Agenda Date: 3/24/21
Agenda Item: 4A

STATE OF NEW JERSEY

Board of Public Utilities
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OFFICE OF CABLE TELEVISION
AND TELECOMMUNICATIONS

IN THE MATTER OF THE PETITION OF VERIZON NEW JERSEY INC. TO DELETE CERTAIN MEASUREMENTS AND STANDARDS FROM THE NEW JERSEY CARRIER-TO-CARRIER GUIDELINES AND THE NEW JERSEY INCENTIVE PLAN	)	ORDER DOCKET. NO. TO20050360

Parties of Record:

Richard C. Fipphen, Esq., Associate General Counsel, Verizon New Jersey Inc.
Stefanie A. Brand, Esq., Director, New Jersey Division of Rate Counsel

BY THE BOARD:

BACKGROUND:

Pursuant to the 1996 Federal Telecommunications Act ("Act"), 47 U.S.C. 151, et seq., Incumbent Local Exchange Carriers ("ILECs") such as Verizon New Jersey ("Verizon" or "Company") are required to provide non-discriminatory access to interconnection, unbundled network elements ("UNEs") and resale to interconnecting Competitive Local Exchange Carriers ("CLECs") that is at least equal in quality to that provided to the ILEC itself. As part of its investigation into the status of local competition and the implementation of the Act, on May 25, 2000, the Board of Public Utilities ("Board") adopted New Jersey Carrier-to-Carrier ("C2C") Guidelines ("C2C Guidelines"), Performance Standards and Reports.[1] The C2C Guidelines are a detailed document of specific functions to be performed and measured by Verizon, outlining the specific data to be gathered and the standard to be applied for each function and measurement. They are organized into general categories and are intended to cover essential service and related activities that Verizon provides to CLECs. Currently the Company reports on 239 unique Metrics ("Metrics").

By Order dated January 10, 2002, the Board adopted an Incentive Plan ("IP") which, among other things, incorporated performance measures and standards based upon the C2C Guidelines and set forth the provisions regarding incentive credits to be provided by Verizon to CLECs if Verizon's performance does not meet the applicable standards.[2] Pursuant to the plan, Verizon submits

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[1] I/M/0 the Investigation Regarding Local Exchange Competition for Telecommunications Services, Docket No. TX95120631, and I/M/0 the Board's Investigation Regarding the Status of Local Exchange Competition in New Jersey, Docket No. TX98010010 (order dated July 13, 2000).
[2] I/M/O the Investigation Regarding Local Exchange Competition for Telecommunications Services, Docket

Quarterly C2C reports and IP reports to CLECs and the Board, detailing its performance under the Metrics.

On December 13, 2004, the Board issued an Order incorporating revisions to the C2C Guidelines and IP, which included setting forth the process to be used for any changes to the C2C Guidelines and the IP going forward.[3] Under this process, Verizon is required to submit to Staff of the Board of Public Utilities ("Staff") any proposed C2C Guideline modifications for comment by interested parties and consideration in New Jersey.

On May 18, 2020, Verizon filed a petition ("Petition") with the Board seeking the removal of five billing Metrics contained in the C2C Guidelines and the IP. Specifically, Verizon requested the removal of the following billing Metrics:

1. BI-4-01 – DUF Accuracy - this measurement captures the accuracy of the usage records transmitted from Verizon to the CLEC on the Daily Usage Feed ("DUF");
2. BI-5-01 – Accuracy of Mechanized Bill Feed - this measurement captures the accuracy of the mechanized bill feed for CRIS (Customer Records and Information System) bills;
3. BI-6-01 – Completeness of Usage Charges - this measure captures the completeness of Verizon usage charges and Verizon usage billing errors that are itemized by date on the carrier bill of record;
4. BI-7-01 – Completeness of Fractional Recurring Charges - this measurement captures the completeness of Verizon fractional recurring charges shown on the carrier bill of record; and
5. BI-8-01 – Non-Recurring Charge Completeness - this measurement captures the completeness of Verizon non-recurring charges shown on the carrier bill of record.

