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July 14, 2016

VIA ELECTRONIC FILING

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

**RE: PMO III – Petition for Waiver of Remedies
re: 2016 Work Stoppage (F0020)
Docket No. P-2016-2551053
PMO – Performance Metrics and Remedies (F0020) M-00011468**

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 May 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
Rich Layton, TUS
Bryan Mahla, TUS
Jennedy Johnson, Law Bureau

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have been “influenced by factors beyond Verizon’s control.”² Such a waiver is required for four of the PAP wholesale measures with benchmark standards for the month of May 2016 due to the effects of an event beyond Verizon PA’s control — an employee work stoppage.³

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, 2016.⁴ This extraordinary event, which was beyond Verizon PA’s control, prevented it from satisfying four of the PAP wholesale measures with benchmark standards during May 2016.⁵ 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 \$77,822 to \$3,872. Attached hereto as

(. . . continued)

2016 and currently expects to file one for the month of June 2016.

² See PAP, Appendix C, at 38-40 (“Waivers”) and Appendix F at 69-70 (time table for waiver filings).

³ 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).

⁴ 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.

⁵ Because the strike lasted until June 1, 2016 and continued to disrupt normal operations thereafter as workers returned to their normal jobs, Verizon expects that the service performance for some PAP

(continued . . .)

Exhibit 1 is a copy of the “Performance Assurance Plan – May 2016 Monthly Report” that Verizon PA submitted to the Commission on June 29, 2016. Exhibit 2 contains a summary chart that shows Verizon PA’s performance from April 2015 through May 2016 for the benchmark measures for which Verizon PA seeks a waiver.

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 May 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,⁶ 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.

(. . . continued)

measures could also be influenced in June 2016 and beyond.

⁶ 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.”

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 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.⁷

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 FOUR MEASURES WITH BENCHMARK STANDARDS DURING MAY 2016.

Despite its best efforts, Verizon PA was unable due to the work stoppage to satisfy the service quality standards for four of the 80 measures in the PAP with benchmark standards for May 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

⁷ 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.

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-2-06-1200	% On Time LSR/ASR Rej – Facility Check (Electronic No Flow-through) – UNE/RES Specials
OR-1-06-3211	% On Time LSRC/ASRC - Facil Chk (Electr. No Flow-through) UNE Specials DS1
OR-1-12-5020	% On Time FOC - Interconnect Trunks(<=192 Forecast)

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 2, for the most part service for these metrics exceeded the 95% standard for each of the 12 months prior to the work stoppage. For OR-2-06-1200 and OR-1-12-5020, 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 one miss allowance in the PAP.⁸ If Verizon PA's May 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 May 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

⁸ See PAP, Appendix C at page 36 (Small Sample Benchmark Scoring Procedures).

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 May PAP measures with benchmark standards (76 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 (4 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 May.

IV. DESPITE THE EXTRAORDINARY WORK STOPPAGE EVENT, VERIZON PA CONTINUED TO PROVIDE PARITY SERVICE TO CLECS

The PAP provides that any service waiver for events beyond Verizon's control must include "an analysis of the extent to which the parity metrics (retail and wholesale) were affected by the subject event"⁹ An analysis of the PAP data for parity measures shows that Verizon PA provided parity service to the CLECs during the month of May on all but two parity measures. In May 2016, Verizon PA missed MR-5-01-3112 (% Repeat Reports within 30 Days, UNE-L) and MR-5-01-3342 (% Repeat Reports within 30 Days, UNE 2W xDSL Loops).

⁹ PAP Appendix C, at 40.

