" orders now "flow through;" and, for this specific sub-metric, these type of orders continue to be measured in OR-2-02 (Percent On Time LSR Reject - Flow Through). All three sub-metrics have had no activity in them in New York for the last six months of 2008. The CWG agreed to recommend deletion of these three sub-metrics.

OR-3 (Percent Rejects) measures the percent of rejects due to omission of required order information. Orders rejected and captured in sub-metrics OR-3-01-2000 and OR-3-01-2000 for the Resale and UNE products, respectively, are due to order entry errors (e.g., incompatible request types or account codes). When this metric was developed, an associated performance standard was not established; and, the metric does not track errors made by Verizon. The CWG agreed that the metric was not used to isolate any quality issues or rework tracking by operations. Therefore, the CWG recommends deletion of these sub-metrics. In the event a CLEC or Verizon wanted to track the percent of rejected orders, Verizon committed that the underlying data would be available as part of OR-1 (Order

Confirmation Timeliness) and OR-2 (Reject Timeliness) that will continue to be reported.

In addition, the CWG reviewed OR-3-02-1000 (Percent Local Service Request (LSR) Resubmission Not Rejected) and concluded that they did not see any need to keep tracking performance on this metric since there are no issues regarding rejected resubmissions. The CWG indicated that the underlying data to compute the reject rate is available from other metrics that are retained and reported monthly. The CWG recommends deletion of this sub-metric.

OR-6 (Order Accuracy) metric measures the percent of orders completed as ordered. For sub-metric OR-6-01 (Percent Service Order Accuracy), Verizon uses a manual audit process to review the sampled orders. The CWG reviewed and discussed the size of the sample of orders audited in the process. The sample size of 400 was based upon a worst case assumption of a 50% inaccuracy rate. As a result of the smaller standard deviation expected based upon known actual historical performance, the CWG concluded that the sample size used to develop this metric can be reduced from 400 to 300 without unreasonably impacting the margin of error.

OR-7 (Percent Order Confirmation/Rejects Sent Within Three (3) Business Days) measures the percent of Resale and UNE Loop LSRs confirmed or rejected within three business days of receipt as a percent of total LSRs received. The CWG reviewed sub-metrics OR-7-01-2000 (Resale) and OR-7-01-3331 (UNE Loop) with their three business day interval and determined that, while the existing OR-1-02 (Percent On Time LSRC - Flow Through) and OR-2-02 (Percent On Time LSR Reject - Flow Through) metrics carry shorter or equivalent intervals between 2 hours and 3 days for these types of orders, there is no longer a need for this metric as performance meets or exceeds the standard under the

OR-1 and OR-2 metrics that have shorter intervals. If an analysis is needed in the future, Verizon has the underlying data that includes the fields for "on-time-confirm," "on-time-reject," "confirm-reject-on-time," and "confirm-elapsed-business days." The CWG recommends deletion of OR-7-01-2000 and OR-7-01-3331.

OR-8 (Acknowledgement Timeliness) measures the percent of LSR acknowledgements received within a specified timeframe and OR-9 (Order Acknowledgement Completeness) measures the number of LSR acknowledgements sent on the same day the LSR is received as a percent of total LSRs received. The CWG reassessed the value of the associated sub-metrics OR-8-01-2000 and OR-8-01-3000 (Percent Acknowledgements On Time) and OR-9-01-2000 and OR-9-01-3000 (Percent Acknowledgement Completeness) for Resale and UNE products. They compared the value of acknowledgements in the current industry environment versus what other sub-metrics, such as, OR-1-12 (Firm Order Confirmations, OR-2 (Reject Notices), OR-4-16 (Provisioning Completion Notifiers) and OR-4-17 (Billing Completion Notifiers) indicated. The CWG determined the acknowledgements do not indicate that the orders were ever completed. It concluded that they have a limited added value in comparison to the orders that are confirmed and the provisioning and billing process that is completed and that the confirmed orders and process offer more critical information to the industry. The CWG recommends deletion of sub-metrics OR-8-01-2000, OR-8-01-3000, OR-9-01-2000 and OR-9-01-3000.

3. Provisioning Performance

PR-1 (Average Interval Offered) measures the average number of business days between the order date and the committed completion date. The CWG reviewed the PR-1 sub-metrics and corresponding product with a similar level of scrutiny as the

Ordering metrics. It noted that the PR-1-07-2211 (Resale Special DS1), PR-1-08-3213 (UNE Special DS3), and PR-1-08-2213 (Resale Specials DS3), had little activity in New York for the last six months of 2008 and that the products are rarely ordered by the CLEC community. In addition, the CWG discussed that, in the future, if CLECs were interested in the results of PR-1-08-2213 (Average Interval Offered - Resale Special DS3) metric, related information would still be available in PR-4-01-2213 (Percent of Missed Appointments for Resale Specials DS3) which measures on-time installation performance. The CWG recommends deletion of PR-1-07-2211, PR-1-08-3213, and PR-1-08-2213 metrics.

PR-1-12-2103, PR-1-12-2200, PR-1-12-3133, and PR-1-12-3200 (Average Interval Offered - Disconnects) for the various products (Resale POTS/Complex, Resale Specials, UNE POTS & Complex, and UNE Specials) was originally developed to monitor how quickly disconnects were performed. The CWG reviewed this metric and determined that it no longer provides useful information. The CWG recommends deletion of this metric.

The CWG discussed the metrics developed for the UNE Loop - Batch Hot Cut product offered and the associated metrics PR-1-13-3525 (Average Interval Offered - Hot Cuts - No Dispatch), PR-6-02-3525 (Percent Installation Troubles Reported Within Seven (7) Days), PR-9-01-3525 (Percent On Time Performance - Hot Cut), and PR-9-04-3525 (Percent On Time Batch Due Date). These metrics have not reflected any activity in New York since their inception and the CWG agreed that Batch Hot Cuts are not likely to be purchased in the future. The CWG recommends deletion of PR-1-13-3525, PR-6-02-3525, PR-9-01-3525, and PR-9-04-3525.

