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August 15, 2016

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**RE: PMO III – Performance Metrics and Remedies (Folder 19)**  
**Docket No. \_\_\_\_\_<sup>1</sup>**

Dear Secretary Chiavetta:

Enclosed please find the Petition of Verizon Pennsylvania LLC for a Waiver of Certain Service Quality Results Measured under the Performance Assurance Plan (“PAP”) for June 2016 and Amendment to Petitions for Waiver for April and May 2016.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink that reads "Suzan D. Paiva" with a date "8/15/16" written at the end.

SDP/slb  
Enc.

**Via Federal Express**  
cc: Louise Fink Smith  
Cheryl Walker Davis

**Via Electronic Mail**  
cc: Pennsylvania Carrier Working Group

**Via First Class U.S. Mail**  
cc: Certificate of Service

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<sup>1</sup> Docket No. M-00011468 is the parent case for this filing.

## CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that, as directed in the Secretarial Letter dated July 20, 2016, Verizon Pennsylvania LLC has sent the following documents by first class mail to each company that does not participate in the PA Carrier Working Group to which remedies would have been paid but for this proceeding.

1. Petition of Verizon Pennsylvania LLC for a Waiver of Certain Service Quality Results Measured Under the Performance Assurance Plan for April 2016
2. Petition of Verizon Pennsylvania LLC for a Waiver of Certain Service Quality Results Measured Under the Performance Assurance Plan for May 2016
3. Petition of Verizon Pennsylvania LLC for a Waiver of Certain Service Quality Results Measured Under the Performance Assurance Plan for June 2016 and Amendment to Petitions for Waiver for April and May 2016

Verizon Pennsylvania LLC does not expect to file any additional PAP waivers related to the 2016 work stoppage addressed in the above filings.

To preserve confidentiality the company names are not individually listed in this Certificate of Service but are available to Commission Staff upon request.

Dated at Philadelphia, Pennsylvania, this 15<sup>th</sup> day of August, 2016.



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Attorney for Verizon Pennsylvania LLC

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PERFORMANCE MEASURES                    :**  
**REMEDIES (F0018)                        :**

**PETITION OF VERIZON PENNSYLVANIA LLC FOR A WAIVER OF  
CERTAIN SERVICE QUALITY RESULTS MEASURED UNDER  
THE PERFORMANCE ASSURANCE PLAN FOR JUNE 2016  
AND AMENDMENT TO PETITIONS FOR WAIVER FOR APRIL AND MAY 2016**

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Dated: August 15, 2016

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achieved during periods of emergency, catastrophe, natural disaster, severe storms, or other events beyond Verizon’s control.” For this reason, the PAP allows for a waiver of results that have been “influenced by factors beyond Verizon’s control.”<sup>2</sup> Such a waiver is required for two of the PAP wholesale measures with benchmark standards for the month of June 2016 due to the effects of an event beyond Verizon PA’s control — an employee work stoppage.<sup>3</sup>

On April 13, 2016, the unionized workers of Verizon PA and its affiliated operating companies (collectively, “Verizon”) engaged in a work stoppage that lasted until June 1, 2016.<sup>4</sup> Although the unionized workers returned to their jobs on June 1, the work stoppage continued to disrupt normal operations into the month of June due to the need to handle a backlog of open issues generated during the strike as well as the transition back into normal working conditions. This extraordinary event, which was beyond Verizon PA’s control, prevented it from satisfying two of the PAP wholesale measures with benchmark standards during June 2016. In normal months, Verizon PA has routinely provided excellent service to CLECs and met or exceeded the standard for these measures.

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<sup>2</sup> See PAP, Appendix C, at 38-40 (“Waivers”) and Appendix F at 69-70 (time table for waiver filings).

<sup>3</sup> The Commission previously granted a waiver from service quality results measured under the PAP for a work stoppage and hurricane in August 2011. See PMO III – *Petition of Verizon Pennsylvania Inc. for Waiver of Certain Service Quality Results Measured Under the Pennsylvania Performance Assurance Plan for August 2011*, etc. P-2011-2269052; M-00011468 (F0018), Order (Jan. 30, 2012). The New York Public Service Commission has held under the current PAP and an earlier version of the PAP that a work stoppage by Verizon New York Inc.’s (“Verizon NY”) Associates qualifies as a “situation[] beyond Verizon’s control” that entitles Verizon NY to relief from bill credits for the affected benchmark metrics. See Case 99-C-0949 - *Petition of Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan*, filed in C 97-C-0271, *Order Granting Waiver Request for August 2011 Service Quality* (Issued and Effective May 3, 2012); *Order Granting in Part and Denying in Part Requests for Waivers of Service Quality Targets* (Issued and Effective June 7, 2001).

<sup>4</sup> This work stoppage affected Verizon’s operations in Connecticut, Delaware, the District of Columbia, Maryland, Massachusetts, New Jersey, New York, Pennsylvania, Rhode Island and

(continued . . .)

Verizon PA estimates that if the instant waiver requests are granted, the amount of monthly bill credits due to CLECs will be reduced from \$270,386 to \$20,023. Attached hereto as Exhibit 1 is a copy of the “Performance Assurance Plan – June 2016 Monthly Report” that Verizon PA submitted to the Commission on July 29, 2016. Exhibit 2 contains a summary chart that shows Verizon PA’s performance from April 2015 through June 2016 for the benchmark measures for which Verizon PA seeks a waiver.

For the reasons set forth below, the Commission should grant the waiver request and allow Verizon PA to exclude effects of the work stoppage from the monthly service results that will comprise the performance levels against which it will be measured under the PAP for June 2016.

## **II. FACTUAL BACKGROUND**

Beginning at 6:00 the morning of April 13, 2016, the Communications Workers of America (“CWA”), the union that represents certain employees of Verizon,<sup>5</sup> began a work stoppage despite the company’s efforts to reach final agreement on new contracts to replace contracts that expired on August 1, 2015.

