STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service Commission held in the City of Albany on November 28, 2001

COMMISSIONERS PRESENT:

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

CASE 00-C-2051 - Proceeding to Investigate Methods to Improve and Maintain High Quality Special Services Performance by Verizon New York Inc.

CASE 92-C-0665 - Proceeding on Motion of the Commission to Investigate Performance-Based Incentive Regulatory Plans for New York Telephone Company.

ORDER DENYING PETITIONS FOR REHEARING AND CLARIFYING APPLICABILITY OF SPECIAL SERVICES GUIDELINES

(Issued and Effective December 20, 2001)

BY THE COMMISSION:

INTRODUCTION AND BACKGROUND

On June 15, 2001, the Commission issued Opinion No. 01-1 in the above referenced proceeding which, among other things, adopted revised Special Service Guidelines.[1] On July 20, 2001, a Notice Inviting Comment was issued concerning the

[1] Special Services cover non-basic services most of which are non-switched, and require engineering design review before being installed. Some may require construction of fiber facilities. They include alarm, video, foreign exchange and other services, but the majority demanded are high speed data circuits of 1.5 megabits and higher transmission rates. These same services are known as "special access" when provided pursuant to federal tariffs. Special access services are provided pursuant to Federal Tariff if the customer advises that more than 10% of the traffic will be inter-state, regardless of where the facilities to serve the traffic are located. For reporting purposes, all special services are addressed by the Commission's Special Service Guidelines.

applicability of the guidelines to all local exchange carriers, and also requesting data concerning the number of special service circuits each carrier currently provides to end users. Petitions for rehearing of the June 15 Order have been received as have comments in response to the Notice.[2]

We initiated this proceeding on November 24, 2000, directing Verizon New York Inc. (Verizon) to submit plans to improve its service quality for special services, to demonstrate nondiscriminatory treatment of Verizon's customers, affiliates and other carriers, and to seek comment on Verizon's proposed rebate tariff for missed commitments. The proceeding also considered the need for revised or additional standards and metrics to monitor special services, incentives tied to performance targets, changes in Verizon's ordering practices to permit a single ordering interface and the sharing by competitors of forecast information. Verizon was directed to work with Staff to ensure that network capacity remains adequate to meet expected demand.

In our June 15 opinion and order (the Order)[3] we found that Verizon's provisioning performance for special services is significantly below Commission targets, that performance data suggest Verizon treats other carriers less favorably than its retail customers, that Verizon continues to dominate this market as a competitive facilities-based market has yet to emerge. We also found that the proposed rebate tariff should be expanded, and that Verizon had yet to provide reports needed to identify capacity problems.

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[2] The Notice Inviting Comments and Petitions for Reconsideration were noticed in the State Register on June 13, 2001 and August 15, 2001, respectively. Comments were received and are discussed in Appendices 1 and 2, attached to this order.

[3] Case 00-C-2051, Verizon New York Inc. - Special Services Guidelines, Opinion No. 01-1 (issued June 15, 2001).

The Order adopted revised Special Service Guidelines including additional metrics and reporting requirements. Verizon was given 90 days from the Order to develop the necessary processes and procedures to report in the manner defined in the modified guidelines, and to begin reporting pursuant to them beginning October 1, 2001. Verizon was also given 120 days from the Order to show, by filing performance results under the modified guidelines, improved overall service quality as well as nondiscriminatory performance. Subsequently, these reporting requirements were suspended.[4]

Tentatively, we also found that the guidelines should apply to all local exchange carriers providing these services to customers because the services are critically important to business and economic growth in New York. Public comment was sought by notice issued July 20, 2001 on the applicability of the guidelines to all local exchange carriers and included a request that each carrier identify the number of special service circuits in use.

On June 29, 2001, Verizon filed tariff revisions reflecting the ordered changes to its rebate plan.[5] This order addresses the petitions for rehearing on the June 15 Order, and comments received on applicability of the guidelines to all local exchange carriers.

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[4] These requirements were indefinitely suspended by the Commission on September 20, 2001 due to the World Trade Center disaster and were reinstated by order issued November 26, 2001.

[5] In discussions between Staff and Verizon prior to the events of September 11, 2001, it was apparent that Verizon was working to meet other requirements established by the Order, and will likely reinitiate its efforts soon. Verizon's progress in this regard will be reported at a later time.

SUMMARY OF REHEARING PETITIONS

Petitions for rehearing were submitted by AT&T Communications of New York, Inc., TC Systems, Inc. and ACC Corp., collectively identified as AT&T, and Verizon on July 31, 2001. Comments were received on July 31, 2001, from Verizon, AT&T, WorldCom Inc. (WorldCom), and a group of carriers including Allegiance Telecom of New York, Inc., Focal Communications Corporation of New York and Time Warner Telecom - NY, L.P., collectively identified as the "coalition." These comments are briefly summarized below, and also represented in more detail in Appendix 1 to this order. In addition, Verizon sought clarification on reporting requirement dates contained in the June 15 Order.[6]

Verizon

Verizon's petition raises four issues: jurisdiction, market dominance, discriminatory treatment, and revisions to selected metrics and targets of the guidelines. We discuss each below.

Regarding jurisdiction, Verizon claims that the Commission lacks authority on interstate special services, and asserts that when it develops the ability to measure only intrastate service, it will cease reporting interstate results. Verizon also reiterates its claim of non-dominance, and its belief that the Order is inconsistent with a previous Commission finding. It asks that this issue be developed more fully in the comments on the applicability of the guidelines to all local exchange carriers.

[6] This issue is moot in view of our suspension of the requirements of the Order, Cases 00-C-2051 and 92-C-0665, Order Suspending October 1 and October 13 Reporting Requirements,(issued September 20, 2001). A new compliance date has been established.

Verizon claims it does not discriminate when provisioning circuits for other carriers and end users. It claims Average Delay Day results demonstrate this, because results are essentially the same for end users and carriers. It also claims that contrary to expectations, the revised metrics will fail to identify discriminatory treatment because carriers and end users have different expectations.

Verizon requests clarification of the definition for the Percent on Time Performance metric (SS-PR-3).[7] Verizon believes the guidelines are unachievable and that new targets should be considered. Verizon seeks a theoretical basis for our dismissal of Verizon's statistical analysis.

AT&T

While AT&T endorses the findings of the Order, and most of the changes to the guidelines, it seeks fine tuning of certain metrics to better achieve its objectives.

AT&T requests that held order data provided to Staff include orders with a missed due date, and orders without a due date. Verizon should also be required to construct new facilities whenever utilization achieves 65%-75% of capacity.

AT&T proposes that the Percent on Time Performance metric (SS-PR-1) be defined to include unilateral (by Verizon) changes to commitment dates. It also seeks electronic notification of potential misses of due dates (jeopardy notices). Concerning the recently adopted Percent On Time Access Service Request metric (SS-OR-1), AT&T believes that because there are no material consequences to Verizon for postponing dates, an estimated completion date will have no meaning to AT&T or its customers. It requests that this metric

[7] The parenthetical references are to specific metrics of the guidelines which are set forth in Appendix 3, attached to this order.

be replaced with one that requires due dates not exceeding the standard intervals of the guidelines where facilities exist, and an interval of Verizon's planned construction date plus two days where facilities do not exist. AT&T would have us define "facilities available" as any spare path that can be used to met a requested due date.

Other Parties

WorldCom and the coalition believe Verizon's petition for reconsideration does not meet the requirements of 16 NYCRR 3.7(b), in that it does not identify any error of law or fact, or new circumstances requiring a different determination, and should be denied. WorldCom also disputes Verizon's claim of non-dominance in the special services market.

Contrary to Verizon's claim, WorldCom believes that the Percent On Time Performance metric is a reliable means of measuring parity performance. WorldCom also believes that the Commission adequately addressed Verizon's statistical analysis concerning its ability to achieve the overall performance targets of the guidelines, and rightly rejected it.

WorldCom supports AT&T's petition because it would tighten the obligations imposed on Verizon and reduce the potential to game the system. The coalition, on the other hand, seeks dismissal of Verizon's petition, but supports the Percent On Time Access Service Request metric (SS-OR-1) as critical data adopted by the Commission in the absence of a consensus proposal. Contrary to Verizon's position, both parties believe that the Percent On Time Performance metric (SS-PR-1) should exclude "customer not ready" situations, and WorldCom also believes the Quality of Installation Work metric (SS-PR-3) should be based on circuits installed in a given month, not total circuits.

Verizon's Reply

Verizon claims that AT&T's petition for rehearing does not meet the requirements of 16 NYCRR 3.7(b), and should be dismissed. It claims AT&T is requesting new reports and/or metrics in an attempt to rewrite the Order, and rejects a mandate to provide relief whenever an interoffice facility exceeds 65%-75% utilization. Verizon believes there is no need for clarification of the Percent On Time Performance (SS-PR-1) metric to include unilateral changes in due dates.

Concerning electronic notification of potential due date misses, Verizon is willing to work with other carriers to develop notice provisions, but believes the format of notification should not be mandated. Verizon also opposes AT&T's recommendation to require a firm order commitment in every instance within 72 hours, regardless of the availability of facilities and rejects defining "available facilities" as AT&T suggests because it states not every spare path can be used to provision certain types of special services.

AT&T's Reply

In reply, AT&T opposes Verizon's stated intention to discontinue reporting service quality associated with federally tariffed special services, stresses that average delay day results are an unreliable indicator of discrimination, and reiterates the need for the Quality of Installation work metric (SS-PR-3) to be based on circuits installed in a given month, not total circuits.

SUMMARY OF COMMENTS ON APPLICABILITY

Ten submissions were received representing approximately 50 parties, including all incumbent local exchange companies. Of the parties, only two, Verizon and the Communications Workers of America (CWA), recommend that the

Special Services Guidelines apply to all carriers. For a variety of reasons stated below, the rest of the parties oppose extending the guidelines. A detailed summary of these comments is provided in Appendix 2 to this order.