The PR-4 (Missed Appointments) performance metrics measure the percent of orders completed after the due date. For

sub-metrics PR-4-01-2214 and PR-4-01-3214 (Percent of Missed Appointments - Verizon - Total) for Non - DSO, DS1, DS3 Resale and UNE Specials, the CWG agreed that orders are rarely submitted for these products. When the metric was initially developed, it primarily included circuits for alarm systems. Over time, the CLECs phased out installations of these types of circuits and instead moved to other alternatives. The CWG recommends deletion of PR-4-01-2214 and PR-4-01-3214.

PR-4-03 (Percent Missed Appointment - Customer) measures the percent of orders completed after the due date, due to CLEC, or end-user delay. A further disaggregation of this sub-metric is captured in PR-4-08-2200, PR-4-08-2341, PR-4-08-3200, PR-4-08-3341, PR-4-08-3342 (Percent Missed Appointment - Customer - Due to Late Order Confirmation) for Resale Specials and 2-Wire Digital Service and UNE Specials, 2-Wire Digital Loops and 2-Wire xDSL Loops. The CWG decided that the data measured in the PR-4-08 metrics duplicates the data in the PR-4-03 metric. Any missed appointments due to late confirmations would continue to be counted in PR-4-03 going forward and, in the event of a missed standard, the underlying data is available to determine if late order confirmations contributed to missing the standard. The CWG determined that there were no missed appointments due to late order confirmations in 2008 in New York. The CWG recommends deletion of PR-4-08-2200, PR-4-08-2341, PR-4-08-3200, PR-4-08-3341, PR-4-08-3342.

The CWG determined that PR-5-03-5000 (Percent Orders Held for Facilities > 60 Days) measuring the percent of trunks completed more than 60 days after the due date, due to a lack of Verizon facilities, is already included in PR-5-01 (Percent Missed Appointments - Verizon - Facilities), PR-4-02 (Average Delay Days and PR-5-02 (Percent Orders Held for Facilities > 15

Days). Since PR-5-03-5000 is included in these other metrics, the CWG recommends deletion of this metric.

PR-5-04-3112, PR-5-04-3200, PR-5-04-3341 and PR-5-04-3342 (Percent Orders Cancelled - After Due Date - Due to Facilities), for the various products, measures the percent of total orders (completed and cancelled) cancelled five or more business days after the due date. PR-5-04 was originally developed by the CWG primarily for xDSL providers as a diagnostic metric to view geographic issues that may arise. The CWG discussed this metric and determined that no issues have arisen concerning this metric; and, therefore, it is no longer needed. CWG recommends deletion of PR-5-04.

PR-8 (Percent Open Orders in a Hold Status) measures the number of open orders that, at the close of the reporting period, remain in a hold status for more than 30 or 90 calendar days, as a percentage of orders completed in the reporting period. Sub-metrics PR-8-01 and PR-8-02 measure the same types of orders for the same products, for different duration, 30 Days and 60 days, respectively. The CWG reviewed this metric and determined PR-8-02 (and its various products) duplicates PR-8-01. Hence, any order in hold status for 90 days is counted in the 30-day metric. This metric was originally developed as an additional metric for orders remaining in a hold status for an extended period, but little, if any, activity has occurred in the most recent year. In the event orders in a hold status become an issue going forward, Verizon committed to making the underlying data available for PR-8-02. The CWG recommends deletion of PR-8-02-2100, PR-8-02-2200, PR-80-02-2341, PR-8-02-3100, PR-8-02-3200, PR-8-023341, PR-8-02-3342, PR-8-02-3510, PR-8-02-3530, and PR-8-02-5000.

4. Maintenance and Repair Performance

MR-2 (Trouble Report Rate) measures the total initial contact, via a customer direct call or a customer referred call, per 100 lines/circuits/trunks in service. Sub-metric MR-2-04 (Percent Subsequent Reports as a Percent of Total Reports) measures the number of calls received to report a trouble while an existing trouble report is pending. MR-2-04 is disaggregated according to various products (Resale POTS, Resale 2-Wire Digital Service, UNE POTS Loop, UNE 2-Wire Digital Loops and UNE 2-Wire xDSL Loops). The CWG discussed the merits of these metrics and determined that they were originally developed as diagnostic metrics and introduced prior to the development of the electronic trouble reporting systems. The CWG agreed that troubles are electronically submitted; and, the industry has the ability to use their interfaces to track such troubles. The CWG no longer sees a value in these metrics as a diagnostic tool and recommends deletion of MR-2-04-2100, MR-2-04-2341, MR-2-04-3112, MR-2-04-3341, and MR-2-04-3342.

MR-4 (Trouble Duration Intervals) performance metrics measure the average interval from when the trouble is received to when the trouble is cleared for various products. The CWG reviewed the MR-4-01 (Mean Time to Repair - Total) sub-metrics (MR-4-01-2100, MR-4-01-3112, MR-4-3341) and agreed that they duplicated the trouble orders in the MR-4-02 (Loop Trouble) and MR-4-03 (Central Office Trouble) metric. In most instances, the CWG agreed to delete redundant metrics. However, the CLECs have an interest in MR-4-01-3341 (Mean Time to Repair - Total for UNE 2-Wire Digital Loops) and agreed to continue to report it and to remove the parity standard and the associated statistical comparison between wholesale and retail for this metric. Therefore, the CWG recommends deletion of MR-4-01-2100 and MR-4-01-3112.

The CWG reviewed MR-4-06-2110 for Resale POTS Business and MR-4-06-2120 for Resale POTS Residence (Percent Out of Service > 4 Hours) and determined that the 4 hour interval is not consistent with typical repair times for Resale POTS. It was decided that the more relevant metrics for POTS are MR-4-07-2110 and MR-4-07-2120, which measure out-of-service greater than 12 hours, and MR-08-2110 and MR-08-2120, which measure out-of-service greater than 24 hours for Business and Residential customers. The CWG recommends deletion of MR-4-06-2110 and MR-4-06-2120.

