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**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> 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:

On May 14, 2015, the New York Public Service Commission adopted an order approving revisions to the New York Carrier-to-Carrier Guidelines.<sup>1</sup> Revised Guidelines conforming to that order were filed with the New York PSC on June 12, 2015. On July 7, 2015 Verizon Pennsylvania LLC (“Verizon PA”) submitted revised Carrier-to-Carrier Guidelines for Pennsylvania to conform to the June 2015 New York Guidelines. These revisions consist of 13 administrative changes and 108 process changes (metric deletions), most of which are the deletion of metrics that the New York Carrier Working Group agreed by consensus are no longer needed because of little to no activity.

Pursuant to the schedule set by the Commission’s July 14, 2015 Secretarial Letter, on July 21, 2015 Verizon PA filed comments in support of adopting these revisions for Pennsylvania, and no other party filed comments or reply comments.

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<sup>1</sup> *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>.

The matter was discussed at the previously scheduled August 4, 2015 meeting of the Pennsylvania Carrier Working Group ("PA CWG"). Verizon explained to the group that an examination of Pennsylvania-specific data shows that the same metrics have little to no activity in Pennsylvania, so that the Pennsylvania-specific data also supports deleting these metrics in the Pennsylvania Guidelines.

As explained to the PA CWG, Verizon looked at a year of historic Pennsylvania-specific metric data (July 2014-June 2015), an analysis that was very similar to one conducted in both New York and Pennsylvania in 2009 for a prior Guidelines change. A threshold of metrics with observations in the 20's per month was considered a low volume for a metric. The metric's denominator was generally used to make this determination except for a small subset where it made more sense to use the numerator (MR-2, MR-3, NP-1, PR-6 & PR-8). Verizon only looked at the 108 metrics that were eliminated in New York. Over the 12 months reviewed, the quantity of no-volume metrics was higher in Pennsylvania than it had been in New York, establishing that the same metrics are also experiencing low or no volumes in Pennsylvania.

At the August 4, 2015 PA CWG meeting Commission staff requested that Verizon file in the docket the data summarized in its presentation. In addition to the explanation provided in this letter, attached is a table demonstrating the low or no volumes for the relevant metrics in Pennsylvania.

Pursuant to the agreement reached at the August 4, 2015 PA CWG meeting, any party wishing to respond to this letter shall do so within five calendar days (or by August 12, 2015) or at a minimum inform the PA CWG in writing by that date of its intent to file a more substantive response at a later date. If no substantive responses are filed, then it will be presumed that the PA CWG has reached consensus that the proposed changes to the Pennsylvania Guidelines should be approved. Any such later-filed, more substantive response must be filed within 15 days of the filing and service of this letter, which would be consistent with reply comment periods in prior Guideline-related proceedings.

Very truly yours,

  
Suzan D. Paiva

Enc.

**Via Federal Express**

cc: Louise Fink Smith  
Cheryl Walker Davis

**Via Electronic Mail**

cc: Rich Layton  
Bryan Mahla  
Pennsylvania Carrier Working Group

MR Metrics that had little to no activity(in the 12 months reviewed)