In the Petition, Verizon indicated that two of these Metrics are New Jersey specific:

1) BI-4-01 – DUF Accuracy, and
2) BI-5-01 – Accuracy of Mechanized Bill Feed.

The three other Metrics exist only in New Jersey and Pennsylvania:

3) BI-6-01 – Completeness of Usage Charges,
4) BI-7-01 – Completeness of Fractional Recurring Charges, and
5) BI-8-01 – Non-Recurring Charge Completeness.

Verizon argues that these five Metrics are antiquated or unworkable in today's competitive environment and do not serve their original intended purpose. Furthermore, Verizon states that the volumes for these Metrics have declined significantly over the years due to a decline in the Company's wholesale business and the elimination of unbundled network elements-platform ("UNE-P").

No. TX95120631, and I/M/O the Board's Investigation Regarding the Status of Local Exchange Competition in New Jersey, Docket No. TX98010010 (Order dated January 10, 2002).

[3] I/M/O the Comprehensive Review of the Monthly Performance Reports and the Associated Incentive Plan Reports filed by Verizon New Jersey Inc., Docket No. TX02090665 (Order dated December 13, 2004 at p. 19). See Carrier-to-Carrier Guidelines Performance Standards and Reports, Verizon Reports, New Jersey Appendix Q, Changes to the Carrier-to-Carrier Guidelines Performance Standards and Reports, Version 18.0. The C2C Guidelines and IP are the product of a collaborative effort of CLECs through the New York Carrier Working Group ("CWG"), and cover Verizon's services primarily in the Northeastern states.

In addition, Verizon claims the five Metrics in question and the associated methodologies provide a meaningless assessment of Verizon's wholesale performance and are no longer necessary in today's competitive environment. According to the Company, the proposed deletions are consistent with national practices and standards and will provide better, more accurate data, consistent with the methodologies set forth in the C2C Guidelines.

BI-4-01 – DUF Accuracy

In support of its position, Verizon argues that this Metric should be removed from the C2C Guidelines and from the IP because it does not produce any useful information and the Metric has never fallen below the standard of 95%. Furthermore, volumes for BI-4-01 have decreased by 65%over 10 years.

Staff requested additional information regarding a 65% decrease in volume of BI-4-01. Verizon stated the volume decrease is mainly attributed to the overall decline of the wholesale business. Despite this decline, this Metric has met the standard with zero penalties paid in over 10 years.

BI-5-01 – Accuracy of Mechanized Bill Feed

In the Petition, the Company states that it has never failed to meet this Metric and that the volume of files being measured is too low to provide meaningful results, never exceeding 150 over the past two years. Furthermore, the Company avers that this measurement is duplicative of BI-2 – Timeliness of Carrier Bill, which already captures this information.

Verizon was asked to define CRIS as it relates to BI-5-01. Verizon defined CRIS as the acronym for "Customer Records and Information System," which is the name of the Verizon system that creates the bill for Resale services. In addition, Staff asked what attributed to the low/high file volumes and Verizon explained low/high file volume is attributed to customer activity; either installing or terminating service. Despite the low volumes, the Metric has maintained 100% bill accuracy with zero penalties paid in over 10 years. Staff requested that Verizon explain and illustrate how the Metric BI-5-01 provides the same information as the BI-2 Metric. Verizon stated the BI-5 Metric is a sub Metric of BI-2. BI-2 applies to all carrier bills from both CRIS and from CABS, (Carrier Access Billing System) which is the billing system for UNE-P and Access services. The BI-5 Metric only focuses on the CRIS bills, but because the CRIS system is stable and accurate, this sub Metric doesn't provide any useful data or perform any function beyond that of the slightly more general Metric, BI-2.

