

Pennsylvania Final Report – Verizon Response to Recommendations

VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
1	III-C-1	III-B-1 III-B-4 III-B-8 III-B-9 III-B-11 III-B-13 III-B-14 III-B-16 III-B-17	Develop An English Language Version Document Describing Verizon PA’s Business Rules Which Are Used To Implement The Provisions Of The C2C Guidelines.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon believes that the Carrier-to-Carrier Guidelines and FACT tables are accurate and adequate. Furthermore, the Guidelines and associated appendices are a document that the industry has come to “know and love”.</p> <p>Action Taken/Required: No action is required. However, as specified in Verizon’s action plan in this document, Verizon will propose clarifying language to the appropriate Carrier Working Group (CWG).</p> <p>Implementation period: Verizon will make the proposals to the appropriate CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>
2	III-C-2	III-B-4 III-B-5 III-B-6 III-B-8 III-B-9 III-B-10	Reduce The Content Of The C2C Guidelines To Contain Only The Rules For Each Metric And Provide Proper Supporting Documentation.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon believes that the Guidelines are accurate and adequate.</p> <p>Action Taken/Required: No action is required. However, as specified in Verizon’s action plan in this document, Verizon will propose clarifying language to the appropriate CWG.</p> <p>Implementation period: Verizon will make the proposals to the appropriate CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>

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3	III-C-3	III-B-5 III-B-9	Reformat The C2C Guidelines For Consistency And Clarity.	<p>Verizon Position: Verizon agrees in part and disagrees in part.</p> <p>Rationale: Verizon believes that the Guidelines are accurate and adequate. Verizon disagrees that the language for Snps and restores requires clarification. However, recent consensus changes (not administrative clarifications) to the Guidelines by the NY CWG resolve DCI's issue. Verizon agrees that there were grammatical errors in the Guidelines. Changes to this language are already pending approval by the PA PUC. Other proposed clarifications are already awaiting review in the NY CWG.</p> <p>Action Taken/Required: No further action is required for Verizon until PA PUC and NY PSC orders are issued.</p> <p>Implementation period: Verizon will make compliance filings in NY and PA consistent with agreed upon procedures in the respective jurisdictions. The Executive Director, Metrics Policy & Planning will be responsible for the compliance filings.</p>
4	III-C-4	III-B-12	Eliminate Any Restrictions Placed On A Third-Party's Use Of The CMA Or Supporting Documentation.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: The Carrier Metrics Algorithms (CMA) are protected by Federal copyright and intellectual property laws and the appropriate copyright designation has been placed on the CMA.</p> <p>Action Taken/Required: No action required. However, Verizon will prepare a detailed response after receipt of changes recommended by CLECs in the PA CWG.</p> <p>Implementation period: Verizon will prepare its detailed response within 45 days of receipt of the recommendations from the participating CLECs. The Executive Director, Metrics Policy & Planning, will be responsible for this response.</p>

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5	III-C-5	III-B-2	Conform Verizon PA Practices To Comply With The C2C Guidelines For The PO-5 and NP-1 Metrics.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon believes that the Guidelines are accurate and adequate. Verizon has already proposed clarifying language for NP-1 to the NY CWG.</p> <p>Action Taken/Required: No action is required. However, Verizon will propose language clarifications for PO-5 to the NY CWG.</p> <p>Implementation period: Verizon has already proposed clarifying language for NP-1. Verizon will propose clarifying language for PO-5 no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>
6	III-C-6	III-B-3 III-B-10	Review Metrics Identified In This Report And Revise Them, As Appropriate.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon believes that the Guidelines are accurate and adequate.</p> <p>Action Taken/Required: No action is required. However, Verizon will propose language clarifications for PR-6, PO-7, PO-4, OR-1, and OR-2 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposals to the NY CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>

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7	III-C-7	III-B-6 III-B-7 III-B-8	Ensure Consistency Among C2C Guidelines, Performance Standards And Reports, And PA PAP Reports.	<p>Verizon Position: Verizon agrees in part and disagrees in part. Verizon disagrees with DCI finding IIIB-6, IIIB-8 and that part of IIIB-7 relating to the Billing metrics.</p> <p>Rationale: Verizon believes that the Guidelines are accurate and adequate. However there are minor inconsistencies found between the C2C Guidelines, Performance Standards Reports, and PA PAP Reports.</p> <p>Action Taken/Required: Verizon will propose modified language to the specified CWG to address the following items:</p> <ul style="list-style-type: none"> • UNE Platform: The June Version of the C2C guidelines is inconsistent with naming conventions for UNE POTS platform. Propose a clarification to the NY CWG to resolve this. • PO-4: Proposed clarification to NY CWG in Guidelines. • OD Standard Deviation: Verizon will issue a change control to display statistical scores. Verizon will discuss general standard issue with the NY CWG. • BI Statistical Scoring: Propose discussion of appropriate statistical methodology to address dollars and statistics in PA CWG. <p>No further action necessary for the following:</p> <ul style="list-style-type: none"> • OR-4-09: Issue resolved with the adoption of the June PAP. • NP-2: Issue has been resolved with CCR 10261. Completed for August 2003 Data month. • OD-1: Issue has been resolved with 12/03 Redline filing. • Appendix S: DCI was using April Guidelines. Appendix S is in June Guidelines • Process for adoption of NY changes: This has been extensively discussed in PA collaborative with consensus reached. <p>Implementation period: Verizon will make the above proposals to the NY and PA CWGs no later than the second quarter 2004. OD standard deviation change control will be created for completion in 2nd Quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for these proposals.</p>