Minimum OBS/Month July '14 - June '15	Maximum OBS/Month July '14 - June '15	Metric Num	METRIC_DESC	PRODUCT_DESC
1	1	MR-1-04-6050	Average Response Time - Request Cancellation of Trouble	LSI-TA
0	3	MR-2-01-2200	Network Trouble Report Rate	Resale Specials
0	2	MR-2-02-2341	Network Trouble Report Rate - Loop	Resale 2-Wire Digital Services
0	1	MR-2-03-2341	Network Trouble Report Rate - Central Office	Resale 2-Wire Digital Services
0	7	MR-2-05-2200	% CPE/TOK/FOK Trouble Report Rate	Resale Specials
0	2	MR-2-05-2341	% CPE/TOK/FOK Trouble Report Rate	Resale 2-Wire Digital Services
0	2	MR-2-05-3341	% CPE/TOK/FOK Trouble Report Rate	UNE 2-Wire Digital Loops
1	2	MR-3-01-2341	% Missed Repair Appointment - Loop	Resale 2-Wire Digital Services
1	1	MR-3-02-2341	% Missed Repair Appointment - Central Office	Resale 2-Wire Digital Services
0	7	MR-3-03-2100	% CPE/TOK/FOK - Missed Appointment	Resale POTS
0	1	MR-3-03-3341	% CPE/TOK/FOK - Missed Appointment	UNE 2-Wire Digital Loops
1	2	MR-4-01-2216	Mean Time To Repair - Total	Resale Specials (Non DS0 & DS0)
1	2	MR-4-01-2217	Mean Time To Repair - Total	Resale Specials (DS1 & DS3)
1	2	MR-4-01-2341	Mean Time To Repair - Total	Resale 2-Wire Digital Services (ISDN)
1	2	MR-4-01-3216	Mean Time To Repair - Total	UNE Specials (Non DS0 & DS0)
1	6	MR-4-01-3341	Mean Time To Repair - Total	UNE 2-Wire Digital Loops
1	2	MR-4-02-2341	Mean Time To Repair - Loop Trouble	Resale 2-Wire Digital Services
1	1	MR-4-03-2341	Mean Time To Repair - Central Office Trouble	Resale 2-Wire Digital Services
1	2	MR-4-04-2216	% Cleared (all troubles) within 24 Hours	Resale Specials (Non DS0 & DS0)
1	2	MR-4-04-2217	% Cleared (all troubles) within 24 Hours	Resale Specials (DS1 & DS3)
1	2	MR-4-04-2341	% Cleared (all troubles) within 24 Hours	Resale 2-Wire Digital Services
1	2	MR-4-04-3216	% Cleared (all troubles) within 24 Hours	UNE Specials (Non DS0 & DS0)
1	2	MR-4-06-2216	% Out of Service > 4 Hours	Resale Specials (Non DS0 & DS0)
1	1	MR-4-06-2217	% Out of Service > 4 Hours	Resale Specials (DS1 & DS3)
1	1	MR-4-06-3216	% Out of Service > 4 Hours	UNE Specials (Non DS0 & DS0)
1	2	MR-4-07-2341	% Out of Service > 12 Hours	Resale 2-Wire Digital Services
1	2	MR-4-08-2216	% Out of Service > 24 Hours	Resale Specials (Non DS0 & DS0)
1	1	MR-4-08-2217	% Out of Service > 24 Hours	Resale Specials (DS1 & DS3)
1	2	MR-4-08-2341	% Out of Service > 24 Hours	Resale 2-Wire Digital Services
1	1	MR-4-08-3216	% Out of Service > 24 Hours	UNE Specials (Non DS0 & DS0)
1	3	MR-5-01-2200	% Repeat Reports within 30 Days	Resale Specials
1	2	MR-5-01-2341	% Repeat Reports within 30 Days	Resale 2-Wire Digital Services

PR Metrics that had little to no activity (in the 12 months reviewed)