The fact that Verizon PA was able to maintain parity for 90 of the 92 parity metrics in May 2016 shows that CLECs continued to receive parity service during the work stoppage. In fact this small number of misses on parity measures is consistent with normal performance, as data from the four months before the work stoppage shows that Verizon PA has occasionally missed a small number of parity measures but maintained parity for the vast majority of the measures. The two misses on the May 2016 metrics could be attributed to the fact that Verizon simply did not have sufficient management employees to perform the usual monitoring tasks that Verizon's wholesale team undertakes as part of its normal operating procedures. Verizon's systems and processes produce parity by design and usual operation. However, Verizon also has an operational team that previews the company's performance on the wholesale measures. This team develops and executes remedial procedures that are intended to drive performance to parity when Verizon detects that performance is falling below the parity standard. The disruption to Verizon's normal practices of monitoring service to CLECs could have resulted in Verizon achieving failing scores on these single metrics.

In short, the parity metric data for May 2016 do not provide any indication that Verizon PA intentionally discriminated against its CLEC customers. To the contrary, the data indicates that Verizon PA strove to maintain parity for the numerous wholesale services that these measures monitor and was largely successful in doing so.

V. CONCLUSION

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

Respectfully submitted,

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

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Telephone No. 215-466-4755

Counsel for
Verizon Pennsylvania LLC

Dated: July 14, 2016

EXHIBIT 1

May-16

Performance Assurance Plan - Verizon PA

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Section	Mode	Weighted Score	Market Adjustment
MOE	Loop	-0.0939	\$0
MOE	Resale	-0.0996	\$0
MOE	Trunks	-0.0357	\$0
MOE	Total		\$0
Critical Measure	Loop		\$0
Critical Measure	Resale		\$15,931
Critical Measure	Trunks		\$24,762
Critical Measure	Specials		\$33,257
Critical Measure	Other		\$0
Critical Measure	Total		\$73,951
Individual Rule	Total		\$3,872
All	Grand Total		\$77,822