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8	III-C-8	III-B-15	Establish Consistency In The FACT Table Procedures For Defining How The Same Data Element Used For Multiple Metrics Or Different Domains Is Derived.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Different domains are derived from different sources. Certain data elements within these various systems are defined differently. Some differences will always exist. The field name should not be used as a basis for the actual measurement calculation process. Intervals are measured both from the original service order and also table-driven fixed intervals. This was a design decision to allow NMP to easily make modifications based on the Guidelines. The fact that different derivations are used across domains is irrelevant since metrics are calculated correctly and are consistent with the C2C Guidelines.</p> <p>Action Taken/Required: No action is required. However, FACT tables are being discussed with the NY CWG. Verizon will modify the FACT tables to address issues raised in the Replication Sub-Committee.</p> <p>Implementation period: The Replication sub-committee will read out in the fourth quarter of 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this implementation.</p>

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9	IV-C-1	IV-B-1	Create A Test Environment For The NMP.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon has created and maintains multiple NMP testing environments and executes multiple levels of testing. NMP conducts testing in the development, system testing, and quality assurance environment for each software release.</p> <p>Specifically, NMP maintains several environments supporting both Verizon East and Verizon West jurisdictions. The Production and Standard Testing Environment are maintained under Verizon Information Processing Services operational control. In addition, NMP maintains separate development, system testing and quality assurance environments.</p> <p>Prior to each metric domain implementation into NMP, at least two months of end-to-end parallel testing is executed and evaluated to ensure the accuracy of reported metrics. Once a domain is established in NMP, unit testing, system testing, independent metric replication, CCR verification and report QA testing is performed.</p> <p>During DCI’s evaluation period, approximately 6 percent of the change activity was related to process steps prior to the Data Warehouse and were tested on an individual case basis.</p> <p>Action Taken/Required: No further action required.</p>
10	IV-C-2	IV-B-2	Incorporate Documentation On The Handling And Reporting Of All Error Table Results Within The NMP.	<p>Verizon Position: Verizon agrees.</p> <p>Rationale: Within NMP, additional information on error table handling and error criteria should be documented.</p> <p>Action Taken/Required: Verizon will update NMP documentation on error handling and error criteria.</p> <p>Implementation Period: The NMP documentation updates are scheduled for 2nd quarter 2004. The Executive Director, Systems Architecture, will be responsible for this implementation.</p>

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11	V-F-1	V-B-1 V-B-2 V-B-3	Develop FACT Table And Metric Algorithms That Fulfill The Requirements Of PMO II.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon believes that the Carrier-to-Carrier Guidelines and FACT tables are accurate and adequate.</p> <p>Action Taken/Required: No action is required. However, the NY CWG and other collaboratives have already discussed modifications to the Guideline document. Verizon is working on a consolidated Guideline document that reflects state specific differences. This consolidation has already been recommended and is currently underway for use with the next changes that come out of New York. Verizon is modifying the FACT tables and working with the NY Replication sub-committee. Verizon will propose clarifications to the collaboratives to modify the Carrier-to-Carrier Guidelines/appendices to address items that cannot be addressed in the FACT tables.</p> <p>Implementation period: Verizon will file the consolidated Guidelines at the next NY compliance filing. The Replication sub-committee will read out in the fourth quarter of 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this implementation.</p>

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12	V-F-2	V-D-1	Verizon PA Must Follow C2C Guidelines In Making Metric Calculations	<p>Verizon Position: Verizon agrees that it must follow the C2C Guidelines but disagrees with DCI’s conclusion that Verizon is not doing so.</p> <p>Rationale: DCI claims that there are three specific metric issues raised in the finding referenced for this recommendation. Verizon believes that it is in compliance with all three.</p> <ul style="list-style-type: none"> • MR-1: This has been addressed via clarification contained redline of PA Guidelines filed in December 2003. • OR-2: While Verizon believes it is calculating results correctly, further clarification can be discussed in the NY CWG. • MR-2: DCI is incorrect. The Exclusion section of the Carrier-to-Carrier Guidelines specifies “Report rate excludes subsequent reports (additional customer calls while the trouble is pending)”. MR 2-04, % Subsequent Reports, is not a “report rate” metric. Therefore, subsequent reports are not excluded from this metric. Furthermore, if this exclusion was to apply, it would have to apply to numerator and denominator making the performance result 0.0% for all months reported, making the metric meaningless. To make this even clearer a guideline modification could be made that specifies: “Except for MR-2-04 – Exclude subsequent reports.” <p>Action Taken/Required: No action required. However, Verizon will propose language clarifications for OR-2 and MR-2 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposals to the NY CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for these proposals.</p>

