APPENDIX E – MISCELLANEOUS METRICS
A – INTRODUCTION

This Appendix describes a series of Verizon PA currently used metrics which do not fall within the five principal domains of Pre-Ordering, Ordering, Provisioning, Maintenance & Repair and Billing. They do not share common data-bases, nor are the processes for data collection, calculation and reporting alike. However, they are all important metrics; and are listed below:

- **NP-1**: Percent Final Trunk Group Blockage
- **NP-2**: Collocation Performance
- **OD-1**: Operator Services/Directory Assistance Speed of Answer
- **GE-1**: Directory Listing Verification Reports
- **GE-3**: Timely and Accurate Provisioning of White Page Directory Listings LSRs and DSRs

The following sections provide complete descriptions for data collection, processing and reporting each metric. Findings and related recommendations, as appropriate, are provided.
B – SPECIFIC METRICS

NP-1: PERCENT FINAL TRUNK GROUP BLOCKAGE

Definition

This metric captures the percent of Final Trunk Groups (FTGs) that exceed the blocking design threshold. An FTG does not overflow to an alternate route trunk group for purposes of call completion. It is the last choice group of common interoffice communications channels for the routing of local, operator, and/or toll calls. When an all trunks busy condition exists, calls are typically routed to an announcement or a 120 Impulses Per Minute (IPM) tone. The blocking design threshold is set forth in tables that specify the number of trunks required to handle an offered traffic load, generally identified in hundred call seconds (CCS). If the offered load exceeds the designed level, there is a statistical probability that the service threshold will also be exceeded, and the trunk group will need to be adjusted through servicing action. For Verizon Pennsylvania (Verizon PA) the design service threshold criteria is at .005% probability of blocking, or approximately 2.0% blocking.

This metric compares the Verizon PA retail FTG blocking to that for similar Competitive Local Exchange Carrier (CLEC) trunks. Verizon PA retail trunks are Common FTGs that carry local traffic between offices. Typically, these would be between end offices and access tandems.¹ The intent of this metric is to measure the groups for which Verizon PA is responsible for the sizing and timing. These are referred to as reciprocal trunks, and are dedicated FTGs that carry traffic from the Verizon PA tandem switch to the CLEC.²

Sub-metrics³

Metric NP-1 has four sub metrics:

• **NP-1-01:** Percent Final Trunk Groups Exceeding Blocking Standard
• **NP-1-02:** Percent Final Trunk Groups Exceeding Blocking Standard (No Exceptions)
• **NP-1-03:** Number Final Trunk Groups Exceeding Blocking Standard-Two (2) Months
• **NP-1-04:** Number Final Trunk Groups Exceeding Blocking Standard-Three (3) Months

Exclusions

Certain types of trunks are not included in this measurement. The Carrier-to-Carrier (C2C) Guidelines address two specific types: Interexchange (IXC) dedicated trunks and common trunks carrying only IXC traffic. However, as noted in the definition above, groups defined as reciprocal trunks are included. Consequently, groups such as Operator Services, E911, and Busy Line

¹ Verizon PA C2C Guidelines NP-1 Percent Final Trunk Group Blockage, page 88
² B-027 Interview Summary
³ Verizon PA C2C Guidelines NP-1 Percent Final Trunk Group Blockage, page 89
Verification are not included.\(^4\) Certain situations will cause trunk groups to be excluded on a month to month basis. In general, the following trunk groups will be excluded:

- Trunks blocked due to CLEC network failure
- Trunks that actually overflow to a final group, but are not designated as an overflow group
- Trunks blocked where CLEC order for augmentation is overdue
- Trunks blocked where CLEC has not responded to or has denied Verizon PA request for augmentation
- Trunks blocked due to other CLEC trunk network rearrangements

Procedures call for Verizon PA to electronically notify the CLEC operational trunk staff when it believes one or more of the conditions noted above has been identified on a particular trunk group, and that the trunk group should be excluded from Verizon PA’s performance. “Unless the CLEC responds back with documentation that the information on the condition is inaccurate, the trunk group will be excluded.”\(^5\)

The Verizon PA CLEC Forecasting Guidelines state: “On a semi-annual basis (quarterly where Statement of Generally Available Terms and Conditions (SGAT) or specific contracts between Verizon PA and individual companies state quarterly forecasts as a requirement or where a significant change in demand occurs between forecast periods), CLECs will be requested to provide Verizon PA with a current year plus two-year detailed forecast of traffic and volume requirements for all Interconnection Trunking.”\(^6\) However, DCI was advised that no exclusions are done for untimely or inaccurate forecasts.\(^7\)

**Formula\(^8\)**

- **NP-1-01:** Number of FTGs that exceed blocking threshold for one (1) month exclusive of trunks that block due to CLEC network problems as agreed by CLECs/Total number of FTGs.

