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July 21, 2015

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: PMO III – Periodic C2C Guideline Updates (Folder 19)
Docket No. M-2015-2464294

RE: PMO – Performance Metrics and Remedies (Folder 19)
Docket No. M-00011468

**Verizon Pennsylvania LLC's Submission of Revised PA Guidelines
to Conform the PA Guidelines to the May 2015 NY Guidelines**

Dear Secretary Chiavetta:

Enclosed please find Verizon Pennsylvania LLC's Comments in Support of the July 7, 2015 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 blue ink that reads "Suzan D. Paiva".

SDP/slb
Enc.

Via Federal Express
cc: Louise Fink Smith
Cheryl Walker Davis

Via Electronic Mail
cc: Pennsylvania Carrier Working Group

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PMO III – PERIODIC C2C GUIDELINE UPDATES (F0019)	:	
	:	M-2015-2464294
	:	
PERFORMANCE METRICS AND REMEDIES (F0019)	:	
	:	M-00011468

**VERIZON PENNSYLVANIA LLC’S COMMENTS
ON THE REVISED PENNSYLVANIA GUIDELINES
SUBMITTED ON JULY 7, 2015**

On July 7, 2015 Verizon Pennsylvania LLC (“Verizon PA”) submitted revised “Carrier-to-Carrier Guidelines Performance Standards and Reports” for Verizon PA (“PA Guidelines”).¹ The revised PA Guidelines conform to the June 2015 “Carrier-to-Carrier Guidelines Performance Standards and Reports” for Verizon New York Inc. (“NY Guidelines”). Verizon PA recommended an implementation schedule for the revised PA Guidelines. Verizon PA respectfully requests that the Commission adopt the revised PA Guidelines and accept for the revised PA Guidelines the implementation schedule proposed by Verizon PA.

I. The Commission Should Adopt the Revised PA Guidelines.

On May 14, 2015, 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 June 12, 2015. The revisions to the Guidelines set out in the New York PSC’s May 14, 2015 order are consensus changes to the Guidelines recommended by the New York Carrier Working Group

¹ This submission was provided as directed by the Commission in *Performance Measures Remedies, Final Opinion and Order On Performance Measures and Remedies for Wholesale Performance for Verizon Pennsylvania Inc. (PMO II)*, M-00011468, pp. 87 and 97-98 (12/10/02).

² *Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies*, Case 97-C-0139, Order Issued and Effective May 14, 2015; Errata Issued June 8, 2015. This order and the June 8, 2015 Errata to it are available on the New York PSC’s website at: <http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=97-c-0139&submit=Search+by+Case+Number> (“*May 14, 2015 NY PSC Order*”).

(“NY CWG”).³ They consist of 13 administrative changes and 108 process changes (metric deletions).⁴ Most of the changes are the deletion of metrics that the NY CWG concluded are no longer needed because of little to no activity. None of the deleted metrics is included in the Performance Assurance Plan.⁵ The revisions to the Guidelines are fully described in the NY PSC’s May 14, 2015 order.

The Commission should adopt the revisions to the PA Guidelines submitted by Verizon PA on July 7, 2015. There are compelling reasons for doing so.

First, the revisions improve the PA Guidelines. The 13 administrative changes update the Guidelines to provide more current and useful information to users regarding relevant URLs, contact information and other references, as described in more detail on page 3 of the New York order. The 108 process changes improve efficiency by deleting metrics with little to no activity, based on an analysis of volumes by the NY CWG. 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. The PA Guidelines will operate more efficiently without these low volume metrics.

Second, these changes will be discussed at the August 4, 2015 meeting of the Pennsylvania Carrier Working Group, and the input or consensus of that group regarding the revisions to the NY Guidelines should be considered.

³ *May 14, 2015 NY PSC Order*, p. 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.

⁴ *May 14, 2015 NY PSC Order*, pp. 2-7 and Attachment 1.

⁵ The Performance Assurance Plan (“PAP”) is the Commission-approved financial incentives plan applicable to services Verizon PA provides to CLECs. The PAP uses some, but not all, of the metrics included in the PA Guidelines.

Third, conforming the PA Guidelines to the June 2015 NY Guidelines will allow the PA Guidelines to continue to conform to the Guidelines that are in effect in New York, as well as to the Guidelines that are in effect in the other jurisdictions served by the Verizon telephone companies in the Mid-Atlantic and Northeastern portions of the United States.⁶ The NY Guidelines provide a good model for Guidelines for Pennsylvania and other jurisdictions because the NY Guidelines are the product of over eight years of discussion and litigation in New York. They have received the most extensive review and consideration of any of the carrier-to-carrier service quality measures and standards adopted in the jurisdictions served by the Verizon telephone companies. Having common metrics in the Verizon jurisdictions based on the NY Guidelines has substantial practical advantages for CLECs and Verizon. For instance, uniformity of the metrics reduces the cost and administrative burden for Verizon to implement them, and for CLECs to review measured performance data.

II. Implementation Schedule.

Verizon PA recommends that the revisions to the PA Guidelines set out in its July 7, 2015 Submission be implemented for the November 2015 data month,⁷ which will allow prompt implementation of these revisions consistent with the expected timing in the other Mid-Atlantic states.

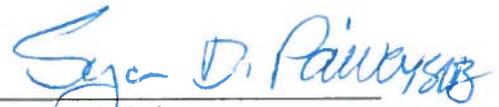
⁶ See, *Performance Measures Remedies, Final Opinion and Order On Performance Measures and Remedies For Wholesale Performance for Verizon Pennsylvania Inc. (PMO II)*, M-00011468, at 19 and 92-93 (12/10/02); *Performance Metrics and Remedies, Order*, M-00011468 (4/17/03); *Performance Metrics and Remedies—2004 Updates, Order*, M-00011468 F0003 (7/27/04); *Performance Metrics and Remedies—First Quarter 2005 Updates, Order*, M-00011468 F0005 (12/21/04); *Performance Metrics and Remedies—2005 Hot Cut Updates, Order*, M-00011468 F0006 (6/2/05); *Performance Metrics and Remedies—Footprint Changes Stemming from NY PCS April 15, 2005 Changes, Elimination of Allegedly Superseded PA-Specific Billing Metrics, Order*, M-00011468 F0008 (9/12/05); *Performance Metrics and Remedies—Footprint Changes Stemming from NY PCS December, 2005 Changes, Order*, M-00011468 F0009 (3/3/06); *Performance Metrics and Remedies—July 2006 Changes, Order*, M-00011468 F0010 (9/18/06).

If the revisions to the Guidelines are not approved for the PA Guidelines by September 30, 2015, implementation of these revisions will be delayed until after the November 2015 data month. If these revisions are approved after September 30, 2015, Verizon PA will notify the Commission as to when the revisions will be implemented.

III. Conclusion.

Verizon PA respectfully requests that the Commission adopt the revised PA Guidelines that were submitted by Verizon PA on July 7, 2015 and accept for the revised PA Guidelines the implementation schedule proposed by Verizon PA.

Respectfully submitted,



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Dated: July 21, 2015

(... continued)

⁷ PA Guidelines reports for the November 2015 data month will be published in December 2015.