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13	V-F-3	V-D-2	Verizon PA Should Request Clarification Of C2C Guidelines Instead Of Making Assumptions.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon believes that it is reporting performance correctly.</p> <p>Action Taken/Required: No action required. However, Verizon will propose language clarifications for OR-1-04, OR-1-06 and MR-2-05 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposals to the NY CWG in the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for these proposals.</p>
14	V-F-4	V-E-1	Verizon PA Should Investigate Metrics Which DCI Could Not Replicate To Determine Root Causes.	<p>Verizon Position: Verizon agrees.</p> <p>Rationale: Verizon has already completed its root cause analysis of DCI replication issues. Verizon provided DCI all information necessary to perform metrics replication.</p> <p>Action Taken/Required: No further action necessary</p>
15	V-F-5	V-E-2	Verizon PA Should Ensure That OSS Systems Are Properly Identifying Input Data.	<p>Verizon Position: Verizon agrees that OSS systems are properly identifying input data and asserts that it has done so.</p> <p>Rationale: Verizon believes that its OSS systems are correctly identifying input data.</p> <p>Action Taken/Required: No further action necessary.</p>
16	V-F-6	V-E-3	Verizon PA Should Improve Testing Of Metric Calculations In Order To Ensure Accurate Metric Calculations.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon maintains multiple testing environments and executes multiple levels of testing for each software release. Verizon’s current testing processes ensure accurate performance results.</p> <p>Action Taken/Required: No further action necessary.</p>

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17	V-F-D-1	V-F-D-1	The Carrier Working Group should clarify its intent with respect to the calculation of entitlement time in the MR-1, and update the C2C Guidelines. ¹	<p>Verizon Position: Verizon agrees that the NY CWG should clarify its intent with respect to the calculation of entitlement time in MR-1. However, Verizon disagrees with the conclusion that it is not calculating entitlement time correctly.</p> <p>Rationale: This issue has been addressed by a clarification that is currently pending adoption in Pennsylvania.</p> <p>Action Taken/Required: No further action necessary.</p>
18	V-F-D-2	V-F-D-2	The C2C guidelines should clearly state that EDI orders with outbound notifications not sent via EDI are excluded if that is the intent of the Carrier Working Group.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon believes that the Guidelines are accurate and adequate.</p> <p>Action Taken/Required: No action is required. However, Verizon will propose language clarifications for OR-1 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposal to the NY CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>
19	V-F-D-3	V-F-D-3	The Carrier Working Group should clarify its intent with respect to Special Services disconnect orders not requiring a facility check and update the C2C guidelines.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon believes that the Guidelines are accurate and adequate.</p> <p>Action Taken/Required: No action is required. However, Verizon will propose language clarifications for OR-1 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposal to the NY CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>

¹ DCI understands that this, and other issues, are pending review and possible adoption by the PA CWG.

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20	V-F-D-4	V-F-D-5	This issue should be revisited by the CWG to either change Verizon PA's calculation process or the C2C Guidelines Definition.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon believes that the Guidelines are accurate and adequate.</p> <p>Action Taken/Required: No action is required. However, Verizon will propose language clarifications for OR-3 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposal to the NY CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>
21	V-F-D-5	V-F-D-6	The disaggregations required by the C2C Guidelines for this metric are possible by using the ORDER_TYPE field rather than the SVC_ORDER_CLASS_ID. Verizon PA should use the ORDER_TYPE field, which prevents the exclusion of orders whose SVC_ORDER_CLASS_ID field are null, but are otherwise eligible for inclusion in the metric.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon reporting is consistent with the Guidelines. However, Verizon notes that there may be some anomalous results based on the reporting method when the processing of an LSR spans more than one reporting month.</p> <p>Action Taken/Required: No action is required. However, Verizon will propose language clarifications for OR-3 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposal to the NY CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>
22	V-F-D-6	V-F-D-7	The Guidelines should be updated to reflect Verizon PA's approach, or Verizon PA should change its approach; to define the denominators in terms of the number of EDI LSRs whose SOP notification date is within the reporting month.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon is including records in the monthly reported OR-4 results in compliance with the Guidelines. Verizon relies on the provisioning notification to determine the last SOP completion date.</p> <p>Action Taken/Required: No action is required. However, Verizon will propose language clarifications for OR-4 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposals to the NY CWG in the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>

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23	V-F-D-7	V-F-D-9	Verizon PA should exclude subsequent Trouble Reports from the MR-2-04 denominator per the C2C Guidelines.	<p>Verizon Position: Verizon agrees that it must follow the C2C Guidelines but disagrees with DCI’s conclusion that Verizon is not doing so.</p> <p>Rationale: This is the same issue raised in # 12. Verizon disagrees with DCI’s recommendation. The Exclusion section of the Carrier-to-Carrier Guidelines specifies: “Report rate excludes subsequent reports (additional customer calls while the trouble is pending)”. MR 2-04, % Subsequent Reports, is not a “report rate” metric. Therefore, subsequent reports are not excluded from this metric. Furthermore, if this exclusion was to apply, it would have to apply to numerator and denominator making the performance result 0.0% for all months reported, making the metric meaningless. To make this even clearer a guideline modification could be made that specifies: “Except for MR-2-04 – Exclude subsequent reports.”</p> <p>Action Taken/Required: No action required. However, Verizon will propose language clarifications for MR-2 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposal to the NY CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>
24	V-F-D-8	V-F-D-10	Verizon PA should include only the Trouble Reports with trouble codes identified in the C2C Guidelines.	<p>Verizon Position: Verizon agrees that it must follow the C2C Guidelines but disagrees with DCI’s conclusion that Verizon is not doing so.</p> <p>Rationale: Verizon is calculating this measure consistent with the Guidelines. CC (Came Clear) is identical to NTF (No Trouble Found) and should be included in this measure. Excluding the CC code would not be in compliance with the Guidelines. A clarification addressing Special Services trouble codes can be discussed in the NY CWG.</p> <p>Action Taken/Required: No action required. However, Verizon will propose language clarifications to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposal to the NY CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>

