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June 14, 2016

**VIA ELECTRONIC FILING**

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

**RE: PMO III – Performance Metrics and Remedies (Folder 19)**  
**Docket No. \_\_\_\_\_<sup>1</sup>**

Dear Secretary Chiavetta:

Enclosed please find the Petition of Verizon Pennsylvania LLC for a Waiver of Certain Service Quality Results Measured under the Performance Assurance Plan (“PAP”) for April 2016.

Please note that under Appendix C of the PAP as approved by the Commission, competitive local exchange carriers (“CLECs”) have ten days to respond to this petition. Also, under Appendix F of the PAP, the Commission is to rule on Verizon’s Petition within 15 business days after CLEC comments are submitted.

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

Very truly yours,

SDP/slb  
Enc.

**Via Federal Express**

cc: Louise Fink Smith  
Cheryl Walker Davis

**Via Electronic Mail**

cc: Pennsylvania Carrier Working Group

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<sup>1</sup> Docket No. M-00011468 is the parent case for this filing.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PERFORMANCE MEASURES**                   :  
**REMEDIES (F0018)**                        :

**PETITION OF VERIZON PENNSYLVANIA LLC FOR A WAIVER OF  
CERTAIN SERVICE QUALITY RESULTS MEASURED UNDER  
THE PERFORMANCE ASSURANCE PLAN FOR APRIL 2016**

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Dated: June 14, 2016

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three of the PAP wholesale measures with benchmark standards for the month of April 2016 due to the effects of an event beyond Verizon PA's control — an employee work stoppage.<sup>2</sup>

On April 13, 2016, the unionized workers of Verizon PA and its affiliated operating companies )collectively, “Verizon”) engaged in a work stoppage that lasted until June 1, 2016.<sup>3</sup> This extraordinary event, which was beyond Verizon PA's control, prevented it from satisfying three of the PAP wholesale measures with benchmark standards during April 2016.<sup>4</sup> In normal months, Verizon PA has routinely provided excellent service to CLECs and met or exceeded the standard for these measures.

Verizon PA estimates that if the instant waiver requests are granted, the amount of monthly bill credits due to CLECs will be reduced from \$55,910 to \$853. Attached hereto as Exhibit 1 is a copy of the “Performance Assurance Plan – April 2016 Monthly Report” that Verizon PA filed with the Commission on May 29, 2016. Exhibit 2 contains a summary chart that shows Verizon PA's performance from April 2015 through April 2016 for the benchmark measures for which Verizon PA seeks a waiver.

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<sup>2</sup> The Commission previously granted a waiver from service quality results measured under the PAP for a work stoppage and hurricane in August 2011. *See* PMO III – *Petition of Verizon Pennsylvania Inc. for Waiver of Certain Service Quality Results Measured Under the Pennsylvania Performance Assurance Plan for August 2011*, etc. P-2011-2269052; M-00011468 (F0018), Order (Jan. 30, 2012). The New York Public Service Commission has held under the current PAP and an earlier version of the PAP that a work stoppage by Verizon New York Inc.'s (“Verizon NY”) Associates qualifies as a “situation[] beyond Verizon's control” that entitles Verizon NY to relief from bill credits for the affected benchmark metrics. *See* Case 99-C-0949 - *Petition of Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan*, filed in C 97-C-0271, *Order Granting Waiver Request for August 2011 Service Quality* (Issued and Effective May 3, 2012); *Order Granting in Part and Denying in Part Requests for Waivers of Service Quality Targets* (Issued and Effective June 7, 2001).

<sup>3</sup> This work stoppage affected Verizon's operations in Connecticut, Delaware, the District of Columbia, Maryland, Massachusetts, New Jersey, New York, Pennsylvania, Rhode Island and Virginia.

<sup>4</sup> Because the strike lasted until June 1, 2016, Verizon expects that the service performance for some PAP measures will also be influenced in May 2016 and beyond.

For the reasons set forth below, the Commission should grant the waiver request and allow Verizon PA to exclude effects of the work stoppage from the monthly service results that will comprise the performance levels against which it will be measured under the PAP for April 2016.

## **II. FACTUAL BACKGROUND**

Beginning at 6:00 the morning of April 13, 2016, the Communications Workers of America (“CWA”), the union that represents certain employees of Verizon,<sup>5</sup> began a work stoppage despite the company’s efforts to reach final agreement on new contracts to replace contracts that expired on August 1, 2015.

Verizon and the Unions had held meetings to discuss key issues up for negotiation many months before the scheduled expiration of the contracts. Formal negotiations began the week of June 22, 2015. The issues involved in these negotiations were complex. Among other things, the parties were seeking to resolve issues related to wages, job security, retirement, and healthcare benefits.

The resolution of each of these issues was extremely important not only for the future operations of the corporation, but also to control the costs that eventually have to be passed onto end-user and wholesale customers. Initially, when the contracts expired, the Union employees worked without a contract. Verizon made numerous comprehensive proposals and took part in over 300 meetings with Union officials. On April 11, 2016, the Unions announced their plan to strike in two days. On April 11-12, 2016, the Federal Mediation & Conciliation Service offered

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<sup>5</sup> In some jurisdictions, some Verizon employees are represented by the International Brotherhood of Electrical Workers. These employees also engaged in a work stoppage. The CWA and IBEW are referred to herein as the “Unions.”

to step in and mediate negotiations. Verizon agreed. However, the Union leaders rejected the offer. The work stoppage officially commenced at 6:00 a.m. on April 13, 2016. On May 15, 2016, the United States Secretary of Labor announced that he had contracted the parties and on May 17, 2016 he announced that discussions would be conducted under the auspices of the Department of Labor. On May 27, 2016, the parties reached an agreement in principle on new contracts, and tentative agreements were signed overnight on May 29, 2016 into May 30, 2016. Striking workers returned to work on June 1, 2016.

