

140 West Street
27th Floor
New York, NY 10007-2109
Tel (212) 321-8136
Fax (212) 962-1687
keefe.b.clemons@verizon.com

Keefe B. Clemons
General Counsel - NY & CT



November 21, 2008

BY HAND

Honorable Jaclyn A. Brillling
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Re: Case 08-V-0835

Dear Secretary Brillling:

Verizon New York Inc. ("Verizon") respectfully submits its revised Network Review Plan. The Plan is based on Verizon's July 15, 2008 Network Review Plan and the August 15, 2008 Supplement to that Plan, as modified in compliance with the Commission's November 3, 2008 "Order Approving FiOS Remediation Plan with Modifications" ("Order").

Respectfully submitted,

Keefe B. Clemons

cc: Honorable Garry A. Brown, Chairman
Honorable Patricia L. Acampora, Commissioner
Honorable Maureen F. Harris, Commissioner
Honorable Robert E. Curry, Jr., Commissioner

Peter McGowan, Esq.
Mr. Charles Dickson
Mr. Chad G. Hume

Active Parties (Case 08-V-0835)

08-V-0835
2008 NOV 21 PM 4:07

VERIZON NEW YORK INC. NETWORK REVIEW PLAN

Verizon New York Inc. ("Verizon") hereby adopts the following Network Review Plan ("Plan") as a prospective modification to the Network Review Plan that it filed on July 15, 2008 and supplemented on August 15, 2008.

INTRODUCTION

A. Verizon is currently engaged in an extensive program of investment in its network infrastructure in New York State. That program includes the deployment of Fiber to the Premises outside-plant facilities and the offering of FiOSsm services over those facilities. Verizon has adopted numerous Methods and Procedures ("M&Ps") whose purpose is to ensure that the company complies with all applicable National Electrical Code® ("NEC," or "Code") requirements, and otherwise conforms to best practices in provisioning its FiOS services. In particular, these M&Ps include provisions relating to the electrical grounding of FiOS Optical Network Terminals ("ONTs"); those provisions (as modified from time to time), together with applicable Code provisions, are referred to collectively in this Plan as the "Grounding M&Ps."

B. Department of Public Service Staff has concluded that some of Verizon's past ONT installations do not conform to the Grounding M&Ps. Because Verizon is committed to compliance with the best practices for FiOS provisioning that are set forth in the Grounding M&Ps, and in response to Staff's concerns, Verizon initiated an ongoing program of training, review, and remediation designed to ensure that all new FiOS installations conform to the Grounding M&Ps in all material respects, and that material non-conformities in past installations

are corrected over time.¹ This program was originally embodied in Verizon's Network Review Plan, which was filed with the Commission on July 15, 2008. A Supplement to the Plan was filed on August 15, 2008.

C. In its November 3, 2008 "Order Approving FiOS Remediation Plan with Modifications" in Case 08-V-0835, the Commission concluded that Verizon's Network Review Plan, "with proper modification, will address the remediation of non-conforming past installations and also improve the quality of future installations." This Plan, which will be implemented by Verizon on a going-forward basis, is based on the original Network Review Plan and the Supplement to that Plan, as well as the requirements of the November 3 Order.

PROVISIONS OF THE PLAN

PART I. GOING-FORWARD COMPLIANCE WITH THE GROUNDING M&Ps

1. This Part of the Plan applies to all ONT installations made on or after August 1, 2008 ("New Installations").
2. Verizon has established an Optical Network Quality Assurance Team ("ONQAT") for purposes of providing independent assurance of the adequacy of the inspection and remediation effort described in this Plan. The ONQAT consists of individuals with sufficient knowledge and training to determine whether ONT installations conform to the Grounding M&Ps. The members of the ONQAT have been selected by Verizon and are either retired Verizon managers (similar to the individuals included in the Quality Assurance Teams that were formed to assess the accuracy of service quality measurements under Verizon's Performance Regulation Plan), or outside consultants, or a combination of both, in Verizon's

¹ A "material" deviation is any deviation other than one that is purely technical in nature and that has no significant impact on the overall safety and reliability of a FiOS installation.

discretion. The ONQAT members will carry out their responsibilities as described in this Plan under the ultimate supervision of a Verizon manager. ONQAT members will be compensated on a basis that does not depend in any way on the results of their review, or on any measure of Verizon's operational or financial performance, or on Verizon's success in the market. Verizon will provide the ONQAT with any clerical support, transportation, etc. necessary to its function, and will reimburse the reasonable expenses of ONQAT members.