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
-6	330	-0.0939	MOE-Loop	Loop Based Mode of Entry Totals								\$ -
0	2	0.0000	PO-1-01-6020	Average Response Time - Customer Service Record (CSR)	EDI	0.03	3.38		4,539		3.3485	
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	0.92		1,669		0.8868	
0	2	0.0000	PO-1-03-6020	Average Response Time - Address Validation	EDI	5.17	4.22		2,626		-0.9491	
0	2	0.0000	PO-1-03-6030	Average Response Time - Address Validation	CORBA	5.17			0			
0	5	0.0000	PO-1-03-6050	Average Response Time - Address Validation	WEB GUI/LSI/W	5.17	2.95		767		-2.2210	
0	2	0.0000	PO-1-06-6020	Average Response Time - Mechanized Loop Qualification - xDSL	EDI	8.68	5.27		1,025		-3.4130	
0	2	0.0000	PO-1-06-6050	Average Response Time - Mechanized Loop Qualification - xDSL	WEB GUI/LSI/W	8.68	2.19		96		-6.4935	
0	5	0.0000	PO-2-02-6010	OSS Interface Availability - Prime Time	WPTS		99.84					
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					
-2	2	-0.0121	PO-8-01-6000	% On Time - Manual Loop Qualification	Systems Metrics		63.16		19			
0	10	0.0000	OR-1-02-3331	% On Time LSRC - Flow Through	UNE-L/Pre-qual Complx/LNP		99.79		12,900			
0	5	0.0000	OR-1-04-3331	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow-through)	UNE-L/Pre-qual Complx/LNP		98.55		619			
0	5	0.0000	OR-1-06-3331	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE-L/Pre-qual Complx/LNP		100.00		212			
0	5	0.0000	OR-2-02-3331	% On Time LSR Reject - Flow-through	UNE-L/Pre-qual Complx/LNP		99.96		5,207			
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		97.78		451			
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		7			
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		99.06		106			
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)		99.28		8,846			
-1	5	-0.0152	OR-5-03-3112	% Flow Through Achieved	UNE-L		92.02		664			
0	5	0.0000	OR-6-03-3331	% Accuracy - LSRC	UNE-L/Complex/LNP		0.00		989			
0	5	0.0000	PR-3-10-3342	% Completed in six (6) Days one (1) to five (5) Lines - Total	UNE 2W xDSL Loops				0			
0	10	0.0000	PR-4-02-3112	Average Delay Days - Total	UNE-L	7.52	13.67	267	3	11.69		
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		32.00	0	1			
0	5	0.0000	PR-4-04-3113	% Missed Appointment - Verizon - Dispatch	UNE-L New	54.76	28.57	294	7		1.7775	
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	0			
0	2	0.0000	PR-4-14-3342	% Completed On Time - 2-Wire xDSL	UNE 2W xDSL Loops		100.00		4			
0	5	0.0000	PR-5-01-3112	% Missed Appointment - Verizon - Facilities	UNE-L	0.68	0.00	294	7		5.0000	
0	5	0.0000	PR-5-02-3112	% Orders Held for Facilities > 15 Days	UNE-L	0.34	0.00	294	7		5.0000	
0	10	0.0000	PR-6-01-3113	% Installation Troubles reported within 30 Days	UNE-L New	11.51	0.00	773	25		5.0000	
0	2	0.0000	PR-6-01-3341	% Installation Troubles reported within 30 Days	UNE 2W Digital	11.51	0.00	773	0			
