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VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pa. 17120

**RE: PMO III – Periodic C2C Updates (F0017)
Docket No. M-2011-2232341**

**PMO – Performance Metrics and Remedies (F0011)
Docket No. M-00011468**

**Verizon Pennsylvania Inc.'s Submission of Revised PA Guidelines to
Conform the PA Guidelines to the December 2010 NY Guidelines**

Dear Secretary McNulty:

Enclosed please find Verizon Pennsylvania Inc.'s Comments in Support of the February 22, 2011 Revisions to the PA Guidelines, in the above-referenced matter.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink that reads "Suzan D. Paiva" with a stylized flourish at the end.

SDP/slb
Enc.

Via FedEx Delivery

cc: Louise Fink Smith, Law Bureau
Ted Farrar, Office of Special Assistants
James Strausbaugh, Bureau of Fixed Utility Services

Via Electronic Mail

cc: Pennsylvania Carrier Working Group

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PMO III – Periodic C2C Updates (F0017)
PMO – Performance Metrics and Remedies

: M-2011-2232341
: M-00011468(F0017)

**VERIZON PENNSYLVANIA INC.'s
COMMENTS IN SUPPORT OF THE FEBRUARY 22, 2011
REVISIONS TO THE PA GUIDELINES**

In accordance with this Commission's *PMO II* Order,¹ Verizon Pennsylvania Inc. ("Verizon PA") submitted to the Commission on February 22, 2011 revised "Carrier-to-Carrier Guidelines Performance Standards and Reports" for Verizon PA ("PA Guidelines") and recommended an implementation schedule for the revised PA Guidelines.

The revised PA Guidelines conform to the December 2010 "Carrier-to-Carrier Guidelines Performance Standards and Reports" for Verizon New York Inc. ("NY Guidelines") and incorporate into the PA Guidelines revisions to the NY Guidelines adopted by the New York Public Service Commission ("PSC") on December 21, 2010. Verizon PA respectfully requests that the Commission adopt the revised PA Guidelines that were submitted by Verizon PA on February 22, 2011 and accept for the revised PA Guidelines the implementation schedule proposed by Verizon PA.

¹ *Performance Measures Remedies, Final Opinion and Order On Performance Measures and Remedies for Wholesale Performance for Verizon Pennsylvania Inc. (PMO II)*, Docket No. M-00011468, pp. 87 and 97-98 (12/10/02).

I. Revised PA Guidelines.

On December 21, 2010, the New York PSC adopted an order approving revisions to the NY Guidelines.² The revised NY Guidelines were filed with the New York PSC on January 20, 2011.

The revisions to the Guidelines include two administrative changes and two process changes.³ The first administrative change to the Guidelines is the deletion of references to West Virginia from the Guidelines document.⁴ On July 1, 2010, Verizon Communications Inc. transferred control of Verizon West Virginia Inc. to Frontier Communications Corporation. Since the Guidelines apply to Verizon incumbent local exchange carriers, it is appropriate to delete from the Guidelines document service areas, such as West Virginia, that are no longer served by Verizon incumbent local exchange carriers.

The second administrative change to the Guidelines pertains to Maintenance Metrics MR-2, MR-4 and MR-5 and clarifies the difference between “Trouble Codes” and “Disposition Codes,”⁵ as these terms are used in the metrics. The revisions make clear that “Trouble Codes”

² *Case 97-C-0139, Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies, Memorandum to the Commission from the CWG Staff Team—Office of Telecommunications, Office of General Counsel, Office of Regulatory Economics and Office of Accounting and Finance; Filed Session of December 16, 2010; Approved as Recommended and so Ordered by the Commission; Issued and Effective December 21, 2010 (“December 21, 2010 NY PSC Order”).*

³ *December 21, 2010 NY PSC Order*, pp. 3-9 and Attachment 1.

⁴ *December 21, 2010 NY PSC Order*, p. 3 and Attachment 1, p. 1.

