

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

At a session of the Public Service  
Commission held in the City of  
Albany on January 22, 2003

COMMISSIONERS PRESENT:

Maureen O. Helmer, Chairman  
Thomas J. Dunleavy  
James D. Bennett  
Leonard A. Weiss  
Neal N. Galvin

CASE 99-C-0949 - Petition Filed by Bell Atlantic-New York for  
Approval of a Performance Assurance Plan and  
Change Control Assurance Plan, filed in  
C 97-C-0271.

ORDER AMENDING PERFORMANCE ASSURANCE PLAN

(Issued and Effective January 24, 2003)

BY THE COMMISSION:

INTRODUCTION

In November 1999, the Commission adopted the  
Performance Assurance Plan and Change Control Assurance Plan  
(PAP or the Plan).<sup>1</sup> The PAP provides for an annual review to  
determine whether any modifications or additions should be made  
to the PAP to address current market conditions. Amendments  
were made to the PAP after the first year review process.<sup>2</sup>

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<sup>1</sup> Case 99-C-0949, Order Adopting the Amended Performance  
Assurance Plan and Amended Change Control Plan (issued  
November 3, 1999).

<sup>2</sup> Case 99-C-0949, Order Amending Performance Assurance Plan,  
(issued December 15, 2000) and Order Granting Modification of  
December 15, 2000 Order and Amending Performance Assurance  
Plan (issued May 8, 2001).

On November 2, 2001, a notice was issued inviting interested parties to propose modifications or additions to the Plan and to comment on Verizon's proposed items outlined in an October 22, 2001 filing.<sup>3</sup> Consideration of the comments received from competitive local exchange carriers (CLECs) and discussions with Verizon were deferred until well into 2002, a consequence of Staff's and Verizon's focus on stabilizing telecommunications service in the months following the 9/11 tragedy. On October 18, 2002, Staff's proposed PAP was posted on the Department web site, and comments were invited on the proposal and three other matters.<sup>4</sup> Comments were received from AT&T, WorldCom, Covad Communications Company (Covad), XO New York, Allegiance Telecom of New York, Inc., A.R.C. Networks, Inc. (d/b/a InfoHighway Communications Corp.), and the Joint Commentors. Replies were received from WorldCom, Joint Commentors and Verizon.

The comments generally support the broad structural changes contained in the October 2002 proposal. CLEC comments

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<sup>3</sup> Comments were received from WorldCom, Inc.(WorldCom), AT&T Communications of New York, Inc.(AT&T), XO New York, Inc.(XO New York), joint comments from Metropolitan Telecommunications, Inc. and Z-Tel Communications, Inc. (Joint Commentors), Network Plus, Inc.(Network Plus), and Allegiance Telecom of New York, Inc., e-Spire Communications, Inc., Focal Communications of New York and Time Warner Telecom-NY-L.P., (collectively, the CLEC Group). Reply comments were received from Verizon, WorldCom, AT&T, XO New York, and the Joint Commentors.

<sup>4</sup> In a letter dated October 15, 2002, Verizon proposed two additional modifications to the Plan: 1) a six-month statute of limitations to challenge the monthly reported data and bill credit calculations, and 2) deletion of the prohibition on waivers for parity metrics. Additionally, Staff asked for comments addressing whether a CLEC's entitlement to bill credits should be conditioned on a CLEC being reasonably timely on its UNE payments to Verizon for undisputed bills.

oppose the three proposed modifications to the 2003 PAP described in footnote 4, supra. Verizon urges their approval with some modifications.

#### ADMINISTRATIVE PROCESSES

##### Statute of Limitations

Verizon proposes that a six-month statute of limitations be applied to CLEC challenges to Verizon's report of its performance under the PAP. All CLECs state that they need more than 6 months just to discover and attempt to resolve errors and omissions on Verizon's bills, which are typically lengthy and complex. Covad suggests that if the Commission adopts any statute of limitations against CLEC challenges, then it should also order a symmetrical provision against Verizon for backbilling of CLECs. WorldCom suggests a 2-year statute, while XO recommends a 1-year statute conditioned on Verizon's timely provision of a detailed explanation of unclear bills.

Verizon asserts that its proposal is reasonable principally because a statute of limitations serves the important purpose of ensuring that disputes are not resolved using data and recollections that have become stale and unreliable due to the passage of time. Expeditious resolutions are needed within the PAP, Verizon contends, where the subject matter experts deal with monthly waves of microscopic detail.

##### Discussion

While CLECs should be properly credited for Verizon's poor service, including that which is uncovered sometime after the fact, a reasonable period to seek review of PAP performance reports should facilitate the process. However, to be fair, CLECs must have access to sufficient information about the data

in order to adequately review and, if necessary, challenge a performance report.

To that end, CLECs have requested that the Structured Query Language (SQL) algorithms which underlie the calculation of each reported metric result be distributed to parties along with the raw data for each metric that is currently provided for metric replication purposes. Verizon indicates that it will complete the metric business rules which contain these query statements "by next year".<sup>5</sup> Given that the queries define the basis for the metric calculations, electronically providing the CLECs with specific query statements along with the raw data used to generate the metric results each month should facilitate the CLECs' ability to replicate reported results, and also lessen confusion regarding how the metric guidelines are being interpreted by Verizon.

Verizon's provision of the complete array of SQLs will allow CLECs to discover data incongruities in a relatively short time. Therefore, a two-year limitation on challenges to PAP performance is reasonable and will be adopted. This limitation will be prospective beginning with the report issued for June 2003 performance,<sup>6</sup> provided Verizon submits all SQLs related to PAP metrics to the Director of Communications prior to that date.

#### Waiver for Parity Metrics

Verizon proposes that the PAP waiver provision be modified to delete the prohibition on waivers for parity metrics. In support of this proposal, Verizon cites examples

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<sup>5</sup> Verizon Reply Comments, November 22, 2002, p.24.

<sup>6</sup> The limitation period will begin on July 25, 2003, the date when June 2003 performance is reported.

from its recent work stoppage as extraordinary circumstances where a waiver request would have been appropriate. It claims that during the work stoppage, it was unable to process its own retail provisioning and repair orders, but CLEC provisioning and repair orders nevertheless continued to come in. Because CLEC orders came in at a faster rate than Verizon retail orders, Verizon asserts, the result was a much larger backlog of CLEC orders than retail orders. According to Verizon, the relevant parity metrics incorrectly interpreted these circumstances as a lack of parity between Verizon's retail and wholesale performance.

The CLECs point out that they are entitled to wholesale performance on par with Verizon's retail performance, regardless of the circumstances. They acknowledge that emergency situations will hamper Verizon's overall performance, but maintain that the PAP's ideal of non-discrimination means that CLECs and Verizon should suffer equally. AT&T notes that federal and state law also obligate Verizon to provide nondiscriminatory access to wholesale services.

#### Discussion

CLECs are understandably concerned that Verizon provide parity service, even in extraordinary circumstances, to assure that their ability to compete effectively is not impeded. WorldCom points out that, even in a work stoppage, Verizon has the ability to adjust or reassign resources so that parity can be met. Recognizing that this latter suggested action may at times be difficult, on balance, maintaining parity performance is a critical element in the competitive fabric. In light of the importance of the PAP's pro-competitive goals, waivers should be reserved as an extreme remedy for relief from circumstances clearly beyond Verizon's control and should apply

only to absolute measures. The examples Verizon submitted in support of its proposal, given as they are solely in the context of a work stoppage, are not compelling and do not justify deletion of the existing prohibition on waivers for parity metrics.

Conditioning of Bill Credits  
Upon Timely CLEC Payments\_\_\_\_\_

Staff tentatively proposed that the receipt of bill credits be conditioned on a CLEC being reasonably timely in its UNE payments to Verizon. CLECs advance three objections to this proposal: first, that no relationship exists between bill credits, which are intended to serve as penalties to enforce the PAP, and timely CLEC payments; second, that Verizon already possesses other means for collecting late CLEC payments through its tariffs and interconnection agreements; and third, that Verizon's billing and dispute resolution procedures are flawed, so Verizon's own processes may result in a CLEC payment being considered untimely. AT&T argues that a 30-day grace period is commercially impractical and/or unfair because some bill credits are based on Verizon's quarterly performance.

Verizon replies that it cannot afford to provide quality service when CLECs do not pay bills in a timely fashion. It notes that its wholesale business depends upon a small customer base that makes large purchases. Verizon would revise Staff's proposal by delaying its effect until the Critical Measures billing claims metrics become effective; applying an offset only to balances that remain unpaid for more than two months after billing disputes are resolved; and allowing Verizon to retain the bill credits that are recaptured by this provision.

Discussion

Staff's proposal was intended to address the potential inequity of Verizon providing bill credits at a time it is owed undisputed payments for service. Judging from the comments received, it appears that issues relating to billing dispute provisions found in interconnection agreements and tariffs, together with bankruptcy rules, could introduce an unnecessary level of complexity to the PAP that could draw the Commission into ordinary commercial disputes.

Verizon will be directed to strike the proposed change to Section II.G. of the Plan and reinstate the original language, to wit: "Verizon NY will issue checks in lieu of outstanding bill credits to CLECs that discontinue taking service from Verizon NY." However, immediately following the reinstated language, the PAP should be amended by adding: "Verizon NY may, however, exercise ordinary commercial means to ensure that it will not issue such a check prior to receipt of a CLEC's undisputed payments due Verizon NY."

Inclusion of CLECs in Annual Review

AT&T, Covad, WorldCom and the Joint Commentors request that CLECs be allowed to participate in the annual review process along with Staff and Verizon. AT&T states that the current process, in which CLECs are invited to comment after the issuance of a proposed PAP, is neither equitable nor efficient. Covad argues that PAP changes should be worked out in the Carrier Working Group (CWG), which promotes a thorough examination of all relevant issues and provides a fair process for resolving disputed issues. WorldCom concurs with Covad and suggests that making annual reviews a function of the CWG would be the most expedient way to involve the CLECs, work out

compromises, and resolve disputes. The Joint Commentors propose establishing a PAP Advisory Board consisting of CLECs.

Verizon states that the 2003 PAP was developed with prior CLEC comments in mind, and that CLECs have been given a full and fair opportunity to comment on the 2003 proposal. It further asserts that including PAP issues in the CWG will damage the CWG's consensus-building processes.