Immediately after the work stoppage commenced, Verizon executed the emergency work stoppage plan. Planning for the work stoppage had begun well over a year before the contracts expired. Managers across the nation (except those designated as essential to corporate operations) were given Emergency Work Assignments (“EWAs”) and required training by the Company’s Business Continuity Planning (“BCP”) team. The BCP team determined the required EWA force by calculating expected work volumes based on historical trends.

During the work stoppage, managers from various Verizon business units, among them Verizon Enterprise (including former MCI business units), Corporate Finance, Human Resources, Information Technology, and Legal, were given assignments in the effected Verizon service area. As a result, previously trained managers from states as far away as California, Illinois, and Texas were given EWAs. Managers were assigned to both retail and wholesale functions. Of necessity, the work force on duty during the work stoppage was dedicated to assuring that existing customers continued to receive the best service possible, which meant that maintenance and repair tasks took precedence over any installation work.

Management employees began to report to their emergency work assignments on Wednesday, April 13, 2016 and were assigned to 12-hour shifts, seven days a week. Verizon

assigned every available manager to an essential work assignment including assignments at the National Market Center (“NMC”), Regional CLEC Maintenance Center (“RCMC”) and Regional CLEC Coordination Center (“RCCC”), which support Verizon’s wholesale operations. As the strike progressed, Verizon increased resources, significantly scaling up its contingency workforce, with the addition of contractors, expanding outsourced call center resources, additional EWAs, and the hiring of new temporary workers. Thousands of these resources were sourced into the organization, trained and deployed. Over the course of the work stoppage, Verizon PA was able to mobilize a force of approximately 1,858 managers to perform work usually handled by approximately 4,328 striking workers in Pennsylvania. This does not include people working remotely for Pennsylvania customers in states like Florida, North Carolina, Oklahoma, and Texas, nor does it take into account the 463 contractors working in Pennsylvania.

The management employees on duty during the work stoppage were required to perform their duties under difficult conditions, including delays caused by disruptive actions by striking workers. During the course of the work stoppage, there were 44 reported incidents of sabotage that caused a loss of service in Pennsylvania, contributing to the already heavy maintenance workload that the management employees had to address during the work stoppage.<sup>6</sup>

On May 27, 2016, it was announced that an agreement in principle had been reached. Those tentative agreements were signed overnight on May 29, 2016 into May 30, 2016, and striking workers returned to work on June 1, 2016.

### **III. THE TERMS OF THE PAP REQUIRE WAIVERS FOR PERFORMANCE ON**

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<sup>6</sup> Verizon took a number of steps to try to reduce the incidents of harassment and sabotage during the work stoppage. It employed additional security personnel, provided escorts for managers assigned to outside plant projects, worked with the local police departments, and offered rewards of up to \$10,000 to individuals who reported acts of sabotage.

### **THREE MEASURES WITH BENCHMARK STANDARDS DURING APRIL 2016.**

Despite its best efforts, Verizon PA was unable due to the work stoppage to satisfy the service quality standards for three of the 80 measures in the PAP with benchmark standards for April 2016. The PAP provides that:

Recognizing that C2C service quality data may be influenced by factors beyond Verizon's control, Verizon may file Exception or Waiver petitions with the Commission seeking to have the monthly service quality results modified on three generic grounds.

. . . .

The third ground . . . relates to situations beyond Verizon's control that negatively affect its ability to satisfy only those measures with Benchmark standards. The performance requirements dictated by Benchmark standards establish the quality of service under normal operating conditions, and do not necessarily establish the level of performance to be achieved during periods of emergency, catastrophe, natural disaster, severe storms, or other events beyond Verizon's control.

(PAP, Appendix C, at 38 and 39.)

A work stoppage is a "situation[ ] beyond Verizon's control that negatively affect its ability to satisfy only those measures with Benchmark standards." Despite the parties' best efforts, Verizon PA could not resolve the outstanding issues after ten months of negotiations, and its unionized workers chose to strike. Once the work stoppage commenced, Verizon PA worked diligently in an attempt to end the dispute and, at the same time, deployed managers in an attempt to continue to provide the best possible service to as many customers as possible under the circumstances. Notwithstanding these efforts, the disruption to Verizon PA's operations and its effect on three of the benchmark metrics was beyond Verizon PA's control. Accordingly, the PAP requires a waiver of the benchmark service standards for the metrics that Verizon PA could not satisfy as a result of the work stoppage.

