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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. 16-XXX -- Petition of Verizon New England Inc. to Waive Certain Results Under its Retail Service Quality Plan for April, May and June 2016

Dear Secretary Clark:

Enclosed for filing in the above docket are the following:

- 1) Petition of Verizon New England Inc. To Waive Certain Service Results Under its Retail Service Quality Plan for April, May and June 2016; and
- 2) Affidavit of Lisa M. Thorne.

Thank you for your attention to this matter.

Sincerely,

Alexander W. Moore

Enclosures

cc: Rebecca Tepper, Assistant Attorney General

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Verizon New England Inc. to Waive Certain Results Under its Retail Service Quality Plan for April, May and June, 2016

PETITION OF VERIZON NEW ENGLAND INC. TO WAIVE CERTAIN RESULTS UNDER ITS RETAIL SERVICE QUALITY PLAN FOR APRIL, MAY AND JUNE, 2016

Pursuant to Paragraph E of the Verizon Massachusetts Retail Service Quality Plan ("the Plan"), Verizon New England Inc., d/b/a Verizon Massachusetts ("Verizon MA") hereby petitions the Department of Telecommunications and Cable ("Department") to exclude from calculation of Verizon MA's overall scores in future months its performance on two of the Plan's twelve metrics during the period April 13 through the end of May, 2016, and its performance on a third metric during the period April 13 through June 6, 2016.

Verizon MA's performance on these metrics in these months was significantly and negatively affected by an extraordinary event beyond its control. On April 13, 2016, the International Brotherhood of Electrical Workers ("IBEW") and the Communications Workers of America ("CWA," collectively, "the Unions") called a general strike against Verizon MA and affiliated telephone operating companies (collectively "Verizon"), and Verizon's unionized workers walked off their jobs for 50 days, until June 1 (the "Work Stoppage"). The Work

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.

Stoppage reduced to a bare minimum the workforce available to Verizon MA to serve its customers and imposed an enormous workload on the company.

As demonstrated below, Verizon MA took reasonable and substantial actions before, during and after the Work Stoppage to minimize its impact on service to Verizon MA's customers and ensure business continuity, and in fact, Verizon MA met the overall requirements of the Plan in April and May. Despite these preparations, however, the Work Stoppage caused Verizon MA to turn in substantially subpar performances on the following metrics in April, May and (with respect to the first metric only) June:

- Percent of Troubles Cleared Within 24 Hours Business
- CSB Average Speed of Answer; and
- Business Service Level (measuring speed of answer at Verizon's Business Sales and Service Center). ²

Because Verizon MA's performance under the Plan is based on the rolling average of its performance in the current month and the preceding 11 months, its performance during and shortly after the Work Stoppage will unfairly and adversely affect its ability to satisfy the Plan in future months.³

Accordingly, the Department should allow Verizon MA to exclude from calculation of its performance under the Plan the results on the Troubles Cleared Business metric from the

Exhibit 1 hereto is Section 1 of the monthly Service Quality Report for April, originally filed with the Department on June 8, 2016. Exhibit 2 hereto is Section 1 of the April report revised to exclude the results on the relevant metrics for the period April 13–30. Exhibit 3 is Section 1 of the monthly Service Quality Report for May, originally filed with the Department on June 21, 2016. Verizon MA will file Section 1 of the Service Quality Report for June once it becomes available, together with a version revised to exclude the results for Troubles Cleared – Business for June 1–6.

For example, Verizon MA anticipates that it may not meet the overall requirements of the Plan in June 2016 due to the substandard results in April and May.

inception of the Work Stoppage on April 13 through June 6 and the results on the other two metrics during the period April 13 through the end of May only.

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.

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 – in some areas dating back to the 2011 work stoppage. 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 Verizon 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 assignments in the Verizon East service area. 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 EWA, including assignments in garages across the Commonwealth, at the "Customer Service Bureau" ("CSB"), the Consumer Sales and Solutions Center ("CSSC"), the Business Sales and Solutions Center ("BSSC"), the Dispatch Resource Center ("DRC") and the Directory Assistance Centers ("DA"), which support Verizon MA's retail customers and 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. 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.

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. Verizon MA took full advantage of this agreement, and Verizon MA field technicians worked, on average, nearly twice their normal overtime rate during the first week of June.

II. VERIZON MA IS ENTITLED TO EXCLUDE THE RESULTS FOR THE THREE METRICS AT ISSUE FOR THE LIMITED PERIOD APRIL 13 – JUNE 6.

Paragraph E of the Plan provides that Verizon MA may file for a waiver of service results due to events beyond its control, including work stoppages and severe weather, as follows:

Recognizing that service quality may be influenced by factors beyond Verizon MA's control, Verizon MA may file Exception of Waiver petitions with the Department seeking to have monthly service qualify results modified. Circumstances that would qualify for such consideration are limited to periods of emergency, catastrophe, natural disaster, severe storms, or other events beyond Verizon MA's control.

Any petition pursuant to this provision must demonstrate clearly and convincingly the extraordinary nature of the circumstances involved, the impact that the circumstances had on Verizon MA's service quality, why Verizon MA's normal, reasonable preparations for difficult situations proved inadequate, and the specific days affected by the event.

The Work Stoppage and its effect on Verizon MA's ability to serve its customers satisfy these requirements. A seven-week strike by Union workers constitutes extraordinary circumstances beyond Verizon MA's control. The Unions have sole decision-making authority to call a strike, and they elected to do so rather than continue to negotiate or accept the federal

government's offer to mediate. Moreover, although paragraph E of the Plan does not expressly mention work stoppages in describing events beyond Verizon MA's control, the Department's Performance Assurance Plan ("PAP") for Verizon MA does, as follows:

The third grounds 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.⁴

Under this provision, the Department has found that, "the lack of experienced manpower available to Verizon to perform the Associates jobs during [a work stoppage in August of 2011] was of an extraordinary nature...," and it waived penalties against Verizon MA for missing five PAP metrics that month. 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. 03-50, Order on Petition dated November 21, 2011 ("2011 Order"). Although the PAP addresses wholesale matters, the wholesale-retail distinction is immaterial in assessing the extraordinary nature of an event. Like the 2011 strike, the Work Stoppage was an extraordinary event beyond Verizon MA's control.

