

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg PA 17105-3265**

Public Meeting held October 22, 2015

Commissioners Present:

Gladys M. Brown, Chairman
John F. Coleman, Jr., Vice Chairman
Pamela A. Witmer
Robert F. Powelson
Andrew G. Place

PMO III – Administrative and Process Changes (Folder 19)

M-2015-2464294

PMO – Performance Metrics and Remedies (Folder 19)

M-00011468

ORDER

BY THE COMMISSION:

Before the Commission are proposed revisions to the Pennsylvania Carrier-to-Carrier Guidelines (PA Guidelines). This set of proposed revisions is designated “F0019” or “Folder 19” and was filed on July 7, 2015, by Verizon Pennsylvania LLC (Verizon PA) and e-served on the Pennsylvania Carrier Working Group (PA CWG). The PA CWG recommends approval of the proposed F0019 revisions. We shall approve the proposed revisions, consistent with this Order.

Background

The PA Guidelines¹ contain the metrics that measure operational aspects of the wholesale services² that Verizon PA³ renders to competitive local exchange carriers (CLECs). The PA Performance Assurance Plan (PA PAP) contains self-executing remedies that are designed to recompense CLECs if Verizon PA's wholesale service fails to meet performance standards specified in the metrics. The PA CWG⁴ is tasked with making recommendations to the Commission regarding the PA Guidelines and the PA PAP. The PA CWG, PA Guidelines/metrics, and PA PAP/remedies exist to support intercarrier operations in Pennsylvania.

The first PA Guidelines and PA PAP were adopted in *Joint Petition of Nextlink, et al., for Investigation of Performance Standards, Remedies and OSS Testing for BA-PA, Inc.*, Docket No. P-00991643 (December 31, 1999) (*PMO I*), and were Pennsylvania-specific.

Thereafter, in conjunction with agreements reached during Verizon PA's Section 271 proceeding at Docket No. M-00001435, Pennsylvania initiated a proceeding to consider migrating to metrics and remedies patterned after the New York (NY)

¹ The PA Guidelines may also be referred to as the "Verizon Footprint Carrier-to-Carrier (C2C) Guidelines for Use in Pennsylvania."

² In this context, "wholesale" also includes retail services provided by Verizon PA for resale.

³ References to "Verizon PA" are generally limited to its incumbent local exchange carrier (ILEC) operations within Pennsylvania excluding operations relative to the former GTE ILEC/Verizon North ILEC. References to "Verizon" reflect the multi-state Footprint-wide ILEC operations of the various affiliated Verizon Communications Inc. entities.

⁴ The PA CWG was formed in 2003 to assist Verizon PA and PA CLECs in resolving metrics and remedies issues and to coordinate with similar groups in other jurisdictions. Primary participation is open to Pennsylvania ILECs, CLECs, statutory advocates, Commission staff, and consultants sponsored by these entities. Secondary participation is open to such entities from other jurisdictions. While encouraging consistency across the traditional Verizon ILEC Footprint, we recognize that CLECs do not operate in every state within that Footprint, that some products may not be available in all Footprint states, and that states within the Footprint experience varying operational problems and follow different timelines in a competitive environment. See *PMO II*, Docket No. M-00011468 (December 12, 2002); http://www.puc.state.pa.us/utility_industry/telecommunications/carrier_working_group.aspx.

Guidelines and the NY PAP.⁵ *See PMO II*, Docket No. M-00011468 (December 10, 2002). The *PMO II* PA Guidelines and PA PAP were modified several times. *See PMO II*, Docket Nos. M-00011468, F0002, F0003, and F0004.

Subsequently, various states, including Pennsylvania,⁶ in the original Verizon ILEC Footprint each independently agreed to try to use common, footprint-wide metrics and remedies (based on the New York models) with the *proviso* that each state may customize or depart from the Footprint Guidelines and the Footprint PAP. Pennsylvania is under no obligation to adopt either New York or Footprint metrics or remedies. State-specific distinctions are noted in the Footprint Guidelines and the Footprint PAP posted on the Verizon website. Thus, Pennsylvania has migrated to a metrics and remedies system modeled on the Footprint metrics and remedies. *See PMO II*, Docket No. M-00011468, F0005 (December 16, 2004). The *PMO II* PA Guidelines and PA PAP were further modified or addressed several times since the F0005 modifications. *See PMO II*, Docket Nos. M-00011468, F0006, F0007,⁷ F0008, F0009,⁸ and F0010.

In 2006, at Folder 11, Verizon PA proposed to change the PA PAP process, asserting two underlying predicates: (1) FCC action that had removed certain unbundled network element platform (UNE-P) products from state jurisdiction; and (2) Verizon PA wanted to “simplify” the PA PAP and to maintain consistency within the Verizon Footprint. The metrics changes had been approved in Folder 9, but implementation of the changes had been deferred until the requisite remedies changes could be worked out. The PA PAP changes⁹ approved in Folder 11 facilitated the implementation of the PA

⁵ The New York-style PAP was a radical departure from the original PA PAP which had provided a flat-fee remedy if a covered metric was missed.

⁶ It is our understanding that New Jersey did not join in the use of the Footprint-based metrics and remedies.

⁷ The proposed changes at F0007 were deemed moot by our June 27, 2008 action at F0011.

⁸ Federal action had eliminated certain UNE-P products from state jurisdiction. The Commission considered and adopted the change to the PA Guidelines in F0009. Implementation of the F0009 metrics changes was, however, deferred until the requisite PA PAP changes could be worked out.

⁹ This change was a significant change from the original New York-style PAP.