3. In each month until the termination of this Plan, Verizon will select a random sample of 10% of the New Installations performed in that month in each of sixteen Relevant Areas.² To generate this sample, a list of New Installations will be extracted each month from Verizon's database in each Relevant Area and randomized using a random-number generator. ONQAT inspectors will use this randomized list to identify installations to inspect. The inspectors will start from the top of the list and work their way downward, excluding situations in which they are unable to obtain access to the customer's premises, until a sample size of 10% is achieved. A more detailed description of the sampling program is provided in Attachment C to this Plan. To the extent that more than 10% of New Installations are inspected (for example because of the presence of multiple ONTs at a single location), no results of inspections made after the 10% level is reached will be taken into account for purposes of determining the level of compliance with the Grounding M&Ps.

4. Each New Installation included in any such sample will be inspected by members of the ONQAT.

² A "Relevant Area" is any of the geographic regions listed in Appendix B to this Plan.

5. The ONQAT will prepare monthly reports identifying the number of New Installations that it inspected in each Relevant Area during the month, and the number of those installations that deviated in any material respect from the Grounding M&Ps. Each such report will be accompanied by detailed back-up data listing the specific locations visited and the nature and location of any material non-conformities that were discovered. The reports will be filed with the Commission. The detailed back-up data will be submitted to the Commission's Records Access Officer pursuant to a request for confidential treatment under the state Freedom of Information Law ("FOIL") and the Commission's FOIL regulations, and will be made available to members of Staff or to the Commissioners in conformity with FOIL procedures.

6. Service technicians will be dispatched to correct any New Installation that was found by the ONQAT not to conform in any material respect to the Grounding M&Ps. Installations in which no ground is present will be remediated within ten business days. For all other deviations from the Grounding M&Ps, the average time between inspection and remediation for New Installations (excluding those to which Verizon is unable to obtain access utilizing the procedures described in ¶ 16(b), below) shall be no greater than 60 days.

7.(a) Verizon will use its best efforts to ensure that 95% or more of the New Installations included in each sample inspected pursuant to paragraphs 3 and 4, above, conform to the Grounding M&Ps in all material respects.

(b) Should Verizon fail to achieve a statewide compliance rate of 95% or more for any individual month, such results will be discussed with Staff during a regularly scheduled monthly results meeting held pursuant to paragraph 20.

(c) Should Verizon fail to achieve a statewide compliance rate that is, at a minimum, 95% for two of the first three months of the Plan, then Verizon will: (1) increase the sample size

to 12% for the following month, and (2) provide Staff with a root cause and targeted remediation plan at the regularly scheduled monthly results meeting held pursuant to paragraph 20. Targeted remediation plans need not be submitted to the Commission for approval.

(d) Should Verizon fail to achieve a statewide compliance rate that is, at a minimum, 95% for four of the first six months of the Plan, then Verizon will establish, at the company's expense, an independent, external quality inspection team of three individuals who will report directly to Staff for the express purpose of supplementing the ongoing Staff ONT grounding quality inspection program. Such external team will remain in place until Verizon achieves three consecutive months of a statewide compliance rate that is, at a minimum 95%.

8.(a) Subject to paragraph 8(b), below, unless Verizon achieves, for New Installations made in any month and in any Relevant Area, both (i) the 95% standard for compliance with the Grounding M&Ps in all material respects, as set forth in paragraph 7, above; and (ii) a 100% standard for the presence of some ground and bond, then the ONQAT will inspect all of the New Installations made in that month in that Relevant Area that were not previously inspected as part of the ONQAT's sampling program, and will remediate any such installations that are found not to conform to the Grounding M&Ps in any material respect.