⁴ PAP, Appendix C, at 39 (emphasis added).

The Department approved the PAP in D.T.E. 99-271 (order dated September 5, 2000). In that order, the Department found that it was reasonable to include "work stoppage" as a situation beyond Verizon MA's control even though that phrase was not included in the New York PAP, on which the PAP is based, and even though the Department otherwise required Verizon MA to conform its proposed PAP to the terms of the New York PAP. See id at 32. The history of the Retail Service Quality Plan does not indicate any intent by the Department to apply a more restrictive standard in determining whether a situation is beyond the Company's control in the retail context. The Department established the Plan in D.P.U. 94-50 (order dated May 12, 1995), and revised the penalty provisions in D.T.E. 01-31 (Phase II order dated April 11, 2003). Neither of these orders discusses the force majeure provisions of the Plan.

Verizon MA took all reasonable steps to mitigate the impact of the Work Stoppage on its customers – before, during and after the event. As explained above, in anticipation of a possible strike, Verizon MA had trained thousands of management employees to perform the duties normally handled by Associates, and the Company was able to field a management work force of 1,800 to perform those functions when the Unions did walk out. During the Work Stoppage, Verizon MA continued to work to resolve the dispute with the Unions while also performing the functions of the striking workers to provide the best possible service to its customers under the circumstances. Following the Work Stoppage, Verizon MA augmented its normal workforce capacity through the liberal use of paid overtime in order to return service quality to normal as quickly as possible. As a result of these aggressive measures, Verizon MA was able to meet the general requirements of the Plan for April and May, although it may be in a penalty situation for June.

The Work Stoppage negatively and significantly affected the Company's performance on the three metrics at issue despite its best efforts. Operating with only 40% of its normal workforce, Verizon MA could not respond to trouble reports and new orders with its usual speed during the Work Stoppage. Troubles Cleared – Business, for example, fell to 57% in April and 32% in May, both of which were far below Verizon MA's average rate of 82% over the preceding year. In addition, managers on EWA were not able to resolve many of the more complex troubles reported by the company's business customers, so that when the company's Associates returned to work on June 1, their workload was heavily weighted with these time-consuming repairs. This caused Verizon MA's performance on Troubles Cleared – Business to remain low, at approximately 54%,6 for the first six days of June, despite the liberal use of

The June results provided in this Petition are not final and are subject to revision.

overtime. Performance then largely returned to normal for the remainder of the month, but as a carryover effect of the Work Stoppage, Verizon MA expects that it timely cleared only about 72% of its business troubles in June as a whole, substantially lower than its normal performance and the standards in the Plan.

Staffing at the Customer Service Bureau (CSB) during the Work Stoppage was only approximately 65% of its normal level. The managers who manned the CSB had been trained for this work, but there was a steep learning curve, and they were not able to address customer calls at the rate normally achieved by experienced customer service representatives. As a result, the CSB Speed of Answer in April was 44 seconds, more than double the rolling average of 19 seconds for the previous twelve months. Further breaking down the results within April shows even greater contrast. The CSB Speed of Answer was only 14 from April 1 through April 12 and then leapt to 68 seconds for the period April 13 through April 30, during the Work Stoppage. The CSB Speed of Answer increased to 95 in May as the Work Stoppage extended through the entire month. Due to these figures, Verizon MA's 12-month rolling average CSB Speed of Answer through May stood at 28, a full eight points above the standard in the Plan. That will cause Verizon MA to miss this metric for months, even if its actual monthly performance meets the standard. For example, Verizon MA performed very well on this metric in June, with a preliminary result of only 14 seconds, yet that performance would only reduce the rolling average slightly, to 27, still substantially higher than the standard in the Plan.

Verizon MA's other centers, such as the Business Sales and Solutions Center ("BSSC"), experienced difficulties during the Work Stoppage similar to those at the CSB. Staffing at the BSSC was at only 70% of its normal level through most of the Work Stoppage, and the emergency work force was unable to handle customer calls at the normal rate of experienced

representatives. Consequently, the Business Service Level, which measures the percentage of calls to the BSSC that are answered within 20 seconds, was only 43% in April, or 28 percentage points lower than Verizon MA's 12-month rolling average prior to April. The figures within April again show a dramatic change due to the Work Stoppage: the Business Service Level was 73% for April 1-12 but only 18% thereafter. In May, the Business Service Level dropped to only 20%. Although Verizon MA's rolling average through May met the Business Service Level standard of 60%, the results during the Work Stoppage, if allowed to stand, would unfairly make it more difficult for Verizon MA to meet this standard going forward.

Indeed, Verizon MA expects that it will not meet the requirements of the Plan in June due to the Work Stoppage, absent relief from the Department. That is because the Plan scores

Verizon MA's average performance on each metric over the most recent 12 months. Where the Work Stoppage caused that average to dip close to the Plan standard, for example with respect to Troubles Cleared – Business, it is not good enough for Verizon MA merely to meet the standard going forward. Rather, Verizon MA must at least match its actual performance for the month that is rolling off of the calculation – which is usually significantly better than the standard in the Plan – in order to maintain the rolling average within that standard. Verizon MA was unable to do this in June with respect to Troubles Cleared – Business due to the complex nature of the repair workload left from the Work Stoppage that it had to address in early June. Likewise, Verizon MA would need a perfect score of 0.0 on CSB Speed of Answer (meaning every call to the CSB is answered immediately) for the next four months in order to bring the rolling average in line with the 20-second standard in the Plan. Granting the requested waiver would effectively replace these draconian standards arising from the Work Stoppage, an extraordinary event beyond Verizon MA's control, with the service quality standards actually stated in the Plan.