BI-6-01 – Completeness of Usage Charges

The standard for this Metric is parity with Verizon's retail operations. Verizon asserts that this Metric no longer makes sense due to the decline of wholesale volumes, which has resulted in a disparity in volumes of 10,000 to 1 between the Company's retail and wholesale transactions, and no longer produces statistically valid results.

Staff requested that Verizon explain what caused a decline of wholesale volumes and how it correlates to the disparity in volumes of 10,000 to 1 between Verizon retail and wholesale transactions. Verizon attributed the volume decrease mainly to overall decline of the wholesale business. Verizon was also asked by Staff to explain and give further detail on how the performance standard is parity with Verizon retail. Verizon explained parity calculations are defined within the Board-approved "IP". Accordingly, BI-6-01 measures whether Verizon's usage charges to wholesale customers are incomplete more often than its usage charges billed to retail customers.

BI-7-01 – Completeness of Fractional Recurring Charges

Similar to BI-6-01 this Metric is measured against the Company's retail operations. In support of its removal, the Company maintains that this Metric, like BI-6-01, has seen a disparity in volume of 100 to 1 between the Company's retail and wholesale transactions, which produces a statistically invalid result.

In regards to the Metric BI-7-0, Staff asked for an explanation of what caused a decline of wholesale volumes and how it correlates to the disparity in volumes of 100 to 1 between Verizon retail and wholesale transactions. Verizon attributed the volume decrease mainly to the overall decline of the wholesale business. In addition, Staff asked Verizon to explain and give further detail on how the performance standard is parity with Verizon retail. Verizon states parity calculations are defined within the Board-approved "IP". In the case of BI-7-01, the parity standard in the Plan measures whether Verizon's fractional recurring charges shown on the carrier bill are complete more often than on the retail customer bills.

BI-8-01 – Non-Recurring Charge Completeness

With respect to the BI-8-01, Verizon maintains, as with BI-7-01 and BI-6-01, that there is large disparity in volume, 10 to 1, between Verizon retail and wholesale transactions, which creates statistically invalid results.

Verizon was asked by Staff to explain and give further detail on how the performance standard is parity with Verizon retail. Verizon explained parity calculations are defined within the Board-approved "IP". In the case of BI-8-01, the parity standard in the Plan measures whether Verizon's non-recurring charges shown on the carrier bill are complete more often than on the retail customer bills. Staff also requested that Verizon explain what caused a decline of wholesale volumes and how it correlates to the disparity in volumes of 10 to 1 between Verizon retail and wholesale transactions. Verizon attributed the volume decrease mainly to the overall decline of the wholesale business.

INCENTIVE PAYMENTS

Staff also asked Verizon about the reporting volumes and penalties for the aforementioned Metrics. Of the five Metrics only three had penalties associated with them over the last 10 years.

They are:

1) BI-6-01 – Completeness of Usage Charges;
2) BI-7-01 – Completeness of Fractional Recurring Charges, and
3) BI-8-01 – Non-Recurring Charge Completeness.

Both the volumes and incentive payments show some variation over the last 10 years. It should be noted that the reported volumes and incentive payments are proprietary to the Company and are therefore not provided in this Order, but are part of the official record under consideration by the Board.

COMMENTS RECEIVED

As part of the review process and in an effort to assist in determining the effect of the requested deletion of specific Metrics, Staff requested comments from the New Jersey Division of Rate Counsel ("Rate Counsel") and wholesale customers. Formal comments were received from Rate

Counsel on September 22, 2020, and Xchange Telecom LLC ("Xchange") on September 9, 2020. Informal comments were received from Spectrotel, Inc. ("Spectrotel") on September 8, 2020, XTEL Communications ("XTEL") on September 9, 2020 and Business Automation Technologies d/b/a Data Network Solutions ("BAT") on October 17, 2020. Reply comments were filed by Verizon on October 5, 2020.

<u>CLEC Comments</u>

Xchange Telecom LLC

Xchange provided comments on three of the billing Metrics: 1) BI-6-01 – Completeness of Usage; 2) I-7-01 – Completeness of Fractional Recurring Charges; and 3) BI-8-01 – Non-Recurring Charge Completeness. Xchange makes no specific comment on the other two Metrics.

