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July 14, 2016

Sara Clark, Secretary  
Department of Telecommunications and Cable  
Commonwealth of Massachusetts  
1000 Washington Street, Suite 820  
Boston, MA 02118-6500

**Re: D.T.C. No. 03-50 -- Performance Assurance Plan –  
Service Waiver Request**

Dear Secretary Clark:

Enclosed for filing in the above docket is the Petition of Verizon New England Inc. To Waive Bill Credits Under The Performance Assurance Plan for May 2016. Verizon MA has served this Petition on the parties to the above docket and those CLECs for whom its records reflect a financial interest in the May 2016 PAP results. (The confidential version of Exhibit 1 to the Petition, which contains proprietary CLEC information, was not served on the parties and is being filed only with the Director of the Competition Division.)

Under Appendix C to the PAP, at 40, CLECs have 10 days to serve and file any replies to this Petition.

Thank you for your attention to this matter.

Sincerely,

Alexander W. Moore

Enclosures

cc: Lindsay DeRoche, Director  
Service List (electronic copies only)

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

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Performance Assurance Plan ) D.T.E. 03-50  
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**PETITION OF VERIZON NEW ENGLAND INC. TO WAIVE BILL CREDITS  
UNDER THE PERFORMANCE ASSURANCE PLAN FOR MAY 2016**

Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon MA”) hereby requests that the Department of Telecommunications and Cable (“Department”) waive the bill credits that would otherwise be due to Competitive Local Exchange Carriers (“CLECs”) under the Performance Assurance Plan (“PAP”) on account of Verizon MA’s inability to meet the Benchmark standards for two metrics in the PAP in May of 2016. Verizon MA’s ability to meet those standards was negatively affected by an extraordinary event beyond its control. Namely, on April 13, 2016, the International Brotherhood of Electrical Workers (“IBEW”) and the Communications Workers of America (“CWA,” and collectively, “the Unions”) called a general strike against Verizon MA and affiliated operating telephone companies (collectively “Verizon”), and Verizon’s unionized workers (the “Associates”) walked off their jobs for 50 days, until June 1, 2016 (the “Work Stoppage”).<sup>1</sup>

The PAP provides that Verizon MA may request a waiver of service results due to events that are beyond its control, including work stoppages, as follows:

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<sup>1</sup> The Work Stoppage affected Verizon’s operations in Connecticut, Delaware, the District of Columbia, Maryland, Massachusetts, New Jersey, New York, Pennsylvania, Rhode Island and Virginia.

The third ground for filing Waivers 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, work stoppage, or other events beyond Verizon's control.<sup>2</sup>

The Work Stoppage satisfies these requirements. It was an extraordinary event beyond Verizon MA's control, and despite reasonable and substantial efforts by the Company to insure business continuity and to minimize the impact of the Work Stoppage on its operations, and in particular on its retail and wholesale customers, the Work Stoppage prevented Verizon MA from meeting two of the 80 PAP Benchmark metrics in May of 2016.<sup>3</sup> The resulting \$29,190 in CLEC bill credits for May<sup>4</sup> should be waived. Indeed, the Department allowed Verizon MA to waive bill credits (including on one of the metrics at issue here) in similar circumstances following a shorter work stoppage in 2011. *See Petition of Verizon New England Inc. to Waive Certain Service Results Measured Under The Performance Assurance Plan for August 2011*, D.T.C. No.

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<sup>2</sup> See PAP, Appendix C, at 39-40.

<sup>3</sup> The Work Stoppage also prevented Verizon MA from meeting certain PAP metrics in April of 2016. *See Petition of Verizon New England Inc. to Waive Certain Service Quality Results Measured Under the Performance Assurance Plan for April 2016*, filed on June 14, 2016.

<sup>4</sup> See Performance Assurance Plan – May 2016 Monthly Report, filed on June 27, 2016, attached hereto as Exhibit 1. This exhibit contains both the Public (aggregate) and Confidential (CLEC-specific) reports.

03-50, Order on Petition dated November 21, 2011 (“2011 Order”).<sup>5</sup> Other state commissions have also granted bill credit waivers in these circumstances.<sup>6</sup>

For the reasons set forth below, the Department should grant the petition and waive the bill credits shown on the monthly PAP report for May of 2016.

## I. FACTUAL BACKGROUND

Verizon and the Unions had held meetings to discuss key issues many months before the then-current contracts were scheduled to expire on August 1, 2015. Formal negotiations began the week of June 22, 2015. The issues involved in these negotiations were many and complex. Verizon made numerous comprehensive proposals and took part in hundreds of meetings with Union officials during the negotiations. When the contracts expired, the Union employees initially worked without a contract. On April 11, 2016, however, 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, but the leaders of the Unions rejected the offer. The work stoppage officially commenced at 6:00 a.m. on April 13, 2016.