The following chart shows the impact of the Work Stoppage on Verizon MA's performance on the metrics at issue. For each metric, it states the threshold and standard performance objectives under the Plan and the rolling average of Verizon MA's performance for the twelve months preceding April, 2016. That is followed by Verizon MA's actual results for April and then by the results for April 1-12 alone, *i.e.* excluding performance during the Work Stoppage. The remaining columns provide the actual results for May and June and the adjusted results for June, *i.e.* excluding the company's performance through June 6.7

	SQI Objective	12-month Rolling	April monthly	Results April 1 -	May monthly	June monthly	Results June 6 -
	Threshold,	Average	results	April 12	results	results	June 30
	Standard			_			
% Troubles	T = 85	82	57	80	32	72	78
Clrd w/i 24 hrs	S = 75						
- Bus							
CSB Avg.	T = 15	19	44	14	95	14	NA
Speed of	S = 20						
Answer							
Bus Service	T = 75	71	43	73	20	84	NA
Level	S = 60						

The chart demonstrates that Verizon MA's performance on these metrics during and shortly after the Work Stoppage was entirely out of line with its consistently strong performance prior to that event and confirms that the Company would have turned in similarly strong results over these months but for the Work Stoppage.

III. CONCLUSION

As demonstrated above, the Work Stoppage was an extraordinary event beyond the control of Verizon MA that significantly and adversely affected specific aspects of Verizon

There are no adjusted results for May because Verizon MA proposes to exclude the full month.

MA's service quality measured by the three metrics above, despite Verizon MA's extensive preparations and appropriate response to this event. Accordingly, the Department should grant this petition and allow Verizon MA to exclude from calculation of its performance under the Plan the results on the Troubles Cleared – Business metric from the inception of the Work Stoppage on April 13 through June 6, 2016, and the results on the CSB Speed of Answer metric and the Business Service Level metric during the Work Stoppage, April 13 through May 31, 2016.

Respectfully submitted,

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

My Mos

By its attorney

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Dated: July 14, 2016

Verizon Massachusetts

Quality of Service Report

April 2016

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Section 1

Service Quality Index

12 Month Rolling Average Monthly Actuals

Total Service Penalty

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Service Quality Index 2015/2016 Statewide Results 12 Month Rolling Average

> T = Target Level S = Standard Level

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Mass Bay

T = Target Level

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NO/NE SBU

T = Target Level S = Standard Level	2015								2016			
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Bay Path SBU

T = Target Level S = Standard Level	2015								2016			
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[RPHL] T = 1.90; S = 2.25 %Trbis Cird wil 24 hrs - Res T = 70%; S = 60%	62 1	61		59	0 2	2 0			57 0	56 0	56 0	53 0
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installation Service Rents: % Appls. Missed-Total Company Reasons T = 1.5%; S = 2.5%	0.7	0 8 2	0 8	2.8	0.8	0.8	0.7	07	0.7	0.7	0.7	0.8
% Appts. Missed-Res. Company Reasons T=1.5%; S=2.5%	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.7	0.7	0.7	0.7
% Appointments Missed - Company Facilities (CF) T = 1.15%; S = 1.25%	0.08	0.09	0.09	0 08	0 08	0.08	0.07	0.07	0.07	0.07	0.07	0.07
% Installation Trouble Reports T = 5.5%; S = 6.0%	3.7	36	36 2	35	3.5	3.6	3.5	3.6	3.5	3.6	3.6	3.6
SQI Points for Bay Path	12	12	12	11	11	11	11	11	12	12	12	11

Service Quality Index 2015/2016 Statewide Results (Monthly Actuals)

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T = Target Level S = Standard Level

	Mar Apr	1.15 0.79	57 42	85 57		1 2.0	0.7	0.11 0.07	3.5 3.4		3.6 4.8	3.8 4.6	8 44	72 46	67 43
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2016	Jan	1.08	48	81		1.0	0.9	0.09	3.4		2.3	3.3	16	92	69
	Dec	1.06	51	82		0.7	9.0	0.07	3.4		3.0	3.6	24	78	99
	Nov	96.0	45	78		0.7	9.0	90.0	4.2		2.6	3.5	20	75	76
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	Sep	1.14	46	82		1.0	0.9	0.10	4.0		3.6	3.4	12	73	78
	Aug	1.37	40	62		1.0	6.0	0.13	4.1		2.9	3.5	15	74	72
	Jul.	1.30	45	82		0.7	9.0	0.10	4.5		3.5	3.3	32	72	29
	Jun	1.37	51	81		0.7	9.0	0.12	5.1		3.7	3.4	22	72	71
2015	Мау	1.09	61	83		0.4	0.4	0.10	5.0		3.6	3.1	19	75	72
	s o	2.25	09	75		2.5	2.5	1.25	0.9		4.0	4.0	20	09	90
	Thresholds	1,90	20	82		5	1,5	1.15	5.5		3.6	3,6	15	75	75
ט - סופותפות בפעפו	Maintenance Service Items:	Network Trouble Report Rate	% Trbls Clrd w/i 24 hrs-Res	% Trbis Cird w/i 24 hrs-Bus	Installation Service Items: % Applis Missed for Co. Reasons	Total Customers	Residence Customers	Company Facilities (CF)	% Installation Trouble Reports	Service Response lems:	DA Avg. Speed of Answer	Toll & Assist Speed of Answer	CSB Avg. Speed of Answer	Residence Service Level	Business Service Level

Mass Bay

2015/2016 Statewide Results Service Quality Index (Monthly Actuals)