Verizon and the Unions had held meetings to discuss key issues up for negotiation many months before the scheduled expiration of the contracts. Formal negotiations began the week of June 22, 2015. The issues involved in these negotiations were complex. Among other things,

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(. . . continued)

Virginia.

<sup>5</sup> In some jurisdictions, some Verizon employees are represented by the International Brotherhood of Electrical Workers. These employees also engaged in a work stoppage. The CWA and IBEW are referred to herein as the “Unions.”

the parties were seeking to resolve issues related to wages, job security, retirement, and healthcare benefits.

The resolution of each of these issues was extremely important not only for the future operations of the corporation, but also to control the costs that eventually have to be passed onto end-user and wholesale customers. Initially, when the contracts expired, the Union employees worked without a contract. Verizon made numerous comprehensive proposals and took part in over 300 meetings with Union officials. On April 11, 2016, the Unions announced their plan to strike in two days. On April 11-12, 2016, the Federal Mediation & Conciliation Service offered to step in and mediate negotiations. Verizon agreed. However, the Union leaders rejected the offer. The work stoppage officially commenced at 6:00 a.m. on April 13, 2016. On May 15, 2016, the United States Secretary of Labor announced that he had contacted the parties and on May 17, 2016 he announced that discussions would be conducted under the auspices of the Department of Labor. On May 27, 2016, the parties reached an agreement in principle on new contracts, and tentative agreements were signed overnight on May 29, 2016 into May 30, 2016. Striking workers returned to work on June 1, 2016.

Immediately after the work stoppage commenced, Verizon executed the emergency work stoppage plan. Planning for the work stoppage had begun well over a year before the contracts expired. Managers across the nation (except those designated as essential to corporate operations) were given Emergency Work Assignments (“EWAs”) and required training by the Company’s Business Continuity Planning (“BCP”) team. The BCP team determined the required EWA force by calculating expected work volumes based on historical trends.

During the work stoppage, managers from various Verizon business units, among them Verizon Enterprise (including former MCI business units), Corporate Finance, Human



Resources, Information Technology, and Legal, were given assignments in the effected Verizon service area. As a result, previously trained managers from states as far away as California, Illinois, and Texas were given EWAs. Managers were assigned to both retail and wholesale functions. Of necessity, the work force on duty during the work stoppage was dedicated to assuring that existing customers continued to receive the best service possible, which meant that maintenance and repair tasks took precedence over any installation work.

Management employees began to report to their emergency work assignments on Wednesday, April 13, 2016 and were assigned to 12-hour shifts, seven days a week. Verizon assigned every available manager to an essential work assignment including assignments at the National Market Center (“NMC”), Regional CLEC Maintenance Center (“RCMC”) and Regional CLEC Coordination Center (“RCCC”), which support Verizon’s wholesale operations. As the strike progressed, Verizon increased resources, significantly scaling up its contingency workforce, with the addition of contractors, expanding outsourced call center resources, additional EWAs, and the hiring of new temporary workers. Thousands of these resources were sourced into the organization, trained and deployed. Over the course of the work stoppage, Verizon PA was able to mobilize a force of approximately 1,858 managers to perform work usually handled by approximately 4,328 striking workers in Pennsylvania. This does not include people working remotely for Pennsylvania customers in states like Florida, North Carolina, Oklahoma, and Texas, nor does it take into account the 463 contractors working in Pennsylvania.

The management employees on duty during the work stoppage were required to perform their duties under difficult conditions, including delays caused by disruptive actions by striking workers. During the course of the work stoppage, there were 44 reported incidents of sabotage

that caused a loss of service in Pennsylvania, contributing to the already heavy maintenance workload that the management employees had to address during the work stoppage.<sup>6</sup>

On May 27, 2016, it was announced that an agreement in principle had been reached. Those tentative agreements were signed overnight on May 29, 2016 into May 30, 2016, and striking workers returned to work on June 1, 2016. However, even after the striking workers began returning to their normal jobs it was still necessary for them to handle a backlog of open issues generated during the strike and normal operations therefore continued to be disrupted into the month of June.

### **III. THE TERMS OF THE PAP REQUIRE WAIVERS FOR PERFORMANCE ON FOUR MEASURES WITH BENCHMARK STANDARDS DURING JUNE 2016.**

Despite its best efforts, Verizon PA was unable due to the work stoppage to satisfy the service quality standards for two of the 80 measures in the PAP with benchmark standards for June 2016. The PAP provides that:

Recognizing that C2C service quality data may be influenced by factors beyond Verizon's control, Verizon may file Exception or Waiver petitions with the Commission seeking to have the monthly service quality results modified on three generic grounds.

. . . .

The third ground . . . relates to situations beyond Verizon's control that negatively affect its ability to satisfy only those measures with Benchmark standards. The performance requirements dictated by Benchmark standards establish the quality of service under normal operating conditions, and do not necessarily establish the level of performance to be achieved during periods of emergency, catastrophe, natural disaster, severe storms, or other events beyond Verizon's control.

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<sup>6</sup> Verizon took a number of steps to try to reduce the incidents of harassment and sabotage during the work stoppage. It employed additional security personnel, provided escorts for managers assigned to outside plant projects, worked with the local police departments, and offered rewards of up to \$10,000 to individuals who reported acts of sabotage.

(PAP, Appendix C, at 38 and 39.)

A work stoppage is a “situation[ ] beyond Verizon’s control that negatively affect its ability to satisfy only those measures with Benchmark standards.” Despite the parties’ best efforts, Verizon PA could not resolve the outstanding issues after ten months of negotiations, and its unionized workers chose to strike. Once the work stoppage commenced, Verizon PA worked diligently in an attempt to end the dispute and, at the same time, deployed managers in an attempt to continue to provide the best possible service to as many customers as possible under the circumstances. Notwithstanding these efforts, the disruption to Verizon PA’s operations and its effect on two of the benchmark metrics was beyond Verizon PA’s control. Accordingly, the PAP requires a waiver of the benchmark service standards for the metrics that Verizon PA could not satisfy as a result of the work stoppage.