Verizon opposes the need for Special Services Guidelines, stating that these services are highly competitive; however, if at all, these guidelines should apply to all carriers. Verizon cites Section 253(b) of the Telecommunications Act to mandate that State requirements should be made on a competitively neutral basis and to selectively apply these standards would violate the Act. Verizon also states that application would violate the equal protection clause of the Constitution as it would impose costs on Verizon that other carriers would not have to bear.

CWA contends that competitive providers generate a number of service quality problems, such as reporting troubles to Verizon before testing their own equipment. CWA believes there should be little additional cost to providers to report service results because tracking information is readily available.

The most common objection to the general application of special services standards is that this proceeding was initiated to focus on Verizon's performance. Since problems of this magnitude do not exist for other carriers, the objectors claim the imposition of general standards would not serve to protect customers or enhance competition, but would merely impose an additional cost burden on these other carriers. Furthermore, they argue that service results will be statistically inaccurate because many companies have too few special services circuits to measure meaningfully. The New York State Telephone Association (NYSTA) states that no concerns have ever been raised regarding special service provisioning by small companies. Frontier Telephone of Rochester (FTR) adds that

special service metrics are currently being discussed in Case 97-C-0139 for inter-carrier performance and, therefore, it would be counterproductive and damaging to the collaborative process for the Commission to mandate standards and metrics in what it considers a "Verizon proceeding" that might be inconsistent with those in the carrier-to-carrier proceeding.

DISCUSSION

In its rehearing petition, Verizon raises the issue of jurisdiction and states its intention to discontinue reporting the service quality of those special service circuits provided under federal tariff.[8] The Public Service Law gives the Commission broad authority to gather data. Because the Commission represents the people of New York State in proceedings before the Federal Communication's Commission (PSL §12) our data gathering jurisdiction is not limited to services subject to our direct jurisdiction. Verizon shall provide service quality information about all special services in order to allow the Commission to monitor performance.

Verizon raises no new issues and presents no new data to support its claim that it does not have market dominance for these service offerings. Nevertheless, it requests that the issue be considered in depth in the comment phase concerning

[8] Verizon claims that Chairman Helmer admitted a lack of jurisdiction in a letter to FCC Chairman Powell dated May 22, 2001. These issues do not center on the Commission's jurisdiction to require information. The Public Service Law §94(2) gives the Commission that authority. See also 16 NYCRR 644.1. In addition, even without rate jurisdiction an agency has authority to consider the entire "factual context in which the proposed" rate functions. See Federal Power Comm'n. v. Conway Corp., 426 US.277, 280 (1976), Matter of New York Telephone Company v. Public Service Commission, 95 NY2d 40 (2000). Arkansas Louisiana Gas Co. v. Dept. of Public Utilities, 304 U.S. 61 (1938) [state order requiring provision of information does not interfere with interstate commerce].

applicability of the guidelines to all carriers. Its suggestion to consider this issue in response to the Notice is not practicable since the comments have already been received. However, we have obtained new information in response to the July Notice. Local exchange carriers reported the number of special service circuits each has in service as of August of 2001. This data corroborates our earlier finding of dominance, and shows that Verizon serves over 79.5% of the statewide market with the next largest carriers, a competitor serving 6.6%, and an incumbent serving less than 5.9% of the statewide market.

Neither does Verizon provide new data or show errors of law with respect to the discrimination issue. Verizon merely reiterates its claim that it provisions service equally with competitors and its own retail customers. Verizon claims that average delay day results evidence no discrimination because all customers, on average, realize the same number of delay days. AT&T points out that average delay day results provide perspective on only a piece of the equality issue: how long after an installation commitment is missed that on average, service is provided. It gives no perspective on overall installation performance such as that provided by the Percent On Time Performance metric (SS-PR-1). It was on the basis of performance under the On Time Performance metric that we concluded Verizon treats other carriers less favorably than its retail customers.[9]

Verizon claims that we dismissed its statistical analysis when rejecting any change in performance targets. Verizon provides no basis to support a rehearing. Verizon has routinely achieved the targets, as is shown in the service performance charts attached to our November 2000 Order

[9] June 15, 2001 Order, p. 6.

instituting this proceeding.[10] We find no benefit to further discussion of a theoretical nature on the reasonableness of the targets in the guidelines.

With respect to the request for clarification of the Percent On Time Performance metric (SS-PR-1), we note an error in the guidelines. The metric excludes "customer not ready" situations which is inconsistent with our intent.[11] Appendix 3 to this order contains a correction to the guidelines for this error. However, AT&T's request to specifically include unilateral company changes to commitment dates is denied. It is unnecessary as the metric, by definition, includes such changes.

Concerning clarification of the Quality of Installation Work metric (SS-PR-3), it should be calculated on the basis of circuits installed during the report month. This method is consistent with the Carrier-to-Carrier Guidelines. Verizon offers no support for its contrary position other than to rely upon historic definitions which used total circuits. Were we to base the calculation on total circuits in service as Verizon suggests, we would, in effect, lower the performance threshold to recognize the larger installed base of circuits. We decline to do so and reject Verizon's petition in this regard.

AT&T asks us to require electronic notification of pending potential misses of installation commitments (SS-PR-5). We find this unnecessary at this time in light of Verizon's willingness to work with carriers to meet their individual needs in this regard. Carriers should apprise us of any continued problems.

AT&T asks us to modify the Percent On Time Access service request metric (SS-OR-1) such that a firm commitment

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[10] Attachment 2, Cases 00-C-2051 et al, Order Instituting Proceeding (issued November 24, 2000).

[11] June 15, 2001 Order, p. 21.

within 72 hours would be provided regardless of the availability of facilities. The process must allow sufficient time for an engineering review of construction requirements, and 72 hours is not sufficient for this purpose. The adopted metric requires a firm date within 72 hours when facilities exist, and when facilities do not exist, an estimated date within 72 hours followed by a firm date within the lesser of three weeks from the estimated date, or 10 days from the in-service date. This allows the carrier time to review construction requirements and offer a realistic firm date. This process is reasonable and we reject AT&T's request.

AT&T would have us define "facilities available" as any spare path. As some special services can only be provided by specific facilities such as fiber optic cable, we cannot agree with AT&T's suggestion. The definition must refer more broadly to a spare facility with all the capabilities required to provide the service requested.

Finally, we deny AT&T's request that Verizon be required to supplement any interoffice route that has exceeded a utilization of 65%-75%. While this utilization range is a part of Verizon's service improvement plan, a mandate would remove Verizon's flexibility to respond to changing conditions. The Commission has adequate means to address continuing service problems without adopting a broad based facility relief requirement.

We turn now to a discussion of the applicability of the guidelines to all local service providers. Special services are vital to the economic viability of the State. Although the majority of these circuits are being provided in major metropolitan areas, the protections afforded to customers by the guidelines should be available in every community, regardless of service provider. In the same manner, we made the protections contained in Part 603 of our rules available to all basic

service customers, regardless of the customer location or the size of the serving carrier. The need for applying performance metrics to all local exchange carriers is likely to become even more important as the businesses that use such services realize a need for more diversity or redundancy in light of the World Trade Center disaster. It is also likely that the demand for special services across the state will continue to grow as businesses introduce new products and technologies.

To the extent that competing carriers are dependent upon another carrier to provide a special services circuit or portion of a circuit that is being resold to its own customer, (i.e., unbundled network elements or any other resold facility) carriers may apply for a waiver of reporting.[12] This waiver option should alleviate the concerns of the smaller providers. Discussions in Case 97-C-0139 focus on carrier-to-carrier metrics for services available from wholesale tariffs, while this proceeding focuses on metrics for special services provided under retail tariffs. Thus, the request of Frontier Telephone of Rochester is rejected.

Concerning reporting requirements, WorldCom suggests the reporting threshold be measured using special services circuits in service rather than exchange access lines. We concur, but will define it on the basis of all special service circuits, not just those that are intrastate as WorldCom proposes. Carriers providing a significant number of special services circuits should not be excused from reporting results based upon the number of local exchange customers it serves. Our survey results suggest that any company providing 50,000 or

[12] This is consistent with the waiver provisions set forth in Part 603.

more special service circuits, both intra- and inter-state, should be required to report results. The count of circuits should also be only those that are facilities-based. Currently, based upon survey results, only three companies meet this requirement. The cost and administrative burden associated with the applicability of the guidelines to all providers should be limited as a result of this high threshold reporting requirement.

As suggested in the public notice seeking comments on applicability, application of special service standards should be consistent with that of basic service under Part 603 of our rules. All local exchange carriers are subject to the Special Service Guidelines, but only the larger carriers as defined above will be required to report. Non-reporting carriers may be required to report should a need become evident, regardless of the number of circuits served. This would likely become apparent through an increase in complaints for a particular carrier.

CONCLUSION

The petitions of Verizon and AT&T for rehearing are denied, except we reaffirm AT&T's position on measuring the Quality of Installation work (SS-PR-3) metric, and adopt Verizon's position on the On Time Performance (SS-PR-1) metric. That is, the former metric should be calculated on the basis of circuits installed within the past 30 days each month, and the latter metric should be calculated by including "customer not ready" situations. We further order that the attached guidelines, which have been modified to reflect this order, shall become effective immediately. We base these decisions on a review of all submissions of the parties.

We direct Verizon to continue reporting service results for special services provided under state and federal

tariff. Reporting is necessary to insure non-discriminatory performance, and is consistent with traditional regulatory oversight.

The guidelines will apply to all local exchange carriers. In addition, only those carriers providing 50,000 or more facilities-based special services circuits, both intra- and inter-state, will be required to report service results, in a manner generally consistent with that used for basic service under Part 603 of our rules. All affected carriers shall begin reporting data required by the guidelines on April 15, 2002 and continue monthly submissions on the 15th day of each month.

The Commission orders:

1. The rehearing petitions of Verizon New York Inc. and AT&T Corp. are denied, except as noted in this order.

2. The special services guidelines shall apply to all carriers, but only those carriers serving more than 50,000 circuits will be required to report performance routinely.