Apr 1.17 0.15 3.6 0.8 0.8 88 2 Mar 0.10 4.7 1.35 9.0 0.5 75 36 Feb 2016 9.0 0.8 3.7 1.19 0.09 45 82 Jan 0.7 9.0 3.5 1.08 0.07 46 84 Dec 9.0 4.2 0.98 90.0 40 78 0.7 2 No No 4.0 0.8 0.7 0.11 1.20 43 82 Ö 0.8 0.10 3.8 1.13 4 84 0.7 Sep 1.2 1.0 1,35 77 0.20 4.4 34 Aug 1.37 9.0 9.0 0.07 5.9 37 79 3 1.44 45 0.6 0.14 7.3 0.7 8 Fig. 2015 1.09 0.3 0.04 6.2 51 0.3 83 May % Installation Trouble Reports Maintenance Service frems: Network Trouble Report Rate %Trbls Cird w/i 24 hrs - Res. %Trbls Clrd w/i 24 hrs - Bus. Installation Service Items: [RPHL] T = 1.90; S = 2.25% Appointments Missed -Company Facilities (CF) T = 1.15%; S = 1.25% T = 1.5%; S = 2.5% T = 1.5%; S = 2.5% S = Standard Level % Appts. Missed-Total Company Reasons Company Reasons % Appts. Missed-Res. T = 70%; S = 60%T = 85%; S = 75% T = 5.5%; S = 6.0%T = Target Level

Exhibit 1

4.0

1.0

0.07

1.0

0.86

35

53

NO/NE

2015/2016 Statewide Results Service Quality Index (Monthly Actuals)

	Арг	6 0.74	8 48	9 57	1.5	1.5	0.14	3.3
	b Mar	1.48	45 58	71 79	1.0 0.7	0.8	0.12	4.0
2016	Jan Feb	1.04	46	92	1:	1.0	0.12	3.6
	Dec	1.02	22	8	0.9	0.7	0.13	3.6
	Nov	0.93	48	75	9.0	0.5	0.08	4.6
	Oct	1.12	21	80	0.8	0.7	0.08	4.3
	Sep	1.06	48	77	1.5	12	0.18	4.5
	Aug	1.23	39	78	1.2	1-	0.10	4.3
	<u> </u>	1.08	47	85	1:1	0.6	0.10	3.5
5		1.23	25	77	0.5	0.4	0.10	3.3
2015	May	1.03	70	78	0.4	0.2	0.17	4.4
T = Target Level S = Standard Level		Meintenance Service Rems Network Trouble Report Rate [RPHL] T = 1.90; S = 2.25	%Trbls Clrd w/i 24 hrs - Res. $T = 70\%$; $S = 60\%$	%Trbls Clrd w/i 24 hrs - Bus. $T = 85\%$; $S = 75\%$	Installation Service Ifems: % Appts. Missed-Total Company Reasons T = 1.5%; S = 2.5%	% Appts. Missed-Res. Company Reasons T = 1.5%; S = 2.5%	% Appointments Missed - Company Facilities (CF) T = 1.15%; S = 1.25%	% Installation Trouble Reports T = 5.5%; S = 6.0%

Bay Path

2015/2016 Statewide Results Service Quality Index (Monthly Actuals)

T = Target Level

T = Target Level S = Standard Level		Maintenance Service Items: Network Trouble Report Rate [RPHL] T = 1.90; S = 2.25	%Trbls Clrd w/i 24 hrs - Res. $T = 70\%$; $S = 60\%$	%Trbls Clrd w/i 24 hrs - Bus. T = 85%; S = 75%	Installation Service Items: % Appls. Missed-Total Company Reasons T = 1.5%; S = 2.5%	% Appts. Missed-Res. Company Reasons T = 1.5%; S = 2.5%	% Appointments Missed - Company Facilities (CF) T = 1.15%; S = 1.25%	% Installation Trouble Reports T = 5.5%; S = 6.0%
2015	May	1.15	64	88	0.5	0.5	0.12	4.2
	Jun	1.41	56	82	0.7	0.6	0.12	3.9
	Jul	1.40	52	86	9.0	0.6	0.11	3.8
	Aug	1.52	45	84	0.8	0.7	60.0	3.6
	Sep	1.2.1	51	85	1.0	1.0	0.05	3.7
	Oct	1.24	57	85	8.0	0.7	0.06	3.8
	No.	0.96	48	83	0.8	0.8	0.00	3.7
	Dec	1.06	54	06	0.6	0.5	0.03	3.2
2016	Jan	1.00	55	86	1.0	1.0	0.05	2.9
	Feb	1.36	49	82	6:0	0.9	0.04	3.6
	Mar	1,19	63	89	9.0	0.6	0.07	3.6
	Apr	0.75	46	99	6.0	1.0	0.02	3.0

Exhibit 1

Verizon Massachusetts

Quality of Service Report

April 2016

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Section 3 - Major Service Outages

Section 4 - Public Access Line Data

Section 1

Service Quality Index

12 Month Rolling Average Monthly Actuals

0.00

Total Service Penalty

Mass State

Service Quality Index 2015/2016 Statewide Results 12 Month Rolling Average

S = Standard Level

T = Target Level

Pts Ts 2 0.0 0.00 8 19 34 41 Sts å 0.09 0.8 ည 1 2 19 0.00 Mar 34 42 Pts 2 N 0.00 0.00 0.8 60.0 3,3 75 Feb 8 34 2 C. SI å 2016 0.08 19 1.16 S 69 Jan 33 S 41 2 0.08 9.0 19 89 0.00 5 260 33 40 ٤ 2 80.0 0.00 0.00 0.00 9.0 18 74 88 ය Nov 33 40 ST 2 N 18 1.18 5 0.08 ö Ş 33 40 2 0.0 1.21 51 0.09 17 99 Sep 00.0 0.00 25 33 40 ů 0.08 8 4.0 16 99 1.20 9.0 52 Aug 34 52 4 å 0.09 1.18 54 9.0 16 99 马 34 8 42 S Š 0.00 0.00 0.8 60.0 5 69 99 Ŗ 1.20 Sun P 34 42 73 S N 2015 3.6 1.19 32 8 14 99 0.5 0.09 May 2.5 2.5 1.25 6.0 66 4.0 888 v Thresholds -1,90 70 85 3.6 15 75 75 % Appls Missed for Co. Reasons % Installation Trouble Reports Toll & Assist Speed of Answer Network Trouble Report Rate 3 or Move 'Standard' Misses Maintenance Service Items: % Trbis Cird w/i 24 hrs-Res CSB Avg. Speed of Answer Points for Response Items Sub-Total Points for SBU's Total SQI Points for Mass. % Trbls Cird w/i 24 hrs-Bus DA Avg. Speed of Answer Installation Service Items: Residence Service Level Service Response Items: Company Facilities (CF) **Business Service Level** Monthly Service Penalty Residence Customers Total Customers