Verizon PA requests a waiver of the service quality results for the following metrics for Critical Measures:

- |              |  |
|--------------|--|
| OR-1-13-5000 | Trunks % On Time Design Layout Record (DLR) - Interconnection Trunks |
| PR-4-15-5000 | Trunks % On Time Provisioning - Interconnection Trunks               |

The first metric (OR-1-13-5000) measures the number of trunk orders where the DLR Design Layout Record (“DLR”) objective is completed on or before DLR objective date in the Trunk Integrated Record Keeping System. The customer requests a copy of the circuit design on new orders when the order is placed. The objective date to send the DLR is established along with the other critical installation dates. Once the Verizon engineer designs the circuit a copy is sent electronically to the customer. For June 2016 Pennsylvania met the DLR objective date on 3 of 10 orders for an on time performance of 30%. Six of the seven orders that missed the DLR

objective date were received in April or May (during the work stoppage) but they were counted for June because that is when they were designed. The seventh was received June 3 but was also delayed due to the backlog from the strike. This metric continued to be affected after the unionized workers returned because it is an example of the orders being received in a previous month but not measured until a subsequent month (June) because the measurement does not occur until the order is completed.

The second metric (PR-4-15-5000) was similarly affected by the fact that the relevant orders came in during the work stoppage. This metric measures the number of trunks completed on or before the objective date due. This is a measure of the number of trunks completed rather than the number of orders completed (each order may contain 24 individual trunks and each trunk has its own circuit layout and design). For June 2016 Verizon PA completed 480 of 624 trunk installations on or before the objective due date for an on time percentage of 76.92%. There were 144 trunk installations that missed the objective due date. The 144 trunks were provisioned on three orders. The objective due dates for the orders were April 15, May 12 and May 24 – all during the work stoppage. The orders were completed in June and therefore measured in June.

As noted, Verizon PA allocated managers to all functions including the wholesale functions in order to provide the best service possible during the work stoppage. However, Verizon PA was unable to satisfy the benchmark standards for these measures because it simply did not have enough personnel to provide the resources necessary to handle the volume of orders that were being received in the manner that it handles them under normal conditions.

In the past, Verizon PA has provided the CLECs with excellent service on these metrics. As can be seen from the chart included in Exhibit 2, for the most part service for these metrics

exceeded the 95% standard for each of the 12 months prior to the work stoppage. For OR-1-13-5000, Verizon PA exceeded the 95% standards for all but two of the 12 months prior to the work stoppage, and in one month – August 2015 -- the metric was not scored as a miss because of the one miss allowance in the PAP.<sup>7</sup> If Verizon PA's June 2016 performance had not been impacted by the work stoppage, this record of past performance indicates that Verizon PA would have satisfied the standard for each of these metrics. Thus, Verizon PA's performance on these metrics should be waived for June 2016.

In summary, while Verizon PA assigned a large body of management employees to the jobs normally handled by the striking workers, this management work force represented only a modest fraction of its usual work force and it was simply impossible for Verizon PA to keep up with the daily workload and each passing day resulted in a substantial increase to the backlog. Moreover, while Verizon managers had been trained to perform their work stoppage jobs, most of them, especially early in the work stoppage, could not perform their jobs as quickly as the workers who ordinarily would perform these jobs. Verizon PA took all reasonable, precautionary steps to mitigate the impact of the work stoppage on its service quality and to assure that its wholesale and retail customers received the best service quality possible. As a result of these actions, Verizon PA was able to meet most of the June PAP measures with benchmark standards (77 out of 80). However, the length of the work stoppage thwarted Verizon PA's efforts to satisfy the service quality objectives of these two metrics that measure orders received during the work stoppage but completed in June. Clearly, the work stoppage was an

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<sup>7</sup> See PAP, Appendix C at page 36 (Small Sample Benchmark Scoring Procedures).

event beyond Verizon PA's control. It was simply impossible for Verizon PA to satisfy the benchmark standards for the measures under these circumstances for the entire month of June.

**IV. DESPITE THE EXTRAORDINARY WORK STOPPAGE EVENT, VERIZON PA CONTINUED TO PROVIDE PARITY SERVICE TO CLECS**

The PAP provides that any service waiver for events beyond Verizon's control must include "an analysis of the extent to which the parity metrics (retail and wholesale) were affected by the subject event . . . ."<sup>8</sup> An analysis of the PAP data for parity measures shows that Verizon PA provided parity service to the CLECs during the month of June on all but two parity measures. In June 2016, Verizon PA missed MR-5-01-3112 (% Repeat Reports within 30 Days, UNE-L) and MR-5-01-3342 (% Repeat Reports within 30 Days, UNE 2W xDSL Loops).

The fact that Verizon PA was able to maintain parity for 90 of the 92 parity metrics in June 2016 shows that CLECs continued to receive parity service during the work stoppage. In fact this small number of misses on parity measures is consistent with normal performance, as data from the four months before the work stoppage shows that Verizon PA has occasionally missed a small number of parity measures but maintained parity for the vast majority of the measures. The two misses on the June 2016 metrics could be attributed to the fact that Verizon simply did not have sufficient management employees to perform the usual monitoring tasks that Verizon's wholesale team undertakes as part of its normal operating procedures. Verizon's systems and processes produce parity by design and usual operation. However, Verizon also has an operational team that previews the company's performance on the wholesale measures. This team develops and executes remedial procedures that are intended to drive performance to parity

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<sup>8</sup> PAP Appendix C, at 40.

when Verizon detects that performance is falling below the parity standard. The disruption to Verizon's normal practices of monitoring service to CLECs could have resulted in Verizon achieving failing scores on these single metrics.

In short, the parity metric data for June 2016 do not provide any indication that Verizon PA intentionally discriminated against its CLEC customers. To the contrary, the data indicates that Verizon PA strove to maintain parity for the numerous wholesale services that these measures monitor and was largely successful in doing so.