### Discussion

The PAP provides that "CLECs and other interested parties will have an opportunity to provide comments on any proposed changes" to the PAP. Recognizing that the review process initiated in 2001 was interrupted by the events of 9/11, we find that the existing process, as modified by Staff depending on the particular circumstances, is working. CLECs provided input prior to Staff's proposed revisions and filed comments and reply comments on the 2003 PAP proposal after two conference calls with Staff designed to assist their understanding of the proposed changes.

To facilitate greater participation, CLECs suggest that the PAP review be tied in certain ways to the Carrier Working Group (CWG), for example, to have the CWG propose PAP changes. Because this suggestion may change the consensus building processes of the CWG, we will not adopt it.<sup>7</sup>

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<sup>7</sup> For example, the three proposals set forth in footnote 4, supra, do not lend themselves to consensus resolution, and many such proposals will be contentious. However, an exception will be made for changes to the Carrier Guidelines, arrived at through consensus, which affect existing PAP measures. In agreeing to such changes, Verizon understands they will be incorporated into the PAP at some point. We now establish that when the Carrier Guidelines changes are approved by the Commission, a separate PAP order will be issued to give effect to the consensus provisions affecting existing PAP measures.



While we decline to dictate any particular process, we believe that the annual review should afford the CLECs the opportunity to file comments proposing changes to the PAP prior to any discussions by Staff with Verizon for modification of the Plan. Comments should be solicited to initiate the annual review, with the comments forming the basis for the annual review discussions. Following discussions with Verizon, Staff's proposed changes should be posted on the Department web site and a technical conference held before seeking comments on the proposed changes. Staff will have discretion to propose such other changes as it deems appropriate.

#### Third Party Audits

AT&T and WorldCom propose that an independent third party auditor be utilized to perform the PAP annual audit. AT&T states that this is necessary because of the substantial amount of time and resources required to perform a comprehensive audit.

WorldCom's proposal includes content of the audit, who should pay for the audit, remedies, and single-issue "mini-audits." The Joint Commentors support WorldCom's proposal with certain modifications relating to management, funding of mini-audits, and resolution of CLEC complaints involving mis-reporting by Verizon. WorldCom generally justifies third party audits by noting that Staff has ceased replicating metrics and that other states, including two in Verizon's territory (Pennsylvania and New Jersey), have ordered the ILEC to pay for at least one year of independent auditing.

Verizon argues that third party audits are unnecessary because: (1) the 2003 PAP already includes annual audit provisions; (2) the PAP was established well in advance of other states, and PAP data has been scrutinized by Staff for three years; (3) the PAP already allows CLECs to request an audit of

any monthly measure; and (4) CLECs will be given the ability to replicate Verizon's data with the provision of the SQLs.

Verizon requests that, if the Commission adopts third party audits, Verizon should only pay half of the cost of the annual audit and none of the cost of mini-audits (unless Verizon were to be found at fault).

#### Discussion

While there is value in assuring the accuracy of performance reporting, our three years' experience with the PAP indicates no present need to seek further assurances. Since the inception of the PAP, the Commission has addressed a wide array of technical and operational issues, which together constituted comprehensive review of Verizon's OSS, its quality control, and the accuracy of its data. Numerous metric modifications and new metrics have been incorporated into the PAP from the Carrier Guidelines or established specifically for the PAP (e.g., EDI Special Provisions) as a direct result of ongoing monitoring of Verizon performance. Further, because there have been few specific complaints by CLECs regarding the aforementioned issues, there is not sufficient evidence to justify the expense associated with the extensive audits contemplated by the CLECs.

WorldCom notes that several other state commissions have authorized annual third party audits. However, these states are, for the most part, in the early stages of their respective performance plans and may find it beneficial to seek outside assistance to assess the functionality of their plans. While we will not order similar action at this time, this proposal may be revisited at the next annual review, taking into consideration CLEC evidence of Verizon's non-compliance with PAP requirements.

METRICS AND STANDARDS ISSUES

Absolute Measures Performance Scores

CLECs maintain that a "-1" performance score for an absolute standard metric should not have the same connotation as a "-1" score for a parity metric. The Joint Commentors note that there is no gray area in the Carrier Guidelines language regarding non-achievement of absolutely defined performance standards; either service was provided at the required level or it was not. WorldCom argues that a benchmark measure "should be a clear bright line," which would set the required level of service to ensure that CLECs have a "meaningful opportunity to compete."

Verizon finds fault with the Joint Commentors' probability-based calculations and argues that they have confused the notion of performance level and probabilities. It further argues that no new information has been introduced that would support a change to absolute metrics scoring.

Discussion

In setting benchmark standards for the Carrier Guidelines,<sup>8</sup> the Commission was cognizant of the statistical nature inherent in the processes associated with absolute metrics. Although not subject to a statistical test for parity, the processes that are measured with benchmark metrics may exhibit random variation on a month to month basis. Thus, Verizon was given the incentive to aim higher than the absolute standard (e.g. 95% on time, parity plus four seconds, etc.) in order to minimize the possibility of being incorrectly penalized (i.e., much closer to 0% than to 5%). However, such risk may not

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<sup>8</sup> Case 97-C-0139, Proceeding on Motion of the Commission to Review service Quality Standards for Telephone Companies, Order Adopting Inter-Carrier Service Quality Guidelines, (issued February 16, 1999).

be entirely avoidable for all benchmark measures as currently defined. The "-1" thresholds associated with absolute standard metric performance scores were intended to balance numerous considerations. The CLECs' proposal to remove the "-1" scores for absolute metrics, such that full penalty consequences apply at Carrier Guidelines levels, would cause a major shift in the financial impact of the PAP. We decline to entertain such a large scale restructuring of the Plan's risk parameters.

#### Mode of Entry Deadband Thresholds

AT&T argues that the deadband thresholds allow for the possibility that Verizon could miss a metric repeatedly, month after month, without any financial consequences. AT&T proposes lower performance scores ("-3" and "-4") to account for failure of a specific metric over multiple months. Verizon suggests that AT&T's argument is without merit, because many of the metrics that AT&T cites are Critical Measures and could be subject to bill credits under the PAP's Individual Rule.<sup>9</sup> AT&T also proposes to offset Type I error (a finding that discrimination exists when in fact there is none) with adjustments for Type II error (not detecting discrimination when in fact it has occurred) to avoid the need for deadbands all together. Verizon notes that AT&T's modifications to address repeated failures, as well as its arguments for Type I/Type II error balancing, have been previously rejected by the Commission. Verizon also suggests that the methodology for the threshold calculation should take

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<sup>9</sup> PAP, appendix F. A CLEC that receives a performance score of "-1" or less in two consecutive months for a particular Critical Measure is assured of receiving bill credits, notwithstanding that all CLECs on average received an aggregate score for that measure above "-1" for either or both such months.

into account the effect of weighting differences between individual MOE metrics.

Discussion

AT&T's proposal was taken into consideration when the Modes of Entry were first developed. The MOEs are overall market measures wherein a small number of metric failures may not reach a level deemed to warrant an industry-wide rebate<sup>10</sup>. The deadband sets a threshold point where accumulated poor service triggers a rebate. If the deadband were changed, as suggested by AT&T, the initial rebate amount, as well as each graduated step, would also change to account for threshold and confidence level changes. Thus, each rebate generated under AT&T's suggestion would be comparable in value to the rebates generated using the deadbands in the revised PAP for 2003. AT&T's proposal to adjust Type I error with Type II error has been thoroughly reviewed and rejected, as discussed in the initial order approving implementation of the PAP.<sup>11</sup> Arguments have not been presented that would justify a change in our reasoning on this issue.

We note that the effect of weighting differences between individual MOE metrics, as suggested by Verizon, is a statistically correct consideration that should be taken into account to more accurately compute the deadbands. Therefore, we will adopt the revised MOE threshold calculation, which underlies Staff's proposed model.

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<sup>10</sup> Key measures in the MOEs are also in the Critical Measures and are subject to the individual two-month rule, which addresses the concern that poor performance in key measures should not be without financial consequences.

<sup>11</sup> Case 99-C-0949, Order issued November 3, 1999, p. 16.

Special Provisions Proposals

AT&T proposes to raise the Special Provision hot cut performance standard to 95%, and increase OR-5-01, Flow Through-Total, to 90%. WorldCom recommends that the Order Completion Notice and Resolution Timeliness Metrics be made a Special Provision (or a separate Critical Measure) at the Carrier Guidelines 95% standard. Verizon opposes these proposals as not being consistent with the intent of Special Provisions. It also points out, for example, that the Flow Through-Total metric is not entirely within its control.

Discussion

Special Provisions are intended for metrics that have had a history of poor service and/or need additional incentives to ensure improvement. The CLEC proposals do not suggest chronic poor performance and will not be adopted. Although the hot cut standard will not be raised, the metric will remain in place to discourage backsliding in this critical process for facilities-based CLECs. Likewise, the standard for Flow Through-Total will not be raised, but may be reconsidered in the event a metric standard is developed for the Carrier Guidelines.

With respect to WorldCom's proposal, the new Order Completion Notice metrics are currently meeting standards and do not merit Special Provision attention. Grouping the proposed metrics in a new Critical Measures category is also not necessary, because the metric for Provisioning Completion Notice, which is already in Critical Measures, adequately measures the timeliness of order completion. Further, the establishment of metrics for the Resolution Performance Critical Measure will redress CLECs when service problems are not resolved in a timely fashion.

Small Sample Provision for Benchmark Measures

The Joint Commentors propose that recognized national standards should be used whenever possible in order to avoid the need to develop small sample rules and tables. They indicate that there should be fewer excuses for not performing at the highest level when sample sizes are small. Verizon argues that it would be required to provide perfect service to its competitors without the small sample tables for benchmark metrics.

Discussion

Small sample absolute metric scoring procedures have been included in Appendix C of the PAP since its inception. The modifications to Appendix C in the revised PAP do not change the methodology for evaluating benchmarks with a 95% standard, but merely provide a more general rule, which enables small sample absolute metric scoring when the standard is other than 95%.<sup>12</sup>

The Joint Commentors suggest that national standards be used in place of our current rules and procedures for evaluating performance for benchmark metrics. However, it is unclear how the national standards proposed by the Joint Commentors, relating to average process characteristics, pertain to the decision parameters which went into determining each current Carrier Guideline and PAP metric definition. Before national standards can reasonably be considered for use in place of our current rules and procedures for evaluating benchmark performance (or, for that matter, parity performance), the relevance of those standards should first be fully addressed by the Carrier Working Group. Appendix C provides a reasoned guide for assessing benchmark measures.