Mass Bay

Service Quality Index 2015/2016 Statewide Results 12 Month Rolling Average

T = Target Level S = Standard Level Maintenance Service Items:	2015 May Pt	hul P	luk P	Aug	Sep Pt	Oct Pr	Nov PP	Dec P	2016 Jan Pt	Feb 7.	Mar Pt	Apr Pt
Network Trouble Kaport Fate [RPHL] T = 1.90; S = 2.25 %Trbls Cird wil 24 hrs - Res T = 70%; S = 60%	48	1.50	48 2	46 0	45	44 0	44 0	44	43 2	43	43	42
%Trbls Cird w/l 24 hrs - Bus T = 85%; S = 75%	79	1	79	79	79	79	79	98	80	118	81	81
Anstallation Service Rems; % Appts. Missed-Total Company Reasons T = 1.5%; S = 2.5%	0.8	0.8	0.8	0.9	0.8	0.9	0.9	0.8	0.8	0.8	0.7	0.7
% Appls. Missed-Res. Company Reasons T = 1.5%; S = 2.5%	0.6	0.6	0.6	0 6 2	0 6 2	0.6	0.7	0.7	0.6	0.6	0.6	0.7
% Appointments Missed - Company Facilites (CF) T = 1.15%; S = 1.25%	0.08	0.08	0.08	0.08	0.08	0.09	0.09	0.09	0.09	0.09	0.10	0.10
% installation Trouble Reports $T = 5.5\%$; $S = 6.0\%$	4.5	4.5	4.4	4.5	4.4	4.5	4.5	4.6	4.6	4.6	4.6	4.6
SQI Points for MassBay	11	=	=	11	1	11	1	17	11	11	=	1

NO/NE SBU

Service Quality Index 2015/2016 Statewide Results 12 Month Rolling Average

T = Target Level S = Standard Level	2015									2016				
	May	nnf	ž	Aug	Sep	ű.	20 22	Nov P	Dec P	Jan	F.	£	Mar	Apr
Maintenance Service Rents: Network Trouble Report Rate [RPHL] T = 1.90; S = 2.25	1.16	1.17	14	9	1.15	2	1.13	1.13	1.09	1.09		1.13	1,11	1.09
%Trbls Clrd w/i 24 hrs - Res T = 70%; S = 60%	54	54	54	53		52 0	52 0	51	52	52		51	52 0	51 0
%Trbls Cird wii 24 hrs - Bus T = 85%; S = 75%	78	77	78 1	78	1	77	77	77	78	78		78	78	77
#Astallation Service ftents; % Appls. Missed-Total Company Reasons T = 1.5%; S = 2.5%	0.8	0.8	2 0.9	6.0	2	1.0	1.0	0.9	6:0	0.9	[2]	0.9	0.9	0.9
% Appls. Missed-Res. Company Reasons T = 1.5%; S = 2.5%	0.5	0.5	2 2 2	0.5	2	2	0,6	0.6	0.6	2		0.7	07	0.8
% Appointments Missed - Company Facilities (CF) T = 1.15%; S = 1.25%	0.12	0.10	0.09	0.10	010	2	0.09	0.09	0.10	0.10		0.11	0.11	0.12
% Installation Trouble Reports $T = 5.5\%$; $S = 6.0\%$	4.1	4.0	3.9	3.9	3.	3.9	3.9	4.0	4.0	4.0		4.0	4.0	3.9
SQI Points for North/N.E.	11	1	1		11	1-	11	11	11		11	11	11	11

Bay Path SBU

T = Target Level

	un Jul Aug Sep Oct Nov Dec Pt Pt Pt Pt Pt	24 1.21 1.23 1.24 1.22 1.21 1.17 2 2 2 2 2 2	61 60 59 58 58 57 1 0 0 0 0 0	83 84 84 84 84 84 1 84 1<	0.8 0.8 0.8 0.7 2 2 2 2	0.6 2 0.6 2 0.6 2 0.6 2	1.09 0.09 0.08 0.08 0.08 0.07 0.07 2 2 2 2 2 2	3.6 3.6 3.5 3.5 3.5 3.5	10 19 11 11 11 11
S = Standard Level	May Jun Pt	Maritenarce Service Rems: Network Trouble Report Rato [RPHL] T = 1,90; S = 2,25		%Trbis Cird wii 24 hrs - Bus 83 83 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	firstellation Sarvice Hems: % Appls. Missed-Total Company Reasons T = 1.5%; S = 2.5%	% Appts. Missad-Res. Company Reasons 7 = 1.5%; S = 2.5%	% Appointments Missed - 0.08 0.09 Company Facilities (CF) 2 T = 1.15%; S = 1.25%		SOI Points for Bay Path 12 12

Service Quality Index 2015/2016 Statewide Results (Monthly Actuals)