(b) At the discretion of the Director of the Office of Telecommunications of the Department of Public Service (the "Director"), an inspection of all New Installations in a given month and Relevant Area pursuant to paragraph 8(a), above, will not be required if Verizon identifies a root cause factor for its failure to meet the requirements of paragraph 8(a) in such month and area, and puts forth a focused plan judged appropriate by the Director for addressing this root cause factor. In order to qualify under this subparagraph 8(b), the root cause factor must be one which is isolated, can be readily tracked for re-inspection and remediation, and

which upon remediation produces a passing grade relative to the requirements set forth in paragraph 8(a).

9.(a) Notwithstanding any other remedies set forth in the Plan or available under applicable law, if the percentage of New Installations made during any month in any Relevant Area that conform to the Grounding M&Ps falls below any of the thresholds identified in Table 1, Verizon will issue the corresponding product credit to each customer account for which an ONT was installed in that month in that Relevant Area. The purpose of such credit is to compensate such customers for the inconvenience of the inspection (and, where applicable, remediation) process. The total amount of credits required by this subparagraph may be in the millions of dollars, depending upon the level of compliance that is achieved.³

TABLE 1

Threshold	Product Credit
<95%	\$10
<85%	\$15
<75%	\$20

(b) Verizon's obligations to issue credits under this paragraph will cease when the Plan terminates pursuant to paragraph 19, below.

PART II. REMEDIATION OF PRIOR INSTALLATIONS

10. The ONTs that Verizon had deployed in New York State as of August 1, 2008 are referred to in this Plan as the "Past Installations."

³ The precise upper-level estimates cannot be provided without disclosing Verizon's projections as to the number of ONTs it will be deploying, which is competitively-sensitive data.

11. Verizon personnel or contractors trained in the Grounding M&Ps (“inspectors”) will be dispatched to inspect each of the Past Installations to determine whether those installations conform in all material respects to the Grounding M&Ps. Any material deviations from the Grounding M&Ps will be corrected as soon as possible after inspection, provided, however, that the average time between inspection and remediation (excluding those to which Verizon is unable to obtain access utilizing the procedures described in ¶ 16(b), below) shall be no greater than 60 days.

12. Verizon will maintain a database listing:
- (a) Past Installations that were inspected;
 - (b) Situations in which the inspectors were not able to obtain access to Past Installations;
 - (c) Past Installations in Category (a) in which material non-conformities were found;
 - (d) Past Installations in Category (c) in which the non-conformities were corrected;
- and
- (e) Any Past Installations in Category (c) in which the non-conformities were not corrected, and the reason why they were not corrected.

In each case in Category (e), a follow-up visit will be made to correct the non-conformity. In each case in Category (b), reasonable follow-up efforts will be made by Verizon to arrange for access to the customer’s premises, as described in paragraph 16(b), below, including, where necessary, correction of material non-conformities.

13. Within 45 days after the completion in a particular area of the activities described in the preceding paragraph, the ONQAT will re-inspect 10 percent of all of the FiOS installations in that area to confirm that the inspectors assigned to the area detected all material non-

conformities with the Grounding M&Ps. The ONQAT will also re-inspect 10% of those installations at which material non-conformities with the Grounding M&Ps were observed, for the purposes of confirming that the non-conformities that were identified were properly corrected. Verizon service technicians will be dispatched to correct any remaining material non-conformities that are detected during the course of this effort. Verizon will use its best efforts to make such remediation as soon as possible after inspection, provided, however, that the average time between inspection and remediation (excluding those to which Verizon is unable to obtain access utilizing the procedures described in ¶ 16(b), below) shall be no greater than 60 days.

14. Notwithstanding any other provision of the Plan, Verizon senior management will be available to update the Commission on the status of the Plan at the six-month mark, and again upon the completion of the remediation effort.