Guidelines changes from Folder 9. Also approved were provisions such as the elimination of certain metrics with little or no activity and the retention of oversight safeguards, audit provisions including funding of audits, parallel reporting after a change, and access to the underlying calculations and data, some of which were unique to Pennsylvania. Going forward, the PA Guidelines and PA PAP were designated as *PMO III*. See *PMO III*, Docket Nos. M-00011468, F0011 (September 11, 2008). The *PMO III* PA Guidelines and PA PAP have been further modified or addressed several times since the F0011 modifications. See *PMO III*, Docket Nos. M-00011468, F0012, F0013, F0014, F0015, F0016,¹⁰ F0017, and F0018.¹¹

The metrics and remedies presently in effect in Pennsylvania were last modified by Commission order entered on November 11, 2011, at Docket Nos. M-00011468 and M-2009-2134347, with the designation F0017. The most recent third-party independent review was released to the public by order entered on July 16, 2013, at *PMO III 2012 Review of Performance Metrics and Related Remedies of Verizon PA by Silverpoint Consulting LLC*, Docket No. M-00011468.

By custom, proposed Footprint-wide metrics changes are typically initially discussed in the NY CWG by Verizon, NY CLECs, and other interested parties.¹² When the New York entities reach a consensus or impasse,¹³ the matters are presented to the

¹⁰ Folder 16 addressed directory listing metrics and remedies unique to Pennsylvania.

¹¹ Folder 18 was a *force majeure* waiver petition at *Verizon PA's Petition for Waiver of Service Quality Results for August 2011*, Docket Nos. P-2011-2269052 and M-00011468. There was an additional *force majeure* waiver petition at *Verizon PA's Petition for Waiver of Service Quality Results for November 2013*, Docket Nos. P-2013-2343560 and M-00011468 which has not been assigned a folder number.

¹² The NY CWG exists specifically to address metrics concerns in New York. The needs and interests of the New York market and its participants take precedence in the NY CWG over the needs or interests of other Footprint markets and participants. NY CWG participants recognize that the New York market may not be representative of markets in the footprint states. Pennsylvania staff, CLECs, and statutory advocates are invited to participate in the discussions in New York, but, due to pragmatic considerations, Pennsylvania CLECs and the Pennsylvania statutory advocates do not typically participate. Pennsylvania staff does typically observe the New York CWG discussions. There is no formal Footprint CWG.

¹³ Only New York entities may veto or block any item under consideration by the NY CWG. Only entities with a nexus to New York may participate in the New York metrics docket before the NY PSC.

New York Public Service Commission (NY PSC), which, after notice and opportunity for hearing in New York, generally adopts consensus items and resolves non-consensus items for use in New York.

The procedure is different, however, for proposed remedies and PAP changes. Proposed remedies and proposed PAP changes are not discussed in the NY CWG. The NY CWG has no authority to address remedies or PAP matters.¹⁴ In New York, proposed remedies and PAP changes are initially a matter of negotiation between the NY PSC staff and Verizon NY. Proposals for changes to the New York remedies and PAP thereafter go directly to the NY PSC without any collaborative input from NY CLECs (or other entities) or the NY CWG. The NY PSC, after notice to NY stakeholders and an opportunity for hearing in New York, generally adopts uncontested proposed remedies changes and resolves disputed remedies proposals for use in New York.

Once metrics and remedies changes have been approved by the NY PSC, the Verizon entity operating in the states that use the Footprint Guidelines and Footprint PAP presents the NY PSC-approved changes in those states for respective consideration and prospective adoption as Footprint-wide changes for use in the respective states. It is our understanding that some states in the Verizon Footprint have adopted changes approved by the NY PSC with minimal review in that particular state.

Pennsylvania is not obligated to, and does not automatically, incorporate changes approved or adopted elsewhere in the Verizon Footprint. Relative to Pennsylvania operations, Verizon PA notifies this Commission, the PA CLECs, and the Pennsylvania statutory advocates of proposed footprint-wide changes after NY PSC adoption by way of a proposed “update” to the PA Guidelines and/or PA PAP. Such filings do not constitute Verizon PA’s position statement. The PA CWG then discusses the proposed changes and

¹⁴ In contrast, the PA CWG is tasked by this Commission with addressing remedies and PAP issues.

underlying rationales. This process affords Pennsylvania CLECs and statutory advocates as well as Commission staff with the opportunity for collaborative analysis of any proposed metrics or remedies changes and of the ways in which the proposed changes may relate to Pennsylvania operations.

After discussion in the PA CWG, interested parties with standing in Pennsylvania have the opportunity to file written comments, to discuss the matter further in a PA CWG meeting, or to request a hearing before this Commission prior to any action on our part regarding the metrics/Guidelines or the remedies/PAP as used in Pennsylvania.

Pennsylvania retains complete jurisdictional autonomy to adopt, modify, reject, or develop any Footprint-wide or New York-predicated proposals to change the Guidelines and/or PAP for Verizon PA operations. We also have complete jurisdictional autonomy to develop, adopt, modify, or reject any specific metrics and remedies designed and proposed specifically for operations and market conditions in Pennsylvania.¹⁵

History of M-2015-2464294 (F0019)

The proposed F0019 changes under consideration herein stem from consensus changes adopted on May 14, 2015, by the NY PSC.¹⁶ The proposed changes would delete Pennsylvania metrics/submetrics with low or no volume of activity in the Verizon Footprint as reported from July 2014 through June 2015, and make associated administrative changes, based on Verizon PA's analysis. None of the metrics proposed for deletion are subject to remedies, so the PA PAP is not affected.

¹⁵ See, e.g., *PMO III, Directory Listings (F0016)*, Docket Nos. M-00011468 and M-2009- 2134347.

¹⁶ See *Proceeding to Review Service Quality Standards for Telephone Companies*, Case 97-C-0139, Order Issued and Effective May 14, 2015; Errata Issued June 8, 2015, on the NY PSC website at: <http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=97-c-0139&submit=Search+by+Case+Number>. The complete NY PSC docket may be viewed at: <http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=97-C-0139&submit=Search+by+Case+Number>.