According to Xchange , Verizon's arguments to delete BI-6-01 – Completeness of Usage; BI-7-01 – Completeness of Fractional Recurring Charges; and BI-8-01 – Non-Recurring Charge Completeness are similar, i.e., due to the decline of wholesale volumes, the Metrics no longer makes sense because there is a disparity in volumes between Verizon's retail and wholesale transactions. Xchange asserts that such a large disparity in volumes requires the Metrics be revised, not deleted

Xchange contends that CLECs rely on accurate usage bills to root out potential abuses by its customers. For example, it points to situations where a CLEC customer that is abusing an "unlimited phone plan" by overuse and abuse, the accuracy of the usage bill is the CLEC's only line of defense. Mistakes or delays in providing usage charges, or accurately billing such usage charges can be problematic. Therefore, it is crucial that an incentive remains to ensure that Verizon provides CLECs with accurate usage billing.

Xchange also raised concerns regarding what it describes as significant billing issues with Verizon's billing systems. According to the company, accounts that were not Xchange's have appeared on Xchange's bills. In addition, accounts have disappeared and been backbilled for charges from over 12 months before, especially non-recurring charges

Based upon the foregoing, Xchange argues that the Board should therefore deny Verizon's petition and review whether additional Metrics and standards are warranted.

<u>INFORMAL CLEC COMMENTS</u>

Spectrotel

Spectrotel argued the company has been purchasing Resale/Wholesale services from Verizon since the inception of the Act, and it would like these measurements to stay in place.

Xtel

Xtel stated that if incentive payments are being paid the Metrics still serve a purpose.

BAT

BAT raised numerous issues not related to Verizon's Petition. However, in its opinion, if the Metrics at issue are outdated, Verizon's Petition should be denied and a review initiated to determine if additional metrics and standards are warranted.

Rate Counsel's Comments

Rate Counsel does not object to deletion of the New Jersey specific Metrics: BI-4-01–DUF and BI-5-01 because the Company has demonstrated consistent and strong performance record (meeting and/or exceeding standards 95% of the time).

However, Rate Counsel voiced concerns regarding billing accuracy that may be impacted by these two Metrics. Therefore, Rate Counsel recommends that if the Board grants the relief requested by Verizon in connection with New Jersey specific Metrics: BI-4-01–DUF Accuracy and BI-5-01– Accuracy of Mechanized Bill Feed, the Board should include language in its order that affirms the Board's continuing jurisdiction and statutory authority to investigate CLEC complaints connected to billing, and if found warranted, re-impose or impose new measures, metrics and standards to prevent the continuation of anticompetitive and discriminatory conduct by the ILEC.

With respect to the other Metrics, Rate Counsel registered its concerns with their removal and has requested that the Board deny Verizon's relief in connection with Metrics BI-6-01, Completeness of Usage Charges; BI-7-01, Completeness of Fractional Recurring Charges and BI-8-01 Non-Recurring Charge Completeness. Additionally, Rate Counsel raised concerns regarding the billing issues expressed by Xchange. Specifically:

- Accounts that weren't Xchange's accounts have appeared on Xchange's bills;
- Accounts have disappeared; and
- Xchange has been backbilled for charges from over 12 months before, especially non-recurring charges.

Additionally, the three Metrics: BI-6-01, Completeness of Usage Charges; BI-7-01 Completeness of Fractional Recurring Charges; and BI-8-01 Non-Recurring Charge Completeness continue to be enforced in Pennsylvania. Therefore, Rate Counsel considers that contrary to removing the Metrics, a better course of action may be for the Board to initiate a process (with the collaboration of Verizon, CLECs and other interested parties) to adjust the three Metrics and standards to achieve the purpose and goals intended under the C2C Guidelines and IP.