Page 1 of 4

T = Target Level

			2015								2016			
	Thresholds	St A	Ž	2	=	Aug	S	Ö	Nov	Oec	Cal	E C	Mar	Apr
Maintenance Service Items:	•)	Á			A	3	Š						
Network Trouble Report Rate	1.90	2.25	1.09	1.37	1.30	1.37	1.14	1.19	0.96	1.06	1.08	1.39	1.15	0.79
% Trbls Cird w/i 24 hrs-Res	20	09	61	51	45	40	46	20	45	51	48	43	22	42
% Trbls Clrd w/i 24 hrs-Bus	82	75	83	81	82	79	82	82	78	85	81	75	85	80
Installation Service Items:														
% Appts Missed for Co. Reasons									-	100		00	100	-
Total Customors	1.5	2.5	0.4	0.7	0.7	1.0	1.0	0.8	0.7	0.7	1.0	80	0.7	1.1
Residence Customers	1.5	2.5	0.4	9.0	0.6	0.9	0.9	0.7	9.0	9.0	0.9	0.7	0.7	1.1
Company Facilities (CF)	1.15	1.25	0.10	0.12	0.10	0.13	0.10	0.08	90.0	0.07	0.09	0.08	0.11	0.07
% Installation Trouble Reports	5.5	0.9	5.0	5.1	4.5	4.1	4.0	4.0	4.2	3.4	3.4	4.1	3.5	3.4
Sanira Recoonse Itame:														
DA Ava. Speed of Answer	3.6	4.0	3.6	3.7	3.5	2.9	3.6	3.5	2.6	3.0	2.3	3.4	3.6	4.8
Toll & Assist Speed of Answer	3.6	4.0	3.1	3.4	3.3	3.5	3.4	3.3	3.5	3.6	3.3	3.8	3.8	4.6
CSB Avg. Speed of Answer	15	20	19	22	32	15	12	24	50	24	16	24	8	14
Residence Service Level	75	09	75	72	72	74	73	75	92	78	92	71	72	46
Business Service Level	75	09	72	71	29	72	78	75	9/	99	. 69	69	29	73

Mass Bay

Service Quality Index 2015/2016 Statewide Results (Monthly Actuals)

2015 May	nn	חר	Aug	Sep	O	o N	Dec	2016 Jan	Feb	Mar	Apr
1.44		1.37	1.35	1.13	1.20	86.0	1.08	1.10	1.35	1.17	0.86
45		37	34	41	43	40	46	45	36	51	35
8	П	67	77	88	82	78	84	82	75	88	80
0.7		9.0	1.2	0.8	0.8	0.7	0.7	0.8	9.0	0.8	1.0
0.6		0.6	1.0	0.7	0.7	0.6	0.6	0.8	0.5	0.8	1.0
0.14		0.07	0.20	0.10	0.11	0.00	0.07	0.09	0.10	0.15	0.07
7.3		5.9	4.4	3.8	4.0	4.2	3.5	3.7	4.7	3.6	Exhibit 2

Bay Path

Service Quality Index 2015/2016 Statewide Results (Monthly Actuals)

	Apr	0.75	46	88	0.9	1.0	0.02	Exhibit 2
	Mar	1.19	63	68	9.0	9.0	20.0	3.6
	Feb	1.36	49	82	6:0	0.9	0.04	3.6
2016	Jan	1.00	55	98	1:0	1.0	0.05	5.9
	Dec	1.06	54	06	9.0	0.5	0.03	3.2
	Nov	96:0	48	83	0.8	0.8	90.0	3.7
	Oct	1.24	57	85	0.8	0.7	0.06	3.8
	Sep	1.21	51	85	100	1.0	0.05	3.7
	Aug	1.52	45	84	8.0	0.7	0.09	3.6
	Jul	1.40	52	86	0.6	0.6	0.11	89.
	Jun	14.1	56	85	0.7	0.6	0.12	3.9
2015	May	1.15	64	88	0.5	0.5	0.12	4.2
T = Target Level S = Standard Level		Maintenanze Servize Items: Network Trouble Report Rate [RPHL] T = 1.90; S = 2.25	%Trbls Cird wii 24 hrs - Res. T= 70%; S= 60%	%Trbls Cird wii 24 hrs - Bus. T = 85%; S = 75%	Installation Service Items: % Appts. Missed-Total Company Reasons T = 1.5%; S = 2.5%	% Appts. Missed-Res. Company Reasons T = 1.5%; S = 2.5%	% Appointments Missed - Company Facilities (CF) T = 1.15%; S = 1.25%	% Installation Trouble Reports T = 5.5%; S = 6.0%

Verizon Massachusetts

Quality of Service Report

May 2016

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Section 4 - Public Access Line Data

Section 1

Service Quality Index

12 Month Rolling Average Monthly Actuals

Total Service Penalty

Mass State

Service Quality Index 2015/2016 Statewide Results 12 Month Rolling Average

> T = Target Level S = Standard Level

			2015	10											~	2016							
	Thresholds T S	s S	nn C		Jul	Aug	Ć.	Sep	į	000		Nov.	Dec	ن د	Jan	ă	Feb.	Ď	Mar	ŭ	Apr	ă	May
Maintenance Serwice Items;	1.90	2.25	1.20		1.18		20 2	1.21	-	1.18	2 (2)	1.18		1.15		1.16	1.19	-	1.18	2 2	1.16	2	1.15
	20	09	54		54		52 0	51	L	51	0	50	0	51	0	50 0	49		50	0	48	0	45
% Trbls Cird wil 24 hrs-Bus	85	75	80	-	30	Ш		88		80	-	80	1	Ц	82	81 1	8		82	F	79	-	75
Installation Service Items:																							
% Appts Missed for Co. Reasons											-	-				-		L				-	
	1.5	2.5	0.8	2	0.8		0.8	6.0	2	0.9	2	0.8	2	1	0	8	0.8		0.8	2	0.8	2	60
Residence Customers	1.5	2.5	0.5	73	9.0	2 0	0.6	0.6	5 2	9.0	2	9.0		9.0	2	0.7 2	0.7	7	0.7	2	0.7	2	0.8
	1,15	1.25	60.0	2	60.0		0.08	0.09	3 2	0.08	2	0.08	2 0	0.08	2	08 2	0.09	53	0.09	2	60.0	2	60.0
eports	5,5	6.0	4.0	2	4.0	2 4	10	4.0	2	4.0	23	4.0	2	4.1	2	4.0 2	4.1	2	4.1	2	4.0	Ci	4.0
Control Recoons																							
DA Ava. Speed of Answer	3.6	4.0	3.6	2	3.5	2 3	3.5 2	3.5	5 2	3.5	2	3.5		3.4		3.3 2	3.3	2	3.3	2	3.4	2	3.5
Toll & Assist Speed of Answer	3.6	4.0	3.1	2	3.2		3.2 2		2	3.2	2	3.3	2	3.3	2	3 2	3,	4 2	3.4	2	3.6	2	3.6
CSR Ava Speed of Answer	15	20	15	2	16		L			18	-	18	-	19			20	-	19	-	22	D	28
Residence Service Level	75	09	69	-	202	-	71 1	77	-	72	7	74	-	75	2	76 2	75	2	75	-	72	-	69
Business Service Level	75	09	99	5"	99	-	1 99	99	1	19	1	68	7-	68		69 1	70	1	7.1	۳	69	=	64
Points for Response Items				89		7	7		7		7		7		80	8		8		7		9	
Sub-Total Points for SBU's				34		34	33		33	2012/2012/19	33		33	33		34		34		34		33	
Total SQI Points for Mass.				42	H	41	40		40		40	7	40	41		42		42		41		39	
3 or More 'Standard' Misses				No	S	0	No		No.		O.N.	N _O	L	Ñ		No		° №		N _O N		No No	N _O
Manufelt. Conden Danoth.			000	-	000	000	-	000		000		000	-	000	800	-	000		000		000		000