5. Network Performance

NP-2 (Collocation Performance) performance metrics measure the average number of business days between the order application date and the completion date or between order application date and response date. The metrics include physical and virtual collocation arrangement products ordered and provisioned via state tariff and virtual collocation arrangement products ordered and provisioned via federal tariff.

The CWG compared the collocation average interval (NP-2-03-6701, NP-2-03-6711 and NP-2-03-6712) to the percent on-time metric (NP-2-05) for physical collocation and determined that the average interval metrics no longer provide much value as an analysis tool; and, the on-time performance metrics are the preferred ones. In addition, the CWG also reviewed NP-2-07-6701 & 6702 (Average Delay Days) for new and augmented collocation products and determined that NP-2-05 could be used to compute average delay days if a root cause analysis was necessary. The CWG recommends deletion of NP-2-03-6701, NP-2-03-6711, NP-2-03-6712 and NP-2-07-6701 & 6702. Verizon committed that, if there are issues with on-time performance in the future, the underlying data will be made available to compute the interval.

The CWG reviewed the virtual collocation metrics NP-2-02-6701 & 6702 (Percent On Time Response to Request), NP-2-04-6701 & 6702 (Average Interval), NP-2-06-6701 & 6702 (Percent On Time), NP-2-08-6701 & 6702 (Average Delay Days) for new and augmented collocation products and noted that there was no activity in these metrics in New York for the last six months of 2008 and that they rarely submit orders to provision this product. The CWG recommends deletion of these metrics.

The majority of changes to the C2C Guidelines are based on recent inactivity and/or redundancy in New York. The CWG will continue to evaluate proposed modifications on a case-by-case basis to make further improvements in the C2C Guidelines.

CONCLUSION

The proposed modifications proposed are reasonable and will streamline the C2C Guidelines to incorporate industry practices, and facilitate compliance. The proposed modifications represent the consensus recommendations of the CWG. Team members from the Office of Accounting and Finance and the Office of Regulatory Economics assisted with the preparation of this memorandum and agree with these recommendations.

RECOMMENDATION

It is recommended that:

1. Proposed modifications to the Inter-Carrier Service Quality Guidelines (C2C Guidelines) consisting of three administrative changes and 105 process changes be adopted consistent with the discussion herein.

2. Within 30 days of the date this Order is issued, Verizon New York Inc. should file with the Secretary an original and one copy and serve each party to the Inter-Carrier Service Quality Guidelines with the corrections, changes and additions adopted herein.

Respectfully submitted,

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New York Carrier Working Group - 7/24/2009**Section A – Administrative Changes to the Guidelines****1. Change Proposed:**

Members of the Carrier Working Group agree to renumber metrics PR-1-06-2210, PR-1-06-3210 and PR-1-07-3211 as PR-1-09-2210, PR-1-09-3210 and PR-1-09-3211 respectively.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PR-1-06-2210	Average Interval Offered - Specials DS0	Resale Specials DS0	Renumber
PR-1-06-3210	Average Interval Offered - Specials DS0	UNE Specials DS0	Renumber
PR-1-07-3211	Average Interval Offered - Specials DS1	UNE Specials DS1	Renumber

Rationale:

This is an administrative change to be consistent with the normal Guidelines numbering methods of having "Average Interval Offered Total" for Specials products measured under the same sub-metric number, "PR-1-09", with the last 4 digits indentifying the specific products, "2210", "3210", and "3211".

Section B – Changes to the Guidelines**2. Change Proposed:**

Members of the Carrier Working Group agree to delete metrics PO-1-07-6020, PO-1-07-6030, and PO-1-07-6050

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PO-1-07-6020	Average Response Time - Rejected Query+	EDI	Delete
PO-1-07-6030	Average Response Time - Rejected Query+	CORBA	Delete
PO-1-07-6050	Average Response Time - Rejected Query+	LSI-TA	Delete

Rationale:

These metrics, which measure response time for rejected queries, represent a low percentage of overall pre-order queries, and there have not been recent response time issues. Verizon will continue to report response times on successful queries for Customer Service Records (PO-1-01), Due Data Availability (PO-1-02), Address Validation (PO-1-03), Product and Service Availability (PO-1-04), Telephone Number Availability & Reservation (PO-1-05), and Mechanized Loop Qualification - xDSL (PO-1-06). Additionally, in the event there are issues with reject response times in the future, Verizon will have the underlying data to provide the CWG with analysis of the underlying cause of extended response times upon request.

New York Carrier Working Group - 7/24/2009

3. Change Proposed:

Members of the Carrier Working Group agree to consolidate metric PO-3-02 into a single geography, "Verizon East" instead of Verizon North and Verizon Mid-Atlantic.

METRIC ID	METRIC_DESC	PRODUCT_DESC	Consensus
PO-3-02	% Answered within 30 Seconds - Ordering	Resale & UNE combined	Single Geography of Verizon East

Report Dimensions		
Company:		Geography:
<ul style="list-style-type: none"> CLEC Aggregate 		<p>PO-3-02: <u>Verizon East: UNE & Resale combined</u> Verizon North NY, CT, MA and RI: UNE & Resale combined Verizon Mid-Atlantic PA, DE, NJ, DC, MD, VA, WV: UNE & Resale combined</p> <p>PO-3-04: Verizon East: UNE & Resale combined</p>
Products	<ul style="list-style-type: none"> Resale 	<ul style="list-style-type: none"> UNE
Sub-Metrics		
PO-3-02	% Answered within 30 Seconds - Ordering	
Calculation	Numerator	Denominator
	Number of calls to main number answered within 30 seconds after the call was received by the ACD.	Total calls answered by Ordering Center plus 15% of abandoned calls plus 10% of busy calls.
PO-3-04	% Answered within 30 Seconds - Repair	
Calculation	Numerator	Denominator
	Number of calls to main number answered within 30 seconds after the call was received by the ACD.	Total calls answered by Repair Center plus 15% of abandoned calls plus 10% of busy calls.