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<sup>12</sup> This only applies to CLEC aggregate results. Critical Measures and the two-month individual rule are not implicated.

CHANGES TO THE PAP FOR 2003

In adopting the modifications and additions to the PAP summarized below, we have considered the proposals advanced by Verizon and its competitors, the Carrier Guidelines changes that impact the Plan, and developing market conditions. Many of the Carrier Guidelines changes relate directly to proposals submitted by CLECs in their November 2001 comments. Such changes include order completion metrics, resolution metrics for missing notifiers and billing claims, and metrics that focus on facilities-based competition. With the exception of the issues discussed above, Staff's proposed PAP substantially addresses the concerns raised by CLECs since the last annual review.

The broad changes to the Plan are the separation of the UNE Mode of Entry (MOE) and Critical Measures (CM) into UNE Platform and UNE Loop, moving metrics for Specials from the MOEs into a Critical Measure, establishing a Critical Measure for Resolution Performance (timely resolution of order exceptions and billing claims) and reallocating funds among several components of the Plan.<sup>13</sup> On a metric-specific basis, various metric and standard changes follow changes adopted in the Carrier Guidelines.<sup>14</sup>

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<sup>13</sup> The CLECs have also raised issues relating to line loss, dark fiber, directory listing, and project performance, among others, which may have relevance for inclusion in the PAP. However, their respective proposals are premature. The issues should first be brought to the Carrier Working Group to be prioritized and developed by all interested parties.

<sup>14</sup> Case 97-C-0139, Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies, Order Modifying Existing and Establishing Additional Inter-Carrier Service Quality Guidelines (issued October 29, 2001); Order Establishing Additional Inter-Carrier Service Quality Guidelines (issued April 29, 2002); and, Order Establishing Additional Inter-Carrier Service Quality Guidelines (issued October 25, 2002).



Mode of Entry Changes

The UNE MOE will be divided into a Mode of Entry for UNE Platform and a Mode of Entry for UNE Loop. This change allows funds to be directly associated with facilities-based providers, a growing segment of the market.<sup>15</sup>

Metrics for Specials will be eliminated from all the MOEs and will be grouped into a new Critical Measure. This change allows Specials to be product-specific. It also provides rebates to the customers directly affected by service.

In the DSL MOE, metrics for Resale 2-wire Digital and Line Splitting will be added.

Reallocation of Funds

In the MOEs, \$10 million will be provided for the new UNE Loop MOE by reallocating \$5 million from each of the Resale and Trunks MOEs. The \$45 million dedicated to the original UNE MOE will fund the new UNE Platform MOE.

Mode of Entry	2002 PAP	Change	2003 PAP
UNE	45.0*	(45.0)	
UNE Platform		45.0	45.0
UNE Loop		10.0	10.0
Resale	10.0	(5.0)	5.0
DSL	10.0		10.0
Trunks	10.0	(5.0)	5.0
Total	75.0	0	75.0

\* all amounts in \$ millions

Critical Measures funds will be increased overall by \$18 million from funds moved from the eliminated EDI Special Provision, and \$5.5 million and \$1.5 million will be reallocated from Trunks and Collocation CMs, respectively. Funds for UNE

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<sup>15</sup> As a whole, the Plan is evolving to emphasize facilities-based competition consistent with Commission policy.

Platform will be \$45 million, and the new UNE Loop category will have \$16 million assigned. The new categories for Specials and Resolution Performance will have \$3 million and \$1 million allocated to them, respectively.

Critical Measures	2002 PAP	Change	2003 PAP
UNE	40.0*	(40.0)	
UNE Platform		45.0	45.0
UNE Loop		16.0	16.0
Resale	10.0		10.0
DSL	10.0		10.0
Trunks	17.5	(5.5)	12.0
Collocation	3.5	(1.5)	2.0
Specials		3.0	3.0
Resolution Performance.		1.0	1.0
Total	81.0	18.0	99.0

\* all amounts in \$ millions

Metric Changes in the Modes of Entry

Service in the pre-order domain has been at a high level under current standards, therefore, several metrics in the UNE Platform, UNE Loop, and Resale MOEs will be removed. Changes in the revised Plan will reflect a shift in emphasis to ordering and provisioning.

New ordering metrics in the UNE Platform, UNE Loop, Resale, and DSL MOEs will be added and standards will be changed to correspond to new Carrier Guidelines.

In the provisioning domain for the new UNE Loop MOE, on-time and quality performance for hot cuts will be linked together to provide an overall performance measure. Metric changes in the other MOEs will reflect Carrier Guidelines changes.

In the maintenance domain, trouble report metrics will be removed and replaced by metrics for trouble duration. At present, trouble report rate metrics do not provide a reliable

indication of the quality of performance. The metric change places an increased emphasis on performance for correcting troubles, a more consistent measurement of maintenance performance. Other changes reflect metric disaggregation incorporated into the Carrier Guidelines.

#### Critical Measures Changes

Like the MOE changes, the Critical Measures category for UNE measures will be divided into UNE Platform and UNE Loop. New categories will also be created for Resolution Performance and Specials. Other metric changes will mirror metric changes in the MOEs.

The Resolution Performance CM will include new metrics developed for the Carrier Guidelines that measure Verizon's performance resolving notifier exceptions and billing claims. However, billing claims metrics are still under development in the Carrier Working Group, and a placeholder will be provided pending their inclusion in the Carrier Guidelines and acceptance into the PAP.<sup>16</sup>

#### Special Provisions

The only change in Special Provisions will be the elimination of the EDI measures. The funds allocated to EDI measures will be moved to Critical Measures. Improved EDI measures, developed for the Carrier Guidelines, will be incorporated into MOEs and Critical Measures.

We note that the PAP's introductory paragraph for the Special Provisions component indicates that it addresses a need to measure key aspects of Verizon's wholesale service to CLECs

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<sup>16</sup> When billing claims metrics are approved for inclusion in the Carrier Guidelines, an order will be issued making such metrics effective for the PAP as well.

"...during the first year after Verizon NY's entry in the interLATA market." By continuing the effect of Special Provisions, we intend that they provide an incentive for Verizon to not let its performance in provisioning essential UNEs backslide. Therefore, the quoted language should be stricken and replaced with the following: "...to ensure their ability to effectively compete in the local service market."

Market Adjustment Scale

The range for market adjustments will be modified in the Mode of Entry categories to account for changes in the number of parity measures and the methodology change for metric weights. New ranges were established for the UNE Platform and UNE Loop categories. Unchanged is the initial 20% level of the maximum monthly adjustment for each MOE. The chart below sets forth the relevant performance ranges subject to payment of bill credits.

Market Adjustment Scale

Mode of Entry	Minimum Market Adj.	Maximum Market Adj.	% Market Adj. at Minimum	No. of Increments (min. to max.)
UNE Platform	-.25292	-.67	20%	19
UNE Loop	-.24862	-.67	20%	19
Resale	-.24715	-.67	20%	19
DSL	-.23024	-.67	20%	19
Interconnection	-.21429	-1.0	20%	13

CONCLUSION

The revised PAP for 2003 reflects the knowledge and experience gained from the current PAP and is intended to ensure that local competition will be maintained and continue to

develop. The PAP proposal posted on the Department web site, as modified by this Order, will be adopted.

The Commission orders:

1. The Verizon New York Inc. Performance Assurance Plan set forth in the October 18, 2002 proposal posted on the Department web site, as modified by this Order, and as displayed in the attachments to this Order, is adopted and will be effective for March 2003 performance.

2. Within 10 days of the issuance of this Order, Verizon New York Inc. shall file 15 copies of its revised Performance Assurance Plan, in compliance with this Order, with Janet Hand Deixler, Secretary to the Commission, Public Service Commission, 3 Empire State Plaza, Albany, New York 12223-1350. Verizon New York Inc. shall also post the Plan to the company's web site and provide electronic copies of the Plan by e-mail to the parties on the Case 99-C-0949 Active Party List.

3. This proceeding is continued.

By the Commission,

(SIGNED)