Mass Bay

Service Quality Index 2015/2016 Statewide Results 12 Month Rolling Average

T = Target Level

ã 75 1.18 40 0.8 0.7 0,10 4.6 May ñ. 0.7 0.10 1,18 79 0.7 42 4.6 Apr ã 1,21 0.7 0.6 0.10 43 81 Mar ã 0.8 0.09 1,22 43 81 0.6 4.6 Feb 屲 2016 60.0 1,19 0.8 43 80 9.0 Jan ã 1.17 0.09 44 80 0.8 0.7 Dec ā, 6.0 1,19 44 79 0.09 Š ã 1,19 6.0 9.0 0.09 44 29 Ö ũ 1 22 0.08 0.8 9.0 45 79 Sep ď 1.20 0.9 9.0 0.08 46 79 4.5 Ang ã 1.18 9.0 9.0 90.0 48 79 3 ã 2015 0.08 48 0.8 9.0 80 Ę % Installation Trouble Reports Network Trouble Report Rate Maintenance Service Items: %Trbls Cird w/i 24 hrs - Res %Trbls Chd wii 24 hrs - Bus Installation Service Items: [RPHL] T = 1.90; S = 2.25 % Appointments Missed -Company Facilities (CF) S = Standard Level SQI Points for MassBay T = 1.5%; S = 2.5% T= 1.5%; S= 2.5% Company Reasons % Appts. Missed-Total T = 1.15%; S = 1.25% Company Reasons % Appts. Missed-Res. T=70%; S=60% T = 85%; S = 75% T = 5.5%; S = 6.0%

NO/NE SBU

Service Quality Index 2015/2016 Statewide Results 12 Month Rolling Average

T = Target Level S = Standard Level	2015							2016				
	lut.	â	Aug	Sep	ā O C	NO.	Dec Dec	Jan	Feb	Mar	Apr	May
Maintenance Service frems: Network Trouble Report Rate [RPHL] T = 1.90; S = 2.25	1.17 1.14		2 2	1,15	1.13	113	1.09	1,09	1.13	11.1	1.09	1.07
%Trbls Cird w/i 24 hrs - Res T = 70%; S = 60%	54 0	54	53	52 0	52 0	51 0	52 0	52 0	51 0	52 0	51	48
%Trbis Cird wii 24 hrs - Bus T = 85%; S = 75%	77 1	78 1	78	77	77	77 1	78	78	78	78	76	72 0
Installation Sarvice Items; % Appts. Missed-Total Company Reasons T = 1.5%; S = 2.5%	0.8	2	0.9	1.0	1.0	0.9	0.9	0.9	0.9	0.9	0.9	1.1
% Appts. Missed-Res. Company Reasons T = 1.5%; S = 2.5%	0.5 0.5	5 2	0.5	0.6	0.6	0.6	0.6	0.7	0.7	0.7	0.8	0 0 0
% Appointments Missed - Company Facilities (CF) T = 1.15%; S = 1.25%	0.10 0.09	2 6	0.10	0.10	0.09	0 00	0.10	0.10	0.11	0.11	0.12	0.11
% Installation Trouble Reports T = 5.5%; S = 6.0%	4.0 3.9	2	3.9	3.9	3.9	4.0	4.0	4.0	4.0	4.0	3.9	3.9
SQI Points for NorthVN.E.	11	11	=	11	11	4-	1-	11	11	12	11	10

Bay Path SBU

T = Target Level

ă. 22 9.0 90.0 8 6.0 3.5 May -置 0.07 3.6 23 84 0.8 0.7 Apr 12 ď 0.7 0.7 0.07 3.6 28 98 Mar 12 ĩ 26 85 0.07 3.6 Feb **** **~** 15 2016 0.07 57 0.7 Jan <u>T</u> 0.07 58 85 9.0 Dec ä. *--57 84 0.07 ş iiw **G** 0.08 器 84 ŏ <u>ور</u> 0.08 9.6 3.5 28 84 1.24 Sep T A... 0.08 3.5 53 84 0.8 Aug E 12 0.09 99 84 0.8 3 € 12 2015 3.6 0.09 1.24 8.0 9.0 61 L L Maintenance Service items: Network Trouble Report Rate % Installation Trouble Reports T = 5.5%; S = 6.0%%Trbls Clrd w/l 24 hrs - Res %Trbls Cird wii 24 hrs - Bus Installation Sarvice Rems: [RPHL] T = 1.90; S = 2.25 % Appointments Missed -Company Facilities (CF) S = Standard Level T=1.5%; S=2.5% SQI Points for Bay Path T= 1.5%; S= 2.5% % Appts. Missed-Total Company Reasons T = 1.15%; S = 1.25% Company Reasons % Appts. Missed-Res. T = 70%; S = 60% T = 85%; S = 75%