#### **V. VERIZON HAS NO CHANGES TO THE APRIL AND MAY PETITIONS**

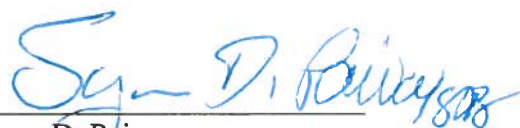
By Secretarial Letters dated June 22, 2016 and July 20, 2016 Verizon PA was directed to "file an amendment to its Petition for Waiver by August 15, 2016, reflecting that all the relevant data and results have been filed and served and articulating revisions, if any, to the initial waiver request." Verizon does not have any amendments or revisions to the April and May petitions. All relevant data and results have been filed. This June petition is the last waiver petition relating to the work stoppage that Verizon expects to file.

As directed in the July 20, 2016 letter, Verizon is filing this date a Certificate of Service indicating that each of the petitions (April, May and June) has been sent by first class mail to each company that does not participate in the PA Carrier Working Group to which remedies would have been paid but for this proceeding. To preserve confidentiality the company names are not included on the Certificate of Service but are available to staff upon request.

**VI. CONCLUSION**

For the foregoing reasons, Verizon PA requests that the Commission grant this Petition and waive Verizon PA's service performance results for two PAP service measures with benchmark standards for June 2016.

Respectfully submitted,



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Philadelphia, PA 19103  
Telephone No. 215-466-4755

Counsel for  
Verizon Pennsylvania LLC

Dated: August 15, 2016



# **EXHIBIT 1**

Section	Mode	Weighted Score	Market Adjustment
MOE	Loop	-0.0485	\$0
MOE	Resale	-0.0830	\$0
MOE	Trunks	-0.4286	\$64,725
<b>MOE</b>	<b>Total</b>		<b>\$64,725</b>
Critical Measure	Loop		\$0
Critical Measure	Resale		\$0
Critical Measure	Trunks		\$185,638
Critical Measure	Specials		\$19,563
Critical Measure	Other		\$0
<b>Critical Measure</b>	<b>Total</b>		<b>\$205,201</b>
Individual Rule	Total		\$460
<b>All</b>	<b>Grand Total</b>		<b>\$270,386</b>

Performance Assurance Plan - Verizon PA

Version 4.0

Blank Stat. Score = Insufficient activity or no activity to perform a statistical test