3. All carriers subject to the reporting requirements of the special services guidelines except Verizon New York Inc., shall begin reporting data on April 15, 2002 and file subsequent reports on the 15th day of each month. Reporting requirements for Verizon New York Inc. are addressed in a separate order.

4. Verizon New York Inc. shall continue to report performance results for all special services.

5. These proceedings are continued.

By the Commission,

(SIGNED) JANET HAND DEIXLER
Secretary

Below is a more detailed representation than that summarized in the order.

REHEARING PETITIONS

Verizon

Verizon's petition raises four areas of concern: 1. Jurisdiction, 2. Market dominance, 3. Discriminatory treatment, and 4. Revisions to selected metrics of the guidelines. Each are summarized below.

In the area of jurisdiction, Verizon claims that based on a letter from the Commission to the Federal Communications Commission (FCC),[1] the Special Service Guidelines can only be read to apply to intrastate services, and that when Verizon develops the means to measure intrastate service alone, it will cease reporting interstate results consistent with a supposed admonition of lack of jurisdiction.

Verizon reiterates its claims of non-dominance of the special services market, and views the finding in the Order inconsistent with the data it provided as well as a previous Commission finding that these services are already competitive.[2] It claims no opportunity was given to develop the record, and suggests that this issue be developed more fully as part of the comments on the applicability of the guidelines to all LECs.

Concerning non-discriminatory treatment, Verizon claims its On Time Provisioning performance results are different between end users and carriers because each group of customers has differing expectations. In meeting these

[1] Letter from Maureen O. Helmer to Hon. Michael K. Powell, dated May 22, 2001.

[2] Case 98-C-0690, Proceeding on Motion of the Commission to Examine Methods By Which Competitive Local Exchange Carriers Can Obtain and Combine Unbundled Network Elements, Order Directing Tariff Revisions, issued March 24, 1999, at 8.

expectations Verizon claims it is not discriminating between the two. Further, it claims that Average Delay Day results which are essentially the same for both customer groups shows no discrimination exists. It also claims that the revised metrics will not identify discriminatory treatment because of the differing practices followed for end users versus carriers requesting service.

With respect to specific metrics, Verizon indicates that the Order expressly stated an intention not to change existing metric definitions except to use a reporting basis of circuits, but the published guidelines for On Time Provisioning (SS-PR-1) and Installation Quality (SS-PR-3) are a departure from established Verizon practice. It claims that On Time Provisioning should include "customer not ready" situations even though the guidelines define this metric as exclusive of them. It also claims that the basis for calculating Installation Quality should be the total of all in service special service circuits, and not just those installed in the last thirty days. Verizon indicates that leaving these two metrics as currently defined in the guidelines essentially raises the performance bar and is inconsistent with the historical definition of each metric.

Finally, Verizon reiterates its claim that the guidelines are unachievable, and that new targets should be considered. More specifically, this aspect of its petition addresses the dual requirements that Verizon attain specified performance levels on each metric in at least 90% of its opportunities to do so, and have no more than five service inquiry situations in the same calendar period. It claims that the Order dismissed the statistical analysis of its expert, Dr. Donald Pardew, out of hand, without providing any theoretical arguments. It submitted a detailed explanation of its analysis

supposedly refuting any criticism of it and supporting its argument that the targets are unattainable.

AT&T

While AT&T endorsees the findings of the Order, and most of the changes to the guidelines, it states that fine tuning of certain metrics will better achieve their objectives. It seeks changes to held order reporting, mandated network capacity additions, and various other changes to metric definitions.

AT&T believes that the Commission should clarify what held order data should be provided to Staff. It suggests that the report include orders where Verizon missed a due date, and also identify those orders which do not yet have a due date at the time of the report. Further, held orders should be identified in the report as to cause such as a lack of facilities in the local loop, the interoffice plant or in the central office. It believes this data will provide necessary information for Staff to ensure that Verizon's improvement efforts are properly focused.

AT&T believes that Verizon should be required to construct new facilities when utilization reaches the range of 65%-75%. This range which Verizon identified in its service improvement plan submitted last December AT&T suggests be made a requirement so that the risk of service deterioration is minimized. Further, AT&T would have Verizon routinely report on utilization of its facilities and its service improvement plans.

In reference to metric definitions, AT&T proposes that that the percentage of installations completed on or before the due date (SS-PR-1) be clearly defined as including unilateral changes to commitment dates by Verizon. AT&T also seeks a requirement defining timely notification of a jeopardy condition

(i.e., a potential miss of a due date) via electronic means. It suggests that Verizon be directed to work with other carriers to develop procedures for such electronic notification.

AT&T also seeks reliable commitments of in-service dates and believes that the recently adopted Percent On Time Access Service Request metric (SS-OR-1) which was designed with this in mind will not result in reliable dates. This metric currently allows for either a firm due date where facilities exist, or an estimated completion date followed by a firm due date when facilities are not yet available. It believes this new metric is incompatible with automated order-tracking systems, increases customer uncertainty and removes incentives for Verizon to provide timely service. In particular, it believes that because there are no material consequences to Verizon for postponing dates, an estimated completion date will have no meaning to AT&T or its customers. AT&T suggests that only firm completion dates can be used by customers. To correct this problem, AT&T would require due dates that do not exceed the standard intervals of the guidelines where facilities exist, and an interval of Verizon's planned construction date plus two days where facilities do not yet exist.

AT&T believes that Verizon will be tempted to use the estimated completion date whenever possible because in its view an estimate allows considerable flexibility without adequate regulatory scrutiny. To reduce this temptation, AT&T would include in the definition of "facilities available," all situations where there is a spare path that can be used to meet a requested due date.

Other Parties

WorldCom and the coalition believe Verizon's petition does not meet the requirements of 16 NYCRR 3.7(b), in that

Verizon's petition does not identify any error of law or fact, or new circumstances requiring a different determination. Therefore, the petition should be denied.

WorldCom also rebuts Verizon's claim of non-dominance in the special services market. It believes the Commission had a more than sufficient basis to conclude that Verizon remains the dominant provider. WorldCom disputes Verizon's claim that this finding is at odds with a previous Commission decision over two years ago because that proceeding concentrated on the provision of expanded extended links, and did not examine the competitive market for special services. In that proceeding, WorldCom believes there was no Commission finding on special services dominance.

Contrary to Verizon's claim, WorldCom believes that the Percent On Time Performance metric is a reliable means of measuring parity performance. The metric is designed to show how often Verizon meets its due dates for end users and those of its competitors.

WorldCom also believes that the Commission adequately addressed Verizon's statistical analysis concerning its ability to achieve the overall performance targets of the guidelines, and rightly rejected it. It claims Verizon provided no further evidence to reconsider this aspect of the Order.

WorldCom supports AT&T's petition in its entirety, because its adoption would tighten the obligations imposed on Verizon and reduce the potential to game the system. The coalition, on the other hand, seeks dismissal of Verizon's petition, but supports the Percent On Time Access Service Request metric (SS-OR-1) as critical data adopted by the Commission in the absence of a consensus proposal. Contrary to Verizon's position, both parties believe that the Percent On Time Performance metric (SS-PR-1) should exclude "customer not

ready" situations, and WorldCom also believes the Quality of Installation Work metric (SS-PR-3) should be based on circuits installed in a given month and not total circuits.

Verizon Reply Comments

Verizon claims that AT&T has not met the requirements of 16 NYCRR 3.7(b), and its petition should therefore be dismissed. It claims that in requesting clarification of the Order, AT&T is actually requesting new reports and/or metrics in an attempt to rewrite the Order. For example, AT&T's request to expand held order reporting between Verizon and Staff, would require inclusion of data concerning orders not yet held for lack of facilities, and that it must first establish a commitment date, and miss that date before an order can be considered a held order.

Verizon rejects AT&T's request that relief be mandated by the Commission whenever an interoffice facility exceeds 65%-75% utilization because it was not previously discussed during the proceeding and only first raised in the petition for rehearing. Additionally, such a mandate would deprive Verizon of its ability to respond to changes in demand, especially if there is an economic downturn and a decline in forecasted demand.

Verizon believes there is no need for clarification of the Percent On Time Performance (SS-PR-1) to specifically include unilateral changes in due dates. Verizon believes such changes are already included and quotes the guideline definition wherein the metric measures the percent of orders completed as verified by the customer on or before the first confirmed due date, or a subsequent customer initiated and verified change in due date. Verizon believes this language requires that any

company initiated change in due date associated with a missed installation be scored as a company miss.

Concerning AT&T's request that electronic notification be required in a jeopardy situation, a situation where a due date might be missed, Verizon claims it is not always possible to do, and it might deprive carriers of flexibility in obtaining notification. Verizon does indicate it is willing to work with other carriers to develop notice provisions, but it believes no one carrier should dictate the method of such notice.

AT&T has also recommended changing the Percent On Time Access Service request Response metric (SS-OR-1) to require a firm order commitment in every instance within 72 hours regardless of the availability of facilities. Verizon indicates that provision of a commitment within this interval leads to unrealistic and unreliable commitments. It has suggested throughout the proceeding that a more realistic interval for responding to a service request is 5 days, not 72 hours. Recognizing that its proposal was not adopted, Verizon admits that the adopted interval of 72 hours with the ability to provide either a firm commitment or an estimated completion date takes some account of reality, and is preferred to AT&T's proposal.

Verizon also rejects AT&T's proposal to define available facilities as all situations where a spare path exists. It believes this expands the definition beyond the commonly understood meaning of a spare path with all the capabilities required to provide the service requested. Verizon notes that not every spare path can be used to provision certain types of special services such that AT&T's definition is not realistic.

AT&T Reply Comments

In reply, AT&T addresses Verizon stated intention to discontinue reporting service quality associated with federally tariffed special services, average delay day results as an unreliable indicator of discrimination, and reiterates the need for the Quality of Installation Work metric (SS-PR-3) to be based on circuits installed in a given month and not total circuits.