15.(a) Attachment A to this Plan is a schedule setting forth monthly targets for the number of Past Installations that will be inspected by Verizon personnel in each month.⁴ The goal of the schedule is to ensure the completion of the inspection of Past Installations pursuant to paragraph 11, above, within a period of eight months beginning August 1, 2008 and ending March 31, 2009. Notwithstanding Appendix A and the time intervals set forth in this Plan for remediation of Past Installations, 45% of Past Installations (on a statewide basis) will be inspected and remediated by December 31, 2008 and 100% of Past Installations (on a statewide basis) will be inspected and remediated by May 31, 2009. For purposes of the preceding sentence, “remediated” means either that any material non-conformities have been corrected,

⁴ Separate targets are established for New York City, the Capital/LI region, and the State as a whole. The targets are expressed as a percentage of total Past Installations in each specified region.

that the allowed period for remediation has not yet expired, or that the installation is subject to the procedures for no access discussed in paragraph 16, below.

(b) Should Verizon fail to achieve (subject to paragraph 16, below) 90% or better of the number of monthly inspections as set forth in Attachment A of the Plan for any month, then such results will be discussed with Staff during the a regularly scheduled monthly results meeting held pursuant to paragraph 20.

(c) Should Verizon fail to achieve (subject to paragraph 16, below) 90% or better of the number of monthly inspections as set forth in Attachment A of the Plan for any two consecutive months, then Verizon will increase the monthly number of inspections for the month immediately following by 10% of the original target (modified target).

(d) The monthly inspection target shall return to that established in Attachment A upon Verizon achieving the target (or modified target) for two consecutive months.

(e) Subject to paragraph 16, Verizon will use its best efforts to meet the schedule set forth in Attachment A.

(f) Should it become necessary, Verizon will augment the Inspection and ONQAT teams to meet the schedule set forth in Appendix A. Such additional resources, should they become necessary, would be deployed to the areas with the highest rates of nonconformity.

(g) Verizon will supplement Staff's inspection program with an independent team at any point during the Plan at the discretion of the Director.

16.(a) Verizon anticipates that its personnel and/or ONQAT members will not be able to obtain access to some Past Installations, particularly where those installations are in MDUs. In such cases, Verizon will follow up with the customer or property owner in order to obtain such access in accordance with the procedures set forth in paragraph 16(b), below. The number of

situations in which Verizon is unable to obtain access will be subtracted from the completion targets set forth in Attachment A.

(b) The following procedures will be utilized for Past Installations to which Verizon cannot obtain access for inspection or remediation purposes:

- (i) Verizon will make two separate telephone calls to the customer over a ten-day period, including both day and evening hours, to try to schedule an appointment. Scripts for such calls will be provided to the Director and to the Director of the Office of Consumer Services at least five days before they are implemented.
- (ii) If Verizon is still unable to obtain access after making the calls described in (i), above, together with such other strategies for obtaining access that it may adopt, then it will contact the customer by registered letter.⁵ The contents of the letter will conform to the requirements of the Commission's November 3, 2008 Order, and will be provided to the Director and to the Director of the Office of Consumer Services at least five days before it is sent to any customer.

⁵ In place of the "certified" letter required in certain no-access situations by the Order (*see* Order at 17), the no-access provisions of this paragraph call for a "registered" letter. It is not clear to us that the Order intended to use the term "certified" letter in its narrow, technical sense. Registered letters permit "verif[ication of] the date and time of delivery," while for certified letters, the "recipient's signature is [also] obtained at the time of delivery and a record is maintained by the Post Office." (*See* <http://www.usps.com/send/waystosendmail/extraservices/certifiedmailservice.htm> and <http://www.usps.com/send/waystosendmail/extraservices/registeredmailservice.htm>.) The necessity of obtaining the customer's signature imposes an extra burden on the customer, who may not be home when the delivery is made and who therefore will have to arrange to be present at the time of a subsequent delivery or else take a trip to the post office to pick up the letter. The delivery confirmation provided for registered letters amply satisfies the purposes of the Plan without this added burden. It should be noted that Verizon intends to discuss with Staff additional enhancements that will minimize the number of no-access situations.