Verizon PA requests a waiver of the service quality results for the following Ordering metrics for Critical Measures:

OR-1-04-2320	% On Time LSRC/ASRC - No Facility Check (Electronic No Flow-through) - Resale POTS/Pre-qualified Complex
OR-2-04-1200	% On Time LSR/ASR Rej – No Facility Check (Electronic No Flow-through) – UNE/RES Specials
OR-2-06-1200	% On Time LSR/ASR Rej – Facility Check (Electronic No Flow-through) – UNE/RES Specials

These metrics measure the timeliness of Verizon PA’s provision of order confirmations (Local Service Request confirmations and Access Service Request confirmations) to CLECs. The work activities covered by each of these metrics are handled manually by Verizon PA representatives. As noted, Verizon PA allocated managers to all functions including the wholesale functions in order to provide the best service possible during the work stoppage. However, Verizon PA was unable to satisfy the benchmark standards for these measures because it simply did not have enough personnel to provide the resources necessary to fully staff its centers to handle the volume of orders that were being received in the manner that it handles them under normal conditions. Furthermore, each of the UNE and Resale orders must be manually typed into the Verizon Service Order Processor system. This is a complex task that requires a highly experienced worker, with the proper working knowledge of the USOCs and FIDs that must be placed on the order to provide the requested services. Although the managers who performed these manual tasks were provided training, there was a steep learning curve, and the speed at which they could process orders was substantially slower than that normally

achieved by an experienced representative.

In the past, Verizon PA has provided the CLECs with excellent service on these Ordering Measures. As can be seen from the chart included in Exhibit 3, service for these metrics exceeded the 95% standard for each of the 12 months prior to the work stoppage for all but one of these measures. For OR-2-06-1200, Verizon PA exceeded the 95% standards for all but two of the 12 months prior to the work stoppage, and in those months, the metric was not scored as a miss because of the small sample size.<sup>7</sup> If Verizon PA's April 2016 performance had not been impacted by the work stoppage, this record of past performance indicates that Verizon PA would have satisfied the standard for each of these metrics. Thus, Verizon PA's performance on these metrics should be waived for April 2016.

In summary, while Verizon PA assigned a large body of management employees to the jobs normally handled by the striking workers, this management work force represented only a modest fraction of its usual work force and it was simply impossible for Verizon PA to keep up with the daily workload and each passing day resulted in a substantial increase to the backlog. Moreover, while Verizon managers had been trained to perform their work stoppage jobs, most of them, especially early in the work stoppage, could not perform their jobs as quickly as the workers who ordinarily would perform these jobs. Verizon PA took all reasonable, precautionary steps to mitigate the impact of the work stoppage on its service quality and to assure that its wholesale and retail customers received the best service quality possible. As a result of these actions, Verizon PA was able to meet most of the April PAP measures with benchmark standards (77 out of 80). However, the length of the work stoppage thwarted

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<sup>7</sup> See PAP, Appendix C at page 36 (Small Sample Benchmark Scoring Procedures).

precautionary steps to mitigate the impact of the work stoppage on its service quality and to assure that its wholesale and retail customers received the best service quality possible. As a result of these actions, Verizon PA was able to meet most of the April PAP measures with benchmark standards (77 out of 80). However, the length of the work stoppage thwarted Verizon PA's efforts to satisfy the service quality objectives on a small number of metrics with benchmark standards (3 out of 80). Clearly, the work stoppage was an event beyond Verizon PA's control. It was simply impossible for Verizon PA to satisfy the benchmark standards for the measures under these circumstances for the entire month of April.

**IV. CONCLUSION**

For the foregoing reasons, Verizon PA requests that the Commission grant this Petition and waive Verizon PA's service performance results for three PAP service measures with benchmark standards for April 2016.

Respectfully submitted,

  
Suzan D. Paiva

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Dated: June 14, 2016

# **EXHIBIT 1**

Section	Mode	Weighted Score	Market Adjustment
MOE	Loop	0.0000	\$0
MOE	Resale	-0.0996	\$0
MOE	Trunks	0.0000	\$0
<b>MOE</b>	<b>Total</b>		<b>\$0</b>
Critical Measure	Loop		\$0
Critical Measure	Resale		\$15,931
Critical Measure	Trunks		\$0
Critical Measure	Specials		\$39,126
Critical Measure	Other		\$0
<b>Critical Measure</b>	<b>Total</b>		<b>\$55,057</b>
Individual Rule	Total		\$853
<b>All</b>	<b>Grand Total</b>		<b>\$55,910</b>

Performance Assurance Plan - Verizon PA

Version 4.0

Blank Stat. Score = Insufficient activity or no activity to perform a statistical test