AT&T believes it is imperative that Verizon continue to provide monthly service quality results for all special services so that unlawful discrimination can be corrected. Based on its reading of the Order, AT&T states that discrimination is evident, and Verizon's stated intention to stop reporting service results on special services provided under federal tariffs would preclude any future determination of such discrimination. AT&T cites case law supporting a conclusion that Verizon must provide such information to state regulators so that the Commission can discharge its statutory obligation to compare service quality provided to end users with that provided to competing carriers to ensure that any evident discrimination is not unlawful.[3] Further, it claims that Verizon erroneously assumes that by reporting such service data to the Commission, the Commission is assuming regulatory authority over them. It states that Verizon provides no citation in support of this assumption.

AT&T also refutes Verizon's claim that its average delay days results prove that no discrimination exists in the

[3] Federal Power Commission v. Conway Corp., 426 U.S.271, 96 S.Ct. 1999, 48 L. Ed. 2d 626(1976), Matter of New York Telephone Company v.Public Service Commission, 95 NY 2d 40, 49, 710 NYS 2d 305 (2000), and Public Service Law §91(3).

provisioning of special services. While such results may be similar for end users and competing carriers, they are a measure of delay after missing a commitment, and the more relevant performance measure is Provisioning On Time Performance where a clear difference exists.

The following is a more detailed presentation of comments from parties on the applicability of the Special Service Guidelines to all local exchange carriers than that provided in the memorandum.

Verizon

Verizon opposes continued use of Special Services Guidelines given the fact that such services are highly competitive; however, if they must apply, they should apply to all carriers. Verizon believes that the Commission's ruling conflicts with its finding in Case 98-C-0690 where it determined that the special services market is competitive. It cites Section 253(b) of the Telecommunications Act that says imposition of State requirements should be made "on a competitively neutral basis," and that not extending the guidelines would be a violation of this provision of the Act. Verizon states not doing so would also violate the equal protection clause of the U.S. Constitution, and that singling out Verizon would impose costs on it that others would not have to bear. Also, Verizon believes that the "trigger" of more than 500,000 access lines is proposed to dictates which carriers report results should not be access lines, since some providers would escape the reporting requirements altogether if they do not also provide access lines.

AT&T

AT&T believes that the special services guidelines should not be extended to other carriers, as this proceeding is focusing on Verizon's performance. Competitive carriers are dependent upon Verizon to provide timely and reliable loop special access in order for them to provide special services to their own customers. Where competitors rely on Verizon for their very ability to compete for customers, the imposition of regulatory rules is unnecessary.

NYSTA

NYSTA opposes extending the Special Services Guidelines to other carriers. It believes such action will result in increased regulatory burdens on telecommunications providers. On behalf of its Small Company Committee, NYSTA also indicates that so few special services are provisioned by small companies that results from measuring such activity would be statistically inaccurate. Furthermore, it believes that no concerns have ever been raised regarding small companies' special service provisioning leading to the conclusion that application of the guidelines is unnecessary.

Frontier Telephone of Rochester (FTR)

FTR believes that Verizon-specific guidelines should not apply to other carriers. It also indicates that special services metrics are currently being discussed in for carrier-to-carrier in Case 97-C-0139, and it would be counterproductive and damaging to the collaborative process for the Commission to mandate metrics inconsistent with those developed in that proceeding. It claims implementation of these guidelines for FTR would involve extensive work and cost, and could lead to implementation of metrics that would be unworkable for other carrier, for example, only a few companies send electronic requests for service and have no electronic validation of any kind with respect to service orders.

Joint Respondents of Allegiance Telecom of New York, Inc., Focal Communications Corporation of New York, and Time Warner Telecom-NY, L.P.

The joint respondents believe that the Special Services Guidelines should not extend beyond Verizon because it would not protect customers or enhance competition. The

respondents argue that competitive carriers have not demonstrated a pattern of poor performance, and that only a local exchange carrier with an identified problem should be scrutinized.

XO New York, Inc.

XO New York states that the Special Services Guidelines should apply to only to those incumbent carriers who control bottleneck facilities, and not to competitive carriers. It is unreasonable to hold CLECs responsible for performance failures that are largely dependant on the performance of LECs.

Adelphia Business Solutions

Adelphia Business Solutions indicates that special service problems are with Verizon, not other carriers such that the guidelines should not apply to other carriers.

WORLDCOM, Inc.

WorldCom opposes expanding the Special Services guidelines to competitive carriers, stating that this proceeding was instituted to improve Verizon's performance. WorldCom also calls Verizon's claims regarding Section 253 of the Act a misstatement, stating that this section in no way mandates that a state must regulate all carriers in the same way. WorldCom recommends that the Commission define access lines to include specials only, and not POTS lines, and interstate lines be excluded. The count should be by customer, not capacity. Finally, WorldCom believes that a carrier should not be subject to guidelines for services it provides through resold facilities, unbundled network elements, or through facilities obtained from another carrier, as it should not be held

accountable for the performance of another carrier on whom it relies.

Communications Workers of America (CWA)

CWA believes that the guidelines should apply to all providers. It contends that competitive providers cause a number of service quality problems, such as sending troubles to Verizon before actually testing their own facilities. It also believes that tracking information is already available for other providers, and that any additional cost associated with measuring and reporting are overstated.

Effective December 20, 2001

SPECIAL SERVICE GUIDELINES
QUALITY OF SERVICE MEASUREMENTS

Overview

The Special Service Guidelines are performance criteria by which the quality of Special Services provided by Local Exchange Telecommunications Carriers is assessed by the New York State Public Service Commission. The Guidelines were last revised in 1987. The current revisions result from the Commission's findings and directives in Case 00-C-2051 – Proceeding to Investigate Methods to Improve and Maintain High Quality Special Services Performance by Verizon New York Inc. The services addressed by these guidelines are listed in Attachment 1.

Areas of Performance Measurement

Performance in providing Special Services is measured in three basic areas: ordering of service, installation of service and ongoing maintenance or repair of service. One indicator of ordering performance is evaluated under the guidelines, Order Confirmation Timeliness which measures the percentage of on time access service responses.

Five indicators of installation performance are evaluated under the guidelines. The first indicator, on Time Performance, is measured by the percentage of installations completed on or before their due dates. The second indicator, Missed Installation Appointment Delays, is measured by the average number of business days that missed installations are delayed. The third indicator of installation performance, Quality of Installation Work, is measured by the customer trouble report rate during the first 30 days of operation of Special Service circuits. The fourth indicator, Percent Missed Appointments – Due to a Lack of Facilities, measures the percentage of missed appointments due to a lack of facilities. The fifth indicator, Percent Jeopardies, measures the number of missed orders where advance notice is provided of a miss.

Two indicators of ongoing maintenance and repair performance are evaluated under the guidelines. The first, Reliability of Service, utilizes customer trouble report rates on the total base of Special Service circuits as a unit of measurement. Promptness of Repair is the second ongoing maintenance and repair performance indicator, and its unit of

measurement is the interval of time between reporting of a trouble by a customer and the clearance of that trouble by the carrier.

Performance Criteria and Ranges

This section sets forth the specific metrics and performance thresholds that Local Exchange Telecommunications Carriers are expected to meet or exceed in providing service to end users and/or other carriers. The reporting requirements specified in these guidelines envision parity comparisons where appropriate, in place of the specified threshold performance levels when incumbent local exchange telecommunications carriers provide Special Services to other carriers. Attachment 2 provides a more detailed definition of each indicator, or metric. Metric identification numbers as shown in Attachment 2 are shown in parenthesis below.

I. - Ordering Performance

Indicator 1A – Percent on Time Access Service Request Response – (Electronic – No Flow-through)(SS-OR-1)

Unit of Measurement – Percent of responses to electronic access service requests where the confirmed in-service date and/or estimated in-service date is provided within 72 hours from receipt of the request.

Threshold Performance Range 95.0 - 100

II. - Installation Performance

Indicator 2A - On Time Performance (SS-PR-1)

Unit of Measurement - Percent of Installations Completed On or Before the Due Date

Threshold Performance Range 96.0 - 100

Indicator 2B - Missed Installation Appointment Delays (SS-PR-2)

Unit of Measurement - Average Number of Business Days by Which Unkept Appointments Are Missed

Threshold Performance Range 0 - 3.0

Indicator 2C - Quality of Installation Work (SS-PR-3)
Unit of Measurement - Customer Trouble Reports per 100 Special Service Circuits During First 30 Days of Service

Threshold Performance Range 0 - 4.0

Indicator 2D – Missed Appointments Due to Lack of Facilities (SS-PR-4)
Unit of Measurement – Percent of Orders Missed Due to a Lack of Facilities

This indicator has no associated threshold performance level.

Indicator 2E – Percent Jeopardies (SS-PR-5)
Unit of Measurement – Percent of Missed Orders Where Advance Notice is Provided

This indicator has no associated threshold performance level.

III. - Maintenance And Repair Performance

Indicator 3A - Reliability of Service (SS-MR-1)
Unit of Measurement - Customer Trouble Reports Per Month Per 100 Special Service Circuits

Threshold Performance Range 0 - 3.5

Indicator 3B Promptness of Repair (SS-MR-2)
Unit of Measurement - Average Duration In Hours Between Customer Reporting and Telephone Company Clearing of Troubles

Threshold Performance Range 0 - 9.0

Performance Threshold Service

The specified performance thresholds apply to each Repair Service Bureau or Special Service Center as well as to the 132 Local Access and Transport Area (LATA 132) and to the remainder of New York State (“Remainder of State” - all other areas combined). Local Exchange Telecommunications Carriers shall report performance monthly on each of the above metrics in each bureau, LATA 132 and the Remainder of the State. Additionally, LATA 132 and Remainder of State monthly performance results shall be disaggregated to show performance

provided to retail end users distinct from that provided to other telephone carriers as a group, and from that provided to the reporting carrier's affiliates as a group. Performance provided by the reporting carrier to an individual telephone carrier will be provided to that individual carrier and/or Commission staff, upon request.