Perf. Score	Wgt.	Wgtd. Score	Metric #	Metric Description	Product	VZ Perf.	CLEC Perf.	VZ Obs.	CLEC Obs.	VZ Std.Dev.	Difference or Stat. Score	Bill Credit
-4	330	-0.0485	<b>MOE-Loop</b>	<b>Loop Based Mode of Entry Totals</b>								\$ -
0	2	0.0000	PO-1-01-6020	Average Response Time - Customer Service Record (CSR)	EDI	0.03	3.54		3,743		3.5065	
0	2	0.0000	PO-1-01-6030	Average Response Time - Customer Service Record (CSR)	CORBA	0.03			0			
0	5	0.0000	PO-1-01-6050	Average Response Time - Customer Service Record (CSR)	WEB GUI/LSI/W	0.03	1.11		2,124		1.0771	
0	2	0.0000	PO-1-03-6020	Average Response Time - Address Validation	EDI	5.51	4.44		3,002		-1.0633	
0	2	0.0000	PO-1-03-6030	Average Response Time - Address Validation	CORBA	5.51			0			
0	5	0.0000	PO-1-03-6050	Average Response Time - Address Validation	WEB GUI/LSI/W	5.51	3.19		766		-2.3114	
0	2	0.0000	PO-1-06-6020	Average Response Time - Mechanized Loop Qualification - xDSL	EDI	9.09	5.17		1,038		-3.9192	
0	2	0.0000	PO-1-06-6050	Average Response Time - Mechanized Loop Qualification - xDSL	WEB GUI/LSI/W	9.09	2.85		86		-6.2409	
0	5	0.0000	PO-2-02-6010	OSS Interface Availability - Prime-Time	WPTS	99.98						
0	5	0.0000	PO-2-02-6020	OSS Interface Availability - Prime Time	EDI	99.93						
0	5	0.0000	PO-2-02-6030	OSS Interface Availability - Prime Time	CORBA	100.00						
0	5	0.0000	PO-2-02-6080	OSS Interface Availability - Prime Time	Web GUI	100.00						
-2	2	-0.0121	PO-8-01-6000	% On Time - Manual Loop Qualification	Systems Metrics	77.50			40			
0	10	0.0000	OR-1-02-3331	% On Time LSRC - Flow Through	UNE-L/Pre-qual Compl/LNP	99.51			12,402			
0	5	0.0000	OR-1-04-3331	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	UNE-L/Pre-qual Compl/LNP	98.74			635			
0	5	0.0000	OR-1-06-3331	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE-L/Pre-qual Compl/LNP	99.47			3,303			
0	5	0.0000	OR-2-02-3331	% On Time LSR Reject - Flow-through	UNE-L/Pre-qual Compl/LNP	99.97			3,303			
0	5	0.0000	OR-2-04-3331	% On Time LSR/ASR Rej - No Facil Chk (Electr. No Flow-through)	UNE-L/Pre-qual Compl/LNP	98.86			438			
0	2	0.0000	OR-2-04-3341	% On Time LSR/ASR Rej - No Facil Chk (Electr. No Flow-through)	UNE 2W Digital				0			
0	2	0.0000	OR-2-04-3342	% On Time LSR/ASR Rej - No Facil Chk (Electr. No Flow-through)	UNE 2W xDSL Loops				0			
0	2	0.0000	OR-2-06-3331	% On Time LSR/ASR Rej - Facil Chk (Electr. No Flow-through)	UNE-L/Pre-qual Compl/LNP	100.00			160			
0	2	0.0000	OR-2-06-3341	% On Time LSR/ASR Rej - Facil Chk (Electr. No Flow-through)	UNE 2W Digital				0			
0	5	0.0000	OR-4-16-1000	% Provisioning Comp. Notifiers sent - 1 Business Day	Resale/UNE (EDI)	99.34			8,200			
0	5	0.0000	OR-5-03-3112	% Flow Through Achieved	UNE-L	96.79			935			
0	5	0.0000	OR-6-03-3331	% Accuracy - LSRC	UNE-L/Complex/LNP	0.00			1,322			
0	5	0.0000	PR-3-10-3342	% Completed in six (6) Days one (1) to five (5) Lines - Total	UNE 2W xDSL Loops	100.00			13			
0	10	0.0000	PR-4-02-3112	Average Delay Days - Total	UNE-L	10.50	20.38	561	8	15.76	-1.5393	
0	2	0.0000	PR-4-02-3341	Average Delay Days - Total	UNE 2W Digital	3.50		2	0	0.71		
0	5	0.0000	PR-4-02-3342	Average Delay Days - Total	UNE 2W xDSL Loops	28.00	34.78	2	18	2.83		
0	5	0.0000	PR-4-04-3113	% Missed Appointment - Verizon - Dispatch	UNE-L New	22.93	10.14	1,749	69		2.8626	
0	2	0.0000	PR-4-04-1341	% Missed Appointment - Verizon - Dispatch	Resale/UNE 2W Digital	40.00		5	0			
0	2	0.0000	PR-4-05-3341	% Missed Appointment - Verizon - No Dispatch	UNE 2W Digital	0.00		4	0			
0	2	0.0000	PR-4-14-3342	% Completed On Time - 2-Wire xDSL	UNE 2W xDSL Loops	100.00			49			