Rationale:

Calls from regions are no longer routed to the centers as shown in the current Guidelines

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4. Change Proposed:

Members of the Carrier Working Group agree to consolidate metric PO-4 into a single geography, "Verizon East" instead of Verizon North and Verizon Mid-Atlantic.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PO-4	Metrics for Change Management Notices		Single Geography of Verizon East

Report Dimensions	
Company: <ul style="list-style-type: none"> CLEC Aggregate 	Geography: <ul style="list-style-type: none"> <u>Verizon East</u> <ul style="list-style-type: none"> Verizon North: NY, CT, MA, RI (Combined) Verizon Mid-Atlantic: PA, DE, NJ, DC, MD, VA, WV (Combined)

Rationale:

Change Management notices are region-wide, not specific to North and Mid-Atlantic

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5. Change Proposed:

Members of the Carrier Working Group agree to replace Change Management metrics PO-4-01-6622, PO-4-01-6661, PO-4-01-6662, PO-4-01-6671, PO-4-02-6622, PO-4-02-6661, PO-4-02-6662, PO-4-02-6671, PO-4-03-6622, PO-4-03-6661, PO-4-03-6662, and PO-4-03-6671, which measure percent on time and delay days for subsets

Products	Change Notification and Confirmation • → Type 1 - Emergency Maintenance and Type 2 Regulatory (combined); Type 3 - Industry Standard; Type 4 VZ-originated; and Type 5 - CLEC-originated (combined) • → Type 3 - Industry Standard; Type 4 VZ-originated; and Type 5 - CLEC-originated (combined)	Change Confirmation • → Type 2 - Regulatory • → Type 3 - Industry Standard; Type 4 VZ-originated; and Type 5 - CLEC-originated (combined)
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of change notice types, with a single metric, PO-4-01-6600, that measures percent on time for all change notice types in total.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PO-4-01-6622	% Change Management Notices Sent on Time	Change Conf. Type 2	Delete
PO-4-01-6661	% Change Management Notices Sent on Time	Change Not. Type 3, 4, 5 (combined)	Delete
PO-4-01-6662	% Change Management Notices Sent on Time	Change Conf. Type 3, 4, 5 (comb.)	Delete
PO-4-01-6671	% Change Management Notices Sent on Time	Change Not. Type 1 & 2 (combined)	Delete
PO-4-02-6622	Change Management Notice - Delay one (1) to seven (7) days	Change Conf. Type 2	Delete
PO-4-02-6661	Change Management Notice - Delay one (1) to seven (7) days	Change Not. Type 3, 4, 5 (combined)	Delete
PO-4-02-6662	Change Management Notice - Delay one (1) to seven (7) days	Change Conf. Type 3, 4, 5 (comb.)	Delete
PO-4-02-6671	Change Management Notice - Delay one (1) to seven (7) days	Change Not. Type 1 & 2 (combined)	Delete
PO-4-03-6622	Change Management Notice - Delay eight (8) plus days	Change Conf. Type 2	Delete
PO-4-03-6661	Change Management Notice - Delay eight (8) plus days	Change Not. Type 3, 4, 5 (combined)	Delete
PO-4-03-6662	Change Management Notice - Delay eight (8) plus days	Change Conf. Type 3, 4, 5 (comb.)	Delete
PO-4-03-6671	Change Management Notice - Delay eight (8) plus days	Change Not. Type 1 & 2 (combined)	Delete
PO-4-01-6600	% Change Management Notices and Confirmations Sent on Time	Change Not. and Conf. Type 1,2,3,4 and 5 (combined)	Add

Rationale:

As the OSS system has evolved over time, the number of change management notices has declined substantially since the metrics were originally developed. Verizon has also reduced the frequency of releases from monthly to only 3 times per year. The current metrics measure Change Management notifications and confirmations in subsets based on the Change Type (Emergency, Regulatory, Industry Standard, Verizon originated, CLEC

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originated). Even in total, change management notices have been in the single digits. Thus, the breakdown into subsets is no longer necessary to track performance. With volumes this low, tracking the overall on time performance for all types under PO-4-01-6600 will suffice. In the event this single metric misses its standard, Verizon will have the underlying data to provide the CWG with requested analysis of the underlying cause, the type of notification that was not on time, and the delay incurred.

6. Change Proposed:

Members of the Carrier Working Group agree to delete metrics PO-7-02-6000, PO-7-03-6000, and PO-7-04-6000

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PO-7-02-6000	Delay Hours - Software Resolution - Change - Transactions failed - no workaround	Systems Metrics	Delete
PO-7-03-6000	Delay Hours - Software Resolution - Change - Transactions failed with workaround	Systems Metrics	Delete
PO-7-04-6000	Delay Hours - Failed/Rej. Test Deck Transactions - failed no workaround	Systems Metrics	Delete

Rationale:

The metrics measure the delay hours for software resolutions that are not completed in a timely manner. The number of releases is substantially less today in comparison to when the metric was created, and recent performance shows resolutions, if any, have been timely, with no delays. Verizon will continue to report overall percent timeliness of software resolutions under the PO-6 % Software Validation and PO-7-01 % Software Problem Resolution Timeliness metrics. If Verizon does not meet the timeliness standards going forward, Verizon will have the underlying data to provide the CWG with the delay hours and analysis of underlying causes of these delays upon request.

7. Change Proposed:

Members of the Carrier Working Group agree to delete metric PO-8-02-6000.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PO-8-02-6000	% On Time - Engineering Record Request	Systems Metrics	Delete

Rationale:

The metric had no activity in New York or other states for the last 6 months of 2008 and members of the Carrier Working Group agreed that they rarely use this function if at all.