⁵ “Trouble Codes” are specific codes, either “FAC,” “CO” or “STN,” for Specials and Trunks, used to indicate network troubles. “Disposition Codes” are the codes assigned by the Verizon field technician when closing a trouble. The Disposition Code identifies the plant type/location in the network where the trouble was found. *December 21, 2010 NY PSC Order*, p. 3, footnotes 5 and 6.

only apply to measurements for the Specials and Trunks products, while “Disposition Codes” apply to other products measured under Metrics MR-2 through MR-5.⁶

These two administrative changes to the Guidelines set out in the New York PSC’s December 21, 2010 order are consensus changes to the Guidelines recommended by the New York Carrier Working Group.⁷

The first process change to the Guidelines is the deletion from Metric MR-1, “Response Time OSS Maintenance Interface,” of measurements of performance for the “Electronic Bonded Trouble Administration” (“EBTA”) interface. Metric MR-1 measures response times for transactions submitted to the Verizon Operations Support System (“OSS”) maintenance interface. Measurements of performance for the EBTA interface were deleted because no CLEC now uses this interface for any Verizon jurisdiction covered by the Guidelines. This change to Metric MR-1 was a consensus change recommended by the New York Carrier Working Group.⁸

The second process change to the Guidelines is to change the standard for Metric MR-2-01, “Trouble Report Rate,” for Unbundled Network Element (“UNE”) “Specials”⁹ from “Parity with Verizon Retail” to “No Standard.” Metric MR-2 measures the number of Verizon network

⁶ *December 21, 2010 NY PSC Order*, pp. 3-4 and Attachment 1, pp. 1-2.

⁷ *December 21, 2010 NY PSC Order*, pp. 3, 4, and Attachment 1, pp. 1-2. The New York Carrier Working Group includes New York State Department of Public Service staff, Verizon NY and interested CLECs, who participate in the New York PSC’s on-going collaborative on carrier-to-carrier service quality measurements and standards.

⁸ *December 21, 2010 NY PSC Order*, p. 4 and Attachment 1, pp. 2-3.

⁹ “Special Services” or “Specials” are services that require engineering design intervention. These services include (but are not limited to): high capacity services (DS1 or DS3), primary rate ISDN, 4-Wire xDSL services, digital services, and private lines or foreign served services (a line physically in one exchange, served by another through a circuit). See, “Carrier-to-Carrier Guidelines Performance Standards and Reports,” “Glossary,” “Special Services” (Submission, Exhibit 3), p. 121.

troubles per 100 lines/circuits/trunks in service. This metric is not a Performance Assurance Plan metric.

The New York PSC agreed that for UNE Specials, Metric MR-2-01 was “broken.” It adopted the recommendation of the New York PSC Staff, Verizon NY, and the vast majority of CLECs, that the most efficacious way to deal with this problem was to change the standard for UNE Specials from “Parity with Verizon Retail” to “No Standard.” The New York PSC Staff wrote in its recommended decision:

With the exception of Covad, the group agreed that there was no reasonably quick and straightforward way to fix the measurement definition and standard for the MR-2-01-3200 sub-metric for UNE Specials. The Group determined that the most efficacious course of action to deal with this “broken” sub-metric was to change the performance standard from “Parity with Verizon” to “No Standard” with the understanding that the CLECs would continue to receive monthly data on their individual NTRRs [Network Trouble Report Rate] for each of their respective sub-metrics under MR-2-01-3200. The aggregate monthly report will also contain the aggregate NTRR for each of the MR-2-01-3200 sub-metrics.¹⁰

The New York PSC Staff noted the following points from the New York Carrier Working Group’s discussion of this issue.

First, the metric was “broken;” it did not properly compare Verizon’s performance for CLECs with Verizon’s performance for Verizon retail customers, which was necessary if a performance standard of “Parity with Verizon Retail” was to apply.

The New York Carrier Working Group’s analysis revealed that since March 2005, Verizon NY had consistently failed to satisfy the Metric MR-2-01 Parity with Verizon Retail standard for UNE Specials.¹¹ The New York Carrier Working Group found that Verizon did not

¹⁰ *December 21, 2010 NY PSC Order*, p. 7.

¹¹ *December 21, 2010 NY PSC Order*, pp. 5-6 and Attachment 1, p. 3. Similarly, a review of Verizon PA’s CLEC Aggregate performance in Pennsylvania for the period January 2005 through December

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meet the Parity with Verizon Retail standard for this metric even when Verizon was meeting the performance standard for UNE Specials for other maintenance metrics.¹² Verizon presented evidence that demonstrated that this failure to meet the Parity with Verizon Retail standard was because the metric was performing an “apples-to-oranges” comparison between Verizon’s performance for CLECs and Verizon’s performance for Verizon retail customers. The data demonstrated differences between the services provided by Verizon to CLECs and the services provided by Verizon to Verizon retail customers. As a result, Verizon’s performance for CLECs was not being properly compared to Verizon’s performance for Verizon retail customers.¹³