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25	V-F-E-1	V-F-E-1	Verizon PA should review the algorithms for the areas where PO-1 and PO-2 differences were identified to ensure that the algorithms are being properly applied.	<p>Verizon Position: Verizon agrees and has already conducted this review.</p> <p>Rationale: Verizon has already completed its analysis of DCI replication issues. Verizon provided DCI all information necessary to perform metrics replication.</p> <p>Action Taken/Required: No further action required.</p>
26	V-F-E-2	V-F-E-4	Verizon PA should review its programming methodologies for the comments identified above to ensure that the algorithms are being properly applied.	<p>Verizon Position: Verizon disagrees that its programming methodologies require revision. However, Verizon agrees the algorithms identified by DCI should be reviewed and Verizon has already conducted this review.</p> <p>Rationale: Verizon is calculating the metrics in accordance with the Guidelines. Consistency in the programming is not a requirement. Further, it is not practical in large, complex systems, such as the ones being evaluated, where multiple programmers worked simultaneously to develop this very comprehensive code that supports all of Verizon’s operating states. Verizon has reviewed the algorithms identified by DCI and ensured that they are properly applied. .</p> <p>Action Taken/Required: No further action required.</p>
27	V-F-E-3	V-F-E-5	Verizon PA should provide all required data for metric replication.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon has completed its root cause analysis of DCI replication issues. Verizon provided DCI all information necessary to perform metrics replication for metrics calculated within NMP.</p> <p>Action Taken/Required: No further action required.</p>

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28	V-F-E-4	V-F-E-6	<p>Verizon PA should coordinate the field identifiers for RequestNet and include them in the source data for the NMP. These data fields combined with the sent/received data/time stamps taken from the gateway by Wisdom will allow future CLECs or reviewers sufficient information to complete their reviews in a timely fashion.</p> <p>Verizon PA should develop and document detailed methods and procedures for the calculation and reporting of all the PO-8 sub-metrics.</p>	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Implementation of this specific recommendation would put the metric out of compliance with the guidelines.</p> <p>The PO-8 metric as per the PA C2C Guidelines measures the response time for the provision of Loop Qualification information when such information is not available through an electronic database. This measurement of incoming and outgoing timestamps is done by the front-end interface system WISDOM. RequestNet is a system behind WISDOM. Utilizing any timestamps from within RequestNet would not be appropriate as they are sub-components of the entire transaction. Request Net does not measure elapsed time for a CLEC loop qualification request; therefore, the comparison of RequestNet and WISDOM time stamps is not meaningful for metric calculations.</p> <p>Action Taken/Required: No further action required.</p>
29	V-F-E-5	V-F-E-7	<p>Verizon PA should implement a fix to correct orders with incorrect service order class IDs, so that they may be included in the correct metric disaggregations.</p>	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon provided DCI with information that showed that Specials ordered via LSRs are properly identified and are included in correct metric disaggregations.</p> <p>Action Taken/Required: No further action required.</p>

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30	V-F-E-6	V-F-E-8	Verizon PA should exclude records that have neither a valid SOP_COMPL_DATE nor a valid WORK_COMPL_DATE from the OR-4 metrics, and report the number of such records excluded in the C2C reports.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon is calculating the metric according to the Guidelines. The PA C2C Guidelines have no provision for excluding orders where either the SOP or the completion date is unknown but the work completion date is unknown.</p> <p>Action Taken/Required: No action required. However, Verizon will propose language clarifications for OR-4 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposals to the NY CWG in the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for these proposals.</p>
31	V-F-E-7	V-F-E-9	Clarify the practice described in Finding E-9, in the C2C Guidelines.	<p>Verizon Position: Verizon disagrees that its practice does not comply with the C2C guidelines.</p> <p>Rationale: Verizon believes that the guidelines are accurate and adequate. Verizon only includes the orders in one denominator. The denominator of the metric is based on RM PCN Date within the reported period.</p> <p>Action Taken/Required: No action required. However, Verizon will propose language clarifications for OR-4 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposals to the NY CWG in the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for these proposals.</p>