On July 7, 2015, Verizon PA filed the proposed F0019 changes¹⁷ and electronically served the pleading on the members of the PA CWG. Notice of the comment and reply periods was provided by Secretarial Letter on July 14, 2015.¹⁸ Verizon PA filed comments on July 21, 2015, in support of the proposed F00109 changes.

At the regularly scheduled, telephonic, public session of the PA CWG on August 4, 2015, Verizon PA presented an overview of the proposed F0019 changes. On August 7, 2015, Verizon PA filed a summary of its August 4, 2015 presentation. An additional set of comment and reply periods was established, ending August 22, 2015. Verizon PA August 7, 2015 Letter at 1-2. No other comments and no reply comments were filed.

Throughout August 2015, Commission staff and Verizon PA exchanged clarifying emails to identify the analysis Verizon PA performed relative to Pennsylvania metrics data and to address precisely how the proposed changes would modify the PA Guidelines. The PA CWG was informed of these communications, and the final clarifications were transmitted by Commission staff to the PA CWG on September 1, 2015, by email to allow the PA CWG an opportunity to review and respond to the clarifications. The Folder 19 proposal and clarifications were discussed at the PA CWG on October 8, 2015. No objections were raised to information in the clarifications. The PA CWG supports the proposed F0019 changes, as clarified.

Summary of Proposed F0019 Guidelines Changes¹⁹

Administrative Changes: There were 13 purely administrative changes proposed for application to the PA Guidelines. They are detailed in the Appendix Section A.

¹⁷ See the actual Pennsylvania filings for a complete list and description of the proposed changes by accessing Docket No. M-2015-2464294 at http://www.puc.state.pa.us/filing_resources.aspx or on Verizon's website at <http://www2.verizon.com/wholesale/cwgroup/Carrier-Working-Group.html>.

¹⁸ The initial comments and replies were due before the PA CWG discussion to accommodate concerns regarding a possible work stoppage at Verizon PA.

¹⁹ The metric domains are: Pre-Ordering (PO), Ordering (OR), Provisioning (PR), Maintenance and Repair (MR), and Network Performance (NP). When using the terminology AA-N-NN-NNNN, a metric

Administrative changes relate to matters such as URLs, Help Desk telephone numbers, naming conventions, and other miscellaneous edits. They do not have an independent material impact on the metrics or on the measurement of service rendered.

Administrative changes do not affect the processing of metrics. They can generally be implemented with minimal lead time. The PA CWG recommends approval of the proposed F0019 administrative changes.

Process Changes: There are 108 process changes proposed for application to the PA Guidelines. The process changes are broken into two parts: Ninety-three actual metrics/submetrics slated for deletion, which are detailed in the Appendix Section B, and 15 administrative “cleanups” related directly to the proposed deletions, which are detailed in the Appendix Section C.

Process changes look at whether and/or how a performance measurement is to be calculated and can result in metric deletions at the product code level. Verizon PA looked at a year of historic Pennsylvania-specific metrics data (July 2014-June 2015) for these process metrics, consistent with an analysis conducted in New York and Pennsylvania for a prior Guidelines change in 2009. A threshold of observations in the 20’s or lower per month was considered low volume for this analysis. The metric’s denominator was generally used to make this determination except for a small subset where the numerators were used (MR-2, MR-3, NP-1, PR-6 & PR-8). Verizon PA is not proposing to eliminate any metrics based on low or no activity only in Pennsylvania. Verizon PA August 7, 2015 Letter at 1-2.

Process changes modify the operation of the metrics by changing the manner in which a performance measurement is processed (*e.g.*, how a measurement is calculated or

is expressed as AA-N, a sub-metric as AA-N-NN, and the product code as a four digit extension. When referring to a measurement at the AA-N-NN level, the terms metric and sub-metric are, however, often used interchangeably.

which products are measured in accordance with the performance measurement). Process changes often require more time than administrative changes to be implemented by Verizon PA. The PA CWG recommends approval of the proposed F0019 process changes.

PA CWG Consensus and Party Comments

The proposed F0019 changes were discussed at a PA CWG meeting with several follow-up/clarifying communications from Verizon PA and Commission staff. Relative to the proposed changes, members of the PA CWG have had the opportunity to comment or reply in response to the initial proposal, the Verizon PA comments, the Verizon PA presentation and follow-up letter, and the September clarifications. There were no contrary proposals from PA CWG members or other stakeholders. The PA CWG consensus is to recommend implementation of the proposed F0019 changes.

Implementation Timeline and Parallel Reporting

Verizon PA typically implements changes to the PA Guidelines on a quarterly schedule during the first three quarters of a calendar year. Verizon PA is directed to implement the proposed F0019 changes in the next quarterly update that allows for the requisite lead time. The interval will allow Verizon PA to make the process changes necessary to perform and report the modified and revised measurements and to test whether these changes have been properly made. Verizon PA shall provide a compliance filing incorporating the changes mandated herein and the confirmed implementation schedule within 15 days of the date of entry of this order.

For the first six months the new PA Guidelines are in effect, Verizon PA shall report performance under both the existing version of Guidelines and the Folder 19 version. This parallel reporting will allow us to confirm that the deletion of these metrics has not affected service rendered.

Conclusion

As noted above, all parties have had notice of the proposed changes and follow-up clarifications. The proposed changes were supported by filed comments. There are no requests to depart either from the proposal which reflects the general pattern of metrics in the Verizon Footprint or from the proposed implementation schedule. Thus, these proposed modifications represent the consensus recommendation of the PA CWG.

We find that the modifications proposed here are unopposed and reasonable and will help to clarify the PA Guidelines and enhance the efficient measurement of Verizon PA's operational processes. Accordingly, we shall approve the proposed F0019 changes, the implementation schedule, and the reporting requirements, consistent with this Order.