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<sup>5</sup> The Department specified in the 2011 Order that Verizon MA should not “normalize” the underlying data but must “leave the unaltered August 2011 data and reports intact on its [WISE] website, and will omit the August 2011 data in its calculation of the Doubling Provision under the PAP.” Verizon MA proposes the same treatment for the May 2016 data.

<sup>6</sup> The New York Public Service Commission has held under both the current PAP and an earlier version of the PAP that a work stoppage by Verizon’s Associates qualifies as a “situation[] beyond Verizon’s control” that entitles Verizon 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). *See also e.g.*, Virginia State Corporation Commission, Case No. PUC-2001-00226, *Order on Petition*, Document 111240100 December 20, 2011.

In response, Verizon immediately executed its emergency work stoppage plan. Verizon had been planning for a potential work stoppage for well over a year before the contracts expired. Managers across the nation (except those who were designated as essential to corporate operations) were given Emergency Work Assignments (EWAs) by the Company's Business Continuity Planning (BCP) team and participated in training courses for their respective assignments. Managers from various Verizon business units, among them Enterprise (including the former MCI business units), Corporate Finance, HR, and IT from states as far away as California, Illinois, Colorado and Texas were given EWAs. Managers were assigned to both retail and wholesale functions.

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 emergency 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. 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.

Verizon continued to seek resolution with the Unions during the Work Stoppage. As the strike progressed with no resolution in sight, however, Verizon significantly scaled up its contingency workforce by adding contractors, expanding outsourced call center resources, assigning additional managers to EWAs and hiring new temporary workers. Thousands of these resources were trained and deployed. When all was said and done, Verizon MA was able to mobilize a force of approximately 1,800 managers to perform work usually handled by

approximately 4,400 striking workers in Massachusetts. This does not include people working remotely in Florida, North Carolina, Oklahoma and Texas.

The management employees deployed during the Work Stoppage performed their duties under difficult conditions, including delays caused by disruptive actions by striking workers. In addition, approximately 20 reported incidents of sabotage caused losses of service in Massachusetts during the Work Stoppage, contributing to the already heavy maintenance workload on the management employees.<sup>7</sup>

On May 27, 2016, Verizon and the Unions reached an agreement in principle on new contracts, and the Associates returned to work on June 1, 2016. As part of that agreement, the Unions agreed to lift for two weeks restrictions on the number of hours that Verizon MA could have Associates work, in order to help address the backlog of order processing and repair and installation work that had developed during the Work Stoppage.

**II. VERIZON MA IS ENTITLED TO WAIVE ITS PERFORMANCE AND RESULTING BILL CREDITS ON TWO PAP METRICS FOR MAY, 2016, DUE TO THE WORK STOPPAGE.**

Despite its best efforts, Verizon MA was unable due to the Work Stoppage to satisfy the service quality standards for two of the 80 measures in the PAP with Benchmark standards for May, 2016. The PAP provides that:

... C2C service quality data may be influenced by factors beyond Verizon's control, [and] Verizon may file Exception or Waiver

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<sup>7</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.

petitions with the Department seeking to have the monthly service quality results modified on three generic grounds.

...

The third ground for filing Waivers 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, work stoppage, or other events beyond Verizon's control.<sup>8</sup>

A work stoppage of 50 days is without question an event beyond Verizon MA's control "that negatively affect its ability to satisfy ... measures with Benchmark standards." Despite its best efforts, Verizon MA could not resolve the outstanding differences with the Unions through ten months of negotiations, and its unionized workers chose to strike. Verizon MA had prepared diligently for a possible strike, and it worked long and hard during the Work Stoppage both to resolve the dispute and, at the same time, to perform the functions of the striking workers and provide the best possible service to as many customers as possible under the circumstances.

The PAP explicitly provides that work stoppages are events beyond Verizon's control that entitle it to waive certain performance results, and the Department has recognized such as well. As noted above, the Department granted Verizon MA a waiver of bill credits (including on the OR-1-06-3211 metric at issue here) after the August 2011 work stoppage.<sup>9</sup> Thus, Verizon MA is entitled to waive the bill credits for the metrics that it could not satisfy as a result of the 2016 Work Stoppage. Those metrics are the following:

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<sup>8</sup> PAP, Appendix C, at 38, 39.

<sup>9</sup> See 2011 Order, at 8.

OR-1-06-3211	CM – Specials	% On Time LSRC/ASRC - Facil Chk (Electr. No Flow-through) – UNE Specials DS1
OR-1-12-5020	MOE – Trunks	% On Time FOC – Interconnect Trunks

These metrics measure the timeliness of Verizon MA’s provision of service order confirmations to CLECs. These measures are handled manually by Verizon representatives. As noted, Verizon MA allocated managers to all functions including the wholesale functions in order to provide the best service possible during the Work Stoppage. Even with this extraordinary effort, however, Verizon MA simply did not have enough manpower during the Work Stoppage to fully staff its centers to handle in its normal manner the volume of orders being received.