Minimum OBS/Month July '14 - June '15	Maximum OBS/Month July '14 - June '15	Metric Num	METRIC_DESC	PRODUCT_DESC
2	3	PR-1-01-2341	Average Interval Offered - Total No Dispatch	Resale 2-Wire Digital Services
1	1	PR-1-02-3341	Average Interval Offered - Total Dispatch	UNE 2-Wire Digital Services
3	28	PR-1-03-2120	Average Interval Offered - Dispatch one (1) to five (5) Lines	Resale POTS Residence
2	15	PR-1-04-2100	Average Interval Offered - Dispatch six (6) to nine (9) Lines	Resale POTS
1	7	PR-1-04-3112	Average Interval Offered - Dispatch six (6) to nine (9) Lines	UNE POTS Loop
1	4	PR-1-05-2100	Average Interval Offered - Dispatch (>= 10 Lines)	Resale POTS
1	3	PR-1-05-3112	Average Interval Offered - Dispatch (>= 10 Lines)	UNE POTS Loop
1	2	PR-1-09-2210	Average Interval Offered - Specials DS0	Resale Specials DS0
1	13	PR-1-09-3210	Average Interval Offered - Specials DS0	UNE Specials DS0
1	5	PR-1-09-3511	Average Interval Offered - Total	UNE EEL Backbone
3	7	PR-1-09-3530	Average Interval Offered - Total	UNE IOF
1	1	PR-1-13-3529	Average Interval Offered - Hot Cuts - No Dispatch	UNE: POTS Loop - Basic Hot Cut (21 Lines and greater)
3	22	PR-3-06-2100	% Completed in three (3) Days one (1) to five (5) Lines - Dispatch	Resale POTS
3	22	PR-3-09-2100	% Completed in five (5) Days one (1) to five (5) Lines - Dispatch	Resale POTS
1	1	PR-3-11-3528	% Completed in 10 Business Days	UNE: POTS Loop - Basic Hot Cut (11 to 20 Lines)
1	6	PR-4-01-2210	% Missed Appointment - Verizon - Total	Resale Specials DS0
1	1	PR-4-01-2211	% Missed Appointment - Verizon - Total	Resale Specials DS1
2	13	PR-4-01-3210	% Missed Appointment - Verizon - Total	UNE Specials DS0
1	1	PR-4-02-2200	Average Delay Days - Total	Resale Specials
1	5	PR-4-02-3200	Average Delay Days - Total	UNE Specials
1	10	PR-4-03-2200	% Missed Appointment - Customer	Resale Specials
1	7	PR-4-03-2341	% Missed Appointment - Customer	Resale 2-Wire Digital Services
1	1	PR-4-03-3341	% Missed Appointment - Customer	UNE 2-Wire Digital Services
5	16	PR-4-03-3530	% Missed Appointment - Customer	UNE IOF
1	1	PR-4-04-3341	% Missed Appointment - Verizon - Dispatch	UNE 2-Wire Digital Services
1	7	PR-4-05-2341	% Missed Appointment - Verizon - No Dispatch	Resale 2-Wire Digital Services
1	2	PR-5-01-2200	% Missed Appointment - Verizon - Facilities	Resale Specials
1	1	PR-5-01-3341	% Missed Appointment - Verizon - Facilities	UNE 2-Wire Digital Services
1	2	PR-5-02-2200	% Orders Held for Facilities > 15 Days	Resale Specials
1	1	PR-5-02-3341	% Orders Held for Facilities > 15 Days	UNE 2-Wire Digital Services
2	18	PR-6-03-2100	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Resale POTS
5	6	PR-8-01-3112	Percent Open Orders in a Hold Status > 30 Days	UNE POTS - Loop

Other Metrics with little to no activity( in the 12 months reviewed)

Minimum OBS/Month July '14 - June '15	Maximum OBS/Month July '14 - June '15	Metric Num	METRIC_DESC	PRODUCT_DESC
0	3	NP-1-01-5000	% Final Trunk Groups Exceeding Blocking Standard	CLEC Trunks
0	5	NP-1-02-5000	% Final Trunk Groups Exceeding Blocking Standard (No Exceptions)	CLEC Trunks
1	1	NP-2-01-6701	% On Time Response to Request for Physical Collocation	Collocation - New Applications
1	1	NP-2-05-6701	% On Time - Physical Collocation	Collocation - New Applications
1	4	OR-1-04-2214	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale Specials (Non DS0, Non DS1 & Non DS3)
3	9	OR-1-04-2341	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale 2-Wire Digital Services
1	8	OR-1-04-3210	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	UNE Specials DS0
1	1	OR-1-04-3341	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	UNE 2-Wire Digital Services
1	2	OR-1-06-2341	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	Resale 2-Wire Digital Services
1	5	OR-2-04-2200	% On Time LSR/ASR Reject - No Facility Check (Electronic - No Flow-through)	Resale Specials
3	3	OR-2-06-2200	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	Resale Specials