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32	V-F-E-8	V-F-E-10	The ACE process and flow thru eligibility determinations should be thoroughly reviewed. DCI did not do this during the review, because of the late date (October 23, 2003) that the ACE data was supplied.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: The premise for this recommendation, that ACE is a process that determines flow thru eligibility, is incorrect. ACE is a not a process and flow thru eligibility is determined by Verizon OSS and Operations personnel. ACE is a consulting firm that created a database to store flow through information and provide a report for flow through scoring. ACE provides the report to enable operations to score flow through. Verizon personnel use the Generic Flow Through Scenario document, the In-Scope USOC document, analysis of service orders and discussion with system personnel to determine eligibility.</p> <p>DCI could have audited the flow through results without the ACE data by looking at the Generic Flow Through Scenario document, the In-Scope USOC document, error messages and manual scoring.</p> <p>Action Taken/Required: No further action required.</p>
33	V-F-E-9	V-F-E-11	Verizon PA should review and provide accurate data for replication of metrics.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon has completed its root cause analysis of DCI replication issues. Verizon provided DCI all information necessary to perform metrics replication for metrics calculated within NMP.</p> <p>Action Taken/Required: No further action required.</p>
34	V-F-E-10	V-F-E-12	DCI accepts that metric results were not affected, but recommends that systems be improved to ensure that Provider is always identified on each record, in all provisioning data mart tables, so that Verizon PA will be in a position to react promptly when C2C Guidelines change.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: DCI has drawn an incorrect conclusion. The absence of data in the provider field for access requests to disconnect Feature Group D (FGD) Trunks does not hinder Verizon’s ability to react promptly when the C2C Guidelines change. Verizon stands by its initial response to Exception D-002 that these are not metric impacting orders. In the future, if the Guidelines change, an appropriate coding change will be made as per the Change Control Process.</p> <p>Action Taken/Required: No further action required.</p>

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35	V-F-E-11	V-F-E-13	Verizon PA should issue a process improvement Change Control to correct the product designation on these types of orders, as indicated in its response to ER D-003.	<p>Verizon Position: Verizon agrees that the code should be consistent, but disagrees that the existing code had any affect on the results.</p> <p>Rationale: Verizon agrees and will issue a process improvement change control to modify the product indicator code. The orders identified by DCI were administrative orders that are not counted in the metric. The administrative orders were incorrectly flagged as UNE Platform but there is no impact to the reported results.</p> <p>Action Taken/Required: Verizon will issue a process improvement change control to modify the product indicator code.</p> <p>Implementation period: Change Control will be issued for implementation by the 4th quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this implementation.</p>
36	V-F-E-14	V-F-E-16	Verizon PA should correct its code to not exclude S-coded orders in all the provisioning performance measurement calculations.	<p>Verizon Position: Verizon agrees that the code should be consistent, but disagrees that the existing code had any substantial affect on the results.</p> <p>Rationale: Verizon has issued one process improvement CCR (10346 completed in August data month) to address PR-1-01. Verizon will also issue a second process improvement CCR to address PR-1-12.</p> <p>Action Taken/Required: No further action required for PR-1-01. A process improvement CCR is required for PR-1-12.</p> <p>Implementation period: Change Control will be issued for implementation in the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this implementation.</p>

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VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
37	V-F-E-15	V-F-E-17	Verizon PA should revise its procedures, as follows. Those cancelled orders for which it is definitely determinable that WFA did not set the dispatch indicator to either 'Y' or 'N' should be flagged for exclusion from these metrics.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon is adhering to the Guidelines by including cancelled orders in the PR-1 metrics. Verizon cannot arbitrarily exclude cancelled orders where WFA did not set the dispatch indicator to either Y or N, as recommended by DCI.</p> <p>Action Taken/Required: No action is required. However, Verizon will propose language clarifications for PR-1 to the NY CWG.</p> <p>Implementation period: Verizon will make the above proposal to the NY CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>
38	V-F-E-20	V-F-E-22	Eliminate the exclusion of all trunks whose customer desired due interval is greater than 18 days.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon is in compliance with the guidelines.</p> <p>Action Taken/Required: No action required. However, Verizon will propose language clarifications for PR-1 trunks to the NY CWG</p> <p>Implementation period: Verizon will make the above proposals to the NY CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>
39	V-F-E-22	V-F-E-31	DCI has not found any Change Control notification indicating that this issue is scheduled to be resolved or has been resolved. Verizon PA should correct this error.	<p>Verizon Position: Verizon agrees.</p> <p>Rationale: Verizon has corrected this error with CCR 10515 (severity 2) that was implemented in the December 2003 data month.</p> <p>Action Taken/Required: No further action required.</p>