Perf. Score	Wgt.	Wgt. Score	Metric #	Metric Description	Product	VZ Perf.	CLEC Perf.	VZ Obs.	CLEC Obs.	VZ Std.Dev.	Difference or Stat. Score	Bill Credit
0	330	0.0000	<b>MOE-Loop</b>	<b>Loop Based Mode of Entry Totals</b>								
0	2	0.0000	PO-1-01-6020	Average Response Time - Customer Service Record (CSR)	EDI	0.03	3.30		8,332		3.2707	
0	2	0.0000	PO-1-01-6030	Average Response Time - Customer Service Record (CSR)	CORBA	0.03			0			
0	5	0.0000	PO-1-01-6050	Average Response Time - Customer Service Record (CSR)	WEB GUI/LSI/W	0.03	0.91		2,026		0.8753	
0	2	0.0000	PO-1-03-6020	Average Response Time - Address Validation	EDI	5.71	4.39		2,392		-1.3230	
0	2	0.0000	PO-1-03-6030	Average Response Time - Address Validation	CORBA	5.71			0			
0	5	0.0000	PO-1-03-6050	Average Response Time - Address Validation	WEB GUI/LSI/W	5.71	3.11		646		-2.5981	
0	2	0.0000	PO-1-06-6020	Average Response Time - Mechanized Loop Qualification - xDSL	EDI	9.04	5.23		941		-3.8121	
0	2	0.0000	PO-1-06-6050	Average Response Time - Mechanized Loop Qualification - xDSL	WEB GUI/LSI/W	9.04	2.77		89		-6.2665	
0	5	0.0000	PO-2-02-6010	OSS Interface Availability - Prime-Time	WPTS		99.85					
0	5	0.0000	PO-2-02-6020	OSS Interface Availability - Prime-Time	EDI		100.00					
0	5	0.0000	PO-2-02-6030	OSS Interface Availability - Prime-Time	CORBA		100.00					
0	5	0.0000	PO-2-02-6080	OSS Interface Availability - Prime-Time	Web GUI		100.00					
0	2	0.0000	PO-8-01-6000	% On Time - Manual Loop Qualification	Systems Metrics		100.00		29			
0	10	0.0000	OR-1-02-3331	% On Time LSR/L - Flow Through	UNE-L/Pre-qual Complx/LNP		99.79		12,670			
0	5	0.0000	OR-1-04-3331	% On Time LSR/L/ASRC - No Facility Check (Electronic - No Flow Through)	UNE-L/Pre-qual Complx/LNP		95.70		558			
0	5	0.0000	OR-1-06-3331	% On Time LSR/L/ASRC - Facility Check (Electronic - No Flow-through)	UNE-L/Pre-qual Complx/LNP		98.43		255			
0	5	0.0000	OR-2-02-3331	% On Time LSR Reject - Flow-through	UNE-L/Pre-qual Complx/LNP		100.00		3,551			
0	5	0.0000	OR-2-04-3331	% On Time LSR/ASR Rej - No Facil Chk (Electr. No Flow-through)	UNE-L/Pre-qual Complx/LNP		97.39		421			
0	2	0.0000	OR-2-04-3341	% On Time LSR/ASR Rej - No Facil Chk (Electr. No Flow-through)	UNE 2W Digital				0			
0	2	0.0000	OR-2-04-3342	% On Time LSR/ASR Rej - No Facil Chk (Electr. No Flow-through)	UNE 2W xDSL Loops		100.00		4			
0	2	0.0000	OR-2-06-3331	% On Time LSR/ASR Rej - Facil Chk (Electr. No Flow-through)	UNE-L/Pre-qual Complx/LNP		97.60		167			
0	2	0.0000	OR-2-06-3341	% On Time LSR/ASR Rej - Facil Chk (Electr. No Flow-through)	UNE 2W Digital				0			
0	5	0.0000	OR-4-16-1000	% Provisioning Comp. Notifiers sent - 1 Business Day	Resale/UNE (EDI)		99.33		7,588			
0	5	0.0000	OR-5-03-3112	% Flow Through Achieved	UNE-L		97.87		847			
0	5	0.0000	OR-6-03-3331	% Accuracy - LSR/L	UNE-L/Complex/LNP		0.00		1,068			
0	5	0.0000	PR-3-10-3342	% Completed in six (6) Days one (1) to five (5) Lines - Total	UNE 2W xDSL Loops		100.00		13			
0	10	0.0000	PR-4-02-3112	Average Delay Days - Total	UNE-L	9.24	5.60	240	5	29.03		
0	2	0.0000	PR-4-02-3341	Average Delay Days - Total	UNE 2W Digital			0	0			
0	5	0.0000	PR-4-02-3342	Average Delay Days - Total	UNE 2W xDSL Loops			0	0			
0	5	0.0000	PR-4-04-3113	% Missed Appointment - Verizon - Dispatch	UNE-L New	18.83	9.09	600	33		1.7498	
0	2	0.0000	PR-4-04-1341	% Missed Appointment - Verizon - Dispatch	Resale/UNE 2W Digital			0	0			
0	2	0.0000	PR-4-05-3341	% Missed Appointment - Verizon - No Dispatch	UNE 2W Digital	0.00		20	0			