These thresholds represent good service, but failure to attain the threshold range does not by itself indicate poor service. However, each Local Exchange Telecommunications Carrier shall attain these performance thresholds in at least 90% of its monthly opportunities to do so in a given calendar year. Additionally, the carrier shall not experience any more than five Service Inquiry situations as defined below in the same 12-month calendar period.

Service Inquiry Situations

Service inquiry situations identify Special Service problem areas where immediate improvements are needed. Service inquiry situations are defined as non-threshold performance in the current month and any two of the previous four months by any reporting entity (bureau or larger entity). For each service inquiry situation, a report is required from the carrier as set forth below. Commission staff will analyze the report, and conduct any investigations necessary to fully disclose the nature of the problem and its means of elimination.

A Service Inquiry Report will provide an in-depth analysis of service including Pareto Analysis of defects with root cause statements, and is required when overall bureau/center or higher-level entity performance is in a service inquiry situation. This report will detail the carrier's plans for corrective action, addressing each stated root cause, and include commitment dates for service improvement and reasons for any previously missed commitments. It will also be provided on or before the 5th day of the second month following the report period.

Miscellaneous Application and Performance Measurement Procedures

The following procedures shall be used in administering the Special Service Guidelines and determining performance levels. The application of these procedures and the Special Service Guidelines generally will be consistent with current administrative practices pertaining to the Telephone Service Standards, 16 NYCRR 603.

A Local Exchange Telecommunications Carrier serving fewer than 50,000 special service circuits will not be required to report performance results or provide information specific to it in reference to Attachments 1 and 3.

A Local Exchange Telecommunications Carrier may request an exemption from any or all of the reporting requirements of these guidelines, if that carrier can demonstrate that its services are provided through resale of another carrier’s tariffed services or purchase of another carrier’s Unbundled Network Elements over which it has no direct control. The Director of the Office of Communications will grant or deny such exemption requests on a case-by-case basis.

Standard Special Service Installation Appointments shall be scheduled in accordance with a standard installation interval table filed by the carrier, accepted by Staff and appended to these guidelines. An installation interval is the period from the date on which the carrier receives an order for a Special Service circuit (the "application date") to the date on which that circuit should be installed, tested, and accepted by the customer (the “due date"). The carrier may periodically update its standard interval table (Attachment 3) after consulting with Commission staff. For Verizon New York Inc. installation intervals shall be consistent with those specified in the Carrier-to-Carrier Guidelines for similar services. A copy of the current interval table will be provided by the Local Exchange Telecommunications Carrier to customers upon request.

The standard installation interval does not apply to "Large Jobs" which, in the case of Verizon New York Inc., are defined as all single orders for more than 15 analog or five digital Special Service circuits to the same customer premise. Verizon New York Inc. establishes installation intervals for Large Jobs on a case-by-case basis, and must cooperatively work with individual customers to arrange mutually satisfactory installation schedules. Customers who are unable, after consultation with a Local Exchange Telecommunications Carrier, to obtain satisfactory intervals on Large Jobs may bring their concerns to the Commission staff's attention. Verizon shall maintain consistent treatment for installation intervals on “Large Jobs” with respect to its intervals for similarly sized orders for Special Services in the Carrier-to-Carrier Guidelines.

In measuring Promptness of Repair, the "stop clock" method of timing trouble intervals is used. Under this method, when a trouble requires the field dispatch of a telephone

technician, the timing clock is run whenever the Special Service customer's premise is open and accessible to telecommunications carrier repair personnel from the time the dispatch occurs until the time the trouble is cleared. Whenever the customer's premise is closed or otherwise inaccessible to telecommunications carrier repair personnel during that period, however, the timing clock is stopped. For troubles which do not require access to the customer's premise, however, there is no stopping of the timing clock.

Forecast Sharing

Carriers that use Verizon New York Inc. facilities to provision Special Services may to the extent possible provide forecast information to Verizon. The forecast data may include interoffice facility requirements for Digital Signal Level 1 (DS1, or 1.544 megabits per second) and above, and Optical Carrier Level 1 (OC1, or 51.840 megabits per second) and above, between a Verizon central office and a carrier’s location, or only at specific Verizon central offices. It need not include end user location facility requirements, but may if the carrier chooses to share such data. Carriers may use forms and procedures defined by Verizon to provide such forecasts. Forecast data should be updated on a scheduled basis.

Carrier Ordering Process for Verizon’s High Capacity Services

Carriers ordering high capacity services (i.e., data transmission service equal to, or in excess of 1.544 megabits per second) from Verizon New York Inc. will use Verizon’s Access Service Request (ASR). Carriers will use Verizon’s electronic methods of placing an ASR, if available for placing high capacity service requests. During periods when electronic methods are unavailable, carriers may use facsimile. Individual carriers will be expected to phase in use of electronic methods over a one year period, or as negotiated between that carrier and Verizon.

The following listing is based on the Special Services offered by Verizon New York Inc.

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Access Analog	KC	Local Area Data Channel	
Access Analog	LB	Voice - Non-switched Line	
Access Analog	LC	Voice - Switched Line	
Access Analog	LD	Voice - Switched Trunk	
Access Analog	LE	Voice and Tone - Radio Land Line	
Access Analog	LF	Data Low Speed	
Access Analog	LG	Basic Data and Voice	
Access Analog	LH	Voice and Data - PSN Access Tie Trunk	
Access Analog	LJ	Voice and Data - SSN Access	
Access Analog	LK	Voice and Data - SSN Access - Intermachine Trunk	
Access Analog	LN	Data Extension Voice Grade Data	
Access Analog	LP	Telephoto and Facsimile	
Access Analog	LQ	Voice Grade Customized	
Access Analog	LR	Protective Relay - Voice Grade	
Access Analog	LV	Simultaneous Data and Voice Service	
Access Analog	LZ	Base Line Voice	
Access Analog	MQ	Metallic Customized	
Access Analog	MR	Obsolete Code (Morse Channel)	
Access Analog	NQ	Telegraph Customized	
Access Analog	NT	Protective Alarm - Metallic	
Access Analog	NU	Protective Alarm - Simplex	
Access Analog	NV	Protective Relaying Telegraph Grade	
Access Analog	NW	Telegraph Grade Facility - 75 Baud	
Access Analog	NY	Telegraph Grade Facility - 150 Baud	
Access Analog	PB	Program Audio, 300-2500 Hz - Non-Equalized	
Access Analog	PE	Program Audio, 200-3500 Hz	
Access Analog	PF	Program Audio, 100-5000 Hz	
Access Analog	PJ	Program Audio, 50-8000 Hz	
Access Analog	PK	Program Audio, 50-15,000 Hz	
Access Analog	PN	Obsolete Code (Network Program Channel)	
Access Analog	PQ	Program Grade Customized	
Access Analog	SB	Switched Access - Standard	
Access Analog	SD	Switched Access - Improved	
Access Analog	SE	Special Access - WATS Access Line - Standard	
Access Analog	SF	Special Access - WATS Access Line - Improved	
Access Analog	SJ	Limited Switched Access Line (LSAL)	
Access Analog	SV	Switched Access Line Dedicated IC	
Access Analog	SZ	Electronic Business Service	
Access Analog	TQ	Television Grade Customized	
Access Analog	TW	TV Channel, One Way 5 kHz Audio	
Access Analog	WA	Wideband Analog	
Access Analog	WJ	Wideband Analog, 60-108 kHz	
Access Analog	WL	Wideband Analog, 312-552 kHz	
Access Analog	WN	Wideband Analog, 10-20 kHz	
Access Analog	WP	Wideband Analog, 29-44 kHz	
Access Analog	WQ	Wideband Analog, 10 Hz-50kHz	
Access Analog	WR	Wideband Analog, 584-3084 kHz	
Access Analog	XL	Obsolete code (TWX access line)	
Access Digital	HS	High Capacity Sub Rate	

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Access Digital	WB	Wideband Digital, 19.2 kb/s	
Access Digital	WC	Obsolete code (Special facility w/800 service)	
Access Digital	WD	Wideband Digital, Cellular, 824-894 mHz	
Access Digital	WE	Wideband Digital, 50 kb/s	
Access Digital	WF	Wideband Digital, 230.4 kb/s	
Access Digital	XA	Dedicated Digital, 2.4 kb/s	
Access Digital	XB	Dedicated Digital, 4.8 kb/s	
Access Digital	XC	Obsolete code (TWX concentrator trunk)	
Access Digital	XD	Obsolete code (TWX data trunk)	
Access Digital	XE	Dedicated Digital, Bit Speed Generic	
Access Digital	XF	Obsolete (cross-over trunk facility, temp)	
Access Digital	XG	Dedicated Digital, 9.6 kb/s	
Access Digital	XH	Dedicated Digital, 56.0 kb/s	
Access Digital	XR	Dedicated Digital, Variable Bit Rate	
Access Digital	YG	Frame Relay (less than 1.544 mb/s)	
Access Digital	YN	Digital Transmission Channel - 64 kb/s	
Access Highcap (DS1)	AH	Obsolete code	
Access Highcap (DS1)	HC	Digital High Capacity 1.544 mb/s	
Access Highcap (DS1)	HJ	Digital High Capacity, Non ANSI Rate	
Access Highcap (DS1)	HX	Fractional T-1	
Access Highcap (DS1)	JE	Digital High Cap, SONET, VT1 Signal	
Access Highcap (DS1)	SY	Timing Signal, 1.544 mb/s	
Access Highcap (DS1)	YB	Frame Relay (1.544 mb/s or higher)	
Access Highcap (DS3)	HD	Digital High Capacity 3.151 mb/s	
Access Highcap (DS3)	HE	Digital High Capacity 6.312 mb/s	Analog category in PA/DE
Access Highcap (DS3)	HF	Digital High Capacity 44.736 mb/s	
Access Highcap (DS3)	HG	Digital High Capacity 274.176 mb/s	
Access Highcap (DS3)	HH	Digital High Capacity Greater than 45 mb/s	
Access Highcap (DS3)	HT	Transparent LAN	
Access Highcap (DS3)	JI	Digital High Capacity, SONET, STS1 Signal	
Access Highcap (DS3)	LX	Dedicated Facility - Without Equipment	
Access Highcap (DS3)	LY	Dedicated Facility - With Equipment	
Access Highcap (DS3)	OA	Digital High Capacity, SONET, OC1 Signal	
Access Highcap (DS3)	OE	Digital High Capacity, SONET, OC24 Signal	
Access Highcap (DS3)	TV	TV Channel, Video and Optional Audion Service	
Access Highcap (DS3)	TZ	Non Commercial TV	
Access Highcap (OC3)	JJ	Digital High Capacity, SONET, STS3 Signal	
Access Highcap (OC3)	OB	Digital High Capacity, SONET, OC3 Signal	
Access Highcap (OC12)	OD	Digital High Capacity, SONET, OC12 Signal	
Access Highcap (OC48)	OF	Digital High Capacity, SONET, OC48 Signal	
Access Highcap (OC192)	OG	Digital High Capacity, SONET, OC192 Signal	
Non-access Analog	AA	Packet Analog Access Line	
Non-access Analog	AD	Attendant	
Non-access Analog	AF	Commercial Audio (Full Time)	
Non-access Analog	AI	Automatic Identified Outward Dialing	
Non-access Analog	AL	Alternative Service	
Non-access Analog	AN	Announcement service	
Non-access Analog	AP	Commercial Audio (Part Time)	
Non-access Analog	AU	Auto Script	
Non-access Analog	BL	Bell and Lights	
Non-access Analog	BS	Siren Control	