New York Carrier Working Group - 7/24/2009**8. Change Proposed:**

Members of the Carrier Working Group agree to delete metrics OR-1-04-2210, OR-1-04-2211, OR-1-04-2213, OR-1-06-2210, OR-1-06-2211 and OR-1-06-2213.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
OR-1-04-2210	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale Specials DS0	Delete
OR-1-04-2211	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale Specials DS1	Delete
OR-1-04-2213	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale Specials DS3	Delete
OR-1-06-2210	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	Resale Specials DS0	Delete
OR-1-06-2211	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	Resale Specials DS1	Delete
OR-1-06-2213	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	Resale Specials DS3	Delete

Rationale:

The metrics had no activity in New York or other states for the last 6 months of 2008 and members of the Carrier Working Group agreed that Resale Specials are rarely ordered if at all.

9. Change Proposed:

Members of the Carrier Working Group agree to delete metrics OR-1-06-3210, OR-1-06-3214 and OR-1-06-3342.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
OR-1-06-3210	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE Specials DS0	Delete
OR-1-06-3214	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE Specials (Non DS0, Non DS1 & Non DS3)	Delete
OR-1-06-3342	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE 2-Wire xDSL Loops	Delete

Rationale:

The metrics had very little activity in New York or other states for the last 6 months of 2008 and members of the Carrier Working Group agreed that these metrics for "no-flow-through" are no longer needed now that most orders flow through.

New York Carrier Working Group - 7/24/2009**10. Change Proposed:**

Members of the Carrier Working Group agree to delete metric OR-1-08-3210, OR-1-10-3210, OR-1-10-3213, OR-1-10-3214, OR-2-08-3200 and OR-2-10-3200.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
OR-1-08-3210	% On Time ASRC - No Facility Check (Fax/Mail)	UNE Specials DS0	Delete
OR-1-10-3210	% On Time ASRC - Facility Check (Fax/Mail)	UNE Specials DS0	Delete
OR-1-10-3213	% On Time ASRC - Facility Check (Fax/Mail)	UNE Specials DS3	Delete
OR-1-10-3214	% On Time ASRC - Facility Check (Fax/Mail)	UNE Specials (Non DS0, Non DS1 & Non DS3)	Delete
OR-2-08-3200	% On Time Reject - No Facility Check (Fax)	UNE Specials	Delete
OR-2-10-3200	% On Time Reject - Facility Check (Fax)	UNE Specials	Delete

Rationale:

The metrics had no activity in New York or other states for the last 6 months of 2008. Members of the Carrier Working Group agreed that they rarely submit orders using fax or mail if at all, and do not expect to in the future.

11. Change Proposed:

Members of the Carrier Working Group agree to delete metric OR-1-10-3211.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
OR-1-10-3211	% On Time ASRC - Facility Check (Fax/Mail)	UNE Specials DS1	Delete

Rationale:

The metric had very little activity in New York or other states for the last 6 months of 2008. Members of the Carrier Working Group agreed that they rarely submit orders using fax or mail if at all and do not expect to in the future.

New York Carrier Working Group - 7/24/2009**12. Change Proposed:**

Members of the Carrier Working Group agree to delete metric OR-2-06-3342.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
OR-2-06-3342	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	UNE 2-Wire xDSL Loops	Delete

Rationale:

The metric had no activity in New York or other states for the last 6 months of 2008 and members of the Carrier Working Group agreed that this metric for "no-flow-through" is no longer needed now that most orders flow through and continue to be measured in metric OR-2-02.

13. Change Proposed:

Members of the Carrier Working Group agree to delete metrics OR-3-01-2000, OR-3-01-3000, and OR-3-02-1000

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
OR-3-01-2000	% Rejects	Resale	Delete
OR-3-01-3000	% Rejects	UNE	Delete
OR-3-02-1000	% LSR Resubmission Not Rejected	Resale/UNE comb.(EDI)	Delete

Rationale:

The rejects measured by the OR-3-01 metrics are due to order entry errors (incompatible request types or account codes, incompatible USOCs, invalid listing types, etc). The metric has no standard and does not track Verizon errors. Members of the Carrier Working Group also agree that the metric was not being used for any quality or rework tracking by operations. Additionally, in the event a Carrier or Verizon did want to track the percent of rejected orders, the underlying data would be available from the denominators of OR-1 and OR-2 metrics that will continue to be reported.

Members of the Carrier Working Group did not see any need to keep tracking performance on these metrics since there are no issues regarding rejected resubmissions. Additionally, the underlying data to compute the reject rate will still be available from other metrics that are being retained and reported monthly.

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14. Change Proposed:

Members of the Carrier Working Group agree to reduce the sample size for OR-6-01 to 300 per month from the current 400 based on known actual historical performance while maintaining low margins of error.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
OR-6-01	% Service Order Accuracy	Resale and UNE Loop/Complex/LNP (combined)	Reduce Sample to 300 per month

Methodology:

For sub-metric OR-6-01, VZ uses a manual audit process of sampled orders. A random sample of approximately ~~300~~~~400~~ orders for Resale and UNE Loop/Complex/LNP each month, (~~1520~~ orders randomly sampled each business day) are pulled from Request Manager (for Order Accuracy). VZ compares required fields on the latest version of the LSR to the completed Verizon Service Order(s). Refer to Appendix M for a list of fields reviewed by Verizon.

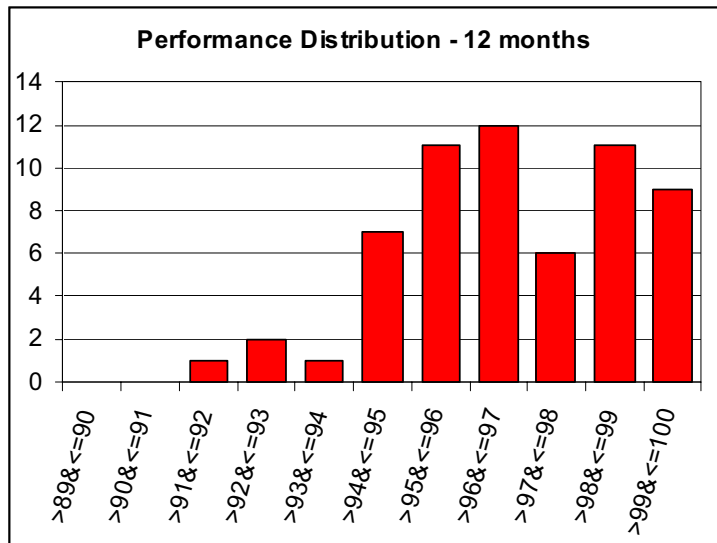
¶ Samples are identified using random number generation from Verizon's Wholesale Ordering systems.