0	5	0.0000	PR-5-01-3112	% Missed Appointment - Verizon - Facilities	UNE-L	1.09	0.00	1,749	69		5.0000	
0	5	0.0000	PR-5-02-3112	% Orders Held for Facilities > 15 Days	UNE-L	0.40	0.00	1,749	69		5.0000	
0	10	0.0000	PR-6-01-3113	% Installation Troubles reported within 30 Days	UNE-L New	7.71	6.11	4,944	180		0.9301	
0	2	0.0000	PR-6-01-3341	% Installation Troubles reported within 30 Days	UNE 2W Digital	7.71		4,944	0			
0	10	0.0000	PR-6-01-3342	% Installation Troubles reported within 30 Days	UNE 2W xDSL Loops	7.71	8.57	4,944	175		-0.3118	
0	20	0.0000	PR-6-02-3520	% Installation Troubles reported within seven (7) Days	UNE-L Basic HC	0.97			103			
0	10	0.0000	PR-6-02-3523	% Installation Troubles reported within seven (7) Days	UNE-L Large Job HC				0			
0	2	0.0000	PR-8-01-3341	Percent Open Orders in a Hold Status > 30 Days	UNE 2W Digital	0.00		9	0			
0	5	0.0000	PR-8-01-3342	Percent Open Orders in a Hold Status > 30 Days	UNE 2W xDSL Loops	18.18	0.00	11	83		5.0000	
0	20	0.0000	PR-9-01-3520	% On Time Performance - Hot Cut	UNE-L Basic HC		97.22		36			
0	10	0.0000	PR-9-01-3523	% On Time Performance - Hot Cut	UNE-L Large Job HC				0			
0	10	0.0000	PR-9-08-3533	Average Duration of Hot Cut Installation Troubles	UNE-L Total HC	43.34	46.82	440	1	40.68		
0	2	0.0000	MR-1-01-6050	Average Response Time - Create Trouble	LSI-TA	5.63	2.33		678		-3.3023	
0	10	0.0000	MR-3-01-3112	% Missed Repair Appointment - Loop	UNE-L	25.58	25.38	19,359	524		0.1483	
0	2	0.0000	MR-3-01-3341	% Missed Repair Appointment - Loop	UNE 2W Digital	25.63		19,377	0			
0	5	0.0000	MR-3-01-3342	% Missed Repair Appointment - Loop	UNE 2W xDSL Loops	25.63	22.22	19,377	180		1.1340	
0	10	0.0000	MR-3-02-3112	% Missed Repair Appointment - Central Office	UNE-L	31.97	40.00	416	5			
0	2	0.0000	MR-3-02-3341	% Missed Repair Appointment - Central Office	UNE 2W Digital	31.89		417	0			
0	5	0.0000	MR-3-02-3342	% Missed Repair Appointment - Central Office	UNE 2W xDSL Loops	31.89	37.50	417	8		-0.0015	
0	5	0.0000	MR-4-02-3112	Mean Time To Repair - Loop Trouble	UNE-L	71.62	61.47	19,359	524	99.97	2.6128	
0	2	0.0000	MR-4-02-3341	Mean Time To Repair - Loop Trouble	UNE 2W Digital	71.61		19,377	0	99.95		
0	2	0.0000	MR-4-02-3342	Mean Time To Repair - Loop Trouble	UNE 2W xDSL Loops	71.61	59.14	19,377	180	99.95	1.9270	
0	5	0.0000	MR-4-03-3112	Mean Time To Repair - Central Office Trouble	UNE-L	50.78	37.09	416	5	79.88		
0	2	0.0000	MR-4-03-3341	Mean Time To Repair - Central Office Trouble	UNE 2W Digital	50.67		417	0	79.81		
0	2	0.0000	MR-4-03-3342	Mean Time To Repair - Central Office Trouble	UNE 2W xDSL Loops	50.67	32.20	417	8	79.81	0.5831	
0	2	0.0000	MR-4-04-3341	% Cleared (all troubles) within 24 Hours	UNE 2W Digital	34.60		19,794	0			
0	2	0.0000	MR-4-04-3342	% Cleared (all troubles) within 24 Hours	UNE 2W xDSL Loops	34.60	47.34	19,794	188		3.6542	
0	5	0.0000	MR-4-07-3112	% Out of Service > 12 Hours	UNE-L	82.26	83.22	13,413	429		-0.4384	
0	2	0.0000	MR-4-07-3341	% Out of Service > 12 Hours	UNE 2W Digital	82.25		13,422	0			
0	2	0.0000	MR-4-07-3342	% Out of Service > 12 Hours	UNE 2W xDSL Loops	82.25	79.69	13,422	128		0.8781	
0	10	0.0000	MR-4-08-3112	% Out of Service > 24 Hours	UNE-L	63.04	57.58	13,413	429		2.3386	
-1	10	-0.0303	MR-5-01-3112	% Repeat Reports within 30 Days	UNE-L	22.15	26.42	20,372	530		-2.2404	
0	2	0.0000	MR-5-01-3341	% Repeat Reports within 30 Days	UNE 2W Digital	22.16		20,391	0			
-1	2	-0.0061	MR-5-01-3342	% Repeat Reports within 30 Days	UNE 2W xDSL Loops	22.16	28.72	20,391	188		-2.0208	