0	10	0.0000	PR-6-01-3342	% Installation Troubles reported within 30 Days	UNE 2W xDSL Loops	11.51	0.00	773	9		5.0000	
0	20	0.0000	PR-6-02-3520	% Installation Troubles reported within seven (7) Days	UNE-L Basic HC		0.00		47			
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	0			
0	5	0.0000	PR-8-01-3342	Percent Open Orders in a Hold Status > 30 Days	UNE 2W xDSL Loops		157.14	0	7			
0	20	0.0000	PR-9-01-3520	% On Time Performance - Hot Cut	UNE-L Basic HC		100.00		20			
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	86.00		237	0	75.83		
0	2	0.0000	MR-1-01-6050	Average Response Time - Create Trouble	LSI-TA	4.93	2.25		612		-2.6805	
0	10	0.0000	MR-3-01-3112	% Missed Repair Appointment - Loop	UNE-L	40.95	40.97	10,490	393		0.0439	
0	2	0.0000	MR-3-01-3341	% Missed Repair Appointment - Loop	UNE 2W Digital	40.96		10,497	0			
0	5	0.0000	MR-3-01-3342	% Missed Repair Appointment - Loop	UNE 2W xDSL Loops	40.96	44.32	10,497	88		-0.5326	
0	10	0.0000	MR-3-02-3112	% Missed Repair Appointment - Central Office	UNE-L	43.92	66.67	189	3			
0	2	0.0000	MR-3-02-3341	% Missed Repair Appointment - Central Office	UNE 2W Digital	43.92		189	0			
0	5	0.0000	MR-3-02-3342	% Missed Repair Appointment - Central Office	UNE 2W xDSL Loops	43.92	100.00	189	3			
0	5	0.0000	MR-4-02-3112	Mean Time To Repair - Loop Trouble	UNE-L	105.57	69.13	10,490	393	119.37	5.0000	
0	2	0.0000	MR-4-02-3341	Mean Time To Repair - Loop Trouble	UNE 2W Digital	105.60		10,497	0	119.38		
0	2	0.0000	MR-4-02-3342	Mean Time To Repair - Loop Trouble	UNE 2W xDSL Loops	105.60	74.25	10,497	88	119.38	3.1043	
0	5	0.0000	MR-4-03-3112	Mean Time To Repair - Central Office Trouble	UNE-L	88.84	32.40	189	3	73.61		
0	2	0.0000	MR-4-03-3341	Mean Time To Repair - Central Office Trouble	UNE 2W Digital	88.84		189	0	73.61		
0	2	0.0000	MR-4-03-3342	Mean Time To Repair - Central Office Trouble	UNE 2W xDSL Loops	88.84	111.86	189	3	73.61		
0	2	0.0000	MR-4-04-3341	% Cleared (all troubles) within 24 Hours	UNE 2W Digital	17.63		10,686	0			
0	2	0.0000	MR-4-04-3342	% Cleared (all troubles) within 24 Hours	UNE 2W xDSL Loops	17.63	17.58	10,686	91		0.1550	
0	5	0.0000	MR-4-07-3112	% Out of Service > 12 Hours	UNE-L	90.48	85.38	7,398	301		2.8658	
0	2	0.0000	MR-4-07-3341	% Out of Service > 12 Hours	UNE 2W Digital	90.49		7,404	0			
0	2	0.0000	MR-4-07-3342	% Out of Service > 12 Hours	UNE 2W xDSL Loops	90.49	83.05	7,404	59		2.0049	
0	10	0.0000	MR-4-08-3112	% Out of Service > 24 Hours	UNE-L	80.81	76.08	7,398	301		2.0651	
-2	10	-0.0606	MR-5-01-3112	% Repeat Reports within 30 Days	UNE-L	24.60	32.26	11,409	403		-3.3502	
0	2	0.0000	MR-5-01-3341	% Repeat Reports within 30 Days	UNE 2W Digital	24.60		11,421	0			
-1	2	-0.0061	MR-5-01-3342	% Repeat Reports within 30 Days	UNE 2W xDSL Loops	24.60	36.26	11,421	91		-2.3685	