¶ For sub-metric OR-6-03, the measure is a percentage of all confirmations sent due to Verizon error against the total number of confirmations sent in the reporting month.

¶ The OR-6-04 sub-metric is reported in the following states only: DC, MD, RI, VA and WV. *

Rationale:

The original sample size chosen was based on assumptions typically made for an unknown process, where one assumes the worst case of $p = 0.50$ (50% performance) and calls for a sample size of 400 to keep the margin of error under +/- 0.05 or 5% with a 95% confidence level. Since historical performance is now available, the appropriate sample size can be based on actual performance going forward in place of the 400 used when performance was an unknown. Historical performance shows the process running over 94.5% more than 90 percent of the time. Thus, a sample of 300 per month with this level of performance would provide a margin of error of only 0.026 or 2.6% at a 95% confidence level, which is about half of the original assumption of 5% error. Also, the change in sample size by itself does not unreasonably impact the margin of error.



New York Carrier Working Group - 7/24/2009**15. Change Proposed:**

Members of the Carrier Working Group agree to delete metrics OR-7-01-2000 and OR-7-01-3331

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
OR-7-01-2000	% Order Confirmation/Rejects sent within Three (3) Business Days	Resale	Delete
OR-7-01-3331	% Order Confirmation/Rejects sent within Three (3) Business Days	UNE Loop	Delete

Rationale:

The existing OR-7-01 metric measures order confirmations within 3 business days while the existing OR-1 % On-Time LSRC and OR-2 % On-Time LSR Reject metrics carry shorter or equivalent intervals between 2 hours and 3 days for Resale and UNE Loop orders. There is no longer a need for this metric as performance meets or exceeds the standard under the OR-1 and OR-2 metrics that have shorter intervals. Additionally the underlying data includes the fields for "on_time_confirm", "on_time_reject", "conf_reject_ontime" and "conf_elapsed_bus_days" if analysis is needed in the future.

16. Change Proposed:

Members of the Carrier Working Group agree to delete metrics OR-8-01-2000, OR-8-01-3000, OR-9-01-2000 and OR-9-01-3000

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
OR-8-01-2000	% Acknowledgements on Time	Resale	Delete
OR-8-01-3000	% Acknowledgements on Time	UNE	Delete
OR-9-01-2000	% Acknowledgement Completeness	Resale	Delete
OR-9-01-3000	% Acknowledgement Completeness	UNE	Delete

Rationale:

Verizon will continue to report timeliness for more critical items such as Firm Order Confirmations (OR-1-12), Reject Notices (OR-2), Provisioning Completion Notifiers (OR-4-16) and Billing Completion Notifiers (OR-4-17). Although acknowledgements will still be sent, measuring and reporting performance almost a month after the month's close is of limited added value since the acknowledgement does not indicate the completion work such as the order confirmation, provisioning completion or billing completion.

New York Carrier Working Group - 7/24/2009**17. Change Proposed:**

Members of the Carrier Working Group agree to delete metrics PR-1-07-2211 and PR-1-08-3213.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PR-1-07-2211	Average Interval Offered - Specials DS1	Resale Specials DS1	Delete
PR-1-08-3213	Average Interval Offered - Specials DS3	UNE Specials DS3	Delete

Rationale:

The metrics had very little activity in New York or other states for the last 6 months of 2008. Members of the Carrier Working Group agreed that they rarely order Resale DS1s or UNE DS3s, and do not expect to in the future.

18. Change Proposed:

Members of the Carrier Working Group agree to delete metrics PR-1-08-2213.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PR-1-08-2213	Average Interval Offered - Specials DS3	Resale Specials DS3	Delete

Rationale:

The metric had no activity in New York or other states for the last 6 months of 2008 and members of the Carrier Working Group agreed that Resale Specials are rarely ordered if at all. Additionally, if there were future activity, metric PR-4-01-2213 would still measure on-time installation performance.

19. Change Proposed:

Members of the Carrier Working Group agree to delete PR-1-12-2103, PR-1-12-2200, PR-1-12-3133, and PR-1-12-3200.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PR-1-12-2103	Average Interval Offered – Disconnects	Resale POTS/Complex	Delete
PR-1-12-2200	Average Interval Offered – Disconnects	Resale Specials	Delete
PR-1-12-3133	Average Interval Offered – Disconnects	UNE POTS & Complex	Delete
PR-1-12-3200	Average Interval Offered – Disconnects	UNE Specials	Delete

Rationale:

The metric was originally developed to monitor the timing of disconnects. Continued measuring the Average Interval Offered does not provide much useful information any longer.

New York Carrier Working Group - 7/24/2009**20. Change Proposed:**

Members of the Carrier Working Group agree to delete metrics PR-1-13-3525, PR-6-02-3525, PR-9-01-3525 and PR-9-04-3525.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PR-1-13-3525	Average Interval Offered - Hot Cuts - No Dispatch	UNE Loop - Batch Hot Cut	Delete
PR-6-02-3525	% Installation Troubles reported within seven (7) Days	UNE Loop - Batch Hot Cut	Delete
PR-9-01-3525	% On Time Performance - Hot Cut	UNE Loop - Batch Hot Cut	Delete
PR-9-04-3525	% On Time Batch Due Date	UNE Loop - Batch Hot Cut	Delete

Rationale:

The metrics have not shown activity in New York or other states since their inception and members of the Carrier Working Group agreed that Batch Hot Cuts are not likely to be purchased in the future.