In closing, Rate Counsel agrees that the public interest is not served by maintaining outdated and unnecessary requirements. However, the measures that have been proposed for deletion continue to be important to ensure that CLEC competition in New Jersey's telecommunications market is not disadvantaged, and to ensure the continued growth and expansion of telecommunications services throughout New Jersey for the benefit of residential and business customers.

Verizon's Reply Comments

On October 5, 2020, Verizon responded to the September 9, 2020 comments of Xchange and Rate Counsel.

Verizon's Response to Xchange Telecom LLC

In its reply, Verizon stated only one CLEC, Xchange, filed comments in response to its Petition claiming that the Metrics need to be revised and that there are significant billing issues. According to Verizon, Xchange's arguments have no bearing on the request in the Petition because the billing issues Xchange identifies are not measured by the Metrics at issue here, with one exception. The inclusion of incorrect accounts or the failure to include all proper accounts on a wholesale bill would be covered by Metric BI-03, not the Metrics that are the subject of Verizon's Petition. None of the billing errors alleged by Xchange would be captured by BI-4-01, BI-5-01, BI-6-01 or BI-7-01, which measure, respectively, the accuracy of usage records transmitted on the Daily Usage Feed, the accuracy of the mechanized bill feed for CRIS bills, the completeness of usage charges on wholesale bills, and the completeness of fractional charges on such bills. Accordingly, Xchange's claims afford no basis to retain any of these Metrics.

The only billing issue alleged by Xchange that would be covered by any of the Metrics at issue here is the claim of back billing for non-recurring charges, which would fall within Metric BI-08. That example, according to Verizon, highlights the second and more general failing of Xchange's allegations: even if it were true, the fact that a CLEC experiences an event that would be captured by a Metric does not show that the Metric remains functional.

Verizon further argues that the C2C Guidelines are intended to measure average performance on key issues across all customers in the wholesale market in order to ensure an appropriate and fair level of service to those customers. Its Metrics are not intended or designed to ensure perfect, error-free performance by Verizon. In this case, the standard for BI-8-01 is not perfection, but parity with Verizon's retail performance, and Verizon has met that standard every month since January 2012. Thus, the possible back billing of nonrecurring charges is not only unsurprising but irrelevant here. And it in no way puts in dispute or even addresses the fact that the volume of wholesale activity monitored by Metric BI-8-01 and the others is so low that it can no longer be fairly compared to the volume of similar retail activity to yield meaningful results.

Moreover, Verizon rejects what it describes as Xchange's broad assertions that Xchange and other CLECs rely on these Metrics for survival, that retaining them is "crucial," and that they are "[t]he only protection Xchange has" do not hold water. They are inconsistent with the now-long experience of other states with wholesale incentive plans. First, only Pennsylvania chose to adopt these Metrics (albeit without performance standards). Second, neither Pennsylvania nor any other state shows any evidence that competition in their wholesale markets is failing due to the absence of these allegedly "crucial" Metrics or standards. Moreover, Xchange and other CLECs continue to have available all of the traditional means of resolving individual disputes. The decline in wholesale activity makes these methods the more appropriate means of "protecting" CLECs from harm than outdated Metrics.

Finally, Verizon responds to Xchange's argument that "the response to a 'broken' Metric ought to be to fix the Metric," not to delete it. Verizon points out that neither Xchange nor any other commenter has explained how these Metrics could be "fixed," or why they should be retained.

Verizon's Response to Comments by Rate Counsel

Verizon noted its appreciation for Rate Counsel's comments not opposing elimination of Metrics BI-4-01 and BI-5-01. However, Verizon takes issue with Rate Counsel's position with respect to the other Metrics. Verizon has explained above that Xchange's billing allegations have no bearing on the issues in this matter. More to the point, Rate Counsel relies on the practice in Pennsylvania for recommending that the Board retain these Metrics in the IP, but while Pennsylvania does track these Metrics, it does so in its C2C Guidelines, not in its PAP (its equivalent of the IP), and it does not apply performance standards or penalties.