0	2	0.0000	PR-4-14-3342	% Completed On Time - 2-Wire xDSL	UNE 2W xDSL Loops		100.00		26			
0	5	0.0000	PR-5-01-3112	% Missed Appointment - Verizon - Facilities	UNE-L	2.50	0.00	600	33		5.0000	
0	5	0.0000	PR-5-02-3112	% Orders Held for Facilities > 15 Days	UNE-L	0.67	0.00	600	33		5.0000	
0	10	0.0000	PR-6-01-3113	% Installation Troubles reported within 30 Days	UNE-L New	8.62	2.74	1,879	73		2.2700	
0	2	0.0000	PR-6-01-3341	% Installation Troubles reported within 30 Days	UNE 2W Digital	8.62		1,879	0			
0	10	0.0000	PR-6-01-3342	% Installation Troubles reported within 30 Days	UNE 2W xDSL Loops	8.62	12.50	1,879	48		-0.7188	
0	20	0.0000	PR-6-02-3520	% Installation Troubles reported within seven (7) Days	UNE-L Basic HC		0.00		21			
0	10	0.0000	PR-6-02-3523	% Installation Troubles reported within seven (7) Days	UNE-L Large Job HC				0			
0	2	0.0000	PR-8-01-3341	Percent Open Orders in a Hold Status > 30 Days	UNE 2W Digital	0.00		20	0			
0	5	0.0000	PR-8-01-3342	Percent Open Orders in a Hold Status > 30 Days	UNE 2W xDSL Loops	25.00	0.00	4	27			
0	20	0.0000	PR-9-01-3520	% On Time Performance - Hot Cut	UNE-L Basic HC		100.00		14			
0	10	0.0000	PR-9-01-3523	% On Time Performance - Hot Cut	UNE-L Large Job HC				0			
0	10	0.0000	PR-9-08-3533	Average Duration of Hot Cut Installation Troubles	UNE-L Total HC	56.02		278	0	51.66		
0	2	0.0000	MR-1-01-6050	Average Response Time - Create Trouble	LSI-TA	5.47	2.18		466		-3.2875	
0	10	0.0000	MR-3-01-3112	% Missed Repair Appointment - Loop	UNE-L	31.02	29.20	8,934	250		0.6774	
0	2	0.0000	MR-3-01-3341	% Missed Repair Appointment - Loop	UNE 2W Digital	31.02		8,936	0			
0	5	0.0000	MR-3-01-3342	% Missed Repair Appointment - Loop	UNE 2W xDSL Loops	31.02	28.13	8,936	96		0.7142	
0	10	0.0000	MR-3-02-3112	% Missed Repair Appointment - Central Office	UNE-L	46.54	60.00	419	5			
0	2	0.0000	MR-3-02-3341	% Missed Repair Appointment - Central Office	UNE 2W Digital	46.54		419	0			
0	5	0.0000	MR-3-02-3342	% Missed Repair Appointment - Central Office	UNE 2W xDSL Loops	46.54	16.67	419	6		1.9821	
0	5	0.0000	MR-4-02-3112	Mean Time To Repair - Loop Trouble	UNE-L	61.40	45.04	8,934	250	60.29	4.7045	
0	2	0.0000	MR-4-02-3341	Mean Time To Repair - Loop Trouble	UNE 2W Digital	61.41		8,936	0	60.28		
0	2	0.0000	MR-4-02-3342	Mean Time To Repair - Loop Trouble	UNE 2W xDSL Loops	61.41	39.05	8,936	96	60.28	4.1879	
0	5	0.0000	MR-4-03-3112	Mean Time To Repair - Central Office Trouble	UNE-L	80.49	46.17	419	5	187.05		
0	2	0.0000	MR-4-03-3341	Mean Time To Repair - Central Office Trouble	UNE 2W Digital	80.49		419	0	187.05		
0	2	0.0000	MR-4-03-3342	Mean Time To Repair - Central Office Trouble	UNE 2W xDSL Loops	80.49	38.17	419	6	187.05	1.2576	
0	2	0.0000	MR-4-04-3341	% Cleared (all troubles) within 24 Hours	UNE 2W Digital	31.87		9,355	0			
0	2	0.0000	MR-4-04-3342	% Cleared (all troubles) within 24 Hours	UNE 2W xDSL Loops	31.87	59.80	9,355	102		5.0000	
0	5	0.0000	MR-4-07-3112	% Out of Service > 12 Hours	UNE-L	84.98	77.39	6,520	199		2.8920	
0	2	0.0000	MR-4-07-3341	% Out of Service > 12 Hours	UNE 2W Digital	84.99		6,521	0			
0	2	0.0000	MR-4-07-3342	% Out of Service > 12 Hours	UNE 2W xDSL Loops	84.99	66.67	6,521	72		4.0079	
0	10	0.0000	MR-4-08-3112	% Out of Service > 24 Hours	UNE-L	66.75	53.77	6,520	199		3.8098	
0	10	0.0000	MR-5-01-3112	% Repeat Reports within 30 Days	UNE-L	18.37	14.06	9,683	256		1.8891	
0	2	0.0000	MR-5-01-3341	% Repeat Reports within 30 Days	UNE 2W Digital	18.37		9,685	0			
0	2	0.0000	MR-5-01-3342	% Repeat Reports within 30 Days	UNE 2W xDSL Loops	18.37	10.78	9,685	102		2.2184	