- (iii) Verizon will work with the Office of Consumer Services in developing the specifics of its outreach program for no-access situations.

17. Verizon will prepare monthly reports summarizing the information referred to in paragraphs 12(a) through 12(e), above. Each such report will be filed with the Commission. The detailed back-up data will be submitted to the Commission's Records Access Officer pursuant to a request for confidential treatment under the state Freedom of Information Law ("FOIL") and the Commission's FOIL regulations. Such reports will be made available to members of Staff or to Commissioners in conformity with FOIL procedures.

18. Verizon will determine in its own discretion the order in which areas of the State will be reviewed under this Part II, as well as the order in which Past Installations will be inspected within a particular area, all with the goal of maximizing the speed and efficiency of the review.

PART III. OTHER PROVISIONS

19. This Plan will terminate when both of the following occur to the satisfaction of the Commission: (a) Verizon completes the inspection of all Past Installations and remediation of any Past Installations that were found not to conform to the Grounding M&Ps in some material respect (except those to which it was unable to obtain access after taking the measures referred to in paragraph 16(b), above); and (b) Verizon has consistently met the 95% target for New Installations as set forth in paragraph 7.

20. As a supplement to the monthly reports required under this Plan, Verizon will participate in monthly meetings with Staff concerning Verizon's progress in implementing the Plan.

21. Verizon will provide remedial training and additional coaching for service technicians who were responsible for Past Installations or New Installations that were determined not to conform to the Grounding M&Ps in any material respect. In appropriate cases such employees will be subject to discipline in accordance with Verizon's established and applicable disciplinary procedures.

22. Verizon's implementation of Parts I and II of this Plan will be suspended to the extent made necessary by Force Majeure. Notwithstanding the occurrence of Force Majeure, Verizon shall perform under this Plan to the extent it is able to do so and shall take all steps, reasonably within its ability, to minimize the length and effect of such Force Majeure delay. For purposes of this paragraph, Force Majeure means an event or events reasonably beyond Verizon's ability to anticipate and control, including but not limited to, severe and unusual weather conditions, strikes, labor disturbances and disputes, war or act of war (whether an actual declaration of war is made or not), insurrection, riots, act of public enemy, incidences of terrorism, acts of vandalism, actions or inactions of any government instrumentality or public utility including condemnation, accidents for which Verizon is not primarily responsible, fire, flood, or other acts of God, and unavailability of materials and/or qualified labor to perform the work necessary. The determination as to when a Force Majeure event has occurred will be made in the discretion of the Staff Director of Telecommunications.

23. If, when, and to the extent deemed necessary by the Commission, Verizon's implementation of the Plan will be subject to an independent, third-party review. This review will be conducted by an entity selected by Staff, and all reasonable fees and disbursements incurred by the firm during the course of the review will be paid by Verizon.

24. To ensure clarity regarding what constitutes acceptable grounding techniques in New York State, Verizon will utilize one of the grounding methods set forth in Staff's August 5, 2008 letter to Verizon for each Outside Installation.⁶ For Inside Installations⁷ Verizon will utilize one of those methods unless it would be impractical or unsafe to do so, in which case it will utilize the TII-442 Grounding Module with ten-gauge wire, as presented by Verizon to Staff on August 13, 2008.

VERIZON NEW YORK INC.

By: _____

Name: Christopher M. Creager

Title: Senior Vice President/General Manager
Verizon Telecom Regional Operations

Date: November 21, 2008

⁶ "Outside Installations" are ONT installations in which the ONT and/or any portion of the conductive elements attached to the ONT are located outside of the customer's building.

⁷ "Inside Installations" are ONT installations in which any conductive elements attached to the ONT are located wholly inside the customer's building.