The compliance filing reflecting these changes shall be filed within fifteen days of the entry date of this order. Appropriate hard and electronic copies are to be provided to the Commission's Secretary's Bureau in conjunction with the compliance filing. The compliance filing may be served electronically on parties in the PA CWG and posted on Verizon PA's website in lieu of hard copy service on all CLECs in the Commonwealth, consistent with our prior directives.

The PA CWG and its subgroups shall continue to address metrics and remedies issues and report findings and recommendations to this Commission as needed. We expect the PA CWG to continue to review performance so as to ensure openness of the local telecommunications market and to formulate recommendations for adjustments to the PA Guidelines and PA PAP as the need may arise. We expect staff to continue to work with the staffs of the other states in the Verizon Footprint to address matters that present similarities across jurisdictional lines.

Going forward, the members of the PA CWG are reminded of the importance of structuring their proposals and comments in terms of Pennsylvania operations. It is not

sufficient merely to assert that what has been adopted by the NY PSC for use in New York or that what is adopted elsewhere in the Verizon Footprint should, on that basis, be adopted in Pennsylvania. Nor is it sufficient to refer to an order from another jurisdiction as the justification for action by this Commission. Orders from other jurisdictions do not constitute pleadings in Pennsylvania and are not substitutes for pleadings in Commission proceeding. Further, it is essential that documents such as pleadings, proposed changes and rationales, comments, and compliance filings be provided in Microsoft Word®-compatible format; **THEREFORE,**

IT IS ORDERED:

1. That the proposed F0019 changes to the Pennsylvania Carrier-to-Carrier Guidelines are approved as described herein.
2. That the Compliance Filing is due within fifteen (15) days of the date of entry of this order.
3. That Verizon Pennsylvania Inc. file, serve, and post on its website an implementation schedule consistent with its quarterly implementation pattern within fifteen (15) days of the date of entry of this order.

4. That Verizon Pennsylvania Inc. file, serve, and post on its website, consistent with this Commission's directives, the updated version of the Pennsylvania Carrier-to-Carrier Guidelines as adopted herein.

BY THE COMMISSION

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is written in a cursive style with a large initial "R".

Rosemary Chiavetta,
Secretary

(SEAL)

ORDER ADOPTED: October 22, 2015

ORDER ENTERED: October 22, 2015

Appendix²⁰

Appendix Section A – Administrative Changes to the PA Guidelines

C2C Guidelines	Appendix - Table	
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Change Proposed: Update entries in Table.

Appendix	Topic
A	Specials and Trunk Maintenance Code Description Reserved for Future Use
B	Provisioning Codes
C	Pre-Ordering Codes
D	Reserved for Future Use
E	Local Number Portability Process
F	E911 Updates
G	Repair Disposition Codes Reserved for Future Use
H	Flow Through Scenarios Reserved for Future Use

Rationale: The information will now be available from the updated links on the URL page. The information on the web link is kept current (Appendix G & H). Updated label for Appendix A to reflect ‘Reserved for Future Use.’

C2C Guidelines	URL References	
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Change Proposed: Update URL Links

Rationale: Over time the URLs listed in the guidelines have become out of date. The guidelines are revised to reflect the valid URLs.

C2C Guidelines	General Notes	
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1. *Change Proposed:* Under CLEC Performance Reports and Raw Data, remove reference to 800-959-9995 number.

²⁰ This Appendix is taken in large measure and without further specific attribution from information provided by Verizon PA on September 1, 2015, via email.

Rationale: The 800 number no longer exists. Contact with the Verizon helpdesk can be made through the e-mail address listed.

2. *Change Proposed:* Update the URL for help desk information to http://www22.verizon.com/wholesale/systemsmeasures/local/measures/performance_measures/CLEC-Performance-Measures.html

Rationale: This is the current URL regarding Help Desk Information.

C2C Guidelines	Section 1	Pre-Ordering Performance
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Change Proposed: Update table regarding PO-7 and PO-8.

Rationale: PO-7 and PO-8 should reflect one sub-metric each.

C2C Guidelines	Section 2	Ordering Performance
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Change Proposed: Update table regarding Metrics and Functions.

Rationale: The alignment of the names of the functions were corrected.

C2C Guidelines	OR-1 – Order Confirmation Timeliness	Exclusions
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1. *Change Proposed:* Remove text describing actual SOP Downtimes and add URL.

From:

For OR-1-02: SOP scheduled ~~downtime~~ hours (flow-through).

Verizon SOP scheduled hours are ~~as follows~~:

To:

For OR-1-02: SOP scheduled hours (flow-through).

Verizon SOP scheduled hours are found at the following URL:

<http://www22.verizon.com/wholesale/systemsmeasures/local/systems/avail/east/verizon-east-system-availability-and-forecast.html>

Rationale: URLs will replace the text and direct readers to the current SOP Availability.

2. *Change Proposed:* Modify exception clause.

From:

Exception: SOP downtime may be extended for significant SOP releases, (*e.g.*, NPA splits). All downtime extensions will be communicated to CLECs in advance of the release through VZ Change Management Guidelines. For NY/NE, the 3rd Saturday of each month is a scheduled release. ~~SOP will have a late start the following Sunday at 9:00 AM~~

To:

Exception: SOP downtime may be extended for significant SOP releases, (*e.g.*, NPA splits). All downtime extensions will be communicated to CLECs in advance of the release through VZ Change Management Guidelines. For NY/NE, the 3rd Saturday of each month is a scheduled release. SOP start time following a release can be found at the above link.

Rationale: URLs will replace the text and direct readers to the post release SOP availability. Note: The PA availability will be noted at the URL, giving the user has access to timely and correct information about PA. Thus, no specific mention of PA is necessary in the text of the Guidelines.