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Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Non-access Analog	CA	SSN Access	
Non-access Analog	CE	SSN Station Line	
Non-access Analog	CF	Obsolete code (OCC Special facility)	
Non-access Analog	CG	Obsolete code (OCC telegraph grade facility-medium speed)	
Non-access Analog	CI	Concentrator Identifier Trunk	
Non-access Analog	CK	Obsolete code (OCC overseas connecting facility-wideband)	
Non-access Analog	CN	SSN Network Trunk	
Non-access Analog	CP	Concentrator Identifier Signaling Link	
Non-access Analog	CR	Obsolete code (OCC backup facility)	
Non-access Analog	CS	Channel service	
Non-access Analog	CT	SSN Tie Trunk	
Non-access Analog	CV	Obsolete code (OCC Voice grade facility)	
Non-access Analog	CW	Obsolete code (OCC wire pair facility)	
Non-access Analog	CX	Obsolete code (Centrex CU Station line)	
Non-access Analog	CZ	Obsolete code (OCC access facility)	
Non-access Analog	DD	Direct-in-Dial-Alternate Design	
Non-access Analog	DJ	Digit Trunk	
Non-access Analog	DK	Data Link	
Non-access Analog	DL	Dictation Line	
Non-access Analog	DT	Obsolete code (Data line concentrator trunk)	
Non-access Analog	DU	Dialed Data Transmission	
Non-access Analog	EA	Switched Access	
Non-access Analog	EB	Electronic Business Service	
Non-access Analog	EC	Obsolete code (Enfia tandem trunk)	
Non-access Analog	EE	Combined Access	
Non-access Analog	EF	Entrance Facility - Voice Grade	
Non-access Analog	EG	Obsolete code (Type 2 telegraph)	
Non-access Analog	EL	Emergency Reporting Line	
Non-access Analog	EM	Emergency Reporting Center Trunk	
Non-access Analog	EN	Obsolete code (Exchange network access facility)	
Non-access Analog	EP	Emergency Private-Switch Trunk - 911	
Non-access Analog	EQ	Equipment-Only (Network Element) Assignment	
Non-access Analog	ES	Obsolete code (extension service voice grade)	
Non-access Analog	EV	Enhanced Emergency Reporting Trunk Service Code	
Non-access Analog	EW	Obsolete code (Off network MTS/WATS Equiv service	
Non-access Analog	FA	Fiber Analog Service	
Non-access Analog	FD	Private Line – Data	
Non-access Analog	FR	Fire Dispatch	
Non-access Analog	FT	Foreign Exchange Trunk	
Non-access Analog	FV	Voice Grade facility	
Non-access Analog	FW	Wideband Channel	
Non-access Analog	FX	Foreign Exchange Line	
Non-access Analog	HV	Simultaneous Data and Voice	
Non-access Analog	IT	Intertandem Tie Trunk	
Non-access Analog	LA	Local Area Data Channel	
Non-access Analog	LL	Long Distance Terminal Line	
Non-access Analog	LS	Local Service	
Non-access Analog	LT	Long Distance Terminal trunk	
Non-access Analog	MA	Cellular Access Trunk 2-Way	
Non-access Analog	MC	Obsolete code (Data multiplex channel)	
Non-access Analog	ML	Obsolete code (multiplex link)	

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Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Non-access Analog	MT	Wired Music	
Non-access Analog	NA	Obsolete code (CSACC Links (EPSCS))	
Non-access Analog	NC	Obsolete code (CNCC Links (EPSCS))	
Non-access Analog	OC	Obsolete code (Centrex CU STN Line-Off premises	
Non-access Analog	OI	Off Premises Intercommunications Station Line	
Non-access Analog	ON	Off Network Access Line	
Non-access Analog	OP	Off premises extension	
Non-access Analog	OS	Off premises PBX Station Line	
Non-access Analog	PA	Protective Alarm (AC Interface at Customer Premises)	
Non-access Analog	PG	Paging	
Non-access Analog	PL	Private Line – Voice	
Non-access Analog	PM	Protective Monitoring	
Non-access Analog	PR	Protective Relaying - Voice Grade	
Non-access Analog	PS	MSC Constructed Spare Facility	
Non-access Analog	PT	Obsolete code (Local program channel)	
Non-access Analog	PV	Protective Relaying - Telegraph Grade	
Non-access Analog	PW	Protective Relaying - Signal Grade	
Non-access Analog	PZ	PBX Station Line	
Non-access Analog	QU	Packet –Asynchronous Access Line	
Non-access Analog	RA	Remote attendant	
Non-access Analog	RD	Reconfigurable Network - Trunk	
Non-access Analog	RL	Reconfigurable Network - CO Switch Line side	
Non-access Analog	RT	Radio Land Line	
Non-access Analog	SA	Satellite/tributary Tie Trunk	
Non-access Analog	SG	Control/Remote Metering - Signal Grade	
Non-access Analog	SM	Sampling	
Non-access Analog	SN	SSN Special Access Termination	
Non-access Analog	SQ	Equipment – Only (Customer Premises Assignment)	
Non-access Analog	SS	Dataphone Select-a-Station	
Non-access Analog	TA	Tandem Tie trunk	
Non-access Analog	TC	Control/remote Metering – Telegraph Grade	
Non-access Analog	TD	Obsolete code (Transaction network -Dial line)	
Non-access Analog	TF	Telephoto/Facsimile	
Non-access Analog	TG	CO Trunk Side Termination	
Non-access Analog	TL	Nontandem Tie Trunk	
Non-access Analog	TM	Obsolete code (Transaction network Switched)	
Non-access Analog	TN	Obsolete code (Transaction Polled access line)	
Non-access Analog	TR	Turret or Automatic Call Distributor (ACD) Trunk	
Non-access Analog	TT	Teletypewriter Channel	
Non-access Analog	TU	Turret or Automatic Call Distributor (ACD) Line	
Non-access Analog	UN	Low Speed Signaling Custom	
Non-access Analog	VF	Commercial Television (Full-Time)	
Non-access Analog	VH	Commercial Television (Part-Time)	
Non-access Analog	VI	Obsolete code (Industrial television)	
Non-access Analog	VM	Control/Remote Metering - Voice Grade	
Non-access Analog	VN	Obsolete code (Network video)	
Non-access Analog	VT	Obsolete code (Local video)	
Non-access Analog	WG	Obsolete code (Western Union Teletypewriter)	
Non-access Analog	WI	WATS Service Trunk	
Non-access Analog	WO	WATS Line (OUT)	
Non-access Analog	WS	WAST Trunk (Out)	
Non-access Analog	WU	Obsolete code (Western Union	