ATTACHMENT A

<u>Incremental</u>	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08	Jan-09	Feb-09	Mar-09
Capital / LI	8.8%	10.3%	12.9%	11.9%	13.6%	14.0%	14.0%	14.5%
NYC	23.7%	25.0%	26.4%	14.1%	10.8%	0.0%	0.0%	0.0%
NYS	12.1%	13.6%	15.9%	12.4%	13.0%	10.8%	10.8%	11.4%

<u>Cumulative</u>	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08	Jan-09	Feb-09	Mar-09
Capital / LI	8.8%	19.1%	32%	43.9%	57.5%	71.5%	85.5%	100%
NYC	23.7%	48.7%	75.1%	89.2%	100.0%			
NYS	12.1%	25.7%	41.6%	54.0%	67%	77.8%	88.6%	100%

ATTACHMENT B

LIST OF RELEVANT AREAS

Area	Location
Staten Island	Staten Island - Richmond County
Brooklyn	Brooklyn - Kings County
Queens	Queens - Queens County
Bronx	Bronx - Bronx County
Manhattan	Manhattan – New York County
North Suffolk	Suffolk County 'North'
South Suffolk	Suffolk County 'South'
North Nassau	Nassau County 'North'
South Nassau	Nassau County 'South'
Western	Buffalo, Amherst, Hamburg, Orchard Park, West Seneca
Central	Syracuse, North Syracuse, Clay, Baldwinsville, Fayetteville, Cicero
Capitol North	Schenectady, Latham
Capitol South	Wappingers Falls, Poughkeepsie-Hamilton , Cornwall, Newburgh, Fishkill
S. Westchester	New Rochelle, Harrison, White Plains, Tarrytown, Tuckahoe, Fairview, Yonkers, Mamaroneck, Scarsdale, Dobbs Ferry, Mt Vernon, Larchmont, Portchester, Rye
N. Westchester	Carmel, Katonah, Bedford, Chappaqua, Mt. Kisco, Yorktown, Armonk, Mahopac, Peekskill, Pleasantville, Ossing
Rockland	Rockland County

ATTACHMENT C
SAMPLING PROGRAM

A. New ONT Installations

- All new (post August 1st) ONT installations are captured in the FiOS DRC Work Manager system then imported into the Dexter System.
- At the end of each week (Sample Period), new ONT installations identified as being completed are extracted from the Dexter new ONT installation report and imported into an Excel spreadsheet. (I.e., new ONT installation completions from September 1 thru September 7 are extracted after business close on the 7th.)
- The default sort extraction from Dexter is by (1) Wire Center and then (2) customer address. The complete volume extraction list from Dexter is then sorted by customer name to drive a greater level of random system output before the random sampling step.
- The new ONT installations are then mapped by wire center (WC) to the appropriate Relevant Area.
- A volume count of all new ONT installations by Relevant Area is established.
- A reconciliation is performed to ensure that the total of each FiOS service area combined equals the total volume for the State for the sample period.
- A third-party web site (<http://www.random.org/sequences/>) is accessed and the total volume for each Relevant Area is entered into the random sequence generator to establish the random sequence to be audited in each Relevant Area. Each new ONT installation is assigned a random selection from the random sequence generator and is audited in that sequence. The NRP Random Sampling Process mirrors the Verizon Manager Sampling Plan (MSP) that is utilized by Verizon and approved by Staff under the Verizon Incentive Plan, and that is used today by the service measurement QAT. In addition, it was audited annually by Deloitte & Touche and reported to be in compliance.
- After each new ONT installation is assigned its random sequenced number, the data is packaged into one Excel file with individual tabs for each relevant area.
- The random sampling file is then sent to the ONQAT Field Manager for dispatch to the ONQAT Auditors.
- ONQAT Auditors inspect each random sample in the random sequence "order" moving from the top of the list to the bottom until a 10% completed target is reached. If the ONQAT auditor encounters a No Access situation, that address is skipped and the ONQAT auditor moves to the next random sequence on the list.
- This process ensures separation between the Dexter data system used for managing the NRP inspections and the ONQAT Audit sampling process.