21. Change Proposed:

Members of the Carrier Working Group agree to delete metrics PR-4-01-2214 and PR-4-01-3214.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PR-4-01-2214	% Missed Appointment - Verizon - Total	Resale Spec. (Non DS0, Non DS1 & Non DS3)	Delete
PR-4-01-3214	% Missed Appointment - Verizon - Total	UNE Specials (Non DS0, Non DS1 & Non DS3)	Delete

Rationale:

The metrics had no activity in New York or other states for the last 6 months of 2008. Members of the Carrier Working Group agreed that they rarely submit orders for "non DS0, non DS1 & non DS3" circuits and do not expect to in the future. This product/service grouping had primarily included circuits for alarm systems when the metric was initially developed. Over time customers are no longer installing these types of circuits and have instead moved to other alternatives.

New York Carrier Working Group - 7/24/2009**22. Change Proposed:**

Members of the Carrier Working Group agree to delete metrics PR-4-08-2200, PR-4-08-2341, PR-4-08-3200, PR-4-08-3341 and PR-4-08-3342.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PR-4-08-2200	% Missed Appointment - Customer - Due to Late Order Confirmation	Resale Specials	Delete
PR-4-08-2341	% Missed Appointment - Customer - Due to Late Order Confirmation	Resale 2-Wire Dig. Svc	Delete
PR-4-08-3200	% Missed Appointment - Customer - Due to Late Order Confirmation	UNE Specials	Delete
PR-4-08-3341	% Missed Appointment - Customer - Due to Late Order Confirmation	UNE 2-Wire Digital Loops	Delete
PR-4-08-3342	% Missed Appointment - Customer - Due to Late Order Confirmation	UNE 2-Wire xDSL Loops	Delete

Rationale:

Metric PR-4-08 is redundant with PR-4-03, "% Missed Appointment - Customer". Any missed appointments due to late confirmations would continue to be counted in PR-4-03 going forward and in the event of a missed standard, the underlying data would be available to determine if late order confirmations were a factor if the standard is missed. Additionally, there were no missed appointments due to late order confirmations in 2008 in NY and very low in other states.

23. Change Proposed:

Members of the Carrier Working Group agree to delete metrics PR-5-03-5000, PR-5-04-3112, PR-5-04-3200, PR-5-04-3341 and PR-5-04-3342.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus?
PR-5-03-5000	% Orders Held for Facilities > 60 Days	CLEC Trunks	Delete
PR-5-04-3112	% Orders Cancelled (> five (5) days) after Due Date - Due to Facilities	UNE POTS Loop	Delete
PR-5-04-3200	% Orders Cancelled (> five (5) days) after Due Date - Due to Facilities	UNE Specials	Delete
PR-5-04-3341	% Orders Cancelled (> five (5) days) after Due Date - Due to Facilities	UNE 2-Wire Digital Loops	Delete
PR-5-04-3342	% Orders Cancelled (> five (5) days) after Due Date - Due to Facilities	UNE 2-Wire xDSL Loops	Delete

Rationale:

The data measured in PR-5-03-5000 is already included in PR-5-01 % Missed Appointment - Verizon - Facilities, PR-4-02 Average Delay Days, and PR-5-02 % Orders Held for Facilities > 15 Days.

PR-5-04 was originally developed by the Carrier Working Group primarily for xDSL providers as a diagnostic metric to look at geographic issues that may arise. It is not needed any longer as no issues have been raised concerning this process.

New York Carrier Working Group - 7/24/2009**24. Change Proposed:**

Members of the Carrier Working Group agree to delete metrics PR-8-02-2100, PR-8-02-2200, PR-8-02-2341, PR-8-02-3100, PR-8-02-3200, PR-8-02-3341, PR-8-02-3342, PR-8-02-3510, PR-8-02-3530, and PR-8-02-5000.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
PR-8-02-2100	Percent Open Orders in a Hold Status > 90 Days	Resale POTS	Delete
PR-8-02-2200	Percent Open Orders in a Hold Status > 90 Days	Resale Specials	Delete
PR-8-02-2341	Percent Open Orders in a Hold Status > 90 Days	Resale 2-Wire Dig. Svc	Delete
PR-8-02-3100	Percent Open Orders in a Hold Status > 90 Days	UNE POTS	Delete
PR-8-02-3200	Percent Open Orders in a Hold Status > 90 Days	UNE Specials	Delete
PR-8-02-3341	Percent Open Orders in a Hold Status > 90 Days	UNE 2-Wire Digital Loops	Delete
PR-8-02-3342	Percent Open Orders in a Hold Status > 90 Days	UNE 2-Wire xDSL Loops	Delete
PR-8-02-3510	Percent Open Orders in a Hold Status > 90 Days	UNE EEL	Delete
PR-8-02-3530	Percent Open Orders in a Hold Status > 90 Days	UNE IOF	Delete
PR-8-02-5000	Percent Open Orders in a Hold Status > 90 Days	CLEC Trunks	Delete

Rationale:

PR-8-02 is redundant with PR-8-01, as any order in a hold status for 90 days will already be counted in the 30-day metric. It was originally developed as an additional metric for orders remaining in a hold status for an extended period, but there is very little if any activity in the most recent year. In the event orders in a hold status become an issue going forward, the underlying data will still be available for PR-8-01. Durations can still be analyzed if needed.

25. Change Proposed:

Members of the Carrier Working Group agree to delete metric MR-2-04.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
MR-2-04-2100	% Subsequent Reports	Resale POTS	Delete
MR-2-04-2341	% Subsequent Reports	Resale 2-Wire Dig. Svc	Delete
MR-2-04-3112	% Subsequent Reports	UNE POTS Loop	Delete
MR-2-04-3341	% Subsequent Reports	UNE 2-Wire Digital Loops	Delete
MR-2-04-3342	% Subsequent Reports	UNE 2-Wire xDSL Loops	Delete

Rationale:

These metrics have no standard. They were originally developed as diagnostic metrics counting the number of calls checking the status of a trouble before it is cleared. These metrics were introduced prior to the development of the current electronic trouble reporting systems. Troubles are electronically submitted and CLECs now have the ability to use these interfaces to track troubles as well. There is no longer value in this metric as a diagnostic tool.