Furthermore, each UNE order must be manually typed into the Verizon Service Order Processor system. This is a complex task that requires a highly experienced worker, with 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 had been trained for this work, there was a steep learning curve, and the speed at which they could process orders was substantially slower than that normally achieved by experienced representatives.

Verizon MA provided the CLECs with excellent service on these Ordering Measures prior to the Work Stoppage. As can be seen from Exhibit 2, Verizon MA exceeded the 95% service standard for each of these metrics in every month but one in the year preceding the Work

Stoppage,<sup>10</sup> demonstrating that it would have met the standard in May as well had there not been a Work Stoppage.

In summary, while Verizon MA assigned a large body of management employees to the jobs ordinarily handled by the striking workers, Verizon MA's available work force was only a fraction of the size of its usual work force, and it was simply impossible for Verizon to meet the standards for these metrics. Moreover, while Verizon MA 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 striking workers who ordinarily would perform these jobs. Verizon MA 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. Clearly, the work stoppage was an event beyond Verizon MA's control. It was not possible for Verizon MA to satisfy the Benchmark standards for the measures under these circumstances for the month of April. Thus, the Department should grant the requested waiver for the above metrics.

### **III. DESPITE THE EXTRAORDINARY WORK STOPPAGE EVENT, VERIZON CONTINUED TO PROVIDE PARITY SERVICE TO CLECS**

The PAP provides that any service waiver for events beyond Verizon MA's control must include "an analysis of the extent to which the parity measures (retail and wholesale) were affected by the subject event. . . ." PAP at 40. This provision enables the Department to evaluate

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<sup>10</sup> Verizon MA did not meet the 95% standard for OR-1-12-5020 in September of 2015. This was not scored as a miss of the Benchmark, however, due to the allowance in the PAP for missing a single transaction in low volume situations. *See* PAP at 36-37.

whether Verizon MA unfairly discriminated against wholesale customers during a work stoppage or other waivable event.

An analysis of the May, 2016, PAP data, shows that Verizon MA met the standards for 90 of the 92 parity measures in the PAP, missing only two: MR-3-02-3112 (% Missed Repair Appointment – Central Office) and MR-5-01-3342 (% Repeat Reports within 30 days). *See* Exhibit 1, column 1. Not only did CLECs generally receive parity service in May, but Verizon MA’s performance that month is consistent with its performance in prior, business-as-usual months. For example, Verizon MA missed three parity metrics in March, 2016, the month before the Work Stoppage began.<sup>11</sup> Thus, missing two metrics in May (and none at all in April) during the Work Stoppage shows no intent by Verizon MA to discriminate against its wholesale customers.

Moreover, the sample size of wholesale observations for the metrics at issue was small. There were only 10 wholesale observations for MR-3-02-3112 for the month, of which Verizon MA missed two. Likewise, there were only 32 wholesale observations with 18 repeat troubles for MR-5-01-3342 in May, as opposed to 6,595 retail observations with over 1,500 repeats. Due to the small wholesale sample size and the great difference in the number of observations recorded between wholesale and retail, it does not take much deviation in performance for Verizon MA to miss these metrics. Accordingly, that Verizon MA missed these metrics does not demonstrate unfair discrimination against wholesale customers.

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<sup>11</sup> *See* Performance Assurance Plan – March 2016 Monthly Report, filed on April 25, 2016.

To the contrary, the data indicates that Verizon MA strove to maintain parity for the numerous wholesale services that the parity measures monitor and was largely successful in doing so.

#### IV. CONCLUSION

For the foregoing reasons, the Department should grant this Petition and allow Verizon MA to waive the bill credits arising from its service performance results in May, 2016, on the two PAP metrics with Benchmark standards discussed above.

Respectfully submitted,

VERIZON NEW ENGLAND INC., d/b/a  
VERIZON MASSACHUSETTS

By its attorney



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Dated: July 14, 2016



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June 27, 2016

**By Overnight Delivery**

Sara Clark, Secretary  
Department of Telecommunications and Cable  
Commonwealth of Massachusetts  
1000 Washington Street, Suite 820  
Boston, MA 02118

**Re: D.T.E. 03-50**

Dear Secretary Clark:

In accordance with the Department's March 29, 2007 Letter Order in this proceeding, please find enclosed copies of the May 2016 Reports under the 2007 Performance Assurance Plan (the "2007 PAP"). The 2007 PAP became operational on July 1, 2007.

A proprietary version of the PAP reports containing carrier-specific performance and bill credit calculations (which are used to allocate the credits among eligible CLECs), are being filed with the Department under separate cover.<sup>1</sup> The separate filing contains carrier-specific data and should be treated confidentially by the Department.

Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in blue ink that reads "Patricia Eagan".

