Filed Session of May 14, 2015
Approved as Recommended
and so Ordered
by the Commission

(Signed)
_____
KATHLEEN H. BURGESS
Secretary
Issued & Effective May 14, 2015
Commissioner Gregg C. Sayre, recused

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

April 29, 2015

TO:          THE COMMISSION

FROM:        CWG STAFF TEAM - Office of Telecommunications, Office
             of Market and Regulatory Economics, Office of
             Accounting, Audits and Finance and Office of General
             Counsel

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

SUMMARY OF
RECOMMENDATION:  It is recommended that the Commission approve
             the proposed modifications to the Inter-Carrier
             Service Quality Guidelines. These modifications
             include 13 administrative changes and 108
             specific performance measurement process
             changes (metric deletions).

<u>BACKGROUND</u>

        The Inter-Carrier Service Quality Guidelines (C2C
Guidelines) establish standards and metrics for measuring and
reporting Verizon New York Inc.'s (Verizon) and Frontier of
Rochester, Inc's (Frontier) inter-carrier service quality
performance.[1]  The C2C Guidelines provide the metrics and
performance standards applicable to Verizon's and to Frontier's

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[1] Case 97-C-0139, Order Adopting Inter-Carrier Service Quality
   Guidelines (issued February 16, 1999).

wholesale operations.  They include comprehensive explanations of the standards' definitions, reporting levels, measurement methodologies, geography covered, current product intervals, and glossary and appendices that provide further explanatory material.

Since the adoption of the C2C Guidelines in 1999, the Carrier Working Group (CWG), with an active membership that includes Department of Public Service Staff (Staff) and the major incumbent local exchange carriers (ILECs) and competitive local exchange carriers (CLECs) operating in New York State, meets regularly to discuss issues relating to the Guidelines. From time-to-time the CWG has collaboratively recommended modifications to the C2C Guidelines to reflect changes in market conditions; the most recent modification occurred by Commission Order dated December 1, 2010.  CWG is now proposing new consensus changes, as discussed below, for additional modifications to the C2C guidelines.  Staff recommends that the Commission adopt these proposed modifications.

DISCUSSION

The Commission has periodically ordered modifications to the 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 here.

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., whether and/or how a measurement is calculated).  The modifications discussed herein consist of 13 administrative changes and 108 process changes (metric deletions).  These modifications were

discussed and reviewed at a number of CWG meetings.  The CWG
unanimously reached consensus on all of the proposed changes.

Pursuant to the State Administrative Procedures Act, a
Notice of Proposed Agency Action to modify the C2C Guidelines
was published in the State Register on October 15, 2014 (SAPA
No. 97-C-0139SP34).  No comments were received.

Administrative Changes

The 13 proposed administrative modifications to the
C2C Guidelines are detailed in Section A of the Attachment
hereto.  In sum, these changes are as follows: (1) update C2C
Guidelines' Appendix – Table; (2) update the URL links listed in
the Guidelines; (3) remove references to the toll-free Help Desk
number; (4) update the URL for access to the Help Desk; (5)
update the Pre-Ordering Performance table to reflect that the
PO-7 (Software Problem Resolution Timeliness) and PO-8 (Manual
Loop Qualification) metrics have one sub-metric each; (6) update
the Ordering Performance table to correct the alignment of the
names of the metric functions; (7) replace text describing
actual Service Order Processor (SOP) Downtimes with an URL for
the OR-1-02 sub-metric (% on time LSRC – Flow Through) to direct
readers to the current SOP Availability; (8) replace text
describing SOP start times during exceptional circumstances
(exception clause) for the OR-1-02 sub-metric with an URL to
direct readers to the post release SOP availability; (9) replace
text describing actual SOP Downtimes with an URL for OR-2-02 (%
On Time Local Service Request (LSR) Reject (Flow-through)) and
Local Service Request (LSRC) – Flow Through) to direct readers
to the current SOP availability; (10) replace text to the
exception clause for OR-2-02 with an URL to direct readers to
the post release SOP start times; (11) delete Appendix G –
Disposition Code and Cause Code data and mark the appendix as
'Reserved for Future Use' as the Guidelines' URL

page states the most current description of the Disposition
Codes and Cause Codes; (12) delete Appendix H - 'Flow Through
Ordering Scenarios and mark the appendix as 'Reserved for Future
Use' as the Guidelines URL page points to the most current Flow
Through Ordering Scenarios; and (13) update Appendix O to
reflect the current testing scenarios as, over time, the
products in the Test Deck have changed.