Service Quality Index 2015/2016 Statewide Results (Monthly Actuals)

T = Target Level

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3.9 0.95 32 28 0.01 4.8 May 4.6 42 57 0.07 Apr 1.15 0.11 3.8 0.7 8 2 2 8 3.5 0.7 Mar 43 0.8 90.0 3.4 24 71 71 4.1 Feb 0.9 2.3 3.3 16 76 76 69 1.08 81 0.09 2016 3.4 Jan 1.06 0.7 85 0.07 3.6 24 78 66 9.0 Dec 0.96 45 78 9.0 90.0 2.6 20 20 75 76 4.2 Nov 1.19 0.8 90.0 3.5 2.3 2.4 75 75 82 22 4.0 ö 3.4 73 78 0.9 0.10 82 46 4.0 Sep 40 2.9 3.5 74 72 6.0 0.13 4.1 Aug 1.30 0.10 3.5 82 45 0.6 0.6 0.12 1.37 72 22 77 2015 8 5 5.1 Jun 2.5 1.25 4.0 4.0 20 60 60 60 (C) Thresholds 1.90 70 85 7,5 1.15 3.6 3.6 15 75 % Appts Missed for Co. Reasons % Installation Trouble Reports Toll & Assist Speed of Answer Network Trouble Report Rate Maintenance Service Items: % Trbis Clrd w/i 24 hrs-Res CSB Avg. Speed of Answer % Trbls Cird w/i 24 hrs-Bus Installation Service Items; DA Avg. Speed of Answer Service: Response flems: Residence Service Level Company Facilities (CF) **Business Service Level** S = Standard Level Residence Customers Total Customers

Mass Bay

Service Quality Index 2015/2016 Statewide Results (Monthly Actuals)

2016	Dec Jan	1.08	46 45	84	0.7	0.6	0.07 0.09 0.10	3.5 3.7 4.7
16	Jan	1.19	45	85				
	Feb	1.35	36	75	0.6			
	Mar	1.17	21	88	0.8	0.8	0.15	3.6
	Apr	0.86 1.00	35 27	53	1.0	1.0	0.07	4.0

NO/NE

Service Quality Index 2015/2016 Statewide Results (Monthly Actuals)

T = Target Level

0.86 0.00 33 3 2.2 2.1 4.1 May 1.5 1,5 0.14 0.74 3.3 48 57 Apr 1.06 79 0.7 0.7 0.11 28 3.4 Mar 0.12 4.0 1.48 0.8 5 1.0 7 Feb 2016 1.0 1.04 0.12 46 76 3.6 1. Jan 6.0 0.7 1.02 22 81 0.13 3.6 Dec 0.93 4.6 9.0 0.5 0.08 48 75 Nov 0.8 0.7 1.12 80 0.08 4.3 51 Oct 1.2 1.06 0.18 4.5 1.5 48 77 Sep 1.23 1.2 0.10 4.3 39 78 1.1 Aug 1.08 0.10 47 82 1. 9.0 3.5 3 2015 0.5 1.23 0.4 0.10 55 11 3.3 H % Installation Trouble Reports Maintenance Service frems: Network Trouble Report Rate %Trbls Clrd w/i 24 hrs - Res. %Trbls Clrd w/i 24 hrs - Bus. Installation Service Items: [RPHL] T = 1.90; S = 2.25 % Appointments Missed -Company Facilities (CF) S = Standard Level T = 1.5%; S = 2.5%T= 1.5%; S= 2.5% Company Reasons % Appts. Missed-Total Company Reasons % Appts. Missed-Res. T = 1.15%; S = 1.25% T = 70%; S = 60%T = 85%; S = 75% T=5.5%; S=6.0%

Exhibit 3

Bay Path

2015/2016 Statewide Results Service Quality Index (Monthly Actuals)

T = Target Level S = Standard Leve

2015	Jun Jul Aug Sep Oct Nov	1.41 1.40 1.52 1.21 1.24 0.96	56 52 45 51 57 48	85 86 84 85 85	0.7 0.6 0.8 0.8 0.8	0.6 0.7 1.0 0.7 0.8	0.12 0.09 0.05 0.06 0.06	3.9 3.8 3.6 3.7 3.8 3.7
2016	Dec Jan	1.06	54 55	98 06	0.6	0.5 1.0	0.03	3.2 2.9
	Feb	1.36	49	82	0.0	0.9	0.04	3.6
	Mar Apr	0.75	63 46	99	0.0	0.6	0.07 0.02	3.6
	May	0.95	24	34	2.4	1.9	0.03	Exhibit 3

COMMONWEALTH OF MASSACHUSETTS DÉPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Verizon New England Inc. to Waive
Certain Results Under its Retail Service Quality
Plan for April, May and June, 2016

AFFIDAVIT OF LISA M. THORNE

Lisa M. Thorne hereby deposes and says:

- Lam a Director State Government Affairs for Verizon New England Inc., d/b/a Verizon Massachusetts ("Verizon MA"). Thave worked for Verizon MA and its predecessor companies since 1989. My current duties include assisting in the development of regulatory policy for Verizon MA in Massachusetts, advocating for that policy before the Department, assisting in the development and implementation of legislative policy in other New England states, and generally advocating the interests of the Company. Lam familiar with Verizon MA's performance, data and reporting under the Department's Retail Service Quality Plan. Lam also familiar with Verizon MA's practices in preparation for and in response to emergencies, including work stoppages.
- 2. I offer this affidavit in support of the Petition of Verizon New England Inc. To Waive Certain Results Under Its Retail Service Quality Plan for April, May and June, 2016, filed herewith. I have reviewed the Petition. The facts stated in the Petition are true and correct to the best of my knowledge, information and belief.

Signed under the pains and penalties of perjury this ___ day of June, 2016.

Diva Thorre