C2C Guidelines	OR-2 – Reject Timeliness	Exclusions
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1. *Change Proposed:* Remove text describing actual SOP Downtimes and add URL.

From:

For OR-2-02: SOP scheduled ~~downtime~~ hours (flow-through).
Verizon SOP scheduled hours are ~~as follows:~~

To:

For OR-2-02: SOP scheduled hours (flow-through).

Verizon SOP scheduled hours are found at the following URL:

<http://www22.verizon.com/wholesale/systemsmeasures/local/systems/avail/east/verizon-east-system-availability-and-forecast.html>

Rationale: URLs will replace the text and direct readers to the current SOP availability.

2. *Change Proposed:* Modify exception clause.

From:

Exception: SOP downtime may be extended for significant SOP releases, (e.g., NPA splits). All downtime extensions will be communicated to CLECs in advance of the release through VZ Change Management Guidelines. For NY/NE, the 3rd Saturday of each month is a scheduled release. ~~SOP will have a late start the following Sunday at 9:00 AM~~

To:

Exception: SOP downtime may be extended for significant SOP releases, (e.g., NPA splits). All downtime extensions will be communicated to CLECs in advance of the release through VZ Change Management Guidelines. For NY/NE, the 3rd Saturday of each month is a scheduled release. SOP start time following a release can be found at the above link.

Rationale: URLs will replace the text and direct readers to the post release SOP start times. Note: The PA availability will be noted at the URL, giving the user has access to timely and correct information about PA. Thus, no specific mention of PA is necessary in the text of the Guidelines.

C2C Guidelines Appendices	Appendix G	
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Change Proposed: Delete Disposition Code and Cause Code data from Appendix ‘G’ and mark the appendix as ‘Reserved for Future Use.’

Rationale: The Guidelines URL page states the most current description of Disposition Codes and Cause Codes.

C2C Guidelines Appendices	Appendix H	
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Change Proposed: Delete ‘Flow Through Ordering Scenarios’ from Appendix ‘H’ and mark the appendix as ‘Reserved for Future Use’.

Rationale: The Guidelines URL page points to the most current Flow Through Ordering Scenarios.

C2C Guidelines Appendices	Appendix O	
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Change Proposed: Update Appendix 'O' to reflect the current testing scenarios.

Rationale: The products tested in the Test Deck have changed. The scenarios now tested are reflected by the revision to the Appendix.

Appendix Section B – Changes to the PA Guidelines Requiring a Process Change

No Volume	Metrics that had no activity	
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Change Proposed: Delete metrics from the MR, OR, PO, and PR domains that have shown no activity.

METRIC_ID	METRIC_DESC	PRODUCT_DESC
MR-1-09-6095	% On-Time - Status Trouble	TAXI
OR-1-04-3210	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	UNE Specials DS0
OR-1-06-3341	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE 2-Wire Digital Services
OR-1-19-5030	% On Time Response - Request for Inbound Augment Trunks	Verizon Inbound Augment Trunks (> 192 Trunks)
OR-13-01-3523	% of Large Job Hot Cut Project Negotiations Completed	UNE Loop - Large Job Hot Cut
PO-2-02-6060	OSS Interface Availability - Prime Time	Maintenance - Electronic Bonding Interface
PO-2-03-6060	OSS Interface Availability - Non-Prime Time	Maintenance - Electronic Bonding Interface
PR-1-02-2341	Average Interval Offered - Total Dispatch	Resale 2-Wire Digital Services
PR-1-09-3210	Average Interval Offered - Specials DS0	UNE Specials DS0
PR-1-09-3511	Average Interval Offered - Total	UNE EEL Backbone
PR-4-01-2211	% Missed Appointment - Verizon - Total	Resale Specials DS1
PR-4-01-2213	% Missed Appointment - Verizon - Total	Resale Specials DS3
PR-4-01-3210	% Missed Appointment - Verizon - Total	UNE Specials DS0
PR-4-01-3213	% Missed Appointment - Verizon - Total	UNE Specials DS3
PR-4-02-2200	Average Delay Days - Total	Resale Specials
PR-4-02-2341	Average Delay Days - Total	Resale 2-Wire Digital Services
PR-4-04-2341	% Missed Appointment - Verizon - Dispatch	Resale 2-Wire Digital Services
PR-5-01-2341	% Missed Appointment - Verizon - Facilities	Resale 2-Wire Digital Services
PR-5-02-2341	% Orders Held for Facilities > 15 Days	Resale 2-Wire Digital Services
PR-6-01-2341	% Installation Troubles reported within 30 Days	Resale 2-Wire Digital Services
PR-6-03-2341	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Resale 2-Wire Digital Services
PR-6-03-3341	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	UNE 2-Wire Digital Services
PR-8-01-2200	Percent Open Orders in a Hold Status > 30 Days	Resale Specials
PR-8-01-2341	Percent Open Orders in a Hold Status > 30 Days	Resale 2-Wire Digital Services

Rationale: Research determined that a number of metrics did not show any activity over the 12 months reviewed. Reasons for the lack of activity include such factors as the industry has changed and the product is no longer ordered or the application is not used or had been retired.

Low Volume	MR Metrics that had little to no activity	Maintenance
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Change Proposed: Remove the MR metrics listed because of very low activity over the 12 months reviewed.