Performance Assurance Plan - Verizon PA

Version 4.0

Blank Stat. Score = Insufficient activity or no activity to perform a statistical test

Perf. Score	Wgt.	Wgtd. Score	Metric #	Metric Description	Product	VZ Perf.	CLEC Perf.	VZ Obs.	CLEC Obs.	VZ Std.Dev.	Difference or Stat. Score	Bill Credit
-5	241	-0.0996	<b>MOE-Resale</b>	<b>Resale Mode of Entry Totals</b>								\$ -
0	2	0.0000	PO-1-01-6020	Average Response Time - Customer Service Record (CSR)	EDI	0.03	3.30		8,332		3.2707	
0	2	0.0000	PO-1-01-6050	Average Response Time - Customer Service Record (CSR)	WEB GUI/LSI/W	0.03	0.91		2,026		0.8753	
0	2	0.0000	PO-1-03-6020	Average Response Time - Address Validation	EDI	5.71	4.39		2,392		-1.3230	
0	2	0.0000	PO-1-03-6050	Average Response Time - Address Validation	WEB GUI/LSI/W	5.71	3.11		646		-2.5981	
0	5	0.0000	PO-2-02-6020	OSS Interface Availability - Prime Time	EDI		100.00					
0	5	0.0000	PO-2-02-6080	OSS Interface Availability - Prime Time	Web GUI		100.00					
0	10	0.0000	OR-1-02-2320	% On Time LSRC - Flow Through	Resale POTS/Pre-qual Compl		98.62		435			
-2	5	-0.0415	OR-1-04-2320	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale POTS/Pre-qual Compl		86.59		82			
0	5	0.0000	OR-2-02-2320	% On Time LSR Reject - Flow-through	Resale POTS/Pre-qual Compl		100.00		113			
-2	2	-0.0166	OR-2-04-2320	% On Time LSR/ASR Rej - No Facil Chk (Electr. No Flow-through)	Resale POTS/Pre-qual Compl		75.68		37			
0	2	0.0000	OR-2-06-2320	% On Time LSR/ASR Rej - Facil Chk (Electr. No Flow-through)	Resale POTS/Pre-qual Compl		100.00		9			
0	5	0.0000	OR-4-16-1000	% Provisioning Comp. Notifiers sent - 1 Business Day	Resale/UNE (EDI)		99.33		7,588			
-1	10	-0.0415	OR-5-03-2000	% Flow Through Achieved	Resale		94.99		459			
0	10	0.0000	OR-6-03-2000	% Accuracy - LSRC	Resale		0.00		138			
0	5	0.0000	PR-3-01-2100	% Completed in 1 Day - one (1) to five (5) Lines - No Dispatch	Resale POTS	65.81	97.09	6,970	103		5.0000	
0	15	0.0000	PR-4-02-2100	Average Delay Days - Total	Resale POTS	9.24	11.00	240	1	29.03		
0	10	0.0000	PR-4-04-2100	% Missed Appointment - Verizon - Dispatch	Resale POTS	18.83	0.00	600	7		5.0000	
0	20	0.0000	PR-4-05-2100	% Missed Appointment - Verizon - No Dispatch	Resale POTS	1.07	0.48	11,838	208		1.2464	
0	5	0.0000	PR-5-01-2100	% Missed Appointment - Verizon - Facilities	Resale POTS	2.50	0.00	600	7		5.0000	
0	5	0.0000	PR-5-02-2100	% Orders Held for Facilities > 15 Days	Resale POTS	0.67	0.00	600	7		5.0000	
0	15	0.0000	PR-6-01-2100	% Installation Troubles reported within 30 Days	Resale POTS	5.09	2.61	15,170	230		2.0062	
0	2	0.0000	MR-1-01-6050	Average Response Time - Create Trouble	LSI-TA	5.47	2.18		466		-3.2875	
0	2	0.0000	MR-1-06-6050	Average Response Time - Test Trouble (POTS Only)	LSI-TA		58.23		729			
0	10	0.0000	MR-3-01-2110	% Missed Repair Appointment - Loop	Resale POTS Bus	32.99	27.66	2,016	47		0.9230	
0	10	0.0000	MR-3-01-2120	% Missed Repair Appointment - Loop	Resale POTS Res	30.44	34.48	6,918	29		-0.2934	
0	10	0.0000	MR-3-02-2110	% Missed Repair Appointment - Central Office	Resale POTS Bus	38.52		244	0			