Patricia Eagan

Enclosures

cc: Lindsay DeRoche  
Kerri DeYoung Phillips

<sup>1</sup> Please note that due to the impact of the work stoppage which began on April 13, 2006 on Verizon's operations in Massachusetts, Verizon intends to file a waiver request with the Department within the timeframe provided for in the 2007 PAP.

May-16

Performance Assurance Plan - Verizon MA

Version 4.0

Section	Mode	Weighted Score	Market Adjustment
MOE	Loop	-0.0636	\$0
MOE	Resale	-0.0415	\$0
MOE	Trunks	-0.0357	\$0
<b>MOE</b>	<b>Total</b>		<b>\$0</b>
Critical Measure	Loop		\$0
Critical Measure	Resale		\$0
Critical Measure	Trunks		\$16,217
Critical Measure	Specials		\$12,973
Critical Measure	Other		\$0
<b>Critical Measure</b>	<b>Total</b>		<b>\$29,190</b>
Individual Rule	Total		\$0
<b>All</b>	<b>Grand Total</b>		<b>\$29,190</b>

Performance Assurance Plan - Verizon MA

Version 4.0

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

Perf. Score	Wgt.	Wgted. Score	Metric #	Metric Description	Product	VZ Perf.	CLEC Perf.	VZ Obs.	CLEC Obs.	VZ Std Dev.	Difference or Stat. Score	Bill Credit
-5	330	-0.0636	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 10	3 35		111		3 2534	
0	2	0.0000	PO-1-01-6030	Average Response Time - Customer Service Record (CSR)	CORBA	0 10			0			
0	5	0.0000	PO-1-01-6050	Average Response Time - Customer Service Record (CSR)	WEB GUI/LSW	0 10	0 88		769		0 7829	
0	2	0.0000	PO-1-03-6020	Average Response Time - Address Validation	EDI	2 05	3 85		1,451		1 7972	
0	2	0.0000	PO-1-03-6030	Average Response Time - Address Validation	CORBA	2 05			0			
0	5	0.0000	PO-1-03-6050	Average Response Time - Address Validation	WEB GUI/LSW	2 05	2 12		357		0 0653	
0	2	0.0000	PO-1-06-6020	Average Response Time - Mechanized Loop Qualification - xDSL	EDI	8 59	4 68		512		-3 9096	
0	2	0.0000	PO-1-06-6050	Average Response Time - Mechanized Loop Qualification - xDSL	WEB GUI/LSW	8 59	1 66		7		-6 9372	
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					
0	2	0.0000	PO-8-01-6000	% On Time - Manual Loop Qualification	Systems Metrics		100 00		1			
0	10	0.0000	OR-1-02-3331	% On Time LSRC - Flow-through	UNE-L/Pre-qual Comp/LNP		99 85		13 659			
0	5	0.0000	OR-1-04-3331	% On Time LSRC/ASRC - No Facil Chk (Electr No Flow-through)	UNE-L/Pre-qual Comp/LNP		98 46		907			
0	5	0.0000	OR-1-06-3331	% On Time LSRC/ASRC - Facil Chk (Electr No Flow-through)	UNE-L/Pre-qual Comp/LNP		99 33		149			
0	5	0.0000	OR-2-02-3331	% On Time LSR Reject - Flow-through	UNE-L/Pre-qual Comp/LNP		99 55		5 136			
0	5	0.0000	OR-2-04-3331	% On Time LSR/ASR Rej - No Facil Chk (Electr No Flow-through)	UNE-L/Pre-qual Comp/LNP		96 36		330			
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		15			
-1	2	-0.0061	OR-2-06-3331	% On Time LSR/ASR Rej - Facil Chk (Electr No Flow-through)	UNE-L/Pre-qual Comp/LNP		92 45		53			
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 (ED)		99 34		10 356			
-1	5	-0.0162	OR-5-03-3112	% Flow Through Achieved	UNE-L		94 82		444			
0	5	0.0000	OR-6-03-3331	% Accuracy - LSRC	UNE-L/Complex/LNP		0 00		1 110			
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	8 75		107	0	11 05		
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	21 23	0 00	292	4			