JANET HAND DEIXLER  
Secretary

**ATTACHMENTS**

UNE PLATFORM MODE OF ENTRY

UNE LOOP MODE OF ENTRY

RESALE MODE OF ENTRY

DSL MODE OF ENTRY

INTERCONNECTION (TRUNKS) MODE OF ENTRY

CRITICAL MEASURES

SPECIAL PROVISIONS

CHANGE CONTROL ASSURANCE PLAN

MARKET ADJUSTMENT SUMMARY

**Verizon New York  
Performance Assurance Plan Report**

**UNE Platform**

**2003 Model**

PO	Pre-Ordering	Performance		Observations		Diff.	Perf. Score	Wgt.	Wgt. Score		
		VZ	CLEC	VZ	CLEC						
PO-1-01-6020	Customer Service Record - EDI	1.00	7.10		18,758	6.10	-2	2	-0.016		
PO-1-03-6020	Address Validation -EDI	1.00	7.10		51,976	6.10	-2	2	-0.016		
PO-2-02-6020	OSS Interface Availability - Prime - EDI		97.90				-2	5	-0.039		
PO-1-01-6030	Customer Service Record - CORBA	1.00	7.10		31,628	6.10	-2	2	-0.016		
PO-1-03-6030	Address Validation - CORBA	1.00	7.10		88,721	6.10	-2	2	-0.016		
PO-2-02-6030	OSS Interface Availability - Prime - CORBA		97.90				-2	5	-0.039		
PO-1-01-6050	Customer Service Record - Web GUI	1.00	7.10		50,619	6.10	-2	2	-0.016		
PO-1-03-6050	Address Validation - Web GUI	1.00	7.10		30,405	6.10	-2	2	-0.016		
PO-2-02-6050	OSS Interface Availability - Prime - Web GUI		97.90				-2	5	-0.039		
<b>OR Ordering</b>											
OR-1-02-3143	% On Time LSRC - Flow Through - Platform - 2hrs		88.01		234,285		-2	10	-0.078		
OR-2-02-3143	% On Time LSR Reject - Flow Through - Platform		89.90		27,882		-2	5	-0.039		
OR-4-11-3000	% Completed Orders with Neither a PCN or BCN Sent		1.01		215,762		-2	5	-0.039		
OR-4-16-3000	% On Time PCN - 1 Business Day		89.10		215,762		-2	5	-0.039		
OR-4-17-3000	% On Time BCN - 2 Business Day		89.00		215,762		-2	5	-0.039		
OR-5-03-3000	% Flow Through - Achieved - POTS		89.00		262,714		-2	5	-0.039		
OR-6-03-3143	% Accuracy - LSRC - Platform		10.10		22,740		-2	5	-0.039		
OR-1-04-3143	% OT LSRC -No Facil Check(Elec.-No Flow Thru) -Platform		89.90		18,140		-2	5	-0.039		
OR-1-06-3143	% OT LSRC/ASRC -Facil Ck(Elec.-No Flow Thru) -Platform		70.00		10		-2	2	-0.016		
OR-2-04-3143	% OT LSR Rej.-No Facil Ck (Elec.-No Flow Thru) -Platform		89.90		7,560		-2	2	-0.016		
OR-2-06-3143	% OT LSR/ASR Rej. -Facil Ck(Elec.-No Flow Thru) -Platform		89.90		636		-2	2	-0.016		
<b>PR Provisioning</b>											
PR-3-01-3140	% Completed in 1 Day (1-5 Lines - No Disp) - Platform	75.00	73.50	10,000	10,000	0.61	-2.45	-2	5	-0.039	
PR-4-05-3140	% Missed Appointment- VZ - No Dispatch - Platform	0.10	0.12	470,229	162,265	0.01	-2.20	-2	20	-0.156	
PR-4-04-3140	% Missed Appointment - VZ - Dispatch - Platform	1.00	1.25	71,031	6,804	0.13	-1.98	-2	10	-0.078	
PR-4-02-3100	Average Delay Days - Total - POTS	2.00	2.25	8,518	4,000	6.72	0.13	-1.94	-2	15	-0.117
PR-5-01-3140	% Missed Appointment - Facilities - Platform	3.00	3.50	71,031	6,804	0.22	-2.31	-2	5	-0.039	
PR-5-02-3140	% Orders Held for Facilities > 15 days - Platform	0.30	0.45	71,031	6,804	0.07	-2.16	-2	5	-0.039	
PR-6-01-3121	% Installation Troubles within 30 days - Platform	5.00	5.15	496,054	167,865	0.06	-2.44	-2	10	-0.078	
<b>MR Maintenance &amp; Repair</b>											
MR-1-01-2000	Avg. Response Time - Create Trouble	2.00	8.10		12,078		6.10	-2	2	-0.016	
MR-1-06-2000	Avg. Response Time - Test Trouble (POTS only)	2.00	8.10		35,262		6.10	-2	2	-0.016	
Stat. Score											
MR-3-01-3144	% Missed Repair Appointments - Loop - Platform - Bus	20.00	22.00	21,998	1,799	0.98	-2.04	-2	10	-0.078	
MR-3-02-3144	% Missed Repair Appointments - CO - Platform - Bus	17.00	21.00	5,275	330	2.13	-1.88	-2	10	-0.078	
MR-4-02-3144	Mean Time to Repair - Loop Trouble - Platform - Bus	20.00	21.50	21,998	1,799	27.83	0.68	-2.20	-2	5	-0.039
MR-4-03-3144	Mean Time to Repair - CO Trouble - Platform - Bus	14.00	16.50	5,275	330	22.38	1.27	-1.97	-2	5	-0.039
MR-4-06-3144	% Out of Service >4 Hours - Platform - Bus	77.00	79.00	23,000	1,705	1.06	-1.89	-2	5	-0.039	
MR-4-07-3144	% Out of Service >12 Hours - Platform - Bus	55.00	57.50	23,000	1,705	1.25	-2.00	-2	5	-0.039	
MR-4-08-3144	% Out of Service > 24 Hours - Platform - Bus	25.00	27.00	23,000	1,699	1.09	-1.84	-2	5	-0.039	
MR-3-01-3145	% Missed Repair Appointments - Loop -Platform - Res	15.00	15.50	93,117	19,028	0.28	-1.76	-2	10	-0.078	
MR-3-02-3145	% Missed Repair Appointments - CO - Platform - Res	10.00	11.50	12,915	1,495	0.82	-1.83	-2	10	-0.078	
MR-4-02-3145	Mean Time to Repair - Loop Trouble - Platform - Res	25.00	25.50	93,117	19,028	27.52	0.22	-2.28	-2	5	-0.039
MR-4-03-3145	Mean Time to Repair - CO Trouble - Platform - Res	13.00	14.00	12,915	1,495	20.16	0.55	-1.82	-2	5	-0.039
MR-4-06-3145	% Out of Service >4 Hours - Platform - Res	85.00	85.60	85,156	16,613	0.30	-1.98	-2	5	-0.039	
MR-4-07-3145	% Out of Service >12 Hours - Platform - Res	70.00	71.00	85,156	16,613	0.39	-2.57	-2	5	-0.039	
MR-4-08-3145	% Out of Service > 24 Hours - Platform - Res	29.00	30.00	85,156	16,598	0.39	-2.60	-2	5	-0.039	
MR-5-01-3140	% Repeat Reports w/in 30 days - Platform	18.00	18.50	133,924	22,652	0.28	-1.81	-2	10	-0.078	
<b>BI Billing</b>											
BI-1-02-2030	% DUF in 4 Business Days		89.90		651,317,092			-2	5	-0.039	
							Totals				
							-90 257 -2.000				
"NA" - no activity "UD" - under development											

**For demonstration purposes, metric performance has been failed to show financial results**

**Verizon New York  
Performance Assurance Plan Report**

**UNE LOOP**

**2003 Model**

PO	Pre-Ordering	Performance		Observations		Diff.	Perf. Score	Wgt.	Wgtd. Score			
		VZ	CLEC	VZ	CLEC							
PO-1-01-6020	Customer Service Record - EDI	1.00	7.10		18,758	6.10	-2	2	-0.022			
PO-1-03-6020	Address Validation - EDI	1.00	7.10		51,976	6.10	-2	2	-0.022			
PO-2-02-6020	OSS Interface Availability - Prime - EDI		97.90				-2	5	-0.055			
PO-1-01-6030	Customer Service Record - CORBA	1.00	7.10		31,628	6.10	-2	2	-0.022			
PO-1-03-6030	Address Validation - CORBA	1.00	7.10		88,721	6.10	-2	2	-0.022			
PO-2-02-6030	OSS Interface Availability - Prime - CORBA		97.90				-2	5	-0.055			
PO-1-01-6050	Customer Service Record - Web GUI	1.00	7.10		50,619	6.10	-2	2	-0.022			
PO-1-03-6050	Address Validation - Web GUI	1.00	7.10		30,405	6.10	-2	2	-0.022			
PO-2-02-6050	OSS Interface Availability - Prime - Web GUI		97.90				-2	5	-0.055			
<b>OR Ordering</b>												
OR-1-02-3331	% On Time LSRC - Flow Thru - Loop/Pre-Qual - 2hrs	89.90			22,726		-2	10	-0.110			
OR-2-02-3331	% On Time LSR Reject - Flow Thru - Loop/Pre-Qual	89.90			5,359		-2	5	-0.055			
OR-4-11-3000	% Completed Orders with Neither a PCN or BCN Sent	1.01			215,762		-2	2	-0.022			
OR-4-16-3000	% On Time PCN - 1 Business Day	89.10			215,762		-2	2	-0.022			
OR-4-17-3000	% On Time BCN - 2 Business Day	89.00			215,762		-2	2	-0.022			
OR-5-03-3000	% Flow Through - Achieved - POTS	89.00			262,714		-2	5	-0.055			
OR-6-03-3331	% Accuracy - LSRC - Loop	10.01			24,296		-2	5	-0.055			
OR-1-04-3331	% OT LSRC -No Facil Ck(E -No F/T) -Loop/LNP	89.90			6,987		-2	5	-0.055			
OR-1-06-3331	% OT LSRC/ASRC -Facil Ck(E -No F/T) -Loop/LNP	89.90			2,020		-2	2	-0.022			
OR-2-04-3331	% OT LSR Rej -No Facil Ck(E -No F/T) -Loop/LNP	81.25			16		-2	2	-0.022			
OR-2-06-3331	% OT LSR/ASR Rej -Facil Ck(E -No F/T) -Loop/LNP	89.90			467		-2	2	-0.022			
<b>PR Provisioning</b>												
PR-4-02-3100	Average Delay Days - Total - POTS	2.00	2.25	8,518	4,000	6.72	0.13	-1.94	-2	5	-0.055	
PR-4-04-3113	% Missed Appointment - VZ - Dispatch - Loop-New	10.00	12.00	71,031	708		1.13	-1.77	-2	20	-0.221	
PR-5-01-3112	% Missed Appointment - Facilities - Loop	3.00	4.50	71,031	708		0.64	-2.33	-2	5	-0.055	
PR-5-02-3112	% Orders Held for Facilities > 15 days - Loop	0.50	1.00	71,031	708		0.27	-1.88	-2	5	-0.055	
PR-6-01-3112	% Installation Troubles within 30 days - Loop	5.00	5.50	496,054	18,244		0.16	-3.04	-2	10	-0.110	
PR-6-02-3520	% Installation Troubles within 7 days - Hot Cut		4.00		11,685				-2	15	-0.166	
PR-9-01-3520	% On Time Performance - Hot Cut		89.00		5,071							
<b>MR Maintenance &amp; Repair</b>												
MR-1-01-2000	Avg. Response Time - Create Trouble	2.00	8.10		12,078		6.10	-2	2	-0.022		
<b>Stat. Score</b>												
MR-3-01-3550	% Missed Repair Appointments - Loop - Loop	16.00	17.50	115,654	2,115		0.80	-1.86	-2	10	-0.110	
MR-4-02-3550	Mean Time to Repair - Loop Trouble - Loop	25.00	26.50	115,654	2,115	33.81	0.74	-2.02	-2	5	-0.055	
MR-4-07-3550	% Out of Service > 12 Hours - Loop	65.00	67.00	108,690	2,086		1.05	-1.90	-2	5	-0.055	
MR-4-08-3550	% Out of Service > 24 Hours - Loop	29.00	31.00	108,690	2,086		1.00	-1.99	-2	5	-0.055	
MR-5-01-3550	% Repeat Reports w/in 30 days - Loop	17.50	19.00	133,924	2,722		0.74	-2.04	-2	10	-0.110	
MR-3-02-3550	% Missed Repair Appointments - CO - Loop	12.00	15.00	18,270	607		1.34	-2.24	-2	10	-0.110	
MR-4-03-3550	Mean Time to Repair - CO Trouble - Loop	14.00	16.00	18,270	607	20.88	0.86	-2.32	-2	5	-0.055	
"NA" - no activity "UD" - under development									Totals	-68	181	-2.000