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VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
40	V-F-E-23	V-F-E-32	<p>DCI recommends that Verizon PA restrict the exclusion to operate only when a ticket had been dispatched IN once (change DISPATCH_IN_CNT <= 1 to DISPATCH_IN_CNT = 1). Such tickets are “possible redirects”. Those which had DISPATCH_IN_CNT = 0 are not even candidates for redirects and certainly should not be excluded. Among the “possible redirects” the trouble may or may not have been found on the second dispatch, so not necessarily all “possible redirects” are definitely redirects, and not necessarily all “possible redirects” should be excluded.</p>	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Changing the code to what DCI suggests would eliminate the misdirect exclusion for the following scenario: Disp in <=1 and disp out =1. This is also considered a misdirect because even though there was no dispatch in, the trouble was dispatched out and closed to a 5 code. This happens when an outside tech is trouble shooting with a frame person and the trouble is found in the frame. In those instances the inside tech repairs the trouble and the outside tech closes it out with the appropriate Central Office code. Any language clarification can be discussed with the CWG.</p> <p>Action Taken/Required: No action is required. However, Verizon will discuss specific suggestions for modifications in the NY CWG.</p> <p>Implementation period: Verizon will make the above proposal to the NY CWG no later than the second quarter 2004. The Executive Director, Metrics Policy & Planning will be responsible for this proposal.</p>
41	V-F-E-24	V-F-E-34	<p>Verizon PA’s system design is such that each standard deviation has a separate algorithm. If Verizon PA intends to maintain this design, safeguards should be built into it, to ensure that a standard deviation is being calculated on the same variable and on the same set of records as the mean and record count to which it is intended to relate.</p>	<p>Verizon Position: Verizon agrees that there is an error, but disagrees as to the explanation of the error and recommended solution.</p> <p>Rationale: DCI is incorrect in their assertion that the only explanation for this error is that the standard deviation is “calculated via a separate MicroStrategy algorithm” for MR-4-01-2216. In response to DCI Exception Report D-033, Verizon discovered that the same underlying data are used to compute standard deviations, results and denominators. The error was limited to the incorrect mapping of a value into the report. Change control 10503 corrects the standard deviation tag.</p> <p>Action Taken/Required: Change Control 10503 is scheduled for implementation with the February data month.</p> <p>Implementation period: Implementation of the CCR will be no later than March 2004 data month. The Executive Director, Metrics Policy & Planning, will be responsible for this implementation.</p>

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VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
42	V-F-E-25	V-F-E-35	Verizon PA should implement a statistical methodology which is more robust at results close to 0% and 100%	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: DCI has recommended using a more “robust” methodology for MR-4-04-2216 (Troubles cleared within 24 hours – Specials) when service is either near 0% or 100%. However, DCI has overlooked, or ignored, that Verizon and the CLECs have arrived at a consensus concerning the appropriate statistical test methodology after careful consideration of several alternative approaches. DCI has also overlooked that the consensus statistical methodology is the result of a CLEC proposal to which Verizon agreed. Furthermore, Verizon agrees with the industry that the current methodology is more robust. From a practical standpoint DCI’s recommendation would have no affect on the key parameters that affect payments.</p> <p>DCI’s recommendation is also based on comparing the result from the “consensus” methodology, i.e. the Fisher Exact Test, to a test statistic derived from a normal approximation to the binomial distribution. It is well known (see <i>Statistical Distributions, 2nd edition</i>, M.Evans, N.Hastings and B. Peacock, J. Wiley and Sons, 1993) that this (“normal”) test statistic should not be used when $np(1-p) \leq 5$ and when $p < 0.1$ or > 0.9. In the examples cited by DCI the number of CLEC observations (n) ranges between 6 and 10, and the CLECs performance is at 100% ($p=1.0$) and Verizon’s is over 98% ($p=0.98$). Clearly, the “normal” test statistic is inappropriate and its results cannot be used to reliably compare it to the Fisher Exact Test. That is, since the normal distribution is not an accurate approximation to the binomial in this region, then DCI’s claim that there is a significant difference between the normal test statistic and the Fisher Exact Test statistic is meaningless.</p> <p>Action Taken/Required: No further action required.</p>
43	VI-C-1	VI-B-1	Continue Providing Support To Field Technicians Through Training And Supervisory Reviews.	<p>Verizon Position: Verizon agrees.</p> <p>Rationale: Verizon will continue providing support to field technicians through training and supervisory reviews</p> <p>Action Taken/Required: No action required</p>

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VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
44	VI-C-2	VI-B-2	Encourage Local Managers To Continue To Emphasize PA PAP Metrics With Field Technicians.	<p>Verizon Position: Verizon agrees.</p> <p>Rationale: Verizon will continue to encourage local field managers to emphasize PA PAP metrics with field technicians.</p> <p>Action Taken/Required: No action required</p>
45	VI-C-3	VI-B-3	Expand The Approach Of Programmatic Checking Used In The WDRC To Include The POTS Installation And Maintenance Organizations.	<p>Verizon Position: Verizon agrees.</p> <p>Rationale: Verizon will expand the approach of programmatic checking used in the WDRC to include the POTS Installation and Maintenance</p> <p>Implementation Period: Scheduled for completion in the 3rd Quarter of 2004. The Director, Customer Response PA, will be responsible for this implementation.</p>
46	VI-C-4	VI-B-4	Perform Internal Audits Of Field Technician Disposition Coding.	<p>Verizon Position: Verizon agrees.</p> <p>Rationale: Verizon will continue to conduct internal reviews of field technician disposition coding.</p> <p>Action Taken/Required: No action required.</p>