Process Changes (Metric Deletions)

The CWG performed an analysis to determine whether to
delete or consolidate C2C metrics with little or no activity.
The CWG analyzed reported metric date and identified the minimum
and maximum operational volumes that occurred during the 12-
month period between March 2013 and February 2014.  A general
annual benchmark of 20 CLEC observations or less was used to
flag "low volume" metrics for consideration by the CWG for
possible deletion.  Process changes, as detailed in Section B of
the Attachment hereto, are proposed for 108 of the total of 341
sub-metrics in the current C2C Guidelines.  These process
modifications are organized according to the general categories
(e.g., Order Confirmation Timeliness, Pre-Ordering Performance,
Maintenance and Repair, and Network Performance) in the C2C
Guidelines.  The process changes involve the removal of those
low volume or no activity metrics which the CWG agreed could be
deleted.  Some of the reasons for the lack of metric activity
included changes in the industry which resulted in wholesale
products no longer being ordered or in wholesale interfaces no
longer used by certain CLECs.

1.  Pre-Ordering Performance

The PO-2 (OSS Interface Availability) metrics are
measurements of the time during which the OSS Interface is

actually available as a percentage of scheduled availability.

2. Ordering Performance

The OR-1 (Order Confirmation Timeliness) metrics measure 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 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 OR-2 (Reject Timeliness) metrics measures the amount of elapsed time between receipt of a valid order request and the receipt of a service order reject acknowledgement.

3. Provisioning Performance

PR-1 (Average Interval Offered) metrics measure the average number of business days between the order date and the committed completion date.

The PR-3 (Completed Within a Specific Number of Days) metrics measure the percent of POTS orders completed in specified numbers of business days, between application and work completion dates.

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

The PR-5 (Facility Missed Orders) metrics measure facility missed orders with calculations for the report month including orders complete in the billing system.

The PR-6 (Installation Quality) metrics measure the percent of lines/circuits/trunks installed where a reported trouble was found in the Verizon network within 30 days of order completion.

The PR-8 (Percent Open Orders in a Hold Status) metrics measure 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.

    4.  <u>Maintenance and Repair Performance</u>

The MR-1 (Response Time OSS Maintenance Interface) metrics measures the response time defined as the time, in seconds, that elapses from receipt of a request at Verizon's access platform to issuance of a response from Verizon's access platform.

The MR-2 (Trouble Report Rate) metrics measure the total initial contact, via a customer direct call or a customer referred call, per 100 lines/circuits/trunks in service.

The MR-3 (Missed repair Appointments) metrics measure the percent of reported Network Troubles not repaired and cleared by the date and time committed.

The 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 MR-5 (Repair Trouble Reports) metrics measure the percent of troubles closed that have an additional trouble closed within 30 days for which a network trouble is found.

    5.  <u>Network Performance</u>

The NP-1 (Percent final Trunk Group Blockage) performance metric measures the percent of dedicated one-way Final Trunk Groups (FTGs) carrying traffic from Verizon's tandem to the CLEC that exceed blocking design threshold.

The NP-2 (Collocation Performance) metric includes physical collocation arrangement products ordered and provisioned via state tariffs.

There are 15 proposed administrative modifications to the Process Changes referenced in Section C of Attachment 1. In sum, as a result of metric deletions, there is no longer a need

for them to be referenced and they are as follows: (1) update the table regarding OR-13 "% of Large Job Hot Cut Project Negotiations Completed"; (2) the PR-1-09 UNE EEL and IOF metrics will be removed; (3) removal of the 6701 Product Code due to the deletion of the NP-1-01 and NP-1-02 metrics; (3) move Products listed under Metrics for PO-2 and update the reported products; (5) update the table regarding PR-1 and PR-3 so the table reflects the accurate number of sub-metrics; (6) remove the text regarding EEL and IOF due to the removal of PR-1-09-3511, PR-1-09-3513 and PR-1-09-3530; (7) remove references to PR-1-04, PR-1-05 and PR-1-13; (8) remove the references to PR-1-09 UNE IOF, UNE-EEL-Loop and UNE-EEL Backbone; (9) remove references to PR-3-11, PR-3-12 and PR-3-13; (10) remove references to PR-3-10-3341, PR-3-11, PR-3-12 and PR-3-13; (11) remove references to PR-2-2-Wire Digital; (12) update the table regarding MR-1 as it will change from 12 to 10 sub-metrics; (13) remove references to MR-1-04 and MR-1-09; adjust the references to MR-2-01 Performance Standards; (14) update the table regarding NP-1 and (15) remove the text regarding NP-1-01 and NP-1-02.

<div align="center">CONCLUSION</div>

The proposed modifications agreed to by the CWG 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 and should be adopted by the Commission. The CWG will continue to evaluate metric performance and propose modifications to the C2C guidelines on an as needed basis.

<div align="center">RECOMMENDATION</div>

It is recommended that:

       1.  The proposed modifications to the Inter-Carrier Service Quality Guidelines (C2C Guidelines) consisting of 13

administrative changes and 108 process changes be adopted consistent with the discussion herein.