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	MOE-Resale	Resale Mode of Entry Totals								\$ -
0	2	0.0000	PO-1-01-6020	Average Response Time - Customer Service Record (CSR)	EDI	0.03	3.38		4,539		3.3485	
0	2	0.0000	PO-1-01-6050	Average Response Time - Customer Service Record (CSR)	WEB GUI/LSI/W	0.03	0.92		1,669		0.8868	
0	2	0.0000	PO-1-03-6020	Average Response Time - Address Validation	EDI	5.17	4.22		2,626		-0.9491	
0	2	0.0000	PO-1-03-6050	Average Response Time - Address Validation	WEB GUI/LSI/W	5.17	2.95		767		-2.2210	
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 Complx		99.76		422			
-2	5	-0.0415	OR-1-04-2320	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale POTS/Pre-qual Complx		76.53		98			
0	5	0.0000	OR-2-02-2320	% On Time LSR Reject - Flow-through	Resale POTS/Pre-qual Complx		100.00		79			
-2	2	-0.0166	OR-2-04-2320	% On Time LSR/ASR Rej - No Facil Chk (Electr. No Flow-through)	Resale POTS/Pre-qual Complx		79.03		62			
0	2	0.0000	OR-2-06-2320	% On Time LSR/ASR Rej - Facil Chk (Electr. No Flow-through)	Resale POTS/Pre-qual Complx		100.00		8			
0	5	0.0000	OR-4-16-1000	% Provisioning Comp. Notifiers sent - 1 Business Day	Resale/UNE (EDI)		99.28		8,846			
-1	10	-0.0415	OR-5-03-2000	% Flow Through Achieved	Resale		93.16		453			
0	10	0.0000	OR-6-03-2000	% Accuracy - LSRC	Resale		0.00		134			
0	5	0.0000	PR-3-01-2100	% Completed in 1 Day - one (1) to five (5) Lines - No Dispatch	Resale POTS	73.15	95.65	5,612	115		5.0000	
0	15	0.0000	PR-4-02-2100	Average Delay Days - Total	Resale POTS	7.52	9.50	267	2	11.89		
0	10	0.0000	PR-4-04-2100	% Missed Appointment - Verizon - Dispatch	Resale POTS	54.76	100.00	294	1			
0	20	0.0000	PR-4-05-2100	% Missed Appointment - Verizon - No Dispatch	Resale POTS	1.12	0.47	9,466	214		1.3393	
0	5	0.0000	PR-5-01-2100	% Missed Appointment - Verizon - Facilities	Resale POTS	0.68	0.00	294	1			
0	5	0.0000	PR-5-02-2100	% Orders Held for Facilities > 15 Days	Resale POTS	0.34	0.00	294	1			
0	15	0.0000	PR-6-01-2100	% Installation Troubles reported within 30 Days	Resale POTS	6.24	0.90	12,000	222		4.2508	
0	2	0.0000	MR-1-01-6050	Average Response Time - Create Trouble	LSI-TA	4.93	2.25		612		-2.6805	
0	2	0.0000	MR-1-06-6050	Average Response Time - Test Trouble (POTS Only)	LSI-TA		55.19		819			
0	10	0.0000	MR-3-01-2110	% Missed Repair Appointment - Loop	Resale POTS Bus	41.72	31.03	2,704	29		1.3626	
0	10	0.0000	MR-3-01-2120	% Missed Repair Appointment - Loop	Resale POTS Res	40.69	31.58	7,786	38		1.3158	
0	10	0.0000	MR-3-02-2110	% Missed Repair Appointment - Central Office	Resale POTS Bus	36.14	66.67	321	3			
0	10	0.0000	MR-3-02-2120	% Missed Repair Appointment - Central Office	Resale POTS Res	29.77	0.00	598	2			
0	5	0.0000	MR-4-02-2110	Mean Time To Repair - Loop Trouble	Resale POTS Bus	92.54	88.00	2,704	29	121.19	0.1103	
0	5	0.0000	MR-4-02-2120	Mean Time To Repair - Loop Trouble	Resale POTS Res	110.09	101.30	7,786	38	118.40	0.4345	
0	5	0.0000	MR-4-03-2110	Mean Time To Repair - Central Office Trouble	Resale POTS Bus	71.66	153.36	321	3	77.31		
0	5	0.0000	MR-4-03-2120	Mean Time To Repair - Central Office Trouble	Resale POTS Res	73.04	2.26	598	2	85.56		
0	5	0.0000	MR-4-07-2110	% Out of Service > 12 Hours	Resale POTS - Bus	86.34	84.62	2,232	26		0.5886	
0	5	0.0000	MR-4-07-2120	% Out of Service > 12 Hours	Resale POTS - Res	91.98	83.87	5,584	31		1.8152	
0	5	0.0000	MR-4-08-2110	% Out of Service > 24 Hours	Resale POTS Bus	77.46	84.62	2,232	26		-0.6043	
0	5	0.0000	MR-4-08-2120	% Out of Service > 24 Hours	Resale POTS Res	81.66	80.65	5,584	31		0.4197	