METRIC_ID	METRIC_DESC	PRODUCT_DESC
MR-1-04-6050	Average Response Time - Request Cancellation of Trouble	LSI-TA
MR-2-01-2200	Network Trouble Report Rate	Resale Specials
MR-2-02-2341	Network Trouble Report Rate – Loop	Resale 2-Wire Digital Services
MR-2-03-2341	Network Trouble Report Rate - Central Office	Resale 2-Wire Digital Services
MR-2-05-2200	% CPE/TOK/FOK Trouble Report Rate	Resale Specials
MR-2-05-2341	% CPE/TOK/FOK Trouble Report Rate	Resale 2-Wire Digital Services
MR-2-05-3341	% CPE/TOK/FOK Trouble Report Rate	UNE 2-Wire Digital Loops
MR-3-01-2341	% Missed Repair Appointment – Loop	Resale 2-Wire Digital Services
MR-3-02-2341	% Missed Repair Appointment - Central Office	Resale 2-Wire Digital Services
MR-3-03-2100	% CPE/TOK/FOK - Missed Appointment	Resale POTS
MR-3-03-2341	% CPE/TOK/FOK - Missed Appointment	Resale 2-Wire Digital Services
MR-3-03-3341	% CPE/TOK/FOK - Missed Appointment	UNE 2-Wire Digital Loops
MR-4-01-2216	Mean Time To Repair – Total	Resale Specials (Non DS0 & DS0)
MR-4-01-2217	Mean Time To Repair – Total	Resale Specials (DS1 & DS3)
MR-4-01-2341	Mean Time To Repair – Total	Resale 2-Wire Digital Services (ISDN)
MR-4-01-3216	Mean Time To Repair – Total	UNE Specials (Non DS0 & DS0)
MR-4-01-3341	Mean Time To Repair – Total	UNE 2-Wire Digital Loops
MR-4-02-2341	Mean Time To Repair - Loop Trouble	Resale 2-Wire Digital Services
MR-4-03-2341	Mean Time To Repair - Central Office Trouble	Resale 2-Wire Digital Services
MR-4-04-2216	% Cleared (all troubles) within 24 Hours	Resale Specials (Non DS0 & DS0)
MR-4-04-2217	% Cleared (all troubles) within 24 Hours	Resale Specials (DS1 & DS3)
MR-4-04-2341	% Cleared (all troubles) within 24 Hours	Resale 2-Wire Digital Services
MR-4-04-3216	% Cleared (all troubles) within 24 Hours	UNE Specials (Non DS0 & DS0)
MR-4-06-2216	% Out of Service > 4 Hours	Resale Specials (Non DS0 & DS0)
MR-4-06-2217	% Out of Service > 4 Hours	Resale Specials (DS1 & DS3)
MR-4-06-3216	% Out of Service > 4 Hours	UNE Specials (Non DS0 & DS0)
MR-4-07-2341	% Out of Service > 12 Hours	Resale 2-Wire Digital Services
MR-4-08-2216	% Out of Service > 24 Hours	Resale Specials (Non DS0 & DS0)
MR-4-08-2217	% Out of Service > 24 Hours	Resale Specials (DS1 & DS3)
MR-4-08-2341	% Out of Service > 24 Hours	Resale 2-Wire Digital Services
MR-4-08-3216	% Out of Service > 24 Hours	UNE Specials (Non DS0 & DS0)
MR-5-01-2200	% Repeat Reports within 30 Days	Resale Specials
MR-5-01-2341	% Repeat Reports within 30 Days	Resale 2-Wire Digital Services

Rationale: These MR metrics reflected low activity over the 12 months reviewed because the products had little inventory, were not utilized or ordered, or the transactions were not performed.

Low Volume	PR Metrics that had little to no activity	Provisioning
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Change Proposed: Remove the PR metrics listed that reflected very low activity over the 12 months reviewed.

METRIC_ID	METRIC_DESC	PRODUCT_DESC
PR-1-01-2341	Average Interval Offered - Total No Dispatch	Resale 2-Wire Digital Services
PR-1-01-3341	Average Interval Offered - Total No Dispatch	UNE 2-Wire Digital Services
PR-1-02-3341	Average Interval Offered - Total Dispatch	UNE 2-Wire Digital Services
PR-1-03-2120	Average Interval Offered - Dispatch one (1) to five (5) Lines	Resale POTS Residence
PR-1-04-2100	Average Interval Offered - Dispatch six (6) to nine (9) Lines	Resale POTS
PR-1-04-3112	Average Interval Offered - Dispatch six (6) to nine (9) Lines	UNE POTS Loop
PR-1-05-2100	Average Interval Offered - Dispatch (>= 10 Lines)	Resale POTS
PR-1-05-3112	Average Interval Offered - Dispatch (>= 10 Lines)	UNE POTS Loop
PR-1-09-2210	Average Interval Offered - Specials DS0	Resale Specials DS0
PR-1-09-3512	Average Interval Offered - Total	UNE EEL Loop
PR-1-09-3530	Average Interval Offered - Total	UNE IOF
PR-1-13-3529	Average Interval Offered - Hot Cuts - No Dispatch	UNE POTS Loop - Basic Hot Cut (21 lines and greater)
PR-3-06-2100	% Completed in three (3) Days one (1) to five (5) Lines - Dispatch	Resale POTS
PR-3-09-2100	% Completed in five (5) Days one (1) to five (5) Lines - Dispatch	Resale POTS
PR-3-10-3341	% Completed in six (6) Days one (1) to five (5) Lines - Total	UNE 2-Wire Digital Loops
PR-3-11-3528	% Completed in 10 Business Days	UNE POTS Loop Basic Hot Cut (11 to 20 lines)
PR-3-12-3531	% Completed in 15 Business Days	UNE POTS Loop Large Job Hot Cut (1-5 lines)
PR-3-12-3532	% Completed in 15 Business Days	UNE POTS Loop Large Job Hot Cut (6 or more lines)
PR-3-13-3531	% Completed in 26 Business Days	UNE POTS Loop Large Job Hot Cut (1-5 lines)
PR-3-13-3532	% Completed in 26 Business Days	UNE POTS Loop Large Job Hot Cut (6 or more lines)
PR-4-01-2210	% Missed Appointment - Verizon - Total	Resale Specials DS0
PR-4-02-3200	Average Delay Days - Total	UNE Specials
PR-4-03-2200	% Missed Appointment - Customer	Resale Specials
PR-4-03-2341	% Missed Appointment - Customer	Resale 2-Wire Digital Services
PR-4-03-3341	% Missed Appointment - Customer	UNE 2-Wire Digital Services
PR-4-03-3530	% Missed Appointment - Customer	UNE IOF
PR-4-04-3341	% Missed Appointment - Verizon - Dispatch	UNE 2-Wire Digital Services
PR-4-05-2341	% Missed Appointment - Verizon - No Dispatch	Resale 2-Wire Digital Services
PR-5-01-2200	% Missed Appointment - Verizon - Facilities	Resale Specials
PR-5-01-3341	% Missed Appointment - Verizon - Facilities	UNE 2-Wire Digital Services
PR-5-02-2200	% Orders Held for Facilities > 15 Days	Resale Specials