0	10	0.0000	MR-3-02-2120	% Missed Repair Appointment - Central Office	Resale POTS Res	27.33	0.00	505	1			
0	5	0.0000	MR-4-02-2110	Mean Time To Repair - Loop Trouble	Resale POTS Bus	46.05	54.07	2,016	47	55.30	-0.9813	
0	5	0.0000	MR-4-02-2120	Mean Time To Repair - Loop Trouble	Resale POTS Res	65.88	72.71	6,918	29	60.94	-0.6489	
0	5	0.0000	MR-4-03-2110	Mean Time To Repair - Central Office Trouble	Resale POTS Bus	53.85		244	0	67.59		
0	5	0.0000	MR-4-03-2120	Mean Time To Repair - Central Office Trouble	Resale POTS Res	54.50	1.33	505	1	171.13		
0	5	0.0000	MR-4-07-2110	% Out of Service > 12 Hours	Resale POTS - Bus	74.32	69.77	1,589	43		0.8581	
0	5	0.0000	MR-4-07-2120	% Out of Service > 12 Hours	Resale POTS - Res	88.09	88.89	5,020	18		0.3468	
0	5	0.0000	MR-4-08-2110	% Out of Service > 24 Hours	Resale POTS Bus	53.56	44.19	1,589	43		1.3694	
0	5	0.0000	MR-4-08-2120	% Out of Service > 24 Hours	Resale POTS Res	70.42	72.22	5,020	18		0.1264	
0	10	0.0000	MR-5-01-2100	% Repeat Reports within 30 Days	Resale POTS	18.37	14.29	9,683	77		1.0774	
0	5	0.0000	BI-1-02-1000	% DUF in four (4) Business Days	Resale & UNE		96.09		402,680			
0	140	0.0000	<b>MOE-Trunks</b>	<b>Trunks Mode of Entry Totals</b>								\$ -
0	5	0.0000	OR-1-12-5020	% On Time FOC	Interconnect Trunks(<=192 Forecast)		75.00		4			
0	10	0.0000	OR-1-13-5000	% On Time Design Layout Record (DLR)	Interconnect Trunks		100.00		8			
0	5	0.0000	OR-1-19-5020	% On Time Response - Request for Inbound Augment Trunks	VZ Inbound Aug Trunks(<=192)				0			
0	5	0.0000	OR-2-12-5020	% On Time Trunk ASR Reject	Interconnect. Trunks				0			
0	20	0.0000	PR-4-07-3540	% On Time Performance - LNP Only	UNE LNP		99.97		3,029			
0	20	0.0000	PR-4-15-5000	% On Time Provisioning - Trunks	Interconnect Trunks		100.00		528			
0	5	0.0000	PR-5-01-5000	% Missed Appointment - Verizon - Facilities	Interconnect Trunks	0.00	0.00	5,221	528		5.0000	
0	5	0.0000	PR-5-02-5000	% Orders Held for Facilities > 15 Days	Interconnect Trunks	0.00	0.00	5,221	528		5.0000	
0	10	0.0000	PR-6-01-5000	% Installation Troubles reported within 30 Days	Interconnect Trunks	0.00	0.00	5,221	528		5.0000	
0	5	0.0000	PR-8-01-5000	Percent Open Orders in a Hold Status > 30 Days	Interconnect Trunks	1.54	0.00	65	8		5.0000	
0	5	0.0000	MR-4-01-5000	Mean Time To Repair - Total	Interconnect Trunks	39.02	27.98	2	4	21.02		
0	5	0.0000	MR-4-05-5000	% Out of Service > 2 Hours	Interconnect Trunks	100.00	100.00	2	3			
0	5	0.0000	MR-4-06-5000	% Out of Service > 4 Hours	Interconnect Trunks	100.00	66.67	2	3			
0	5	0.0000	MR-4-07-5000	% Out of Service > 12 Hours	Interconnect Trunks	100.00	66.67	2	3			
0	5	0.0000	MR-4-08-5000	% Out of Service > 24 Hours	Interconnect Trunks	100.00	33.33	2	3			
0	10	0.0000	MR-5-01-5000	% Repeat Reports within 30 Days	Interconnect Trunks	0.00	0.00	2	4			
0	5	0.0000	NP-1-03-5000	# of Final Trunk Groups Blocked 2 months	CLEC Trunks		0.00					
0	10	0.0000	NP-1-04-5000	Number Final Trunk Groups Exceeding Blocking Standard - Three (3) Months	CLEC Trunks		0.00					