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		3	0			
0	2	0.0000	PR-4-14-3342	% Completed On Time - 2-Wire xDSL	UNE 2W xDSL Loops				0			
0	5	0.0000	PR-5-01-3112	% Missed Appointment - Verizon - Facilities	UNE-L	0 68	0 00	292	4			
0	5	0.0000	PR-5-02-3112	% Orders Held for Facilities > 15 Days	UNE-L	0 00	0 00	292	4			
0	10	0.0000	PR-6-01-3113	% Installation Troubles reported within 30 Days	UNE-L New	11 17	0 00	412	34		5 0000	
0	2	0.0000	PR-6-01-3341	% Installation Troubles reported within 30 Days	UNE 2W Digital	11 17		412	0			
0	10	0.0000	PR-6-01-3342	% Installation Troubles reported within 30 Days	UNE 2W xDSL Loops	11 17		412	0			
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	366 67		3	0			
0	5	0.0000	PR-8-01-3342	Percent Open Orders in a Hold Status > 30 Days	UNE 2W xDSL Loops	0 00		1	0			
0	20	0.0000	PR-9-01-3520	% On Time Performance - Hot Cut	UNE-L Basic HC		100 00		16			
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	68 78		200	0	65 59		
0	2	0.0000	MR-1-01-6050	Average Response Time - Create Trouble	LSI-TA	5 23	2 44		206		-2 7847	
0	10	0.0000	MR-3-01-3112	% Missed Repair Appointment - Loop	UNE-L	50 86	48 54	5 896	206		0 7260	
0	2	0.0000	MR-3-01-3341	% Missed Repair Appointment - Loop	UNE 2W Digital	50 93		5 910	0			
0	5	0.0000	MR-3-01-3342	% Missed Repair Appointment - Loop	UNE 2W xDSL Loops	50 93	57 69	5 910	26		-0 4893	
-1	10	-0.0303	MR-3-02-3112	% Missed Repair Appointment - Central Office	UNE-L	31 58	80 00	247	10		-2 7542	
0	2	0.0000	MR-3-02-3341	% Missed Repair Appointment - Central Office	UNE 2W Digital	32 13		249	0			
0	5	0.0000	MR-3-02-3342	% Missed Repair Appointment - Central Office	UNE 2W xDSL Loops	32 13	50 00	249	6		-0 5165	
0	5	0.0000	MR-4-02-3112	Mean Time To Repair - Loop Trouble	UNE-L	92 58	52 00	5 896	206	101 89	5 0000	
0	2	0.0000	MR-4-02-3341	Mean Time To Repair - Loop Trouble	UNE 2W Digital	92 79		5 910	0	102 10		
0	2	0.0000	MR-4-02-3342	Mean Time To Repair - Loop Trouble	UNE 2W xDSL Loops	92 79	84 47	5 910	26	102 10	0 3432	
0	5	0.0000	MR-4-03-3112	Mean Time To Repair - Central Office Trouble	UNE-L	57 28	74 33	247	10	86 91	-0 6842	
0	2	0.0000	MR-4-03-3341	Mean Time To Repair - Central Office Trouble	UNE 2W Digital	57 52		249	0	86 67		
0	2	0.0000	MR-4-03-3342	Mean Time To Repair - Central Office Trouble	UNE 2W xDSL Loops	57 52	74 32	249	6	86 67	-0 6071	
0	2	0.0000	MR-4-04-3341	% Cleared (all troubles) within 24 Hours	UNE 2W Digital	22 07		6 159	0			
0	2	0.0000	MR-4-04-3342	% Cleared (all troubles) within 24 Hours	UNE 2W xDSL Loops	22 07	28 13	6 159	32		1 0374	
0	5	0.0000	MR-4-07-3112	% Out of Service > 12 Hours	UNE-L	87 02	90 67	4 747	193		-1 4032	
0	2	0.0000	MR-4-07-3341	% Out of Service > 12 Hours	UNE 2W Digital	87 07		4 763	0			
0	2	0.0000	MR-4-07-3342	% Out of Service > 12 Hours	UNE 2W xDSL Loops	87 07	85 71	4 763	21		0 5692	
0	10	0.0000	MR-4-08-3112	% Out of Service > 24 Hours	UNE-L	76 95	59 59	4 747	193		5 0000	
0	10	0.0000	MR-5-01-3112	% Repeat Reports within 30 Days	UNE-L	23 48	26 55	6 572	226		-0 9899	
0	2	0.0000	MR-5-01-3341	% Repeat Reports within 30 Days	UNE 2W Digital	23 47		6 595	0			
-2	2	-0.0121	MR-5-01-3342	% Repeat Reports within 30 Days	UNE 2W xDSL Loops	23 47	56 25	6 595	32		-3 6075	