**For demonstration purposes, metric performance has been failed to show financial results**



**Verizon New York  
Performance Assurance Plan Report**

**RESALE**

**2003 Model**

PO	Pre-Ordering	Performance		Observations		Diff.	Perf. Score	Wgt.	Wgted. Score		
		VZ	CLEC	VZ	CLEC						
PO-1-01-6020	Customer Service Record - EDI	1.00	7.10		18,758	6.10	-2	2	-0.015		
PO-1-03-6020	Address Validation - EDI	1.00	7.10		51,976	6.10	-2	2	-0.015		
PO-2-02-6020	OSS Interface Availability - Prime - EDI		97.90				-2	5	-0.038		
PO-1-01-6050	Customer Service Record - Web GUI	1.00	7.10		50,619	6.10	-2	2	-0.015		
PO-1-03-6050	Address Validation - Web GUI	1.00	7.10		30,405	6.10	-2	2	-0.015		
PO-2-02-6050	OSS Interface Availability - Prime - Web GUI		97.90				-2	5	-0.038		
<b>OR Ordering</b>											
OR-1-02-2320	% On Time LSRC -Flow Thru -POTS/Pre-Qualified Complex -2hrs	89.90			8,247		-2	10	-0.076		
OR-2-02-2320	% On Time LSR Rej - Flow Thru - POTS/Pre-Qualified Complex	89.90			3,412		-2	5	-0.038		
OR-4-11-2000	% Completed Orders with neither a PCN or BCN Sent		1.01		215,762		-2	5	-0.038		
OR-4-16-2000	% On Time PCN - 1 Business Day		89.10		215,762		-2	5	-0.038		
OR-4-17-2000	% On Time BCN - 2 Business Day		89.00		215,762		-2	5	-0.038		
OR-5-03-2000	% Flow Through - Achieved - POTS	87.50			8,739		-2	10	-0.076		
OR-6-03-2000	% Accuracy - LSRC	10.10			5,197		-2	10	-0.076		
OR-1-04-2100	% OT LSRC -No Facil Ck(E -No Flow Thru)-POTS/Pre-Qual Cmplx	89.90			3,561		-2	5	-0.038		
OR-1-06-2320	% OT LSRC/ASRC -Facil Ck(E -No F/T) -POTS/Pre-Qual Cmplx	89.90			664		-2	2	-0.015		
OR-2-04-2320	% OT LSR Rej -No Facil Ck(E -No F/T) -POTS/Pre-Qual Cmplx	89.90			3,016		-2	2	-0.015		
OR-2-06-2320	% OT LSR/ASR Rej -Facil Ck(E -No F/T) -POTS/Pre-Qual Cmplx	84.21			19		-2	2	-0.015		
<b>PR Provisioning</b>											
PR-3-01-2100	% Completed in 1 Day (1-5 lines - No Disp) - POTS Total	75.00	73.00	10,000	1,597		1.17	-1.71	-2	5	-0.038
PR-4-05-2100	% Missed Appointment- VZ - No Dispatch - POTS	0.10	0.17	470,229	7,558		0.04	-1.91	-2	20	-0.152
PR-4-04-2100	% Missed Appointment - VZ - Dispatch - POTS	1.00	1.50	71,031	1,543		0.26	-1.95	-2	10	-0.076
PR-4-02-2100	Average Delay Days - Total - POTS	2.00	3.44	8,518	64	6.72	0.84	-1.71	-2	15	-0.114
PR-5-01-2100	% Missed Appointment - Facilities - POTS	3.00	3.75	71,031	1,543		0.44	-1.71	-2	5	-0.038
PR-5-02-2100	% Orders Held for Facilities > 15 days - POTS	0.30	0.60	71,031	1,543		0.14	-2.13	-2	5	-0.038
PR-6-01-2100	% Installation Troubles within 30 days - POTS	5.00	5.30	496,054	18,813		0.16	-1.85	-2	15	-0.114
<b>MR Maintenance &amp; Repair</b>											
MR-1-01-2000	Average Response Time - Create Trouble	2.00	8.10		12,078			6.10	-2	2	-0.015
MR-1-06-2000	Average Response Time - Test Trouble (POTS only)	2.00	8.10		35,262			6.10	-2	2	-0.015
<b>Stat Score</b>											
MR-3-01-2110	% Missed Repair Appointments - Loop - Bus.	20.00	22.00	21,998	1,516		1.06	-1.88	-2	10	-0.076
MR-3-02-2110	% Missed Repair Appointments - CO - Bus.	17.00	21.00	5,275	359		2.05	-1.95	-2	10	-0.076
MR-4-02-2110	Mean Time To Repair - Loop Trouble - Bus.	20.00	22.00	21,998	1,516	27.83	0.74	-2.71	-2	5	-0.038
MR-4-03-2110	Mean Time To Repair - CO Trouble - Bus.	14.00	16.50	5,275	259	22.38	1.42	-1.76	-2	5	-0.038
MR-4-06-2110	% Out of Service > 4 Hours - POTS - Bus	77.00	79.00	23,000	1,474		1.13	-1.77	-2	5	-0.038
MR-4-07-2110	% Out of Service > 12 Hours - POTS - Bus.	55.00	57.50	23,000	1,474		1.34	-1.87	-2	5	-0.038
MR-4-08-2110	% Out of Service > 24 Hours - POTS - Bus.	25.00	27.00	23,000	1,474		1.16	-1.72	-2	5	-0.038
MR-3-01-2120	% Missed Repair Appointments - Loop - Res.	15.00	18.00	93,117	419		1.75	-1.72	-2	10	-0.076
MR-3-02-2120	% Missed Repair Appointments - CO - Res.	10.00	17.00	12,915	62		3.82	-1.83	-2	10	-0.076
MR-4-02-2120	Mean Time To Repair - Loop Trouble - Res.	25.00	28.00	93,117	419	27.52	1.35	-2.23	-2	5	-0.038
MR-4-03-2120	Mean Time to Repair - CO Trouble - Res.	13.00	18.00	12,915	62	20.16	2.57	-1.95	-2	5	-0.038
MR-4-06-2120	% Out of Service > 4 Hours - POTS - Res.	85.00	88.00	85,156	396		1.80	-1.67	-2	5	-0.038
MR-4-07-2120	% Out of Service > 12 Hours - POTS - Res.	70.00	74.00	85,156	396		2.31	-1.73	-2	5	-0.038
MR-4-08-2120	% Out of Service > 24 Hours - POTS - Res.	29.00	33.00	85,156	396		2.29	-1.75	-2	5	-0.038
MR-5-01-2100	% Repeat Reports w/in 30 days - POTS	18.00	19.50	133,924	2,356		0.80	-1.88	-2	10	-0.076
<b>BI Billing</b>											
BI-1-02-2030	% DUF in 4 Business Days		89.90		651,317,092				-2	5	-0.038
								Totals	-84	263	-2.000