Metrics that had no activity(in the 12 months reviewed)

Last Month  
With Activity

	Metric Num	METRIC_DESC	PRODUCT_DESC
**	MR-1-09-6095	% On-Time - Status Trouble	TAXI
Feb-14	MR-3-03-2341	% CPE/TOK/FOK - Missed Appointment	Resale 2-Wire Digital Services
Jan-14	OR-1-06-2214	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	Resale Specials (Non DS0, Non DS1 & Non DS3)
Oct-08	OR-1-06-3341	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE 2-Wire Digital Services
Apr-05	OR-1-19-5030	% On Time Response - Request for Inbound Augment Trunks	Verizon Inbound Augment Trunks (> 192 Trunks)
Nov-06	OR-13-01-3523	% of Large Job Hot Cut Project Negotiations Completed	UNE Loop - Large Job Hot Cut
Feb-12	OR-2-06-2341	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	Resale 2-Wire Digital Services
Apr-06	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
Jan-14	PO-2-03-6080	OSS Interface Availability - Non-Prime Time	Maintenance Web GUI (RETAS) / Pre-ordering/Ordering Web GUI combined
May-14	PR-1-01-3341	Average Interval Offered - Total No Dispatch	UNE 2-Wire Digital Services
Feb-12	PR-1-02-2341	Average Interval Offered - Total Dispatch	Resale 2-Wire Digital Services
Aug-13	PR-1-09-3512	Average Interval Offered - Total	UNE EEL Loop
Oct-12	PR-3-10-3341	% Completed in six (6) Days one (1) to five (5) Lines - Total	UNE 2-Wire Digital Loops
Aug-11	PR-3-12-3531	% Completed in 15 Business Days	UNE POTS - Loop - Large Job Hot Cut (1-5 Lines)
Aug-11	PR-3-12-3532	% Completed in 15 Business Days	UNE POTS Loop Large Job Hot Cut (6 or more Lines)
Aug-11	PR-3-13-3531	% Completed in 26 Business Days	UNE POTS Loop Large Job Hot Cut (1-5 Lines)
Aug-11	PR-3-13-3532	% Completed in 26 Business Days	UNE POTS Loop Large Job Hot Cut (6 or more Lines)
***	PR-4-01-2213	% Missed Appointment - Verizon - Total	Resale Specials DS3
May-14	PR-4-01-3213	% Missed Appointment - Verizon - Total	UNE Specials DS3
Apr-12	PR-4-02-2341	Average Delay Days - Total	Resale 2-Wire Digital Services
May-13	PR-4-04-2341	% Missed Appointment - Verizon - Dispatch	Resale 2-Wire Digital Services
May-13	PR-5-01-2341	% Missed Appointment - Verizon - Facilities	Resale 2-Wire Digital Services
May-13	PR-5-02-2341	% Orders Held for Facilities > 15 Days	Resale 2-Wire Digital Services
Mar-13	PR-6-01-2200	% Installation Troubles reported within 30 Days	Resale Specials
Sep-08	PR-6-01-2341	% Installation Troubles reported within 30 Days	Resale 2-Wire Digital Services
Apr-13	PR-6-03-2200	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Resale Specials
Dec-09	PR-6-03-2341	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Resale 2-Wire Digital Services
Aug-12	PR-6-03-3341	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	UNE 2-Wire Digital Services
Dec-05	PR-6-03-5000	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Interconnection Trunks (CLEC)
May-14	PR-8-01-2100	Percent Open Orders in a Hold Status > 30 Days	Resale POTS
***	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

\* Activity reviewed starting with Feb 05

\*\* MR-1-09-6095, established in 2005, has never shown activity(status functionality was not created for this app)

\*\*\* Metric did not reflect any Observations, based on this study, including Feb 2005