Performance Assurance Plan - Verizon MA

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
-1	241	-0.0415	<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	0.10	3.35		111		3.2534	
0	2	0.0000	PO-1-01-6050	Average Response Time - Customer Service Record (CSR)	WEB GUI/LSIW	0.10	0.88		769		0.7829	
0	2	0.0000	PO-1-03-6020	Average Response Time - Address Validation	EDI	2.05	3.85		1,451		1.7972	
0	2	0.0000	PO-1-03-6050	Average Response Time - Address Validation	WEB GUI/LSIW	2.05	2.12		357		0.0653	
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 LSR/L - Flow-through	Resale POTS/Pre-qual Compl		100.00		59			
0	5	0.0000	OR-1-04-2320	% On Time LSR/LASRC - No Facil Chk (Electr No Flow-through)	Resale POTS/Pre-qual Compl		96.00		25			
0	5	0.0000	OR-2-02-2320	% On Time LSR Reject - Flow-through	Resale POTS/Pre-qual Compl		100.00		43			
0	2	0.0000	OR-2-04-2320	% On Time LSR/ASRC Rej - No Facil Chk (Electr No Flow-through)	Resale POTS/Pre-qual Compl		100.00		5			
0	2	0.0000	OR-2-06-2320	% On Time LSR/ASRC Rej - Facil Chk (Electr No Flow-through)	Resale POTS/Pre-qual Compl		100.00		2			
0	5	0.0000	OR-4-16-1000	% Provisioning Comp Notifiers sent - 1 Business Day	Resale/UNE (EDI)		99.34		10,356			
-1	10	-0.0415	OR-5-03-2000	% Flow Through Achieved	Resale		93.75		64			
0	10	0.0000	OR-6-03-2000	% Accuracy - LSR/L	Resale		0.00		61			
0	5	0.0000	PR-3-01-2100	% Completed in 1 Day - one (1) to five (5) Lines - No Dispatch	Resale POTS	66.57	62.50	4.876	8		0.0863	
0	15	0.0000	PR-4-02-2100	Average Delay Days - Total	Resale POTS	8.75	2.00	107	1	11.05		
0	10	0.0000	PR-4-04-2100	% Mased Appointment - Verizon - Dispatch	Resale POTS	21.23	100.00	292	1			
0	20	0.0000	PR-4-05-2100	% Mased Appointment - Verizon - No Dispatch	Resale POTS	0.47	0.00	9.487	26		5.0000	
0	5	0.0000	PR-5-01-2100	% Mased Appointment - Verizon - Facilities	Resale POTS	0.68	0.00	292	1			
0	5	0.0000	PR-5-02-2100	% Orders Held for Facilities > 15 Days	Resale POTS	0.00	0.00	292	1			
0	15	0.0000	PR-6-01-2100	% Installation Troubles reported within 30 Days	Resale POTS	6.94	0.00	9.023	39		5.0000	
0	2	0.0000	MR-1-01-6050	Average Response Time - Create Trouble	LSI-TA	5.23	2.44		206		-2.7847	
0	2	0.0000	MR-1-06-6050	Average Response Time - Test Trouble (POTS Only)	LSI-TA		50.23		343			
0	10	0.0000	MR-3-01-2110	% Missed Repair Appointment - Loop	Resale POTS Bus	56.89	51.16	1,786	43		0.9054	
0	10	0.0000	MR-3-01-2120	% Missed Repair Appointment - Loop	Resale POTS Res	48.27	40.00	4,108	5			
0	10	0.0000	MR-3-02-2110	% Missed Repair Appointment - Central Office	Resale POTS Bus	45.49	0.00	244	3			
0	10	0.0000	MR-3-02-2120	% Missed Repair Appointment - Central Office	Resale POTS Res	28.01	0.00	432	1			
0	5	0.0000	MR-4-02-2110	Mean Time To Repair - Loop Trouble	Resale POTS Bus	80.12	82.71	1,786	43	98.37	-0.2385	
0	5	0.0000	MR-4-02-2120	Mean Time To Repair - Loop Trouble	Resale POTS Res	98.04	161.92	4,108	5	102.94		
0	5	0.0000	MR-4-03-2110	Mean Time To Repair - Central Office Trouble	Resale POTS Bus	61.54	20.43	244	3	80.89		
0	5	0.0000	MR-4-03-2120	Mean Time To Repair - Central Office Trouble	Resale POTS Res	54.03	1.55	432	1	82.33		
0	5	0.0000	MR-4-07-2110	% Out of Service > 12 Hours	Resale POTS - Bus	84.74	74.36	1,625	39		1.8879	
0	5	0.0000	MR-4-07-2120	% Out of Service > 12 Hours	Resale POTS - Res	87.30	83.33	3,409	6		0.9502	
0	5	0.0000	MR-4-08-2110	% Out of Service > 24 Hours	Resale POTS Bus	73.11	61.54	1,625	39		1.7430	
0	5	0.0000	MR-4-08-2120	% Out of Service > 24 Hours	Resale POTS Res	78.15	83.33	3,409	6		0.2795	
0	10	0.0000	MR-5-01-2100	% Repeat Reports within 30 Days	Resale POTS	23.48	32.69	6,572	52		-1.3742	
0	5	0.0000	BI-1-02-1000	% DUF in four (4) Business Days	Resale & UNE		99.13		525,758			
-1	140	-0.0357	<b>MOE-Trunks</b>	<b>Trunks Mode of Entry Totals</b>								\$ -
-1	5	-0.0357	OR-1-12-5020	% On Time FOC	Interconnect Trunks(<=192 Forecast)		86.67		15			
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		99.29		1,983			
0	20	0.0000	PR-4-15-5000	% On Time Provisioning - Trunks	Interconnect Trunks		100.00		394			
0	5	0.0000	PR-5-01-5000	% Missed Appointment - Verizon - Facilities	Interconnect Trunks	0.00	0.00	192	394		5.0000	
0	5	0.0000	PR-5-02-5000	% Orders Held for Facilities > 15 Days	Interconnect Trunks	0.00	0.00	192	394		5.0000	
0	10	0.0000	PR-6-01-5000	% Installation Troubles reported within 30 Days	Interconnect Trunks	0.00	0.00	192	394		5.0000	
0	5	0.0000	PR-6-01-5000	Percent Open Orders in a Hold Status > 30 Days	Interconnect Trunks	100.00	50.00		1			
0	5	0.0000	MR-4-01-5000	Mean Time To Repair - Total	Interconnect Trunks				0			
0	5	0.0000	MR-4-05-5000	% Out of Service > 2 Hours	Interconnect Trunks				0			
0	5	0.0000	MR-4-06-5000	% Out of Service > 4 Hours	Interconnect Trunks				0			
0	5	0.0000	MR-4-07-5000	% Out of Service > 12 Hours	Interconnect Trunks				0			
0	5	0.0000	MR-4-08-5000	% Out of Service > 24 Hours	Interconnect Trunks				0			
0	10	0.0000	MR-5-01-5000	% Repeat Reports within 30 Days	Interconnect Trunks				0			
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	# of Final Trunk Groups Blocked 3 months	CLEC Trunks		0.00					