**For demonstration purposes, metric performance has been failed to show financial results**

**Verizon NY Performance Assurance Plan Report DSL 2003 Model**

PO	Pre-Ordering	Performance		Observations		Diff	Perf. Score	Wgt	Wgt'd Score		
		VZ	CLEC	VZ	CLEC						
PO-1-06-6020	Mechanized Loop Qualification - EDI	1.00	7.10		100	6.10	-2	5	-0.034		
PO-2-02-6020	OSS Interface Availability - Prime - EDI		97.90				-2	5	-0.034		
PO-1-06-6030	Mechanized Loop Qualification - CORBA	1.00	7.10		100	6.10	-2	5	-0.034		
PO-2-02-6030	OSS Interface Availability - Prime - CORBA		97.90				-2	2	-0.014		
PO-1-06-6050	Mechanized Loop Qualification - Web GUI	1.00	7.10		100	6.10	-2	5	-0.034		
PO-2-02-6050	OSS Interface Availability - Prime - Web GUI		97.90				-2	2	-0.014		
PO-8-01-2000	% On Time - Manual Loop Qualification		53.30		15		-2	2	-0.014		
PO-8-02-2000	% On Time - Engineering Record Request		89.00		100		-2	2	-0.014		
<b>OR Ordering</b>											
OR-1-04	% On Time LSRC -No Facil Ck (E -No FT) -2W Digital -UNE/Resale	80.00			236		-2	2	-0.014		
OR-1-06	% OT LSRC/ASRC -Facility Ck (E -No FT) -2W Digital -UNE/Resale	75.00			12		-2	2	-0.014		
OR-2-04	% On Time LSR Rej -No Facil Ck(E -No FT) -2W Digital -UNE/Resale	83.00			73		-2	2	-0.014		
OR-2-06	% OT LSR/ASR Rej -Facility Ck(E -No FT) -2W Digital -UNE/Resale	77.20			11		-2	2	-0.014		
OR-1-04-3342	% On Time LSRC -No Facil Ck(E -No FT) -2W xDSL Loops	81.00			542		-2	5	-0.034		
OR-1-06-3342	% On Time LSRC/ASRC -Facility Check(Elec) -2W xDSL Loops	0.00			3		-2	5	-0.034		
OR-2-04-3342	% OT LSR Rej -No Facil Ck(E -No FT) -2W xDSL Loops	84.00			88		-2	2	-0.014		
OR-2-06-3342	% On Time LSR/ASR Rej -Facility Check(Elec) -2W xDSL Loops	89.90			39		-2	2	-0.014		
OR-1-04-3340	% OT LSRC -No Facility Check (E -No FT) -Line Share/Split	82.00			85		-2	5	-0.034		
OR-1-06-3340	% On Time LSRC/ASRC -Facility Ck(E -No FT) -Line Share/Split	89.90			100		-2	5	-0.034		
OR-2-04-3340	% OT LSR Rej -No Facil Ck(E -No FT) -Line Share/Split	85.00			100		-2	2	-0.014		
OR-2-06-3340	% OT LSR/ASR Rej -Facility Ck(E -No FT) -Line Share/Split	81.25			16		-2	2	-0.014		
OR-4-11-3000	% Completed Orders with Neither a PCN or BCN Sent	1.01			215,762		-2	2	-0.014		
OR-4-16-3000	% On Time PCN - 1 Business Day	89.10			215,762		-2	2	-0.014		
OR-4-17-3000	% On Time BCN - 2 Business Day	89.00			215,762		-2	2	-0.014		
<b>PR Provisioning</b>											
PR-4-02	Average Delay Days -Total -2W Digital -UNE/Resale	4.00	7.00	54	7	4.25	1.71	-1.76	-2	2	-0.014
PR-4-04	% Missed Appointment -Dispatch -2W Digital -UNE/Resale	4.00	8.00	724	91		2.18	-1.84	-2	2	-0.014
PR-4-05	% Missed Appointment -No Dispatch -2W Digital -UNE/Resale	1.00	4.00	644	37		1.68	-1.78	-2	2	-0.014
PR-6-01	% Install. Troubles w/in 30 Days -2W Digital Loops -UNE/Resale	6.00	9.00	95,124	257		1.48	-2.02	-2	2	-0.014
PR-8-01	Open Orders In Hold Status >30 Days -2W Digital -UNE/Resale	0.10	0.60	1,394	133		0.29	-1.74	-2	2	-0.014
PR-3-10-3342	% Comp w/in 6 Days (1-5 lines) Tot -2W xDSL Loops		89.90		645				-2	10	-0.069
PR-4-02-3342	Average Delay Days -Total -2W xDSL Loops	5.00	7.00	194	60	7.00	1.03	-1.93	-2	10	-0.069
PR-4-14-3342	% Completed On Time -2W xDSL Loops		89.90		1,469				-2	10	-0.069
PR-6-01-3342	% Installation Troubles w/in 30 Days -2W xDSL Loops	6.00	7.00	91,224	1,787		0.57	-1.76	-2	15	-0.103
PR-8-01-3342	Open Orders in Hold Status >30 Days -2W xDSL Loops	0.10	0.40	1,058	1,737		0.12	-2.43	-2	5	-0.034
PR-3-03	% Completed w/in 3 Days (1-5 lines) No Disp -Line Share/Split		94.00		616				-2	10	-0.069
PR-3-03	% Completed w/in 3 Days (1-5 lines) No Disp -Line Share/Split	95.00	93.00	16,744	616		0.89	-2.24	-2	10	-0.069
PR-4-02	Average Delay Days -Total -Line Share/Split	3.00	4.50	3,608	31	3.87	0.70	-2.15	-2	10	-0.069
PR-4-04	% Missed Appointment -Dispatch -Line Share/Split	6.00	10.00	2,723	112		2.29	-1.75	-2	5	-0.034
PR-4-05	% Missed Appointment -No Dispatch -Line Share/Split	13.00	15.00	24,561	781		1.22	-2.05	-2	10	-0.069
PR-6-01	% Installation Troubles w/in 30 Days -Line Share/Split	1.00	1.75	27,295	851		0.35	-2.17	-2	15	-0.103
PR-8-01	Open Orders in Hold Status >30 Days -Line Share/Split	0.01	0.10	27,328	448		0.05	-1.89	-2	5	-0.034
<b>MR Maintenance &amp; Repair</b>											
MR-1-01-2000	Average Response Time - Create Trouble	2.00	8.10		12,078		6.10	-2	2	-0.014	
<b>Stat. Score</b>											
MR-3-01	% Missed Repair Appt -Loop -2W Digital -UNE/Resale	1.00	3.50	100	100		1.41	-1.78	-2	2	-0.014
MR-3-02	% Missed Repair Appt -CO -2W Digital -UNE/Resale	1.00	3.50	100	100		1.41	-1.78	-2	2	-0.014
MR-4-02	Mean Time To Repair -Loop -2W Digital -UNE/Resale	2.00	4.00	100	100	7.00	0.99	-2.02	-2	2	-0.014
MR-4-03	Mean Time To Repair -CO Trouble -2W Digital -UNE/Resale	2.00	4.00	100	100	7.00	0.99	-2.02	-2	2	-0.014
MR-4-04	% Cleared (all troubles) w/in 24 Hours -2W Digital -UNE/Resale	99.00	96.00	100	100		1.41	-2.13	-2	2	-0.014
MR-4-07	% Out of Service >12 Hours -2W Digital -UNE/Resale	75.00	86.00	100	100		6.12	-1.80	-2	2	-0.014
MR-5-01	% Repeat Reports w/in 30 Days -2W Digital -UNE/Resale	2.00	6.00	100	100		1.98	-2.02	-2	2	-0.014
MR-3-01-3342	% Missed Repair Appt -Loop -2W xDSL Loops	5.00	7.00	116,076	457		1.02	-1.96	-2	5	-0.034
MR-3-02-3342	% Missed Repair Appointment -CO -2W xDSL Loops	2.00	4.00	18,545	156		1.13	-1.78	-2	5	-0.034
MR-4-02-3342	Mean Time To Repair -Loop -2W xDSL Loops	10.00	13.00	116,076	457	33.81	1.58	-1.89	-2	5	-0.034
MR-4-03-3342	Mean Time To Repair -CO -2W xDSL Loops	13.00	16.00	18,545	156	21.08	1.69	-1.77	-2	5	-0.034
MR-4-04-3342	% Cleared (all troubles) w/in 24 Hours -2W xDSL Loops	77.00	74.00	134,621	613		1.70	-1.76	-2	5	-0.034
MR-4-07-3342	% Out of Service >12 Hours -2W xDSL Loops	66.00	70.00	109,285	528		2.07	-1.94	-2	10	-0.069
MR-5-01-3342	% Repeat Reports w/in 30 Days -2W xDSL Loops	29.00	33.00	109,285	528		1.98	-2.02	-2	10	-0.069
MR-3-01	% Missed Repair Appointment -Loop -Line Share/Split	30.00	60.00	300	7		17.52	-1.71	-2	5	-0.034
MR-3-02	% Missed Repair Appointment -CO -Line Share/Split	20.00	35.00	619	30		7.48	-2.01	-2	5	-0.034
MR-4-02	Mean Time To Repair -Loop -Line Share/Split	10.00	35.00	300	7	34.02	13.01	-1.92	-2	5	-0.034
MR-4-03	Mean Time To Repair -CO -Line Share/Split	10.00	30.00	619	30	59.92	11.20	-1.79	-2	5	-0.034
MR-4-04	% Cleared (all troubles) w/in 24 Hours -Line Share/Split	55.00	40.00	919	37		8.34	-1.80	-2	5	-0.034
MR-4-07	% Out of Service >12 Hours -Line Share/Split	50.00	70.00	883	31		9.14	-2.19	-2	10	-0.069
MR-5-01	% Repeat Reports w/in 30 Days -Line Share/Split	25.00	40.00	883	31		7.91	-1.90	-2	10	-0.069
								Totals	-122	291	-2.000

"NA" - no activity "UD" - under development

**For demonstration purposes, metric performance has been failed to show financial results**

**Verizon New York**

**2003 Model**

**INTERCONNECTION (TRUNKS)**

OR	Ordering	Performance		Observations		VZ	CLEC	Standard Deviation	Sample Error	Stat. Score	Perf. Score	Wgt.	Wgt'd. Score		
		CLEC	VZ	VZ	CLEC										
OR-1-12-5020	% OT Firm Order Confirmations (<=192 Forecasted Trunks)	88.00		81							-2	5	-0.071		
OR-1-13-5020	% On Time Design Layout Record	88.10		212							-2	10	-0.143		
OR-1-19-5020	% On Time Response - Request for Inbound Augment (<=192)	25.00		4							-2	5	-0.071		
OR-2-12-5000	% On Time Trunk ASR Reject	88.30		24							-2	5	-0.071		
<b>PR Provisioning</b>															
PR-4-07-3540	% On Time Performance - LNP only	89.90		719							-2	20	-0.286		
PR-4-15-5000	% On Time Provisioning - Trunks	88.80		10,000							-2	20	-0.286		
PR-5-01-5000	% Missed Appointment - Facilities	0.25	0.35	20,176	17,618			0.05	-1.94	-2	5	-0.071			
PR-5-02-5000	% Orders Held for Facilities >15 Days	0.10	0.16	20,176	17,618			0.03	-1.84	-2	5	-0.071			
PR-6-01-5000	% Installation Troubles w/in 30 Days	0.01	0.03	20,176	17,618			0.01	-1.94	-2	10	-0.143			
PR-8-01-5000	Open Orders in a Hold Status >30 Days	0.01	0.03	20,176	35,922			0.01	-2.27	-2	5	-0.071			
<b>MR Maintenance &amp; Repair</b>															
MR-4-01-5000	Mean Time to Repair - Total	2.00	4.00	36	32	5.00		1.21	-1.65	-2	5	-0.071			
MR-4-05-5000	% Out of Service >2 Hours	30.00	50.00	36	32			11.13	-1.80	-2	5	-0.071			
MR-4-06-5000	% Out of Service >4 Hours	16.00	35.00	36	32			8.91	-2.13	-2	5	-0.071			
MR-4-07-5000	% Out of Service >12 Hours	8.00	20.00	36	32			6.59	-1.82	-2	5	-0.071			
MR-4-08-5000	% Out of Service >24 Hours	4.00	12.00	36	32			4.76	-1.68	-2	5	-0.071			
MR-5-01-5000	% Repeat Reports w/in 30 Days	10.00	25.00	36	32			7.29	-2.06	-2	10	-0.143			
<b>NP Network Performance</b>															
NP-1-03-5000	# of Final Trunk Groups Blocked 2 months	2		379							-2	5	-0.071		
NP-1-04-5000	# of Final Trunk Groups Blocked 3 months	2		379							-2	10	-0.143		
											"NA" - no activity		"UD" - under development		
											Totals		-36	140	-2.000