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Blank Stat. Score = Insufficient activity or no activity to perform a statistical test

Perf. Score	Wgt.	Wgtd. Score	Metric #	Metric Description	Product	VZ Perf.	CLEC Perf.	VZ Obs.	CLEC Obs.	VZ Std.Dev.	Difference or Stat. Score	Bill Credit
-2	241	-0.0830	<b>MOE-Resale</b>	<b>Resale Mode of Entry Totals</b>								\$ -
0	2	0.0000	PO-1-01-6020	Average Response Time - Customer Service Record (CSR)	EDI	0.03	3.54		3,743		3.5065	
0	2	0.0000	PO-1-01-6050	Average Response Time - Customer Service Record (CSR)	WEB GUI/LSI/W	0.03	1.11		2,124		1.0771	
0	2	0.0000	PO-1-03-6020	Average Response Time - Address Validation	EDI	5.51	4.44		3,002		-1.0633	
0	2	0.0000	PO-1-03-6050	Average Response Time - Address Validation	WEB GUI/LSI/W	5.51	3.19		766		-2.3114	
0	5	0.0000	PO-2-02-6020	OSS Interface Availability - Prime Time	EDI		99.93					
0	5	0.0000	PO-2-02-6080	OSS Interface Availability - Prime Time	Web GUI		100.00					
0	10	0.0000	OR-1-02-2320	% On Time LSRC - Flow Through	Resale POTS/Pre-qual Comp		99.18		489			
0	5	0.0000	OR-1-04-2320	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale POTS/Pre-qual Comp		98.59		142			
0	5	0.0000	OR-2-02-2320	% On Time LSR Reject - Flow-through	Resale POTS/Pre-qual Comp		100.00		99			
0	2	0.0000	OR-2-04-2320	% On Time LSR/ASR Rej - No Facil Chk (Electr. No Flow-through)	Resale POTS/Pre-qual Comp		96.55		58			
0	2	0.0000	OR-2-06-2320	% On Time LSR/ASR Rej - Facil Chk (Electr. No Flow-through)	Resale POTS/Pre-qual Comp		100.00		7			
0	5	0.0000	OR-4-16-1000	% Provisioning Comp. Notifiers sent - 1 Business Day	Resale/UNE (EDI)		99.34		8,200			
-2	10	-0.0830	OR-5-03-2000	% Flow Through Achieved	Resale		89.76		547			
0	10	0.0000	OR-6-03-2000	% Accuracy - LSRC	Resale		0.00		202			
0	5	0.0000	PR-3-01-2100	% Completed in 1 Day - one (1) to five (5) Lines - No Dispatch	Resale POTS	68.32	94.63	8,494	205		5.0000	
0	15	0.0000	PR-4-02-2100	Average Delay Days - Total	Resale POTS	10.50	11.00	561	4	15.76		
0	10	0.0000	PR-4-04-2100	% Missed Appointment - Verizon - Dispatch	Resale POTS	22.93	20.00	1,749	15		0.5346	
0	20	0.0000	PR-4-05-2100	% Missed Appointment - Verizon - No Dispatch	Resale POTS	1.19	0.31	13,413	318		2.0049	
0	5	0.0000	PR-5-01-2100	% Missed Appointment - Verizon - Facilities	Resale POTS	1.09	0.00	1,749	15		5.0000	
0	5	0.0000	PR-5-02-2100	% Orders Held for Facilities > 15 Days	Resale POTS	0.40	0.00	1,749	15		5.0000	
0	15	0.0000	PR-6-01-2100	% Installation Troubles reported within 30 Days	Resale POTS	8.09	1.72	19,032	348		5.0000	
0	2	0.0000	MR-1-01-6050	Average Response Time - Create Trouble	LSI-TA	5.63	2.33		678		-3.3023	
0	2	0.0000	MR-1-06-6050	Average Response Time - Test Trouble (POTS Only)	LSI-TA		56.06		874			
0	10	0.0000	MR-3-01-2110	% Missed Repair Appointment - Loop	Resale POTS Bus	35.29	35.29	4,367	51		0.1321	
0	10	0.0000	MR-3-01-2120	% Missed Repair Appointment - Loop	Resale POTS Res	22.76	22.22	14,992	72		0.2248	
0	10	0.0000	MR-3-02-2110	% Missed Repair Appointment - Central Office	Resale POTS Bus	35.73	100.00	375	1			
0	10	0.0000	MR-3-02-2120	% Missed Repair Appointment - Central Office	Resale POTS Res	22.73	0.00	638	2			
0	5	0.0000	MR-4-02-2110	Mean Time To Repair - Loop Trouble	Resale POTS Bus	49.91	38.75	4,367	51	121.08	0.8702	
0	5	0.0000	MR-4-02-2120	Mean Time To Repair - Loop Trouble	Resale POTS Res	77.94	86.69	14,992	72	91.98	-0.8413	
0	5	0.0000	MR-4-03-2110	Mean Time To Repair - Central Office Trouble	Resale POTS Bus	34.84	89.57	375	1	59.01		
0	5	0.0000	MR-4-03-2120	Mean Time To Repair - Central Office Trouble	Resale POTS Res	50.04	19.98	638	2	77.69		
0	5	0.0000	MR-4-07-2110	% Out of Service > 12 Hours	Resale POTS - Bus	71.92	66.67	3,394	45		0.9485	
0	5	0.0000	MR-4-07-2120	% Out of Service > 12 Hours	Resale POTS - Res	85.55	86.44	10,262	59		0.0356	
0	5	0.0000	MR-4-08-2110	% Out of Service > 24 Hours	Resale POTS Bus	49.59	44.44	3,394	45		0.8349	
0	5	0.0000	MR-4-08-2120	% Out of Service > 24 Hours	Resale POTS Res	67.27	72.88	10,262	59		-0.7706	
0	10	0.0000	MR-5-01-2100	% Repeat Reports within 30 Days	Resale POTS	22.15	18.25	20,372	126		1.1669	
0	5	0.0000	BI-1-02-1000	% DUF in four (4) Business Days	Resale & UNE		96.76		400,585			
-4	140	-0.4286	<b>MOE-Trunks</b>	<b>Trunks Mode of Entry Totals</b>								\$ 64,725
0	5	0.0000	OR-1-12-5020	% On Time FOC	Interconnect Trunks(<=192 Forecast)		100.00		12			
-2	10	-0.1429	OR-1-13-5000	% On Time Design Layout Record (DLR)	Interconnect Trunks		40.00		10			
0	5	0.0000	OR-1-19-5020	% On Time Response - Request for Inbound Augment Trunks	VZ Inbound Aug Trunks(<=192)				0			
0	5	0.0000	OR-2-12-5020	% On Time Trunk ASR Reject	Interconnect. Trunks		100.00		1			
0	20	0.0000	PR-4-07-3540	% On Time Performance - LNP Only	UNE LNP		99.90		2,999			
-2	20	-0.2857	PR-4-15-5000	% On Time Provisioning - Trunks	Interconnect Trunks		80.77		624			
0	5	0.0000	PR-5-01-5000	% Missed Appointment - Verizon - Facilities	Interconnect Trunks	0.00	0.00	3,706	624		5.0000	
0	5	0.0000	PR-5-02-5000	% Orders Held for Facilities > 15 Days	Interconnect Trunks	0.00	0.00	3,706	624		5.0000	
0	10	0.0000	PR-6-01-5000	% Installation Troubles reported within 30 Days	Interconnect Trunks	0.00	0.00	3,706	624		5.0000	
0	5	0.0000	PR-8-01-5000	Percent Open Orders in a Hold Status > 30 Days	Interconnect Trunks	8.33	7.14	48	14		0.6292	
0	5	0.0000	MR-4-01-5000	Mean Time To Repair - Total	Interconnect Trunks	2.01	4.47	3	4	0.93		
0	5	0.0000	MR-4-05-5000	% Out of Service > 2 Hours	Interconnect Trunks	33.33	66.67	3	3			
0	5	0.0000	MR-4-06-5000	% Out of Service > 4 Hours	Interconnect Trunks	0.00	66.67	3	3			
0	5	0.0000	MR-4-07-5000	% Out of Service > 12 Hours	Interconnect Trunks	0.00	0.00	3	3			
0	5	0.0000	MR-4-08-5000	% Out of Service > 24 Hours	Interconnect Trunks	0.00	0.00	3	3			
0	10	0.0000	MR-5-01-5000	% Repeat Reports within 30 Days	Interconnect Trunks	33.33	25.00	3	4			
0	5	0.0000	NP-1-03-5000	# of Final Trunk Groups Blocked 2 months	CLEC Trunks		0.00					
0	10	0.0000	NP-1-04-5000	Number Final Trunk Groups Exceeding Blocking Standard - Three (3) Months	CLEC Trunks		0.00					