Performance Assurance Plan - Verizon MA

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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
0	10	CM-ALL	<b>Critical Measures Totals</b>								\$ 29,190
0	5	OR-1-02-3331	% On Time LSRC - Flow-through	UNE-L/Pre-qual Compb/LNP	99.85			13,659			\$0
0	5	OR-1-04-3331	% On Time LSRC/ASRC - No Facil Chk (Electr No Flow-through)	UNE-L/Pre-qual Compb/LNP	98.46			907			\$0
0	5	OR-1-06-3331	% On Time LSRC/ASRC - Facil Chk (Electr No Flow-through)	UNE-L/Pre-qual Compb/LNP	99.33			149			\$0
0	2	PR-4-04-1341	% Missed Appointment - Verizon - Dispatch	Resale/UNE 2W Digital			0	0			\$0
0	10	PR-4-04-3113	% Missed Appointment - Verizon - Dispatch	UNE-L New	21.23	0.00	292	4			\$0
0	2	PR-4-14-3342	% Completed On Time - 2-Wire xDSL	UNE 2W xDSL Loops				0			\$0
0	10	PR-6-01-3113	% Installation Troubles reported within 30 Days	UNE-L New	11.17	0.00	412	34		5.0000	\$0
0	2	PR-6-01-3342	% Installation Troubles reported within 30 Days	UNE 2W xDSL Loops	11.17		412	0			\$0
0	20	PR-6-02-3520	% Installation Troubles reported within seven (7) Days	UNE-L Basic HC		0.00		21			\$0
0	10	PR-6-02-3523	% Installation Troubles reported within seven (7) Days	UNE-L Large Job HC				0			\$0
0	20	PR-9-01-3113	% On Time Performance - Hot Cut	UNE-L Basic HC		100.00		16			\$0
0	10	PR-9-01-3523	% On Time Performance - Hot Cut	UNE-L Large Job HC				0			\$0
0	2	MR-3-01-3112	% Missed Repair Appointment - Loop	UNE-L	50.86	48.54	5,896	206		0.7260	\$0
0	2	MR-3-01-3342	% Missed Repair Appointment - Loop	UNE 2W xDSL Loops	50.93	57.69	5,910	26		-0.4893	\$0
0	10	MR-4-08-3112	% Out of Service > 24 Hours	UNE-L	76.95	59.59	4,747	193		5.0000	\$0
0	10	OR-1-02-2320	% On Time LSRC - Flow-through	Resale POTS/Pre-qual Compb		100.00		59			\$0
0	5	OR-1-04-2320	% On Time LSRC/ASRC - No Facil Chk (Electr No Flow-through)	Resale POTS/Pre-qual Compb		96.00		25			\$0
0	10	PR-4-04-2100	% Missed Appointment - Verizon - Dispatch	Resale POTS	21.23	100.00	292	1			\$0
0	20	PR-4-05-2100	% Missed Appointment - Verizon - No Dispatch	Resale POTS	0.47	0.00	9,487	26		5.0000	\$0
0	15	PR-6-01-2100	% Installation Troubles reported within 30 Days	Resale POTS	6.94	0.00	9,023	39		5.0000	\$0
0	1	MR-3-01-2110	% Missed Repair Appointment - Loop	Resale POTS Bus	56.89	51.16	1,786	43		0.9054	\$0
0	1	MR-3-01-2120	% Missed Repair Appointment - Loop	Resale POTS Res	48.27	40.00	4,108	5			\$0
0	5	MR-4-08-2110	% Out of Service > 24 Hours	Resale POTS Bus	73.11	61.54	1,625	39		1.7430	\$0
0	5	MR-4-08-2120	% Out of Service > 24 Hours	Resale POTS Res	78.15	83.33	3,409	6		0.2795	\$0
-1	5	OR-1-12-5020	% On Time FOC	Interconnect Trunks(<=102 Forecast)		86.67		15			\$16,217
0	10	OR-1-13-5000	% On Time Design Layout Record (DLR)	Interconnect Trunks		100.00		8			\$0
0	20	PR-4-07-3540	% On Time Performance - LNP Only	UNE LNP		99.29		1,983			\$0