PR-5-02-3341	% Orders Held for Facilities > 15 Days	UNE 2-Wire Digital Services
PR-6-01-2200	% Installation Troubles reported within 30 Days	Resale Specials
PR-6-03-2100	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Resale POTS
PR-6-03-2200	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Resale Specials
PR-6-03-5000	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Interconnection Trunks (CLEC)
PR-8-01-2100	Percent Open Orders in a Hold Status > 30 Days	Resale POTS
PR-8-01-3112	Percent Open Orders in a Hold Status > 30 Days	UNE POTS Loop

Rationale: Research determined that these PR metrics showed little activity over the 12 months reviewed. A major reason for the lack of activity is that the industry has changed.

Low Volume	Other Metrics that had little to no activity	
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Change Proposed: Remove these NP, OR, and PO metrics that had very low activity over the 12 months reviewed.

METRIC_ID	METRIC_DESC	PRODUCT_DESC
NP-1-01-5000	% Final Trunk Groups Exceeding Blocking Standard	CLEC Trunks
NP-1-02-5000	% Final Trunk Groups Exceeding Blocking Standard (No Exceptions)	CLEC Trunks
NP-2-01-6701	% On Time Response to Request for Physical Collocation	Collocation - New Applications
NP-2-05-6701	% On Time - Physical Collocation	Collocation - New Applications
OR-1-04-2214	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale Specials (Non DS0, Non DS1 & Non DS3)
OR-1-04-2341	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale 2-Wire Digital Services
OR-1-04-3341	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	UNE 2-Wire Digital Services
OR-1-06-2214	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	Resale Specials (Non DS0, Non DS1 & Non DS3)
OR-1-06-2341	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	Resale 2-Wire Digital Services
OR-2-04-2200	% On Time LSR/ASR Reject - No Facility Check (Electronic - No Flow-through)	Resale Specials
OR-2-06-2200	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	Resale Specials
OR-2-06-2341	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	Resale 2-Wire Digital Services
PO-2-03-6080	OSS Interface Availability - Non-Prime Time	Maintenance Web GUI (RETAS)/ Pre-ordering/Ordering Web GUI combined

Rationale: Research determined that these metrics from various domains showed little activity over the 12 months reviewed. A major reason for the lack of activity is that the industry has changed.

**Appendix Section C – Administrative Changes to the PA Guidelines Due to
Proposed Process Changes in Appendix Section B Above**

C2C Guidelines	Section 2	Ordering Performance
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Change Proposed: Update table regarding OR-13.

Rationale: OR-13 – ‘% of Large Job Hot Cut Project Negotiations Completed’ will be deleted. Thus, the entry should be removed from the table.

C2C Guidelines	Retail Analog Table	
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Change Proposed: PR-1-09 UNE EEL and IOF metrics will be removed.

Rationale: The metrics PR-1-09-3511(EEL-Backbone), PR-1-09-3513(EEL-Loop), PR-1-09-3530(IOF) will be deleted. Thus, the exception entry in the table for those metrics/products should be removed.

C2C Guidelines	Product Code Information	
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Change Proposed: Removal of 6701 Product Code.

Rationale: With the deletion of the NP-1-01 and NP-1-02 metrics, product code 6701 is no longer used in the guidelines.

C2C Guidelines	PO-2 OSS Interface Availability	Products
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Change Proposed: Move products list under metrics for PO-2 and update to reflect reported products.

Rationale: PO-2-02-6060 – Prime time – Maintenance – EBI; PO-2-03-6060 – Non-Prime time – Maintenance – EBI; and PO-2-03-6080 – Non-Prime Time – Maintenance Web GUI (RETAS)/PO/OR Web GUI Combined are being removed. Thus, the list of products for the PO-2 metric is no longer common, and the products should be listed separately under each submetric.

C2C Guidelines	Section 3	Provisioning Performance
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Change Proposed: Update table regarding PR-1 and PR-3. PR-1 will change from 7 submetrics to 4, and PR-3 will change from 9 submetrics to 5.

Rationale: Upon metric removal, the table should be updated to reflect the accurate number of submetrics.

C2C Guidelines	PR-1 – Average Interval Offered	Definition
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Change Proposed: Remove text regarding EEL and IOF.

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

Rationale: Upon removal of PR-1-09-3511(EEL-Backbone), PR-1-09-3513(EEL-Loop), and PR-1-09-3530(IOF), there is no need for this entry in the Definition.

C2C Guidelines	PR-1 – Average Interval Offered	Performance Standard
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1. *Change Proposed:* Remove references to PR-1-04, PR-1-05 and PR-1-13.

Rationale: Upon removal of PR-1-04, PR-1-05 and PR-1-13, there is no need for reference to a performance standard for these metrics.