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Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
		Telegraph)	
Non-access Analog	WV	Obsolete code (Western Union Voice Channel)	
Non-access Analog	WX	WATS Service Line	
Non-access Analog	WY	WATS Trunk (2-way)	
Non-access Analog	WZ	WATS line (2-way)	
Non-access Analog	XX	Obsolete code (TWX data test line)	
Non-access Analog	TX	Dedicated Facility - Without Equipment	
Non -access Company Circuits	ZA	Alarm Circuits	
Non -access Company Circuits	ZC	Call and Talk Circuits	
Non -access Company Circuits	ZD	Obsolete code (data line switching test circuits)	
Non -access Company Circuits	ZE	Emergency Patching Circuits	
Non -access Company Circuits	ZF	Order Circuits Facility	
Non -access Company Circuits	ZM	Measurement and Recording Circuits	
Non -access Company Circuits	ZP	Test Circuits, Plant Service Center	
Non -access Company Circuits	ZQ	Qual Control and Management Circuits	
Non -access Company Circuits	ZS	Switching Control and Transfer Circuits	
Non -access Company Circuits	ZT	Test Circuits, Central Office	
Non -access Company Circuits	ZV	Order Circuits, Service	
Non-access Digital	AB	Packet Network Trunk	
Non-access Digital	DA	Digital Data Off Net Extension	
Non-access Digital	DC	Digital Data, 64 CCC	
Non-access Digital	DM	Digital Data - 19.2 kb/s	
Non-access Digital	DP	Digital Data - 2.4 kb/s	
Non-access Digital	DQ	Digital Data - 4.8 kb/s	
Non-access Digital	DR	Digital Data – 9.6 kb/s	
Non-access Digital	DS	Canada	
Non-access Digital	DW	Digital Data – 56 kb/s	
Non-access Digital	DX	Obsolete code (Digital Data - Subrate speed)	
Non-access Digital	DY	Digital Service (under 1 mb/s)	
Non-access Digital	DZ	64 kb/s On the "D" Channel	
Non-access Digital	HA	Non DDS Digital Data 1.2 kb/s	
Non-access Digital	HB	Non DDS Digital Data 19.2 kb/s	
Non-access Digital	HP	Non DDS Digital Data 2.4 kb/s	
Non-access Digital	HQ	Non DDS Digital Data 4.8 kb/s	
Non-access Digital	HR	Non DDS Digital Data 9.6 kb/s	
Non-access Digital	HW	Non DDS Digital Data 56 kb/s	
Non-access Digital	HY	Non DDS Digital Data 64 kb/s	
Non-access Digital	ID	Derived Services	
Non-access Digital	PC	Switched Digital Access Line	
Non-access Digital	QD	Packet DDD Access Line	
Non-access Digital	QE	Frame Relay - 56 kb/s	
Non-access Digital	QJ	Frame Relay - 384 kb/s	
Non-access Digital	QK	Frame Relay - 64 kb/s	
Non-access Digital	QL	Frame Relay - 128 kb/s	
Non-access Digital	QR	Frame Relay - 256 kb/s	
Non-access Digital	QS	Packet – Synchronous Access Line	
Non-access Digital	QY	Frame Relay - 768 kb/s	
Non-access Digital	ST	Digital Trunk	
Non-access Digital	US	Digital Data	
Non-access Highcap (DS1)	AS	Asynchronous Transfer Mode (ATM) Circuit	
Non-access Highcap (DS1)	CH	Obsolete code (OCC Digital facility high speed)	
Non-access Highcap (DS1)	DB	Satellite Access Line	

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Services Covered by the Special Service Guidelines			**Attachment 1**
Category	**Service Code**	**Service**	**Notes**
Non-access Highcap (DS1)	DF	HSSDS-Hub to Hub - 1.5 mb/s	
Non-access Highcap (DS1)	DG	HSSDS-Hub to Earth Station - 1.5 mb/s	
Non-access Highcap (DS1)	DH	Digital Data	
Non-access Highcap (DS1)	FL	Fractional T-1	
Non-access Highcap (DS1)	HK	Timing Signal - 1.544 mb/s	
Non-access Highcap (DS1)	HL	Digital Service Fiber	
Non-access Highcap (DS1)	HN	Digital Voice Circuit	In the Digital category in NE
Non-access Highcap (DS1)	QA	SMDS DS1 Circuit	
Non-access Highcap (DS1)	QG	Frame Relay - 1.544 mb/s or higher	
Non-access Highcap (DS1)	UF	Fractional T-1 (RPL)	
Non-access Highcap (DS1)	UH	Digital High Capacity	
Non-access Highcap (DS1)	UM	High Capacity Custom	
Non-access Highcap (DS3)	FI	FDD – 100 mb/s	
Non-access Highcap (DS3)	HI	Digital Service 45 mb/s or higher	
Non-access Highcap (DS3)	HZ	Private Line Service - 200 mb/s	
Non-access Highcap (DS3)	LI	LAN Connection Operating at 4 mb/s	
Non-access Highcap (DS3)	LM	Transparent LAN	
Non-access Highcap (DS3)	LO	LAN Connection Operating at 10 mb/s	
Non-access Highcap (DS3)	LW	LAN Connection Operating at 16 mb/s	
Non-access Highcap (DS3)	MB	LAN Connection Operating at 2.5 mb/s	
Non-access Highcap (DS3)	MD	SONET - STS1 Signal	
Non-access Highcap (DS3)	MF	SONET - OC1 Signal	
Non-access Highcap (DS3)	MM		
Non-access Highcap (DS3)	QC	SMDS DS3 Circuit	
Non-access Highcap (DS3)	QH	Frame Relay - End-to-end service	
Non-access Highcap (DS3)	TY	Dedicated Facility - With Equipment	In the Analog category NY
Non-access Highcap (DS3)	VR	Non Commercial Television	
Non-access Highcap (ISDN PRI)	IP	ISDN Primary Access Line	
Non-access Highcap (OC3)	ME	SONET - STS3 Signal	
Non-access Highcap (OC3)	MG	SONET - OC3 Signal	
Non-access Highcap (OC12)	MH	SONET - OC12 signal	
Non-access Highcap (OC12)	MP	SONET - STS12 Signal	
Non-access Highcap (OC48)	MJ	SONET - OC48 Signal	
Non-access Highcap (OC192)	MK	SONET - OC192 Signal	
Non-access Local Specials	BA	Protective Alarm (DC Interface at Customer Premises)	
Non-access Local Specials	CL	Centrex Company Line	
Non-access Local Specials	DI	Direct-In-Dial	
Non-access Local Specials	DO	Direct-Out-Dial	
Non-access Local Specials	ND	Network Data Link	
Non-access Local Specials	PX	PBX Station Line	
Non-access Local Specials	SL	Secretarial Line	
Non-access Local Specials	TK	Local PBX Trunk	

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Attachment 2

The following metric definitions provide information on how to measure and report performance under the Special Service Guidelines. For purposes of these definitions and reporting performance, the words “Other Carrier” are meant to include carriers other than the reporting carrier and its affiliates (e.g., competitive local exchange carriers, long distance carriers, and wireless carriers). Retail is meant to include end user service, but exclude any service to carriers.

Function:

Percent On Time ASR Response
(electronic – no flow-through) SS-OR-1

Definition:

This metric measures Response Timeliness in terms of the percentage of responses within the agreed upon timeframes as specified in the Performance Standards with either a firm in-service date or an estimated in-service date where facilities are not currently available.

Order Response Time: The amount of elapsed time (in hours and minutes) between receipt of a valid order request (e.g., VZ Ordering Interface) and distribution of a Service Order confirmation, or an estimated completion date based on an engineering estimate. Rejected orders will have the clock re-started upon receipt of a valid order.

Facility Checks are completed on all orders. If facilities are available, a firm order in-service date will be provided with the response to the service order request. When facilities are not available, an engineering review will be performed, and an estimated in-service date will be provided in response to the service order request rather than a firm order in-service date. The date will be identified as a "best estimate" which will be subsequently confirmed or modified by providing a firm order in-service date within the shorter of three weeks from provision of the estimated date (which allows time to accurately project when facilities will become available), or 10 days prior to the in-service date.

Notes: This measurement is based on ASR electronically submitted orders only. The reporting carrier will include carrier requests for resent confirmations that are submitted electronically as well as resent confirmations due to reporting carrier error in initial confirmation in the Order Confirmation Timeliness measurement. Resent confirmations due to other carrier error are excluded from the measurement. If no order confirmation time exists due to a missing order confirmation, the reporting carrier will use the completion notification time. This measurement includes orders confirmed in the calendar month.

Exclusions:

- Reporting carrier Test and administrative orders
- Weekend and holiday hours (other than flow-through)
  Weekend hours are from 5:00PM Friday to 8:00AM Monday
  Holiday hours are from 5:00PM of the business day preceding the holiday to 8:00AM of the first business day following the holiday. These hours are excluded from the elapsed time when calculating the response times for non-flow-through requests.

Performance Standard:

Percent On Time ASR Response (electronic – no flow-through):
95%or More On Time - Order Response Time within 72 Hours.

Report Dimensions

Company:	Geography:
• Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	New York State orders as handled by each ordering center.

Metric Calculation Specifics

SS-OR-1-01	**Percent On Time ASR Response (electronic – no flow-through)**	
Products	ASR Submitted Orders for DS0; and ASR Submitted Orders for DS1 and above (i.e., two product groups).	
Calculation	**Numerator**	**Denominator**
	Number of electronic ASRs where response date and time minus submission date and time is less than standard.	Total number of electronic ASRs.

Function:

Provisioning On Time Performance - Met Commitments SS-PR-1

Definition:

This metric measures the Percent of Orders completed as verified by the customer on or before the first confirmed commitment date, or a subsequent customer initiated and verified change in the order due date.

Each circuit is counted as a separate order, even if multiple circuits are ordered at the same time.

For carriers: A requested change in order due date is communicated by a supplemental issue of the ASR ("supp").

Exclusions:

- Reporting Carrier Test Orders
- Disconnect Orders
- Reporting Carrier Administrative orders
- Record Orders
- Orders that are not complete. (Orders are included in the month that they are completed)

Performance Standard:

% Installation Commitments On Time:
Greater Than or Equal to 96.0%

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-PR-1-01	**% Met Appointments – Verizon – Total**	
Description	The percent of orders completed on or before the commitment date.	
Products	"DS0;" and "DS1 and above."	
Calculation	**Numerator**	**Denominator**
	Number of Orders where the Order completion date is on or before the order due date.	Number of orders completed for product group.

Function:

Average Delay Days On Missed Installation Orders SS-PR-2

Definition:

For orders where the installation commitment was missed due to Reporting Carrier reasons, this metric measures the average number of days between the first confirmed commitment due date (or a subsequent customer initiated due date that was verified by the customer) and the actual work completion date as verified by the customer.

Each circuit is counted as a separate order, even if multiple circuits are ordered at the same time.

For carriers: A requested change in order due date is communicated by a supplemental issue of the ASR ("supp").

Exclusions:

- Reporting Carrier Test Orders
- Disconnect Orders
- Reporting Carrier Administrative orders
- Record Orders
- Orders that are not complete. (Orders are included in the month that they are completed)
- Saturdays, Sundays, and Legal Holidays are not counted as Delay Days.

Performance Standard:

Average Delay Days:

Less Than or Equal to 3.0

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-PR-2-01	**Average Delay Days – Total**	
Description	For orders missed due to Verizon reasons, the average number of days between committed due date and actual work completion date.	
Products	"DS0;" and "DS1 and above."	
Calculation	**Numerator**	**Denominator**
	Sum of the completion date minus due date for orders missed due to company reasons.	Number of orders missed for company reasons.