B. Embedded Base Inspections "PASS"

- All embedded base (prior August 1st) inspections identified as being in compliance are marked as "PASS".
- For each specified sample period, embedded base "PASS" inspections are extracted from the Dexter report "List of embedded base locations that were inspected and Passed" and are imported into an Excel spreadsheet.
- The default sort extraction from Dexter is (1) by Wire Center, and then (2) by customer address. The complete volume extraction list from Dexter is then sorted by customer name to drive a greater level of random system output before the random sampling step.
- The embedded base "Pass" inspections are then mapped by wire center (WC) to the appropriate FIOS service area.
- A volume count of all embedded base "Pass" inspections by Relevant Area is established.
- A reconciliation is performed to ensure that the total of each FIOS service area combined equals the total volume for the State for the sample period
- A third-party web site (<http://www.random.org/sequences/>) is accessed and the total volume for each relevant area is entered into the random sequence generator to establish the random sequence to be audited in each Relevant Area. Each embedded base "Pass" inspection is assigned a random selection from the random sequence generator and is audited in that sequence. The NRP Random Sampling Process mirrors the Verizon Manager Sampling Plan (MSP) utilized by Verizon and approved by Staff under the Verizon Incentive Plan, and that is used today by the service measurement QAT. In addition, it was audited annually by Deloitte & Touche and reported to be in compliance.
- After each embedded base "Pass" inspection is assigned its random sequenced number, the data is packaged into one Excel file with individual tabs for each relevant area.
- The random sampling file is then sent to the ONQAT Field Manager for dispatch to the ONQAT Auditors.
- ONQAT Auditors inspect each random sample in the random sequence "order" moving from the top of the list to the bottom until a 10% completed target is reached. If the ONQAT auditor encounters a No Access situation, that address is skipped and the ONQAT auditor moves to the next random sequence on the list.
- This process ensures separation between the Dexter data system used for managing the NRP inspections and the ONQAT Audit sampling process.

C. Embedded Base Inspections "FAIL" and "CORRECTED"

- All embedded base (prior August 1st) inspections identified as 'Not' in compliance are marked as "FAIL".

- Embedded base “Fail” inspections are returned to the Dexter database for dispatch to a dedicated Technician force for remediation (Correction). After remediation is completed, these Fail inspections are returned to the Dexter database as “corrected”.
- For each specified sample period, embedded base “FAIL” and “Corrected” inspections are extracted from the Dexter database and imported into an Excel spreadsheet.
- The default sort extraction from Dexter is (1) by Wire Center, and then (2) by customer address. The complete volume extraction list from Dexter is then sorted by customer name to drive a greater level of random system output before the random sampling step.
- The embedded base “FAIL” and “Corrected” inspections are then mapped by wire center (WC) to the appropriate Relevant Area.
- A volume count of all embedded base “Fail” and “Corrected” inspections by Relevant Area is established.
- A reconciliation is performed to ensure that the total of each FIOS service area combined equals the total volume for the State for the sample period
- A third-party web site (<http://www.random.org/sequences/>) is accessed and the total volume for each relevant area is entered into the random sequence generator to establish the random sequence to be audited in each relevant area. Each embedded base “FAIL” and “Corrected” inspection is assigned a random selection from the random sequence generator and is audited in that sequence. The NRP Random Sampling Process mirrors the Verizon Manager Sampling Plan (MSP) utilized by Verizon and approved by Staff under the Verizon Incentive Plan and that is used today by the service measurement QAT. In addition, it was audited annually by Deloitte & Touche and reported to be in compliance.
- After each “Fail” and “Corrected” inspection is assigned its random sequenced number, the data is packaged into one Excel file with individual tabs for each Relevant Area.
- The random sampling file is then sent to the ONQAT Field Manager for dispatch to the ONQAT Auditors.
- ONQAT Auditors inspect each random sample in the random sequence “order” moving from the top of the list to the bottom until a 10% completed target is reached. If the ONQAT auditor encounters a No Access situation, that address is skipped and the ONQAT auditor moves to the next random sequence on the list.
- This process ensures separation between the Dexter data system used for managing the NRP inspections and the ONQAT Audit sampling process.

All associated sampling files, web outputs and random sequence lists as described in the Random Sampling Process Guide are archived by sample period and retained for a period of 3 years.