**For demonstration purposes, metric performance has been failed to show financial results**

Verizon New York				2003 Model					
CRITICAL MEASURES		UNE Platform	UNE Loop	Resale	DSL	Trunks	Specials	Other	Total
<b>PRE-ORDERING</b>									
1	<b>OSS Interface</b>	\$937,500	\$266,667	\$208,333	\$208,333				\$1,620,833
	PO-1-06 Mechanized Loop Qualification - EDI				69,444				
	PO-1-06 Mechanized Loop Qualification - LORBA				69,444				
	PO-1-06 Mechanized Loop Qualification - Web GUI				69,444				
	PO-2-02 OSS Interface Availability - Prime - EDI	312,500	88,889	104,167					
	PO-2-02 OSS Interface Availability - Prime - CORBA	312,500	88,889						
	PO-2-02 OSS Interface Availability - Prime - Web GUI	312,500	88,889	104,167					
<b>ORDERING</b>									
2	<b>% On Time Ordering Notification</b>	\$937,500	\$266,667	\$208,333	\$208,333	\$200,000	\$40,761		\$1,861,594
	OR-1-02 % On Time LSRC - Flow Through	625,000	222,222	138,889					
	OR-1-04 %OT LSRC -No Fac Ck(E-No FT) -2W Digital -UNE/Resale				23,148				
	OR-1-04 %OT LSRC -No Fac Ck(E-No FT) -2W xDSL Loops				57,870				
	OR-1-04 %OT LSRC -No Fac Ck(E-No FT) -Line Share/Split				57,870				
	OR-1-12 % On Time FOC					50,000			
	OR-1-13 % On Time Design Layout Record					100,000			
	OR-1-19 % OT Response -Request for Inbound Augment (<=192)					50,000			
	OR-2-04 %OT LSR Rej -No Fac Ck(E-No FT) -2W Digital -UNE/Resl				23,148				
	OR-2-04 %OT LSR Rej -No Fac Ck(E-No FT) -2W xDSL Loops				23,148				
	OR-2-04 %OT LSR Rej -No Fac Ck(E-No FT) -Line Share/Split				23,148				
	OR-4-16 % On Time PCN - 1 Business Dav	312,500	44,444	69,444					
	OR-1-04 %OT LSRC -No Fac Ck(E-No FT)-All Specials-UNE/Resale						13,587		
	OR-1-06 %OT LSRC/ASRC -Fac Ck(E-No FT) -All Specs -UNE/Resl						13,587		
	OR-2-04 %OT LSR Rej -No Fac Ck(E-No FT) -UNE/Resale						6,793		
	OR-2-06 %OT LSR/ASR Rej-Fac Ck (Elec) -UNE/Resale						6,793		
<b>PROVISIONING</b>									
3	<b>Installation Performance</b>	\$937,500	\$266,667	\$208,333	\$208,333	\$200,000	\$154,891		\$1,975,725
	PR-3-01 % Completed in 1 Day (1-5 lines No Disp.)	78,125		16,026					
	PR-4-02 Average Delay Days -Total	234,375	38,095	48,077					
	PR-4-02 Average Delay Days -Total -2W Digital				5,020				
	PR-4-02 Average Delay Days -Total -2W xDSL Loop				25,100				
	PR-4-02 Average Delay Days -Total -Line Share/Split				25,100				
	PR-4-04 % Missed Appointments -Dispatch	156,250	152,381	32,051					
	PR-4-04 % Missed Appointments -Dispatch -2W Digital -UNE/Resale				5,020				
	PR-4-04 % Missed Appointments -Dispatch -Line Share/Split				12,550				
	PR-4-05 % Missed Appointments - No Dispatch	312,500		64,103					
	PR-4-05 % Missed Appt -No Dispatch -2W Digital -UNE/Resale				5,020				
	PR-4-05 % Missed Appointment -No Dispatch -Line Share/Split				25,100				
	PR-4-14 % Completed On Time -2W xDSL Loops				25,100				
	PR-4-15 % On Time Provisioning - Trunks					133,333			
	PR-6-01 % Installation Troubles w/in 30 Days	156,250	76,190	48,077		66,667			
	PR-6-01 % Install Trbls w/in 30 Days -2W Digital Loop -UNE/Resale				5,020				
	PR-6-01 % Installation Troubles w/in 30 Days -2W xDSL Loops				37,651				
	PR-6-01 % Installation Troubles w/in 30 Days -Line Share/Split				37,651				
	PR-4-01 % Missed Appointment -VZ -DSO -UNE/Resale						6,793		
	PR-4-01 % Missed Appointment -VZ -DS1 -UNE/Resale						6,793		
	PR-4-01 % Missed Appointment -VZ -DS3 -UNE/Resale						6,793		
	PR-4-01 % Missed Appointment -VZ -Other -UNE/Resale						6,793		
	PR-4-02 Average Delay Days -Total -UNE/Resale						6,793		
	PR-5-01 % Missed Appointment -Facilities -UNE/Resale						27,174		
	PR-5-02 % Orders Held for Facilities >15 days -UNE/Resale						27,174		
	PR-6-01 % Installation Troubles w/in 30 days -UNE/Resale						13,587		
	PR-8-01 Open Orders in Hold Status >30 Days -UNE/Resale						6,793		
	PR-4-01 % Missed Appointment -VZ -Total -EEL						13,587		
	PR-4-02 Average Delay Days -Total -EEL						6,793		
	PR-8-01 Open Orders in a Hold Status >30 Days -EEL						2,717		
	PR-4-01 % Missed Appointment -VZ -Total -IOF						13,587		
	PR-4-02 Average Delay Days -IOF						6,793		
	PR-8-01 Open Orders in a Hold Status >30 Days -IOF						2,717		
4	<b>% On Time Performance -LNP</b>					\$200,000			\$200,000
5	<b>Hot Cut Performance</b>		\$266,667						\$266,667
	PR-6-02 % Installation Troubles within 7 days -Hot Cut								
	PR-9-01 % On Time Performance -Hot Cut								

continued on next page

Under the provisions of the Plan, -1 performance scores are subject to adjustment based on the next two month's performance.

For demonstration purposes, metric performance has been failed to show financial results

Verizon New York		2003 Model							
CRITICAL MEASURES		UNE Platform	UNE Loop	Resale	DSL	Trunks	Specials	Other	Total
<b>MAINTENANCE</b>									
<b>6</b>	<b>Maintenance Performance</b>	\$ 937,500	\$266,667	\$208,333	\$208,333	\$200,000	\$54,348		\$1,875,181
	MR-3-01 Missed Repair Appointments -Loop -Business	234,375		15,432					
	MR-3-01 Missed Repair Appointments -Loop -Residential	234,375		38,580					
	MR-3-01 Missed Repair Appointments -Loop		31,373						
	MR-3-01 % Missed Repair Appt -Loop -2W Digital -UNE/Resale				9,058				
	MR-3-01 % Missed Repair Appointment -Loop -2W xDSL Loops				22,645				
	MR-3-01 % Missed Repair Appointment -Loop -Line Share/Split				22,645				
	MR-4-04 % Cleared(all troubles) w/in 24hrs -2W Digital -UNE/Resale				9,058				
	MR-4-04 % Cleared (all troubles) w/in 24hrs -2W xDSL Loops				22,645				
	MR-4-04 % Cleared (all troubles) w/in 24hrs -Line Share/Split				22,645				
	MR-4-08 Out of Service >24hrs -Business	117,188		38,580					
	MR-4-08 Out of Service >24hrs -Residential	117,188		38,580					
	MR-4-08 Out of Service >24hrs -Total		78,431			66,667			
	MR-5-01 % Repeat Reports within 30 Days	234,375	156,863	77,160		133,333			
	MR-5-01 % Repeat Reports w/in 30 Days -2w Digital -UNE/Resale				9,058				
	MR-5-01 % Repeat Reports w/in 30 Days -2W xDSL Loops				45,290				
	MR-5-01 % Repeat Reports w/in 30 Days -Line Share/Split				45,290				
	MR-4-01 Mean Time to Repair - nonDS0 & DS0 -UNE/Resale						6,793		
	MR-4-01 Mean Time to Repair - DS1 & DS3 -UNE/Resale						6,793		
	MR-4-06 % Out of Service >4hrs -nonDS0 & DS0 -UNE/Resale						6,793		
	MR-4-08 %Out of Service >24hrs -nonDS0 & DS0 -UNE/Resale						6,793		
	MR-4-06 % Out of Service >4hrs -DS1 & DS3 -UNE/Resale						6,793		
	MR-4-08 % Out of Service >24hrs -DS1 & DS3 -UNE/Resale						6,793		
	MR-5-01 % Repeat Reports w/in 30 days -Specials -UNE/Resale						13,567		
<b>NETWORK PERFORMANCE</b>									
<b>7</b>	NP-1-04 Final Trunk Groups Blocked					\$200,000			\$200,000
<b>8</b>	<b>Collocation</b>							\$166,667	\$166,667
	NP-2-01/2 % OT Response to Request for Collocation - Total							73,746	
	NP-2-05/6 % On Time - Physical Collocation - Total							85,546	
	NP-2-07/8 Average Delay Days - Total							7,375	
<b>RESOLUTION PERFORMANCE</b>									
<b>9</b>	<b>Resolution Timeliness</b>							83,333	\$83,333
	OR-10-01 % PON Exceptions Resolved w/in 3 Business Days							46,071	
	OR-10-02 % PON Exceptions Resolved w/in 10 Business Days							18,898	
	BI-3-04 % CLEC Billing Claims Acknowledged w/in 2 Bus Days							1,728	
	BI-3-05 % CLEC Billing Claims Resolved w/in 28 Cal Days after Ack.							16,635	
<b>Month Total</b>		<b>\$3,750,000</b>	<b>\$1,333,333</b>	<b>\$833,333</b>	<b>\$833,333</b>	<b>\$1,000,000</b>	<b>\$250,000</b>	<b>\$250,000</b>	<b>\$8,250,000</b>

Under the provisions of the Plan, -1 performance scores are subject to adjustment based on the next two month's performance.