0	10	0.0000	MR-5-01-2100	% Repeat Reports within 30 Days	Resale POTS	24.60	27.78	11,409	72		-0.5032	
0	5	0.0000	BI-1-02-1000	% DUF in four (4) Business Days	Resale & UNE		99.01		373,221			
-1	140	-0.0357	MOE-Trunks	Trunks Mode of Entry Totals								\$ -
-1	5	-0.0357	OR-1-12-5020	% On Time FOC	Interconnect Trunks(<=192 Forecast)		91.67		24			
0	10	0.0000	OR-1-13-5000	% On Time Design Layout Record (DLR)	Interconnect Trunks		100.00		4			
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		90.00		10			
0	20	0.0000	PR-4-07-3540	% On Time Performance - LNP Only	UNE LNP		99.85		2,757			
0	20	0.0000	PR-4-15-5000	% On Time Provisioning - Trunks	Interconnect Trunks		100.00		312			
0	5	0.0000	PR-5-01-5000	% Missed Appointment - Verizon - Facilities	Interconnect Trunks	0.00	0.00	648	312		5.0000	
0	5	0.0000	PR-5-02-5000	% Orders Held for Facilities > 15 Days	Interconnect Trunks	0.00	0.00	648	312		5.0000	
0	10	0.0000	PR-6-01-5000	% Installation Troubles reported within 30 Days	Interconnect Trunks	0.00	0.00	648	312		5.0000	
0	5	0.0000	PR-8-01-5000	Percent Open Orders in a Hold Status > 30 Days	Interconnect Trunks	41.67	40.00	12	5			
0	5	0.0000	MR-4-01-5000	Mean Time To Repair - Total	Interconnect Trunks	4.18	5.30	13	4	4.74		
0	5	0.0000	MR-4-05-5000	% Out of Service > 2 Hours	Interconnect Trunks	100.00	75.00	12	4			
0	5	0.0000	MR-4-06-5000	% Out of Service > 4 Hours	Interconnect Trunks	16.67	75.00	12	4			
0	5	0.0000	MR-4-07-5000	% Out of Service > 12 Hours	Interconnect Trunks	8.33	0.00	12	4			
0	5	0.0000	MR-4-08-5000	% Out of Service > 24 Hours	Interconnect Trunks	0.00	0.00	12	4			
0	10	0.0000	MR-5-01-5000	% Repeat Reports within 30 Days	Interconnect Trunks	38.46	25.00	13	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. Score	Metric #	Metric Description	Product	VZ Perf.	CLEC Perf.	VZ Obs.	CLEC Obs.	VZ Std.Dev.	Difference or Stat. Score	Bill Credit
CM-ALL Critical Measures Totals											
0	14.5	OR-1-02-3331	% On Time LSRC - Flow Through	UNE-L/Pre-qual Complx/LNP		99.79		12,900			\$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		98.55		619			\$0
0	7.25	OR-1-06-3331	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE-L/Pre-qual Complx/LNP		100.00		212			\$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	54.76	28.57	294	7		1.7775	\$0
0	2.9	PR-4-14-3342	% Completed On Time - 2-Wire xDSL	UNE 2W xDSL Loops		100.00		4			\$0
0	14.5	PR-6-01-3113	% Installation Troubles reported within 30 Days	UNE-L New	11.51	0.00	773	25		5.0000	\$0
0	2.9	PR-6-01-3342	% Installation Troubles reported within 30 Days	UNE 2W xDSL Loops	11.51	0.00	773	9		5.0000	\$0
0	29	PR-6-02-3520	% Installation Troubles reported within seven (7) Days	UNE-L Basic HC		0.00		47			\$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		20			\$0
0	14.5	PR-9-01-3113	% 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	40.95	40.97	10,490	393		0.0439	\$0
0	2.9	MR-3-01-3342	% Missed Repair Appointment - Loop	UNE 2W xDSL Loops	40.96	44.32	10,497	88		-0.5326	\$0
0	14.5	MR-4-08-3112	% Out of Service > 24 Hours	UNE-L	80.81	76.08	7,398	301		2.0651	\$0
0	3.87	OR-1-02-2320	% On Time LSRC - Flow Through	Resale POTS/Pre-qual Complx		99.76		422			\$0
-2	1.93	OR-1-04-2320	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale POTS/Pre-qual Complx		76.53		98			\$15,931
0	3.87	PR-4-04-2100	% Missed Appointment - Verizon - Dispatch	Resale POTS	54.76	100.00	294	1			\$0
0	7.73	PR-4-05-2100	% Missed Appointment - Verizon - No Dispatch	Resale POTS	1.12	0.47	9,466	214		1.3393	\$0
0	5.8	PR-6-01-2100	% Installation Troubles reported within 30 Days	Resale POTS	6.24	0.90	12,000	222		4.2508	\$0