0	20	PR-4-15-5000	% On Time Provisioning - Trunks	Interconnect Trunks		100.00		394			\$0
0	10	NP-1-04-5000	# of Final Trunk Groups Blocked 3 months	CLEC Trunks		0.00					\$0
-2	2	OR-1-06-3211	% On Time LSRC/ASRC - Facil Chk (Electr No Flow-through)	UNE Specials DS1		58.33		72			\$12,973
0	2	OR-2-04-1200	% On Time LSR/ASR Rej - No Facil Chk (Electr No Flow-through)	UNE/RES Specials		100.00		6			\$0
0	2	OR-2-06-1200	% On Time LSR/ASR Rej - Facil Chk (Electr No Flow-through)	UNE/RES Specials		100.00		13			\$0
0	2	PR-4-01-1210	% Missed Appointment - Verizon - Total	UNE/RES Specials DS0	0.00		1	0			\$0
0	2	PR-4-01-1211	% Missed Appointment - Verizon - Total	UNE/RES Specials DS1	80.00	25.00	10	4			\$0
0	2	PR-4-01-1213	% Missed Appointment - Verizon - Total	UNE/RES Specials DS3			0	0			\$0
0	2	PR-4-01-3530	% Missed Appointment - Verizon - Total	UNE IOF		0.00	0	1			\$0
0	2	PR-4-02-1200	Average Delay Days - Total	UNE/RES Specials	15.06	16.00	16	1	6.79		\$0
0	5	PR-4-02-3530	Average Delay Days - Total	UNE IOF			0	0			\$0
0	5	PR-5-01-1200	% Missed Appointment - Verizon - Facilities	UNE/RES Specials	0.00	0.00	30	7		5.0000	\$0
0	5	PR-5-02-1200	% Orders Held for Facilities > 15 Days	UNE/RES Specials	0.00	0.00	30	7		5.0000	\$0
0	5	PR-6-01-1200	% Installation Troubles reported within 30 Days	UNE/RES Specials	2.44	0.00	41	8		5.0000	\$0
0	2	MR-4-01-1216	Mean Time To Repair - Total	UNE/RES Specials (Non DS0/DS0)	69.76	52.76	274	3	229.80		\$0
0	2	MR-4-01-1217	Mean Time To Repair - Total	UNE/RES Specials (DS1/DS3)	33.74	16.95	202	111	60.29	3.1963	\$0
0	2	MR-4-08-1216	% Out of Service > 24 Hours	UNE/RES Specials (Non DS0/DS0)	49.59	33.33	246	3			\$0
0	2	MR-4-08-1217	% Out of Service > 24 Hours	UNE/RES Specials (DS1/DS3)	36.04	26.47	111	102		1.6528	\$0
0	2	PO-2-02-6010	OSS Interface Availability - Prime Time	WPTS		99.84					\$0
0	5	PO-2-02-6020	OSS Interface Availability - Prime Time	EDI		100.00					\$0
0	5	PO-2-02-6080	OSS Interface Availability - Prime Time	Web GUI		100.00					\$0
0	10	PO-4-01-6660	% Change Management Notices Sent on Time	Change Notif./Conf. (Type 3,4,5)		100.00		3			\$0
0	25	BI-9-01-1000	% Billing Completeness in Twelve Billing Cycles	Resale/UNE		99.64		3,219,544			\$0

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.	CLEC Perf.	CLEC Perf.	CLEC Perf.	CLEC Perf.	CLEC Perf.	CLEC Perf.	CLEC Perf.	CLEC Perf.	CLEC Perf.	CLEC Perf.	CLEC Perf.	CLEC Perf.	CLEC Perf.	
MA	OR-1-06-3211	% On Time LSRC/ASRC - Facil Chk (Electr. No Flow- through)	UNE Specials DS1	95.00	100.00	100.00	100.00	100.00	99.05	98.02	100.00	100.00	100.00	100.00	100.00	100.00	99.59	97.76	58.33
MA	OR-1-12-5020	% On Time FOC	Interconnect Trunks(<=192 Forecast)	95.00	100.00	100.00	100.00	100.00	100.00	80.00	100.00	100.00	100.00	100.00	100.00	100.00	96.97	100.00	86.67