2. *Change Proposed:* Remove references to PR-1-09 UNE IOF, UNE – EEL –Loop and UNE-EEL Backbone

Rationale: Upon removal of PR-1-09-3511(EEL-Backbone), PR-1-09-3513(EEL-Loop), PR-1-09-3530(IOF), there is no need for an entry in the performance standard for these metrics.

C2C Guidelines	PR-3 – Completed within Specified Number of Days	Exclusions
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Change Proposed: Remove references to PR-3-11, PR-3-12, and PR-3-13.

From:

Coordinated cut-over Unbundled Network Elements such as loops or number portability orders. (This exclusion applies to all PR-3 sub-metrics except PR-3-08, ~~PR 3 11, PR 3 12, and PR 3 13~~).

To:

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

Rationale: Upon removal of PR-3-11, PR-3-12, and PR-3-13, there is no need for reference to these metrics in the exclusion statement.

C2C Guidelines	PR-3 – Completed within Specified Number of Days	Performance Standard
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Change Proposed: Remove references to PR-3-10-3341, PR-3-11, PR-3-12, and PR-3-13.

Rationale: Upon removal of PR-3-10-3341, PR-3-11, PR-3-12, and PR-3-13, there is no need for reference to a performance standard for these metrics.

C2C Guidelines	PR-4 – Missed Appointments	Exclusions
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Change Proposed: Remove references to PR-4 2-Wire Digital.

From:

For ~~PR 4 04 2 Wire Digital~~, and PR-4-14 UNE 2-Wire xDSL Loop **only** exclude orders missed for facility reasons

To:

For PR-4-14 UNE 2-Wire xDSL Loop **only** exclude orders missed for facility reasons

Rationale: Upon removal of PR-4-04-2241 and PR-4-04-3341, there is no need for reference to these metrics in the exclusion statement.

C2C Guidelines	Section 4	Maintenance & Repair Performance
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Change Proposed: Update table regarding MR-1. MR-1 will change from 12 submetrics to 10.

Rationale: Upon metric removal, table should be updated to reflect accurate number of submetrics.

C2C Guidelines	MR-1 – Response Time OSS Maintenance Interface	Performance Standard
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Change Proposed: Remove references to MR-1-04 and MR-1-09.

Rationale: Upon removal of MR-1-04 and MR-1-09, there is no need for reference to a performance standard for these metrics.

C2C Guidelines	MR-2 – Trouble Report Rate	Performance Standard
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Change Proposed: Adjust the references to MR-2-01 Performance Standards.

From:

MR-2-01: For UNE Specials -- No Standard

MR-2-01: Except for UNE Specials -- Parity With VZ Retail

To:

MR-2-01: For UNE Specials, Trunks -- No Standard

~~MR 2-01: Except for UNE Specials -- Parity With VZ Retail~~

Rationale: Based on a consensus decision in 2009, the stakeholders had agreed to remove the parity standard for all the MR-2-01 Metrics. Due to administrative issues, those MR-2-01-5000 and MR-2-01-2200 changes were not submitted for adoption.

Stakeholders have now agreed to proceed with the change for the MR-2-01-5000 metric to 'No Standard' and are further recommending that MR-2-01-2200 be removed due to low volumes or activity.

With the removal of MR-2-01-2200 and MR-2-01-5000 changing to 'No Standard,' the Performance Standard information should be updated to reflect these changes.

C2C Guidelines	Section 5	Network Performance
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Change Proposed: Update table regarding NP-1. NP-1 will change from 4 submetrics to 2.

Rationale: Upon removal of two NP submetrics, the table should be updated to reflect the accurate number of sub-metrics.

C2C Guidelines	NP-1 – Percent Final Trunk Group Blockage	Definition
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Change Proposed: Remove text regarding NP-1-01 and NP-1-02.

~~For the NP-1 metrics, trunk groups exceeding a 2% threshold require action to prevent future blocking.~~

~~The NP-1-01 and NP-1-02 sub-metrics include all FTGs provisioned per CLEC request regardless of whether or not the CLEC utilizes the FTG.~~

Rationale: Upon removal of NP-1-01 and NP-1-02, there is no need for these entries in the Definition.

C2C Guidelines	NP-1 – Percent Final Trunk Group Blockage	Performance Standard
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Change Proposed: Remove text regarding NP-1-01 and NP-1-02.

From:

Metrics NP-1-01, 02, and 03: No standard (Note: Because common trunks carry both retail and CLEC traffic, there will be parity with Retail on common trunks.) For individual trunk groups carrying traffic between VZ and CLECs, VZ will provide an explanation (and action plan if necessary) on individual trunks blocking for two months consecutively.

To:

Metrics NP-1-03: No standard (Note: Because common trunks carry both retail and CLEC traffic, there will be parity with Retail on common trunks.)

For individual trunk groups carrying traffic between VZ and CLECs, VZ will provide an explanation (and action plan if necessary) on individual trunks blocking for two months consecutively.

Rationale: Upon removal of NP-1-01 and NP-1-02, there is no need for these entries in the Performance Standard.

C2C Guidelines	NP-2 – Collocation Performance	Definition
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Change Proposed: Remove text regarding New Arrangements for TRUNKS.

From:

This metric includes physical collocation arrangement products ordered and provisioned via the state tariffs. Products ordered ~~include new arrangements and~~ augments to existing arrangements where Verizon is required to perform work to add capacity for space, cable termination or DC power. Both state and federal collocation arrangements are provisioned in accordance with the intervals listed in the state tariff.

To:

This metric includes physical collocation arrangement products ordered and provisioned via the state tariffs. Products ordered are augments to existing arrangements where Verizon is required to perform work to add capacity for space, cable termination or DC power. Both state and federal collocation arrangements are provisioned in accordance with the intervals listed in the state tariff.

Rationale: Upon removal of NP-2-01-6701 and NP-2-05-6701, there is no need for the reference to new arrangements in the Definition.