       2.  Within 30 days hereto 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.

       3.  This case should be continued.

Respectfully submitted,


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**Section A –Administrative Changes to the Guidelines**

| **C2C Guidelines** | **Appendix - Table** | |
|---|---|---|

*Change Proposed*: Update entries in Table.

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

*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** | |
|---|---|---|

*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** | |
|---|---|---|

1. *Change Proposed*: Under CLEC Performance Reports and Raw Data, remove reference to 800 number.
   - phone (800) 959-9995
   - 

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

2. *Change Proposed*:  URL for help desk information is outdated.
   Old:
   http://www22.verizon.com/wholesale/systemsmeasures/local/measures/performance_measures/1,,perf_meas_ug-pmhomepage,00.html

   New:

**http://www22.verizon.com/wholesale/systemsmeasures/local/measures/performance_measures/CLEC-Performance-Measures.html**

*Rationale:* The guidelines are updated to reflect the current URL regarding Help Desk Information.

| C2C Guidelines | Section 1 | Pre-Ordering Performance |
|---|---|---|

1. *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 |
|---|---|---|

1. *Change Proposed*:  Update table regarding Metrics and Functions.

   *Rationale:* The alignment of the names of the functions was corrected.

| C2C Guidelines | OR-1 Order Confirmation Timeliness | Exclusions |
|---|---|---|

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 3$^{rd}$ 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 3$^{rd}$ 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.

| C2C Guidelines | OR-2   Reject Timeliness | Exclusions |
|---|---|---|

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/v
   erizon-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 3<sup>rd</sup> 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 3<sup>rd</sup> 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.

| C2C Guidelines Appendices | Appendix G | |
|---|---|---|

1. *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 points to the most current description of
   Disposition codes and Cause Codes.

| C2C Guidelines Appendices | Appendix H | |
|---|---|---|

1. *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 | |
|---|---|---|

1. *Change Proposed*: Update Appendix 'O' to reflect the current testing scenarios

   *Rationale:* Over time, the products tested in the Test Deck have changed. The
   scenarios now tested must be reflected in the Appendix.

**Section B –Changes to the Guidelines Requiring a Process Change**

| No Volume | Metrics that had no activity | |
|---|---|---|

1. *Change Proposed*: Deletion of metrics from multiple 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. Some of the reasons for the lack of activity included the fact that the Industry has changed and the product is no longer ordered or the application is not

used or had been retired. The CWG agreed that these particular metrics with no activity should be deleted.

| Low Volume | MR Metrics that had little to no activity | Maintenance |
|---|---|---|

*1. Change Proposed*: Removal of the MR Metrics listed because of very low to no activity in 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:*   A number of 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.  The CWG agreed that these particular MR metrics with low activity should be deleted.

| Low Volume | **PR Metrics that had little to no activity** | **Provisioning** |
|---|---|---|

1. *Change Proposed*: Removal of the PR Metrics listed that reflected very low or no activity in 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- | % Completed in 26 Business Days | UNE POTS Loop Large Job Hot Cut (6 or |

| | | |
|---|---|---|
| 3532 | | 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 a number of PR metrics showed little activity over the 12 months reviewed. A major reason for the lack of activity is that the Industry has changed. The CWG agreed that these particular PR metrics with low activity should be deleted.

| Low Volume | **Other Metrics that had little to no activity** | |
|---|---|---|

1. *Change Proposed*: Removal of additional metrics from various domains that reflected 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) |

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| 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 a number of NP, OR and PO metrics showed little activity over the 12 months reviewed.  A major reason for the lack of activity is that the Industry has changed. The CWG agreed that these particular NP, OR and PO metrics with low activity should be deleted.

**Section C –Administrative Changes Due to Proposed Process Changes in Section B Above**

| C2C Guidelines | Section 2 | Ordering Performance |
|---|---|---|

1. *Change Proposed*:  Update table regarding OR-13.

   *Rationale: OR*-13 – '% of Large Job Hot Cut Project Negotiations Completed' will be deleted. Therefore the entry will be removed from the table.

| C2C Guidelines | Retail Analog Table | |
|---|---|---|

1. *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 removed from the guidelines. Thus, the exception entry in the table for that metric/product is no longer necessary.

| C2C Guidelines | Product Code Information | |
|---|---|---|

1. *Change Proposed*:  Removal of 6701 Product Code.

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

| C2C Guidelines | PO-2 OSS Interface Availability | Products |
| --- | --- | --- |

1. *Change Proposed*: Move Products list under Metrics for PO-2 and update to reflect reported products.