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VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
47	VII-C-1	VII-B-1 VII-B-2 VII-B-4 VII-B-6	Develop An English Version Document Describing Verizon PA’s Business Rules Used To Implement The Provisions Of The PA PAP.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon believes that the Performance Assurance Plan is adequate and accurate. The current Plan documentation is in plain English and is in compliance with the Plan ordered by the Pennsylvania Commission on April 17, 2003. The 91 pages of documentation for the current Plan combined with the NY model are extensive. DCI may have overlooked, that interested participants agreed to this plan and its documentation, and those participants did not comment regarding a need for additional documentation in the numerous proceedings.</p> <p>Action Taken/Required: No action required. However, Verizon will propose modified language to the NY PSC. Once adopted, these changes will flow through to Pennsylvania through existing processes. Should NY not agree to certain clarifications that the PA CWG feels are necessary, Verizon will then propose those changes to the PA CWG.</p> <p>Implementation period: Verizon will make a proposal for modified language to the NY PSC within 45 days of discussions starting on the NY PAP in 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>
48	VII-C-2	VII-B-5 VII-B-7	Eliminate Discrepancies Between C2C Guidelines, C2C Performance Standards And Reports, And The PA PAP.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon disagrees with regard to finding VII-B-7 because it does not mention discrepancies between the C2C and PAP. For VII-B-5, Verizon agrees that there are a small number of discrepancies in product codes. However, the process for the PAP updates addresses any discrepancies as they arise.</p> <p>Action Taken/Required: No further action required.</p>

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VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
49	VII-C-3	VII-B-3	Require Verizon PA To Furnish All CLEC Reports Automatically To The PA PUC Staff and Third Part Reviewers, As Appropriate, Without The Requirement That The CLEC Request Such Information.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: This issue was specifically litigated and addressed in PMO II order. All data necessary to replicate PAP reports was provided to DCI and is made available to the PUC. Verizon believes that DCI’s approach of adding up individual CLEC reports is actually less accurate than replicating the metric from scratch as was done for the C2C reports.</p> <p>Action Taken/Required: No further action is required.</p>
50	VII-C-4	VII-B-4 VII-B-6	Revise The PA PAP And Update It To Clarify The Issues Identified In This Report.	<p>Verizon Position: Verizon agrees in part and disagrees in part.</p> <p>Rationale: With regard to clarification of language for the Domain Clustering Rule, the Pennsylvania Commission Staff did request a clarification of the language in the main document and Appendix E. The issue and draft clarifications were proposed to and discussed in the PA CWG. The CLECs, Verizon, customer advocate groups and Commission Staff members attending the CWG agreed to revised language to clarify Domain Clustering in May 2003. Attendees also concluded that the documentation should not be clarified without a Commission Order specifying the agreed upon language.</p> <p>Action Taken/Required: Verizon will file a compliance filing with the clarified language with the PA PUC pursuant to a Commission order.</p> <p>Implementation Period: Verizon will file a compliance filing with the PA PUC upon issuance of a Commission order within the prescribed timeline. The Executive Director, Metrics Policy & Planning, will be responsible for this compliance filing.</p>

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VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
51	VIII-C-1	VIII-B-1 VIII-B-2	Develop Documentation For NMP And PA PAP Excel Model Spreadsheet Calculation And Reporting.	<p>Verizon Position: Verizon disagrees that additional documentation is needed.</p> <p>Rationale: Verizon’s PAP documentation is accurate and adequate. Verizon has NMP PAP documentation and it was inadvertently omitted from the response to DCI’s data request C-054. (Verizon provided NMP documentation for C2C and statistical algorithms.)</p> <p>Regarding the NY Excel spreadsheet, the spreadsheet is provided by the NY PSC as a guide to clarify the Performance Plan calculations. It is also provided to commission staffs and outside auditors as a guide to supplement documentation. Several states have used this successfully to replicate the PAP. This spreadsheet was not designed to handle the advanced statistical testing that has evolved over the life of the plan, the met/miss determinations that span multiple months, and other provisions of the Plan document that require manual processing in the spreadsheet. It was not intended to be a substitute for other more advanced fully automated programming.</p> <p>Action Taken/Required: No further action required.</p>
52	VIII-C-2	VIII-B-2	Correct The PA PAP And The PA PAP Excel Model Spreadsheet And Develop A PA PAP Report To Assist Outside Auditors In Replicating PA PAP Results.	<p>Verizon Position: Verizon agrees in part and disagrees in part.</p> <p>Rationale: As described in the response to #50, Verizon believes that the PAP can be clarified. As described in #51, Verizon disagrees that corrections to the Excel spreadsheet are necessary. Verizon does not believe it is necessary to modify the PAP or its reporting to assist auditors. Verizon has been asked by state and federal regulatory agencies to undertake, and has completed to date, 13 separate wholesale metrics reviews through 5 different external firms covering 14 separate state and federal regulatory jurisdictions. In every engagement, Verizon’s documentation was sufficient for auditors to perform independent replication of the PAP.</p> <p>Action Taken/Required: No further action required except as described in # 50.</p>