- **NP-1-02:** Number of FTGs that exceed blocking threshold/Total number of FTGs.

- **NP-1-03:** Number of FTGs that exceed blocking threshold for two (2) consecutive months, exclusive of trunks that block due to CLEC network problems as agreed by CLECs. (Since this is reported as a number, there is no denominator.)

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4 Ibid  
5 Verizon PA C2C Guidelines NP-1 Percent Final Trunk Group Blockage, page 88  
6 Verizon CLEC Forecasting Guidelines, page 2  
7 B-027 Interview Summary  
8 Verizon PA C2C Guidelines NP-1 Percent Final Trunk Group Blockage, page 89
• **NP-1-04:** Number of FTGs that exceed blocking threshold for three (3) consecutive months, exclusive of trunks that block due to CLEC network problems as agreed by CLECs. (Since this is reported as a number, there is no denominator.)

**Report Dimension**

The NP-1 metric report is published monthly and includes the performance for the Verizon PA retail trunks and the CLEC trunks carrying traffic from the Verizon PA tandems to the CLEC. Results are provided with (NP-1-01) and without (NP-1-02) those groups that are excluded under the guidelines as noted in the “Exclusions” section above. Also shown each month are the quantities of CLEC groups that exceed the blocking threshold for two and three consecutive months respectively (exclusive of trunks that block due to CLEC network problems as agreed by CLECs). The base numbers for the trunk groups used in the metric calculations are shown for both Verizon PA and the CLECs in aggregate.

**Performance Standard**

The Verizon PA retail trunks are Common Final Trunks carrying local traffic between offices, typically end-offices and access tandems. Because common trunks carry both retail and CLEC traffic, there will be parity with retail on common groups. “For individual trunk groups carrying traffic between Verizon PA and CLECs, Verizon PA will provide an explanation (and action plan if necessary) on individual trunks (sic) blocking for two months consecutively. An individual trunk (sic) should not be blocked for three consecutive months.”

Consequently, the standard for measurement NP-1-04 is zero. “For Percent Final Trunk Group Blockages, a Service Inquiry Report shall automatically be filed whenever performance is not at or better than 3.0 per cent for three consecutive months.”

For the review period, the following were the results:

**Table E-1**

<table>
<thead>
<tr>
<th>April</th>
<th>May</th>
<th>June</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Verizon PA</td>
<td>CLEC</td>
</tr>
<tr>
<td>NP-1-01</td>
<td>0.48</td>
<td>0.00</td>
</tr>
<tr>
<td>NP-1-02</td>
<td>0.48</td>
<td>2.14</td>
</tr>
<tr>
<td>NP-1-03</td>
<td>N/A</td>
<td>0</td>
</tr>
<tr>
<td>NP-1-04</td>
<td>N/A</td>
<td>0</td>
</tr>
<tr>
<td>Base Trunk Groups</td>
<td>209</td>
<td>234</td>
</tr>
</tbody>
</table>

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9 Verizon PA C2C Guidelines NP-1 Percent Final Trunk Group Blockage, page 88
10 Ibid
11 C2C Performance Standards and Reports, Verizon PA, April, May, June, 2003
A review of the raw data files (see description below) that supported the metric calculations, shows that one Verizon PA FTG exceeded the blocking threshold in April and June, and eight in May (all attributable to switch equipment failure at the PHLAPAMK92T local tandem). Consequently, the reported results calculations are correct. A similar review of the raw data files for the CLEC groups reveals five groups in April, seven in May, and two in June exceeded the blocking threshold, again indicating the reported results calculations are correct. All were coded with an “F” action code in the Standard Remarks (STD RMK) field (see below), thus excluding them from the NP-1-01, NP-1-03, and NP-1-04 metrics as “Telecom carrier dependences, to include all CLEC caused blockages”. Further review of the raw data files, indicates one of the excluded trunk groups exceeded the blocking threshold for three consecutive months, while another three of the excluded groups exceeded the blocking threshold for two consecutive months.