   *Rationale:* PO-2-02-6060 and PO-2-03-6060 (Maintenance – Electronic Bonding *Interface) Metrics* the PO-2-03-6080(Maintenance Web GUI (RETAS) / Pre-ordering/Ordering Web GUI combined) – metrics will be removed. The list of Products for the 2 metrics is no longer common. Therefore, the products will be listed separately under each metric.

| C2C Guidelines | Section 3 | Provisioning Performance |
| --- | --- | --- |

1. *Change Proposed*:  Update table regarding PR-1 and PR-3.

   *Rationale:* Upon metric removal, the table must be updated to reflect the accurate number of sub-metrics.  PR-1 will change from 7 to 4 sub-metrics, and PR-3 will change from 9 to 5 sub-metrics.

| C2C Guidelines | PR-1 Average Interval Offered | Definition: |
| --- | --- | --- |

1. *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), PR-1-09-3530(IOF), there is no longer a need for this entry in the Definition.

| C2C Guidelines | PR-1 Average Interval Offered | Performance Standard: |
| --- | --- | --- |

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 longer a 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 longer a need for an entry in the performance standard for these metrics.

| C2C Guidelines | PR-3 Completed within Specified Number of Days | Exclusions: |
|---|---|---|

1.  *Change Proposed*:  remove references 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 longer a need for reference to these metrics in the exclusion statement.

| C2C Guidelines | PR-3 Completed within Specified Number of Days | Performance Standard: |
|---|---|---|

1.  *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 longer a need for reference to a performance standard for these metrics.

| C2C Guidelines | PR-4 Missed Appointments | Exclusions: |
|---|---|---|

1.  *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 longer a need for reference to these metrics in the exclusion statement.

| C2C Guidelines | Section 4 | Maintenance & Repair Performance |
|---|---|---|

1. *Change Proposed*:  Update table regarding MR-1.

   *Rationale:* Upon metric removal, table must be updated to reflect accurate number of sub-metrics.  MR-1 will change from 12 to 10 sub-metrics.

| C2C Guidelines | MR-1 Response Time OSS Maintenance Interface | Performance Standard: |
|---|---|---|

1. *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 longer a need for reference to a performance standard for these metrics.

| C2C Guidelines | MR-2 Trouble Report Rate | Performance Standard: |
|---|---|---|

1. *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~~

Based on a consensus decision in 2009, the CWG had agreed to remove the parity standard for all the MR-2-01 Metrics. Due to administrative issues the MR-2-01-5000 and MR-2-01-2200 metrics were not included in the consensus recommendation submitted to the Commission.

The CWG has agreed to proceed with the change for the MR-2-01-5000 metric to 'No Standard'. As noted above in Section B, it is recommended that MR-2-01-2200  be removed due to low volumes or activity.

   *Rationale:* Upon Removal of MR-2-01-2200, and MR-2-01-5000 changing to 'No Standard' the Performance Standard information must be updated to reflect the changes in the metrics.

| C2C Guidelines | **Section 5** | Network Performance |
|---|---|---|

1. *Change Proposed*:  Update table regarding NP-1.

   *Rationale:* Upon the removal of two NP submetrics, pursuant to the above recommendation in Section B, the table in this section of the guidelines must be updated to reflect the accurate number of sub-metrics.  NP-1 will change from 4 to 2 sub-metrics.

| C2C Guidelines | **NP-1 Percent Final Trunk Group Blockage** | Definition: |
|---|---|---|

1. *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 MR-1-04 and MR-1-09, there is no longer a need for reference to a performance standard for these metrics.

| C2C Guidelines | **MR-2 Trouble Report Rate** | Performance Standard: |
|---|---|---|

2. *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~~

   Based on a consensus decision in 2009, the CWG had agreed to remove the parity standard for all the MR-2-01 Metrics.  Due to administrative issues the MR-2-01-5000 and MR-2-01-2200 metrics were not included in the consensus recommendation submitted to the Commission.

The CWG has agreed to proceed with the change for the MR-2-01-5000 metric to 'No Standard'. As noted above in Section B, it is recommended that  MR-2-01-2200  be removed due to low volumes or activity.

*Rationale:* Upon Removal of MR-2-01-2200, and MR-2-01-5000 changing to 'No Standard' the Performance Standard information must be updated to reflect the changes in the metrics.

| C2C Guidelines | **Section 5** | Network Performance |
|---|---|---|

2. *Change Proposed*:  Update table regarding NP-1.

*Rationale:* Upon the removal of two NP submetrics, pursuant to the above recommendation in Section B, the table in this section of the guidelines must be updated to reflect the accurate number of sub-metrics.  NP-1 will change from 4 to 2 sub-metrics.

| C2C Guidelines | **NP-1 Percent Final Trunk Group Blockage** | Definition: |
|---|---|---|

2. *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.~~