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VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
53	VIII-C-3	VIII-B-1 VIII-B-2	Re-audit PA PAP Results Periodically At Least Until A Favorable Audit Report Is Attained.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: While DCI reviewed the PAP calculations as evidenced by some minor findings, DCI did not report any material calculation or payment errors in their report.</p> <p>Action Taken/Required: None further action required.</p>
54	VIII-C-4	VII-B-3	Use The Same Method To Determine Both Wholesale And Retail Results For PA PAP Purposes.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon believes that the Performance Assurance Plan is adequate and accurate. Specifically, DCI’s statements that Verizon “ignores” the Resale comparative of Retail ISDN or that Verizon simply chose the UNE retail comparative because it is the larger volume service is incorrect. As stated in DCI’s report, the Resale 2W Digital comparative of Retail ISDN is a subset of, and thus is already included in the UNE 2W Digital comparative of Retail POTS-Total (ALL). Retail POTS-Total (ALL) is used as the retail comparison for the PAP measures that combine UNE and Resale because it is already all inclusive of the UNE and Resale comparatives as defined in the Commission ordered C2C Guidelines. DCI’s recommendation that the retail comparatives should be added would result in the double counting of Retail ISDN.</p> <p>Action Taken/Required: No further action required. However, Verizon has obtained concurrence with the NY PSC, author of the plan, that the approach taken by Verizon is correct. Verizon will propose clarifying language to NY PSC in its next plan modification.</p> <p>Implementation period: Verizon will make a proposal for modified language to the NY PSC within 45 days of discussions starting on the NY PAP in 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this proposal.</p>

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VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
55	IX-C-1	IX-B-1 IX-B-2	Send CLEC Notification Letters Detailing The Credit That Is Due To All CLECs Or, Update Verizon PA's Documentation.	<p>Verizon Position: Verizon agrees.</p> <p>Rationale: Currently, Verizon sends out courtesy notification letters to CLECs.</p> <p>Action Taken/Required: Verizon will solicit updated email addresses for PAP Notification letters from CLECs</p> <p>Implementation period: 2nd quarter 2004. The Executive Director, Metrics Policy & Planning will be responsible for this implementation.</p>
56	IX-C-2	IX-B-3	Develop The Same Type Of Documentation For CLEC Claims Or Inquiries From PA PAP Bill Credits, As Verizon PA Uses To Support Blocking Claims.	<p>Verizon Position: Verizon agrees with DCI's finding that Verizon PA's documents for handling CLECs billing claims is sufficiently detailed and comprehensive, but Verizon disagrees with DCI's recommendation.</p> <p>Rationale: The WBCC does not handle PAP Claims, so no documentation or action required. PAP claims are handled through the Help Desk at 1-800-959-9995 or emailed to WQAT@Verizon.com.</p> <p>Action Taken/Required: No further action required.</p>
57	IX-C-3	IX-B-3	Update All Verizon PA Documentation To Refer To The Proper Organizations Or Systems.	<p>Verizon Position: Verizon agrees.</p> <p>Action Taken/Required: Verizon will make requested updates referring to the proper organizations or systems.</p> <p>Implementation Period: 2nd quarter 2004. The Executive Director, Billing, will be responsible for this implementation.</p>
58	IX-C-4	IX-B-5	Update Verizon PA's Wholesale Website.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon has sufficient information on its website for claims submission. The WCIT application is a claims management system currently only used internally for claims tracking.</p> <p>Action Taken/Required: No action required.</p>

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VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
59	X-C-1	X-B-1 X-B-2	Continue Using Existing Metric Change Process Procedures And Documentation.	<p>Verizon Position: Verizon agrees.</p> <p>Rationale: Verizon will continue to use its Metrics Change control Process.</p> <p>Action Taken/Required: No action required.</p>
60	X-C-2	X-B-3	Take Active Steps To Maintain A Current Change Control Notification Contact List.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: It is the responsibility of the party requesting notification of change controls to notify Verizon of changes to their e-mail address. Verizon updates any change when notified.</p> <p>Action Taken/Required: No action required. However, Verizon will proactively notify parties to determine what updates may be required.</p> <p>Implementation period: Targeted for 3rd Quarter 2004. The Executive Director, Metrics Policy & Planning, will be responsible for this implementation.</p>
61	X-C-3	X-B-4	Implement A Periodic Review Process For Metric Calculations Documentation.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon already has in place procedures for review and updating of metrics calculation documentation.</p> <p>Action Taken/Required: No further action required.</p>
62	XI-C-1	XI-B-1	Use A Unique Trouble Identifier Which Remains With The Trouble Ticket For Trouble Report Identification.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: CLECs are able to reconcile trouble tickets using current capabilities in the trouble management system. The current repair system does not have the capability to retain trouble ticket numbers.</p> <p>Action Taken/Required: No action required.</p>

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VZ #	DCI Rec. #	DCI Finding #	DCI Recommendation	Verizon Response
63	XI-C-2	XI-B-2	Adjust The Trouble Closing Process, To Prevent Discrepancies In The Trouble Ticket Closing Time.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: DCI's analysis of results is based on information from CLECs. Verizon follows stated practices and procedures in closing trouble tickets. The clear time and close time is reported consistent with Verizon practice. Verizon's timestamp is based upon closure with the CLEC. Verizon has no control over the methodology employed by CLECs in documenting their data. Verizon has no control over the time that that the CLEC closes out the trouble with its end user.</p> <p>Action Taken/Required: No further action required.</p>
64	XI-C-3	XI-B-3	Conduct Additional Training And/Or Install Controls To Prevent The Manual Generation Of A PCN Prior To Work Being Complete.	<p>Verizon Position: Verizon disagrees.</p> <p>Rationale: Verizon continuously trains its representatives on proper coding. The rare instances found by DCI – only 2 out of almost 5000 PCNs examined (.044%) - resulted from human errors in inputting the wrong date in the completion field.</p> <p>Action Taken/Required: No further action required.</p>