A similar “apples-to-oranges” situation exists in Pennsylvania. As an example, for the January 2011 data month, Verizon PA found that 95% of the UNE Specials services subscribed to by CLECs were DS1 services. Only 23% of the Specials services subscribed to by Verizon PA retail customers, though, were DS1 services. 74% of the Specials services subscribed to by Verizon PA retail customers were DS0 services. The DS1 Specials services had a higher rate of troubles than the DS0 Specials services. Thus, Metric MR-2-01-3200, which measures all types of Specials services, DS0, DS1 and DS3, in a single consolidated measurement, does not fairly compare Verizon PA’s performance for CLECs with Verizon PA’s performance for Verizon PA retail customers.

Second, the New York Carrier Working Group determined that the large denominators associated with the performance captured under Metric MR-2-01 for UNE Specials could

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2010 shows that Verizon PA did not meet the Metric MR-2-01 Parity with Verizon Retail standard for UNE Specials in any month during those six years.

¹² *December 21, 2010 NY PSC Order*, pp. 5-6 and Attachment 1, p. 3.

periodically result in statistically failing scores, when there were actually minuscule differences between Verizon's performance for CLECs and Verizon's performance for Verizon retail customers. Thus, a large denominator problem undercut the usefulness of the statistical scores recorded under this metric and militated against the continued application of a parity standard for this metric.¹⁴

Third, the New York Carrier Working Group agreed that if Metric MR-2-01 continued to be reported for UNE Specials (even if there was no performance standard for UNE Specials) along with the performance measurements for UNE Specials in Metrics MR-4 and MR-5, CLECs would still be able to comprehensively monitor UNE Specials repair performance in the future.¹⁵

Finally, the majority of the New York Carrier Working Group determined that developing a benchmark standard for Metric MR-2-01 for UNE Specials would require a great deal of additional work. With the exception of Covad, the New York Carrier Working Group agreed that there was no reasonably quick and straightforward way to fix the measurement definition and standard for Metric MR-2-01 for UNE Specials.¹⁶ The New York PSC Staff concluded that a benchmark standard could not be readily developed since the analysis and

(... continued)

¹³ *December 21, 2010 NY PSC Order*, p. 6 and Attachment 1, p. 4.

¹⁴ *December 21, 2010 NY PSC Order*, p. 6 and Attachment 1, p. 4.

¹⁵ *December 21, 2010 NY PSC Order*, p. 7 and Attachment 1, p. 4.

¹⁶ *December 21, 2010 NY PSC Order*, p. 7 and Attachment 1, p. 4.

discussion indicated that the UNE Specials products provided by Verizon differ from CLEC to CLEC.¹⁷

The New York PSC Staff and the New York PSC rejected proposals by the lone dissenting CLEC, Covad, to either continue the “Parity with Verizon Retail” standard or adopt a benchmark standard.¹⁸

Summary.

In summary, there were substantial reasons for the revisions to the Guidelines adopted in New York. The same reasons for revising the Guidelines apply in Pennsylvania. Accordingly, the December 21, 2010 revisions to the NY Guidelines should be adopted for the PA Guidelines.

¹⁷ *December 21, 2010 NY PSC Order*, p. 9.

¹⁸ *December 21, 2010 NY PSC Order*, pp. 8-9.

II. Implementation Schedule.

If the revisions to the PA Guidelines set out in Exhibits 2 and 3 of the Submission are approved by June 30, 2011, Verizon PA recommends that these revisions be implemented for the July 2011 data month.¹⁹ Implementing the revisions for the July 2011 data month will allow prompt implementation of the revisions.

If the revisions to the PA Guidelines set out in Exhibits 2 and 3 of the Submission are not approved by June 30, 2011, implementation of these revisions will be delayed until after the July 2011 data month. If these revisions are approved after June 30, 2011, Verizon PA will notify the Commission as to when the revisions will be implemented.²⁰

¹⁹ PA Guidelines reports for the July 2011 data month will be published at the end of August 2011.

²⁰ At present, Verizon PA anticipates that if approval of the revised PA Guidelines is delayed until after June 30, 2011, the earliest the revised PA Guidelines could be implemented would be the November 2011 data month, for which performance reports would be issued at the end of December 2011.

III. Conclusion

The Commission should adopt the revised PA Guidelines that were submitted by Verizon PA on February 22, 2011 and accept for the revised PA Guidelines the implementation schedule proposed by Verizon PA.

Respectfully submitted,


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