Performance Assurance Plan - Verizon PA

Version 4.0

Blank Stat. Score = Insufficient activity or no activity to perform a statistical test

Perf. Score	Wgt.	Wgtd. Score	Metric #	Metric Description	Product	VZ Perf.	CLEC Perf.	VZ Obs.	CLEC Obs.	VZ Std.Dev.	Difference or Stat. Score	Bill Credit
<b>CM-ALL Critical Measures Totals</b>												
0	14.5		OR-1-02-3331	% On Time LSRC - Flow Through	UNE-L/Pre-qual Complx/LNP		99.79		12,670			\$0
0	7.25		OR-1-04-3331	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	UNE-L/Pre-qual Complx/LNP		95.70		558			\$0
0	7.25		OR-1-06-3331	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE-L/Pre-qual Complx/LNP		98.43		255			\$0
0	2.9		PR-4-04-1341	% Missed Appointment - Verizon - Dispatch	Resale/UNE 2W Digital			0	0			\$0
0	14.5		PR-4-04-3113	% Missed Appointment - Verizon - Dispatch	UNE-L New	18.83	9.09	600	33		1.7498	\$0
0	2.9		PR-4-14-3342	% Completed On Time - 2-Wire xDSL	UNE 2W xDSL Loops		100.00		26			\$0
0	14.5		PR-6-01-3113	% Installation Troubles reported within 30 Days	UNE-L New	8.62	2.74	1,879	73		2.2700	\$0
0	2.9		PR-6-01-3342	% Installation Troubles reported within 30 Days	UNE 2W xDSL Loops	8.62	12.50	1,879	48		-0.7188	\$0
0	29		PR-6-02-3520	% Installation Troubles reported within seven (7) Days	UNE-L Basic HC		0.00		21			\$0
0	14.5		PR-6-02-3523	% Installation Troubles reported within seven (7) Days	UNE-L Large Job HC				0			\$0
0	29		PR-9-01-3520	% On Time Performance - Hot Cut	UNE-L Basic HC		100.00		14			\$0
0	14.5		PR-9-01-3523	% On Time Performance - Hot Cut	UNE-L Large Job HC				0			\$0
0	2.9		MR-3-01-3112	% Missed Repair Appointment - Loop	UNE-L	31.02	29.20	8,934	250		0.6774	\$0
0	2.9		MR-3-01-3342	% Missed Repair Appointment - Loop	UNE 2W xDSL Loops	31.02	28.13	8,936	96		0.7142	\$0
0	14.5		MR-4-08-3112	% Out of Service > 24 Hours	UNE-L	66.75	53.77	6,520	199		3.8098	\$0
0	3.87		OR-1-02-2320	% On Time LSRC - Flow Through	Resale POTS/Pre-qual Complx		98.62		435			\$0
-2	1.93		OR-1-04-2320	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale POTS/Pre-qual Complx		86.59		82			\$15,931
0	3.87		PR-4-04-2100	% Missed Appointment - Verizon - Dispatch	Resale POTS	18.83	0.00	600	7		5.0000	\$0
0	7.73		PR-4-05-2100	% Missed Appointment - Verizon - No Dispatch	Resale POTS	1.07	0.48	11,838	208		1.2464	\$0
0	5.8		PR-6-01-2100	% Installation Troubles reported within 30 Days	Resale POTS	5.09	2.61	15,170	230		2.0062	\$0
0	0.39		MR-3-01-2110	% Missed Repair Appointment - Loop	Resale POTS Bus	32.99	27.66	2,016	47		0.9230	\$0
0	0.39		MR-3-01-2120	% Missed Repair Appointment - Loop	Resale POTS Res	30.44	34.48	6,918	29		-0.2934	\$0
0	1.93		MR-4-08-2110	% Out of Service > 24 Hours	Resale POTS Bus	53.56	44.19	1,589	43		1.3694	\$0
0	1.93		MR-4-08-2120	% Out of Service > 24 Hours	Resale POTS Res	70.42	72.22	5,020	18		0.1264	\$0
0	3.75		OR-1-12-5020	% On Time FOC	Interconnect Trunks(<=192 Forecast)		75.00		4			\$0
0	7.5		OR-1-13-5000	% On Time Design Layout Record (DLR)	Interconnect Trunks		100.00		8			\$0
0	14.99		PR-4-07-3540	% On Time Performance - LNP Only	UNE LNP		99.97		3,029			\$0
0	14.99		PR-4-15-5000	% On Time Provisioning - Trunks	Interconnect Trunks		100.00		528			\$0
0	7.5		NP-1-04-5000	Number Final Trunk Groups Exceeding Blocking Standard - Three (3) Months	CLEC Trunks		0.00					\$0
0	2.37		OR-1-06-3211	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE Specials DS1		97.30		111			\$0
-2	2.37		OR-2-04-1200	% On Time LSR/ASR Reject - No Facility Check (Electronic - No Flow-through)	UNE/RES Specials		50.00		20			\$19,563
-2	2.37		OR-2-06-1200	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	UNE/RES Specials		78.79		66			\$19,563
0	2.37		PR-4-01-1210	% Missed Appointment - Verizon - Total	UNE/RES Specials DS0	0.00	0.00	4	4			\$0
0	2.37		PR-4-01-1211	% Missed Appointment - Verizon - Total	UNE/RES Specials DS1	0.00	1.61	8	62		1.2040	\$0
0	2.37		PR-4-01-1213	% Missed Appointment - Verizon - Total	UNE/RES Specials DS3			0	0			\$0
0	2.37		PR-4-01-3530	% Missed Appointment - Verizon - Total	UNE IOF		12.50	0	8			\$0
0	2.37		PR-4-02-1200	Average Delay Days - Total	UNE/RES Specials		11.00	0	1			\$0
0	5.93		PR-4-02-3530	Average Delay Days - Total	UNE IOF		1.00	0	1			\$0
0	5.93		PR-5-01-1200	% Missed Appointment - Verizon - Facilities	UNE/RES Specials	0.00	0.00	8	136		5.0000	\$0
0	5.93		PR-5-02-1200	% Orders Held for Facilities > 15 Days	UNE/RES Specials	0.00	0.00	8	136		5.0000	\$0
0	5.93		PR-6-01-1200	% Installation Troubles reported within 30 Days	UNE/RES Specials	17.24	0.67	29	150		4.2372	\$0
0	2.37		MR-4-01-1216	Mean Time To Repair - Total	UNE/RES Specials (Non DS0/DS0)	14.34		207	0	22.25		\$0
0	2.37		MR-4-01-1217	Mean Time To Repair - Total	UNE/RES Specials (DS1/DS3)	11.49	4.47	307	100	17.97	4.6415	\$0
0	2.37		MR-4-08-1216	% Out of Service > 24 Hours	UNE/RES Specials (Non DS0/DS0)	15.20		171	0			\$0
0	2.37		MR-4-08-1217	% Out of Service > 24 Hours	UNE/RES Specials (DS1/DS3)	13.45	1.33	119	75		3.6105	\$0
0	1.93		PO-2-02-6010	OSS Interface Availability - Prime Time	WPTS		99.85					\$0
0	4.81		PO-2-02-6020	OSS Interface Availability - Prime Time	EDI		100.00					\$0
0	4.81		PO-2-02-6080	OSS Interface Availability - Prime Time	Web GUI		100.00					\$0
0	9.63		PO-4-01-6660	% Change Management Notices Sent on Time	Change Notif./Conf. (Type 3,4,5)		100.00		3			\$0
0	24.06		BI-9-01-1000	% Billing Completeness in Twelve Billing Cycles	Resale/UNE		99.94		4,532,275			\$0

# **EXHIBIT 2**



## VERIFICATION

I, **Philip J. Wood, Jr.**, Director – State Government Relations, Public Affairs, Policy & Communications of Verizon Pennsylvania LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904, (relating to unsworn falsifications to authorities).



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PHILIP J. WOOD, JR.  
Director – State Government Relations  
Public Affairs, Policy & Communications