Function:

Installation Quality SS-PR-3

Definition:

This metric measures the percent of circuits installed where a reported trouble was found in the network within 30 days of order completion.

Trouble Report: Includes Disposition Codes 03 (Drop Wire), 04 (Cable), 05 (Central Office), 07 (Test-OK) and 09 (Found-OK). For Carriers, Disposition Code 05 includes translation troubles closed automatically by the carrier.

Exclusions:

- Subsequent reports (additional customer calls while the trouble is pending).
- Troubles closed due to customer action.
- Troubles reported by Reporting Carrier employees in the course of performing preventative maintenance, where no customer has reported a trouble.
- Customer Premises Equipment (CPE) troubles

Performance Standard:

Percent Installation Troubles Reported Within 30 Days:

Less than or equal to 4.0 trouble reports within 30 days per 100 circuits installed during the calendar month.

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-PR-3-01	**% Installation Troubles reported within 30 Days**	
Description	The trouble report rate on circuits installed where a trouble was reported within 30 days of order completion. Includes Disposition Codes 03 (Drop Wire), 04 (Cable), 05 (Central Office), 07 (Test-OK) and 09 (Found-OK).	
Products	Special Services	
Calculation	**Numerator**	**Denominator**
	Number of trouble reports on circuits installed within 30 days of trouble report.	Total circuits installed in calendar month.

Function:

Percent Missed Appointments Due to a Lack of Facilities SS-PR-4

Definition:

This metric measures facility missed orders.

Facility Missed Orders: The Percent of Orders completed after the commitment date, where the cause of the delay is lack of facilities.

Exclusions:

- Reporting Carrier Test Orders
- Disconnect Orders
- Reporting Carrier Administrative orders
- Record Orders
- Orders that are not complete. (Orders are included in the month that they are completed)
- Customer Not Ready (CNR), No Access (NA) and Lost Access (LA).

Performance Standard:

Percent Missed Appointments Due to a Lack of Facilities:
No performance standard is associated with this metric.

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-PR-4-01	**Percent Missed Appointments Due to a Lack of Facilities**	
Description	The percent of Dispatched Orders completed after the commitment date, due to a lack of facilities.	
Products	"DS0;" and "DS1 and above."	
Calculation	**Numerator**	**Denominator**
	Number of dispatched orders where the order completion date is greater than the order DD due to Reporting Carrier Facility reasons for the product group.	Number of dispatched orders completed for the product group.

Function:

% Jeopardies SS-PR-5

Definition:

This metric measures the number of orders with missed due dates that receive jeopardy notices prior to close of business on the due date.

Note: For Verizon, this is to be measured after a new transaction type is developed in ordering systems.

Exclusions:

- Reporting Carrier Test Orders
- Disconnect Orders.
- Reporting Carrier Administrative orders.
- Orders that are not complete or cancelled.

Performance Standard:

Jeopardy Status Notification:

No performance standard is associated with this metric.

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-PR-5	**% Jeopardies**
Products	"DS0;" and "DS1 and above."

Calculation	**Numerator**	**Denominator**
	Number of missed committed due dates where advance notice is provided.	Number of missed committed due dates.

Function:

Customer Trouble Report Rate SS-MR-1

Definition:

This metric measures the total initial customer direct or referred troubles reported, where the trouble disposition was found to be in the network or a trouble condition was not found (Found OK and Test OK), per 100 circuits in service. A Network Trouble means a trouble with a Disposition Codes of 03 (Drop-wire), 04 (Outside Plant Loop), or 05 (Central Office). A Found-OK means a trouble with a Disposition Codes of 07, and a Test-OK means a trouble with a Disposition Codes of 09.

Subsequent Reports: Additional customer trouble calls while an existing trouble report is pending – typically for status or to change or update information.

Exclusions:

- Report rate excludes subsequent reports (additional customer calls while the trouble is pending)
- Troubles reported on Reporting Carrier official (administrative lines)
- Troubles closed due to customer action.
- Troubles reported by Reporting Carrier employees in the course of performing preventative maintenance, where no customer has reported a trouble
- Customer Premises Equipment (CPE) troubles

Performance Standard:

Report Rate:

Less than or Equal to 3.5 trouble reports per 100 circuits.

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-MR-1-01	**Network Trouble Report Rate**	
Products	Special Services	
Calculation	**Numerator**	**Denominator**
	Number of all trouble reports with found network troubles (trbl_cd is FAC or CO) or not-found troubles (Test-OK or Found-OK) .	Number of circuits in service stated in hundreds.

Function:

Trouble Duration Intervals SS-MR-2

Definition:

This metric measures average trouble duration interval per month. Mean Time to Repair: (MTTR) measures the average duration time from trouble receipt to trouble clearance. It includes Disposition Codes 03 (Drop Wire), 04 (Cable), 05 (Central Office), 07 (Test-OK) and 09 (Found-OK).

For Special Services, including Special Access service, this is measured on a stop clock basis (e.g., the clock is stopped when Carrier testing is occurring, the Reporting Carrier is awaiting carrier acceptance, or the Reporting Carrier is denied access).

Exclusions:

- Subsequent reports (additional customer calls while the trouble is pending)
- Customer Premises Equipment (CPE) troubles
- Troubles closed due to customer action.
- Troubles reported by Reporting Carrier employees in the course of performing preventative maintenance, where no customer reported a trouble.

Performance Standard:

Mean Time To Repair:

Less than or Equal to 9.0 hours

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-MR-2-01	**Mean Time To Repair – Total**	
Products	Special Services	
Calculation	**Numerator**	**Denominator**
	Sum of trouble clear date and time minus trouble receipt date and time for trouble reports with Disposition Codes 03, 04, 05, 07 and 09. (Exclude time when clock is stopped).	Number of trouble reports with Disposition Codes 03, 04, 05, 07 and 09.

Attachment 3

Verizon will routinely update the following standard installation intervals and maintain consistency in the intervals with the intervals of the Carrier-to-Carrier Guidelines for similar services.

Verizon Special Access Installation Intervals

WHOLESALE (CARRIER)		NON CARRIER END USER	
Service	**Interval**	**Service**	**Interval**
Special	**Special**	**Special**	**Special**
VOICE GRADE	1-24 lines 9 days with facilities; 25+ lines negotiated interval. Without facilities, all intervals are negotiated	VOICE GRADE	1-24 lines 9 days with facilities; 25+ lines negotiated interval. Without facilities, all intervals are negotiated
DIGITAL DATA	1-24 lines 9 days with facilities; 25+ lines negotiated interval. Without facilities, all intervals are negotiated	DIGITAL DATA	1-24 lines 9 days with facilities; 25+ lines negotiated interval. Without facilities, all intervals are negotiated
DS1	1-8 systems 9 days with facilities and this interval includes a 3-day facility check; 9+ systems negotiated interval. Without facilities, all intervals are negotiated.	DS1	1-8 DS1s 3 day facility check prior to applying interval. With facilities 6 days, without facilities apply 6 days use longest facility available date as LAM to calculate 6-day interval. 9+ DS1s intervals are negotiated.
DS3	1-4 systems 20 days with facilities and this interval includes a 5-day facility check; 5+ systems negotiated interval. Without facilities, all intervals are negotiated.	DS3	1-4 DS3s 6 day facility check prior to applying interval. With facilities 14 days, without facilities apply 14 days use longest facility available date as LAM to calculate 14-day interval. Over 5 DS3s intervals are negotiated.

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Attachment 3

New York Non-Access Installation Intervals

Unless otherwise specified below requests for six (6) lines / circuits or greater for Non-High Cap Special Services require a Facility Availability Check be performed before assigning a due date to the order.

- For 6-9 lines, the facility check must be completed and the due date negotiated with the customer within 24 hours of the customer's original request / call to BA.
- For 10 or more lines, the facility check must be completed and the due date negotiated with the customer within 72 hours of the customer's original request / call to Verizon.
- If NO facilities are currently available, the FMC response must include a facilities availability date. The due date is derived by using the Facilities Availability Date (FAD) plus the standard interval for the lines / products ordered.
- If the facilities check is not completed in the prescribed timeframe, the sales channel may apply a 10 business day or product interval to the order, whichever is longer, and negotiate the date with the customer.

Service	Interval
Analog Private Lines: 1 - 12 circuits	9 Days
Analog Private Lines: 13 - 24 circuits	14 Days
Analog Private Lines: 25-38 circuits	18 Days
Analog Private Lines: 39 - 50 circuits	22 Days

Pulsenet	3 Days
Switchway Low Speed Data	12 Days
LADS- Must meet tariff qualifications	12 Days

Dovpath	12 Days
Infopath	12 Days

High Cap Services

Project Note	References to "Project" is that the various departments involved in the provision of the service determine the date due with the driver being facility availability.
DS1 High Cap (Includes all types muxed and non muxed, I.e. Flexpath, ADC, LTS, PRI (all types), ENTERPRISE, and Network Reconfiguration Service non access, non FCC DS1 service	Note 1: INTERVALS BELOW BASED ON FACILITIES AVAILABILTY. IF NO FACILITIES, apply 6-day interval using latest available date as LAM calculated with the 6-day interval. A 3-day facility check is done prior to applying any interval.
Quantity	
1 to 8	6 Days
9+	Project
DS3 High Cap (Includes all types muxed and non muxed, I.e. LTS, ENTERPRISE, and Network Reconfiguration Service non access, non FCC DS3 service	Note 1: INTERVALS BELOW BASED ON FACILITIES AVAILABILITY. IF NO FACILITIES, apply 14-day interval using latest available date as LAM calculated with the 14-day interval. A 14-day facility check is done prior to applying any interval.
Quantity	
1 to 4	14 Days
5+	Project
DS0 Ordered with High Cap	
DS1/DS0 services riding High Cap (including PRI)	Date Due intervals must follow at least 2 days after the DS1/DS0 service