For demonstration purposes, metric performance has been failed to show financial results

**Verizon New York**

**2003 Model**

**Performance Report for Critical Measure # 8 - Collocation**

NP	Network Performance	CLEC Perf.	CLEC Obs.	Perf. Score	Wgt.
NP-2-01/2	% OT Response to Request for Collocation - Total	89.0	100	-2	5
NP-2-05/6	% On Time - Physical Collocation - Total	89.9	29	-2	20
NP-2-07/8	Average Delay Days - Total	15.0	5	-2	10
					<b>35</b>

**Performance Report for Critical Measure # 9 - Resolution Performance**

Resolution Timeliness		CLEC Perf.	CLEC Obs.	Perf. Score	Wgt.
OR-10-01	% PON Exceptions Resolved w/in 3 Bus Days	89.90	3,412	-2	5
OR-10-02	% PON Exceptions Resolved w/in 10 Bus Days	97.90	3,499	-2	2
BI-3-04	% CLEC Billing Claims Acknowledged within Two Business Days	89.00	320	-2	2
BI-3-05	% CLEC Billing Claims Resolved w/in 28 Calendar Days after Ack.	89.00	308	-2	20
					<b>29</b>

**Performance Report for Critical Measures - Specials**

OR	Ordering	CLEC Perf.	CLEC Obs.	Perf. Score	Wgt.
OR-1-04	% OT LSRC -No Facil Ck(Elec.-No FT) -All Specials -UNE/Resale	89.90	142	-2	10
OR-1-06	% OT LSRC/ASRC -Facil Ck(E -No FT) -All Specials -UNE/Resale	89.30	633	-2	10
OR-2-04	% OT LSR Rej -No Facil Ck (Elec.-No FT) -UNE/Resale	89.90	100	-2	5
OR-2-06	% OT LSR/ASR Reject -Facil Check (Electronic) -UNE/Resale	89.50	277	-2	5

  

PR	Provisioning	VZ	VZ	Std Dev.	Sample Error	Stat. Score	Perf. Score	Wgt.	
PR-4-01	% Missed Appointment -VZ -DSO -UNE/Resale	5.01	15.00	1,058	20	4.92	-2.03	-2	5
PR-4-01	% Missed Appointment -VZ -DS1 -UNE/Resale	10.00	15.00	848	182	2.45	-2.04	-2	5
PR-4-01	% Missed Appointment -VZ -DS3 -UNE/Resale	10.00	30.00	79	10	10.07	-1.99	-2	5
PR-4-01	% Missed Appointment -VZ -Other -UNE/Resale	10.00	25.00	91	20	7.41	-2.02	-2	5
PR-4-02	Average Delay Days - Total -UNE/Resale	15.00	19.00	482	25	10.00	-1.95	-2	5
PR-5-01	% Missed Appointment - Facilities -UNE/Resale	0.90	2.00	1,721	295	0.60	-1.85	-2	20
PR-5-02	% Orders Held for Facilities > 15 days -UNE/Resale	0.30	1.00	1,721	295	0.34	-2.03	-2	20
PR-6-01	% Installation Troubles within 30 days -UNE/Resale	7.50	10.00	3,013	443	1.34	-1.87	-2	10
PR-8-01	Open Orders in a Hold Status > 30 Days -UNE/Resale	1.00	2.50	2,076	205	0.73	-2.06	-2	5
PR-4-01-3510	% Missed Appointment - VZ - Total - EEL	9.00	15.00	843	101	3.01	-1.99	-2	10
PR-4-02-3510	Average Delay Days - Total - EEL	5.00	12.00	223	16	15.00	-1.80	-2	5
PR-8-01-3510	Open Orders in a Hold Status >30 Days -EEL	1.00	3.00	843	101	1.05	-1.91	-2	2
PR-4-01-3530	% Missed Appointment - VZ - Total - IOF	10.00	20.00	79	58	5.19	-1.93	-2	10
PR-4-02-3530	Average Delay Days - IOF	10.00	20.00	24	13	15.00	-1.94	-2	5
PR-8-01-3530	Open Orders in a Hold Status >30 Days -IOF	1.00	4.00	79	58	1.72	-1.74	-2	2

  

MR	Maintenance & Repair	CLEC Perf.	CLEC Obs.	Std Dev.	Sample Error	Stat. Score	Perf. Score	Wgt.	
MR-4-01	Mean Time to Repair - nonDS0 & DS0 -UNE/Resale	20.00	30.00	3,079	16	20.00	-1.99	-2	5
MR-4-01	Mean Time to Repair - DS1 & DS3 -UNE/Resale	10.00	13.00	1,429	217	25.00	-1.65	-2	5
MR-4-06	% Out of Service > 4 Hours - nonDS0 & DS0 -UNE/Resale	60.00	83.00	3,047	15	12.68	-1.81	-2	5
MR-4-08	% Out of Service > 24 Hours - nonDS0 & DS0 -UNE/Resale	8.00	13.00	3,047	100	2.76	-1.81	-2	5
MR-4-06	% Out of Service > 4 Hours - DS1 & DS3 -UNE/Resale	50.00	57.00	1,425	184	3.92	-1.79	-2	5
MR-4-08	% Out of Service > 24 Hours - DS1 & DS3 -UNE/Resale	3.50	6.00	1,425	184	1.44	-1.74	-2	5
MR-5-01	% Repeat Reports w/in 30 days -UNE/Resale	10.00	14.00	4,508	233	2.02	-1.98	-2	10
								Total	<b>184</b>

For demonstration purposes, metric performance has been failed to show financial results

**Special Provision - UNE Ordering** 2003 Model

		% On Time	Observations	Market Adj.
OR-1-04	% OT LSRC<10 Lines (Elec.-No Flow Through)-POTS	89.90	25,127	\$ 500,000
OR-1-06	% On Time LSRC >=10 Lines (Electronic) - POTS	89.80	2,030	\$ 500,000
OR-2-04	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-POTS	89.88	7,576	\$ 500,000
OR-2-06	% On Time LSR Reject >= 10 Lines (Elec.) - POTS	89.90	1,103	\$ 500,000

May not have enough \$\$'s in current month to fund market adjustment!!

<b>Total Market Adj.*</b>	<b>\$ 2,000,000</b>
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\* For allocation, any UNE Ordering market adjustment is combined with the MOE UNE market adjustment allocation.

**Special Provision - UNE Flow Through**

PR-5-01-3000 % Flow Through - Total - POTS & Specials				OR-5-03-3000 % Flow Through - Achieved - POTS			
Month	%	Observations		Month	%	Observations	
		Gross #	Flow-thru			Gross #	Flow-thru
Month - 1	79.00	302,709	239,140	Month - 1	94.00	278,435	261,729
Month - 2	79.00	261,956	206,945	Month - 2	94.00	241,800	227,292
Month - 3	79.00	288,022	227,537	Month - 3	94.00	262,714	246,951
Overall	79.00	852,687	673,623	Overall	94.00	782,949	735,972

<b>Market Adjustment *</b>	<b>\$ 2,500,000</b>
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\* For allocation, any Flow Through market adjustment is combined with the MOE UNE market adjustment allocation.

**Special Provision - Hot Cut - Loop Performance**

		% On Time Current Mo.	Observations	% On Time Prior Month	Observations
PR-9-01-3520	% On Time Performance - Hot Cut	89.00	5071	98.90	3220
				%Troubles Prior Month	
PR-6-02-3520	% Installation Troubles within 7 days - Hot Cut	4.00	11685	0.47	8166

Greater of - Tier I (2 mo) or Tier II (1mo) Total

<b>Market Adjustment *</b>	<b>\$ 2,000,000</b>	<b>\$ 2,000,000</b>
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\* For allocation purposes, any Hot Cut market adjustment is combined with the Critical measure market adjustment allocation.

<b>For demonstration purposes, metric performance has been failed to show financial results</b>
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**Change Control Assurance Plan**

**2003 Model**

	% On Time	Observations	Mrkt Adj.
<b>PO-4-01 % Change Management Notices sent on Time (type 3,4,5)</b>	<b>89.9</b>	<b>100</b>	<b>\$ 500,000</b>

\* Cumulative number of delay days greater than 8 standard **Delay Days\*** Observations

<b>PO-4-03 Change Management Notice Delay 8 plus Days (type 1-5)</b>	<b>6</b>	<b>10</b>	<b>\$ 150,000</b>
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% Test Deck Wgt. Failure Test Deck Wgt.

<b>PO-6-01 % Software Validation</b>	<b>11</b>	<b>100</b>	<b>\$ 1,000,000</b>
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\* Cumulative number of delay hours greater than 48 hour standard **Delay Hours\*** Observations

<b>PO-7-04 Delay Hours - Failed/Rejected Test Deck Transactions Transactions failed, no workaround</b>	<b>26</b>	<b>3</b>	<b>\$ 5,417</b>
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<b>Total Market Adjustment</b>		<b>\$ 1,655,417</b>
UNE Platform allocation	64.29%	\$ 1,064,196
UNE Loop allocation	14.29%	\$ 236,488
Resale allocation	7.14%	\$ 118,244
DSL allocation	14.29%	\$ 236,488

**For demonstration purposes, metric performance has been failed to show financial results**



<b>Verizon New York</b>		
<b>PAP/CCAP Market Adjustment Summary</b>		
<b>2003 Model</b>		
	<u>Weighted Score</u>	<u>Market Adjustment</u>
<b>MODE OF ENTRY</b>		
UNE Platform	-2.000	\$ 3,750,000
UNE Loop	-2.000	833,333
Resale	-2.000	416,667
Digital Subscriber Lines	-2.000	833,333
Trunks	-2.000	<u>416,667</u>
<b>Mode of Entry Total</b>		<b>\$ 6,250,000</b>
<b># CRITICAL MEASURES</b>		
1	OSS Interface	\$ 1,620,833
2	% On Time Ordering Notification	1,861,594
3	Installation Performance	1,975,725
4	% On Time Performance -LNP	200,000
5	Hot Cut Performance	266,667
6	Maintenance Performance	1,875,181
7	Final Trunk Groups Blocked	200,000
8	Collocation	166,667
9	Resolution Performance	<u>83,333</u>
	<b>Critical Measure Total</b>	<b>8,250,000</b>
<b>Individual Rule Payments: Not Shown (needs two months of data)</b>		
<b>SPECIAL PROVISIONS</b>		
	UNE Ordering	2,000,000
	UNE Flow Through	2,500,000
	UNE Hot Cut Loop	<u>2,000,000</u>
	<b>Special Provision Total</b>	<b>6,500,000</b>
	<b>CHANGE CONTROL</b>	<u>1,655,417</u>
	<b>Grand Total</b>	<b>\$ <u>22,655,417</u></b>

Under the Plan, -1 performance scores are subject to adjustment based on the next two month's performance.

For demonstration purposes, metric performance has been failed to show financial results