Verizon also disagrees with Rate Counsel regarding the importance of these particular Metrics. As noted above, only Pennsylvania adopted these Metrics and it does not attach standards or penalties to them, yet competition has thrived there as it has in New Jersey. Moreover, the significant decline in wholesale activity measured by these Metrics implies that, whatever their significance at inception, they are less important today. This is confirmed by the meager response to Verizon's Petition from the CLEC community. Only one CLEC deemed these Metrics worthy of filing comments in response to Verizon's Petition to delete them, while two others dashed off short emails to Rate Counsel, offering only the barest of positions with no explanation or support.

Verizon has offered a compromise stating that if the Board is reluctant to eliminate these three Metrics outright, as Verizon has requested, it might consider retaining the Metrics but eliminating the performance standards that attach in the IP. That would address the problem of comparing performance on very small wholesale volumes with much larger retail volumes, while allowing the Board and Rate Counsel to continue to monitor Verizon's performance in these areas and take action if and as warranted. It would also be more efficient than convening a new process to amend the Metrics and would align New Jersey policy with policy in Pennsylvania.

DISCUSSION

In its Petition, Verizon seeks deletion of 5 Metrics contained in the C2C Guidelines and the associated penalties specified in the IP. The Company articulated in its filing its rationale for deletion. The Company's arguments fall into two broad categories: 1) that Verizon has met the standards consistently over a period of time, or 2) that it has experienced a significant reduction in reported volumes which invalidate the resultant penalty calculations because they no longer produce statistically valid results due to a disparity between the Company's wholesale and retail operations.

In the comments received, Rate Counsel does not object to deletion of two Metrics, 1) BI-4-01 – DUF Accuracy, and 2) BI-5-01 – Accuracy of Mechanized Bill Feed, but suggests that the Board include language that it retains jurisdiction to revisit and reimpose the Metrics if necessary.

Xchange declined to address these two Metrics. Based upon the Board's analysis, we agree with the Company and Rate Counsel and see no valid reason to maintain the two Metrics.

However, with respect to 1) BI-6-01 – Completeness of Usage Charges, 2) BI-7-01 – Completeness of Fractional Recurring Charges, and 3) BI-8-01 – Non-Recurring Charge Completeness Verizon claimed that due to declining wholesale volumes these Metrics are no longer statistically valid. Xchange and Rate Counsel objected to the Company's claim and suggested that the Board initiate a process to revise the three Metrics and standards to achieve the purpose and goals intended under the C2C Guidelines and IP.

With respect to Xchange's billing concerns, we agree with Verizon that the aforementioned issues, while problematic, are not directly associated with these Metrics and alternative remedies are available to all CLECs. Therefore, we decline to address them herein.

Based on a thorough review of the record and the comments provided by the interested parties, the Board **HEREBY GRANTS** Verizon's request to remove Metrics BI-4-01 and BI-5-01 contained in the C2C Guidelines and the IP. Notwithstanding the removal of these Metrics, the Board **HEREBY AFFIRMS** its continuing authority to investigate CLEC billing complaints, and the Board retains jurisdiction to revisit and reimpose the Metrics if necessary or impose new ones.

With respect to the Metrics BI-6-01, BI-7-01 and BI-8-01, the Board does not deem it appropriate to delete them at this time, and the request is **DENIED**. However, the Board agrees with Verizon's recommendation in its reply comments and will eliminate the performance standards of Metrics BI-6-01, BI-7-01 and BI-8-01 that attach in the IP. Going forward, the Board reserves the right to initiate a collaboration process to adjust the three Metrics: BI-6-01, BI-7-01 and BI-8-01 and standards to achieve the purpose and goals intended under the C2C Guidelines and IP. Verizon may also initiate such a collaborative process.

This Order shall become effective on April 3, 2021.

DATED: March 24, 2021

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BPU DOCKET No. TO200503602

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NEW JERSEY CARRIER TO CARRIER GUIDELINES AND REPORTS

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