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Perf. Score	Wgt.	Wgtd. Score	Metric #	Metric Description	Product	VZ Perf.	CLEC Perf.	VZ Obs.	CLEC Obs.	VZ Std.Dev.	Difference or Stat. Score	Bill Credit
<b>CM-ALL Critical Measures Totals</b>												
0	14.5		OR-1-02-3331	% On Time LSRC - Flow Through	UNE-L/Pre-qual Complx/LNP		99.51		12,402			\$0
0	7.25		OR-1-04-3331	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	UNE-L/Pre-qual Complx/LNP		98.74		635			\$0
0	7.25		OR-1-06-3331	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE-L/Pre-qual Complx/LNP		99.47		376			\$0
0	2.9		PR-4-04-1341	% Missed Appointment - Verizon - Dispatch	Resale/UNE 2W Digital	40.00		5	0			\$0
0	14.5		PR-4-04-3113	% Missed Appointment - Verizon - Dispatch	UNE-L New	22.93	10.14	1,749	69		2.8626	\$0
0	2.9		PR-4-14-3342	% Completed On Time - 2-Wire xDSL	UNE 2W xDSL Loops		100.00		49			\$0
0	14.5		PR-6-01-3113	% Installation Troubles reported within 30 Days	UNE-L New	7.71	6.11	4,944	180		0.9301	\$0
0	2.9		PR-6-01-3342	% Installation Troubles reported within 30 Days	UNE 2W xDSL Loops	7.71	8.57	4,944	175		-0.3118	\$0
0	29		PR-6-02-3520	% Installation Troubles reported within seven (7) Days	UNE-L Basic HC		0.97		103			\$0
0	14.5		PR-6-02-3523	% Installation Troubles reported within seven (7) Days	UNE-L Large Job HC				0			\$0
0	29		PR-9-01-3520	% On Time Performance - Hot Cut	UNE-L Basic HC		97.22		36			\$0
0	14.5		PR-9-01-3523	% On Time Performance - Hot Cut	UNE-L Large Job HC				0			\$0
0	2.9		MR-3-01-3112	% Missed Repair Appointment - Loop	UNE-L	25.58	25.38	19,359	524		0.1483	\$0
0	2.9		MR-3-01-3342	% Missed Repair Appointment - Loop	UNE 2W xDSL Loops	25.63	22.22	19,377	180		1.1340	\$0
0	14.5		MR-4-08-3112	% Out of Service > 24 Hours	UNE-L	63.04	57.58	13,413	429		2.3386	\$0
0	3.87		OR-1-02-2320	% On Time LSRC - Flow Through	Resale POTS/Pre-qual Complx		99.18		489			\$0
0	1.93		OR-1-04-2320	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale POTS/Pre-qual Complx		98.59		142			\$0
0	3.87		PR-4-04-2100	% Missed Appointment - Verizon - Dispatch	Resale POTS	22.93	20.00	1,749	15		0.5346	\$0
0	7.73		PR-4-05-2100	% Missed Appointment - Verizon - No Dispatch	Resale POTS	1.19	0.31	13,413	318		2.0049	\$0
0	5.8		PR-6-01-2100	% Installation Troubles reported within 30 Days	Resale POTS	8.09	1.72	19,032	348		5.0000	\$0
0	0.39		MR-3-01-2110	% Missed Repair Appointment - Loop	Resale POTS Bus	35.29	35.29	4,367	51		0.1321	\$0
0	0.39		MR-3-01-2120	% Missed Repair Appointment - Loop	Resale POTS Res	22.76	22.22	14,992	72		0.2248	\$0
0	1.93		MR-4-08-2110	% Out of Service > 24 Hours	Resale POTS Bus	49.59	44.44	3,394	45		0.8349	\$0
0	1.93		MR-4-08-2120	% Out of Service > 24 Hours	Resale POTS Res	67.27	72.88	10,262	59		-0.7706	\$0
0	3.75		OR-1-12-5020	% On Time FOC	Interconnect Trunks(<=192 Forecast)		100.00		12			\$0
-2	7.5		OR-1-13-5000	% On Time Design Layout Record (DLR)	Interconnect Trunks		40.00		10			\$61,907
0	14.99		PR-4-07-3540	% On Time Performance - LNP Only	UNE LNP		99.90		2,999			\$0
-2	14.99		PR-4-15-5000	% On Time Provisioning - Trunks	Interconnect Trunks		80.77		624			\$123,731
0	7.5		NP-1-04-5000	Number Final Trunk Groups Exceeding Blocking Standard - Three (3) Months	CLEC Trunks		0.00					\$0
-2	2.37		OR-1-06-3211	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE Specials DS1		85.65		223			\$19,563
0	2.37		OR-2-04-1200	% On Time LSR/ASR Reject - No Facility Check (Electronic - No Flow-through)	UNE/RES Specials		100.00		11			\$0
0	2.37		OR-2-06-1200	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	UNE/RES Specials		100.00		63			\$0
0	2.37		PR-4-01-1210	% Missed Appointment - Verizon - Total	UNE/RES Specials DS0	18.18	0.00	11	5			\$0
0	2.37		PR-4-01-1211	% Missed Appointment - Verizon - Total	UNE/RES Specials DS1	31.58	26.87	19	67		0.7056	\$0
0	2.37		PR-4-01-1213	% Missed Appointment - Verizon - Total	UNE/RES Specials DS3			0	0			\$0
0	2.37		PR-4-01-3530	% Missed Appointment - Verizon - Total	UNE IOF		25.00	0	12			\$0
0	2.37		PR-4-02-1200	Average Delay Days - Total	UNE/RES Specials	26.13	16.94	8	18	9.13	1.2811	\$0
0	5.93		PR-4-02-3530	Average Delay Days - Total	UNE IOF		6.67	0	3			\$0
0	5.93		PR-5-01-1200	% Missed Appointment - Verizon - Facilities	UNE/RES Specials	0.00	0.00	18	127		5.0000	\$0
0	5.93		PR-5-02-1200	% Orders Held for Facilities > 15 Days	UNE/RES Specials	0.00	0.00	18	127		5.0000	\$0
0	5.93		PR-6-01-1200	% Installation Troubles reported within 30 Days	UNE/RES Specials	120.00	1.73	5	173			\$0
0	2.37		MR-4-01-1216	Mean Time To Repair - Total	UNE/RES Specials (Non DS0/DS0)	38.12	9.82	423	3	112.10		\$0
0	2.37		MR-4-01-1217	Mean Time To Repair - Total	UNE/RES Specials (DS1/DS3)	13.79	10.36	491	203	43.87	1.0319	\$0
0	2.37		MR-4-08-1216	% Out of Service > 24 Hours	UNE/RES Specials (Non DS0/DS0)	23.29	0.00	395	3			\$0
0	2.37		MR-4-08-1217	% Out of Service > 24 Hours	UNE/RES Specials (DS1/DS3)	8.48	10.19	165	157		-0.3352	\$0
0	1.93		PO-2-02-6010	OSS Interface Availability - Prime Time	WPTS		99.98					\$0
0	4.81		PO-2-02-6020	OSS Interface Availability - Prime Time	EDI		99.93					\$0
0	4.81		PO-2-02-6080	OSS Interface Availability - Prime Time	Web GUI		100.00					\$0
0	9.63		PO-4-01-6660	% Change Management Notices Sent on Time	Change Notif./Conf. (Type 3,4,5)				0			\$0
0	24.06		BI-9-01-1000	% Billing Completeness in Twelve Billing Cycles	Resale/UNE		99.95		4,469,785			\$0

# **EXHIBIT 2**



## VERIFICATION

I, **Philip J. Wood, Jr.**, Director – State Government Relations, Public Affairs, Policy & Communications of Verizon Pennsylvania LLC, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904, (relating to unsworn falsifications to authorities).



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PHILIP J. WOOD, JR.  
Director – State Government Relations  
Public Affairs, Policy & Communications