0	0.39	MR-3-01-2110	% Missed Repair Appointment - Loop	Resale POTS Bus	41.72	31.03	2,704	29		1.3626	\$0
0	0.39	MR-3-01-2120	% Missed Repair Appointment - Loop	Resale POTS Res	40.69	31.58	7,786	38		1.3158	\$0
0	1.93	MR-4-08-2110	% Out of Service > 24 Hours	Resale POTS Bus	77.46	84.62	2,232	26		-0.6043	\$0
0	1.93	MR-4-08-2120	% Out of Service > 24 Hours	Resale POTS Res	81.66	80.65	5,584	31		0.4197	\$0
-1	3.75	OR-1-12-5020	% On Time FOC	Interconnect Trunks(<=192 Forecast)		91.67		24			\$24,762
0	7.5	OR-1-13-5000	% On Time Design Layout Record (DLR)	Interconnect Trunks		100.00		4			\$0
0	14.99	PR-4-07-3540	% On Time Performance - LNP Only	UNE LNP		99.85		2,757			\$0
0	14.99	PR-4-15-5000	% On Time Provisioning - Trunks	Interconnect Trunks		100.00		312			\$0
0	7.5	NP-1-04-5000	Number Final Trunk Groups Exceeding Blocking Standard - Three (3) Months	CLEC Trunks		0.00					\$0
-2	2.37	OR-1-06-3211	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE Specials DS1		86.05		43			\$19,563
0	2.37	OR-2-04-1200	% On Time LSR/ASR Reject - No Facility Check (Electronic - No Flow-through)	UNE/RES Specials		100.00		4			\$0
-1	2.37	OR-2-06-1200	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	UNE/RES Specials		92.59		27			\$13,694
0	2.37	PR-4-01-1210	% Missed Appointment - Verizon - Total	UNE/RES Specials DS0		0.00	0	7			\$0
0	2.37	PR-4-01-1211	% Missed Appointment - Verizon - Total	UNE/RES Specials DS1	0.00	85.71	2	7			\$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		100.00		0			\$0
0	2.37	PR-4-02-1200	Average Delay Days - Total	UNE/RES Specials		26.50	0	6			\$0
0	5.93	PR-4-02-3530	Average Delay Days - Total	UNE IOF		10.50	0	4			\$0
0	5.93	PR-5-01-1200	% Missed Appointment - Verizon - Facilities	UNE/RES Specials	0.00	0.00	2	16			\$0
0	5.93	PR-5-02-1200	% Orders Held for Facilities > 15 Days	UNE/RES Specials	0.00	0.00	2	16			\$0
0	5.93	PR-6-01-1200	% Installation Troubles reported within 30 Days	UNE/RES Specials		0.00	0	31			\$0
0	2.37	MR-4-01-1216	Mean Time To Repair - Total	UNE/RES Specials (Non DS0/DS0)	35.69		153	0	72.25		\$0
0	2.37	MR-4-01-1217	Mean Time To Repair - Total	UNE/RES Specials (DS1/DS3)	20.95	8.14	314	111	37.23	4.4320	\$0
0	2.37	MR-4-08-1216	% Out of Service > 24 Hours	UNE/RES Specials (Non DS0/DS0)	27.94		136	0			\$0
0	2.37	MR-4-08-1217	% Out of Service > 24 Hours	UNE/RES Specials (DS1/DS3)	23.02	10.99	126	91		2.5105	\$0
0	1.93	PO-2-02-6010	OSS Interface Availability - Prime Time	WPTS		99.84					\$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		99.26		4,341,697			\$0

EXHIBIT 2

State	Metric #	Metric Description	Product	STD	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16
					CLEC Perf.													
PA	OR-1-04-2320	% On Time LSRC/ASRC - No Facil Chk (Electr. No Flow-through)	Resale POTS/Pre-qual Complex	95.00	98.84	100.00	99.80	100.00	100.00	100.00	99.37	100.00	100.00	100.00	100.00	100.00	86.59	76.53
PA	OR-1-06-3211	% On Time LSRC/ASRC - Facil Chk (Electr. No Flow-through)	UNE Specials DS1	95.00	100.00	100.00	96.30	100.00	99.03	99.20	98.51	100.00	100.00	100.00	100.00	99.62	97.30	86.05
PA	OR-1-12-5020	% On Time FOC	Interconnect Trunks(<=192 Forecast)	95.00	92.86	100.00	100.00	100.00	100.00	93.33	100.00	100.00	100.00	100.00	100.00	100.00	75.00	91.67
PA	OR-2-06-1200	% On Time LSR/ASR Rej - Facil Chk (Electr. No Flow-through)	UNE/RES Specials	95.00	93.33	100.00	93.75	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	78.79	92.59

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).



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