New York Carrier Working Group - 7/24/2009**26. Change Proposed:**

Members of the Carrier Working Group agree to delete metrics MR-4-01-2100, MR-4-01-3112, MR-4-06-2110 and MR-4-06-2120. Members also agree to remove the parity standard and associated statistical comparisons between wholesale and retail for MR-4-01-3341.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
MR-4-01-2100	Mean Time To Repair - Total	Resale POTS	Delete
MR-4-01-3112	Mean Time To Repair - Total	UNE POTS Loop	Delete
MR-4-01-3341	Mean Time To Repair - Total	UNE 2-Wire Digital Loops	Remove Parity Standard
MR-4-06-2110	% Out of Service > 4 Hours	Resale POTS Business	Delete
MR-4-06-2120	% Out of Service > 4 Hours	Resale POTS Residence	Delete

Rationale:

For MR-4-01, Loop and Central Office troubles are already measured separately under MR-4-02, Mean Time To Repair - Loop Trouble, and MR-4-03, Mean Time To Repair - Central Office Trouble. The Carrier Working Group agreed it is more useful to monitor and identify any performance issues broken out by process, dispatch or non-dispatch, with these two more granular metrics. The combined performance under MR-4-01 is redundant in capturing the same troubles. MR-4-01 is also less meaningful in that it mixes two types of troubles with different processes and thus is impacted by proportion of loop and central office troubles in a given month. For example, for MR-4-01-3341 in 3 of the 12 data months during 2008, there were no Central Office (CO) troubles for wholesale customers in aggregate, while for retail about 5% of total troubles were CO troubles. These shorter interval CO troubles lowered the mean time to repair total troubles for the retail results with no corresponding effect on the wholesale total result. Similarly, in 7 of 12 months, the wholesale CO troubles as a proportion of total troubles were higher than that of retail. This created the opposite effect with a greater proportion of the shorter interval CO troubles lowering the mean time to repair total for wholesale in those months. This imbalance between CO and Loop troubles as a proportion of total troubles often prevents the wholesale/retail comparison from being like-to-like in any given month.

For MR-4-06, the Carrier Working Group agrees the 4 hour interval is not consistent with typical repair clocks for Retail/Resale POTS. The more relevant metrics which remain in the guidelines for POTS service are MR-4-07-2110/ MR-4-07-2120 which measure out-of-service greater than 12 hours and MR-4-08-2110/ MR-4-08-2120 which measure out-of-service greater than 24 hours for Business and Residential customers.

New York Carrier Working Group - 7/24/2009**27. Change Proposed:**

Members of the Carrier Working Group agree to delete metrics NP-2-03-6701, NP-2-03-6711 and NP-2-03-6712.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
NP-2-03-6701	Average Interval - Physical Collocation	Collocation - New	Delete
NP-2-03-6711	Average Interval - Physical Collocation	Collo. Augment not 45 day	Delete
NP-2-03-6712	Average Interval - Physical Collocation	Collo. Augment 45 day	Delete

Rationale:

Performance levels for collocation intervals are measured under NP-2-05 % On-Time metrics which measure "on-time" per intervals in State tariffs. The interval metric does not provide much value in that the on-time performance has been good for collocation. If there are issues with on-time performance in the future, the underlying data will still be available to compute the interval.

28. Change Proposed:

Members of the Carrier Working Group agree to delete metrics NP-2-02-6701, NP-2-04-6701, NP-2-06-6701, NP-2-08-6701 and NP-2-08-6702.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
NP-2-02-6701	% On Time Response to Request for Virtual Collocation	Collocation - New	Delete
NP-2-04-6701	Average Interval - Virtual Collocation	Collocation - New	Delete
NP-2-06-6701	% On Time - Virtual Collocation	Collocation - New	Delete
NP-2-08-6701	Average Delay Days - Virtual Collocation	Collocation - New	Delete
NP-2-08-6702	Average Delay Days - Virtual Collocation	Collocation - Augment	Delete

Rationale:

The metrics had no activity in New York or other states for the last 6 months of 2008. Members of the Carrier Working Group agreed that they rarely submit orders for virtual collocation and do not expect to in the future.

29. Change Proposed:

Members of the Carrier Working Group agree to delete metrics NP-2-07-6701 and NP-2-07-6702.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
NP-2-07-6701	Average Delay Days - Physical Collocation	Collocation - New	Delete
NP-2-07-6702	Average Delay Days - Physical Collocation	Collocation - Augment	Delete

New York Carrier Working Group - 7/24/2009**Rationale:**

The metrics had no activity in New York or other states for the last 6 months of 2008 and members of the Carrier Working Group agreed that there is not likely to be much physical collocation in the future. Additionally, the NP-2-05 Percent On-time Physical Collocation metrics remain in the guidelines, and the underlying data will still exist in the event delay days need to be computed for root cause analysis.

30. Change Proposed:

Members of the Carrier Working Group agree to delete metrics NP-2-02-6702, NP-2-04-6702 and NP-2-06-6702.

METRIC_ID	METRIC_DESC	PRODUCT_DESC	Consensus
NP-2-02-6702	% On Time Response to Request for Virtual Collocation	Collocation - Augment	Delete
NP-2-04-6702	Average Interval - Virtual Collocation	Collocation - Augment	Delete
NP-2-06-6702	% On Time - Virtual Collocation	Collocation - Augment	Delete

Rationale:

The metrics had very little activity in New York or other states for the last 6 months of 2008. Members of the Carrier Working Group agreed that they rarely submit orders for virtual collocation and do not expect to in the future.