Metric Creation

Data for the compilation of the NP-1 metric are captured in the central office switches. The Traffic Data Measurement System (TDMS) is utilized to retrieve the raw data from the switches and aggregate it. The Traffic Network Data System-TK (TNDS-TK) uses the Trunk Servicing System (TSS), a sub-system within TNDS-TK, to perform the calculations on the raw data from TDMS to obtain weekly and monthly data. This information includes actual traffic measurements, the A-Z locations of the trunk groups (the identification of the originating and terminating central offices as identified by common language location identifier (CLLI) codes), and the number of trunks in service. In this system, an FTG is identified by an indicator in the data base, so the required data can be extracted for the NP-01 metric calculations.

DCI was advised that this indicator is populated by the Trunk Capacity Management (TCM) engineer, who is in the Network Engineering organization. This is important to ensure inclusion of all appropriate groups in the measurement. DCI was advised that a weekly report is furnished to the TCM organization that identifies the trunk groups that have the indicator, plus those that are potential candidates. However, no feedback loop is provided for TCM to validate that the number of groups is correct. As can be seen from the report above, there were no month to month variations in the number of Verizon PA groups in the metric. (The number of groups for Verizon PA appears reasonable, as DCI determined there are 197 Verizon PA end offices in Pennsylvania.) Of further note, there were variations in the number of CLEC groups, but they were relatively small.

Raw data files are built from the information discussed above for all of the FTGs, and sent to the appropriate TCM group for investigation of those groups that exceed the threshold criteria (one month at 2.0%). The TCM engineer is responsible for populating a four character STD RMK field, based on the results of their investigation. This field is a key determinant in those groups that will be excluded from the NP-1-01, NP-1-03, and NP-1-04 sub-metrics. The first character of the STD RMK field is the action code, and indicates what action Verizon PA is taking, or is planning, for a particular trunk group. The second character indicates the validity of the study period data, the third

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12 Data Request B-058, B-058 SUPP, and B-087 Responses
13 B-027 Interview Summary
14 Data Request B-086 Response
character shows why the FTG blocked, and the fourth indicates the number of consecutive months excessive blocking has occurred. The action codes are A-F, as defined below:

- A-Relief pending
- B-Relief provided
- C-Group under investigation
- D-No action required
- E-No data or invalid data for the period under investigation
- F-Telecomm carrier dependencies, to include all CLEC caused blockages (See Exclusion Section above)\(^{15}\)

DCI was advised that the Managers of the TCM engineers perform weekly reviews of trunk groups that exceed the blocking threshold and validate the coding placed in the STD RMK field. When the TCM engineers complete their work, the files are returned to the systems group for merger with the rest of the data.\(^{16}\) A determination is made that all groups that exceeded the threshold have remarks in the STD RMK field, and the raw data file is updated. A spreadsheet is developed that captures all the relevant data and forwarded to the TCM group for a final validation. DCI was advised that if something is found that appears to be incorrect, it is reworked from the raw data files to ensure it is properly corrected. After the final review by the TCM Engineer, the raw data files are forwarded to the Network Metrics Platform (NMP) for calculating and publishing the metrics.\(^{17}\)

The identification of the Time Consistent Busy Hour (TCBH) is integral to the determination of the blocking level for a given trunk group, and consequent metric calculation. While it could be assumed that the development of the blocking levels are based on twenty-four hour per day, seven day a week measurements, that is not the case. Instead, TNDS-TK utilizes data from the switch to produce a TCBH for each of the FTGs. A program in this system collects peg count (the number of calls), overflows (the calls that could not be completed because of an all trunk busy condition), message usage measured in CCS, and maintenance usage measured in CCS for all 24 hours per day. The system performs internal validations on the data.

Another program in TNDS-TK utilizes the hourly data to calculate the offered load in CCS for each hour for Monday through Friday, the five day measurement period, or study week. The blocking percent is also calculated in the same manner for the study week (overflows/peg count). The offered load and the blocking percent are averaged for each hour for the study week (hour 00=12 midnight to 1:00a.m., through hour 23=11:00p.m.to 12 midnight).

For monthly reporting, a four week weighted average (the study period), is developed from the sum of four or fewer of the most recently measured study weeks in a nine week span. The highest average blocking hour for the study period is the TCBH, and becomes the basis for the metric reporting. Should there be no blocking for a particular FTG, the highest average calculated offered load is used to define the TCBH.\(^{18}\) DCI was furnished a June, 2003, TNDS-TSS report for trunk

\(^{15}\) B-027 Interview Summary
\(^{16}\) B-028 Interview Summary
\(^{17}\) B-027 Interview Summary
\(^{18}\) B-027 Interview Summary
group AA156152, PHLAPAMK92T-PHLAPAMKN41, and from this report verified the calculations as described. Moreover, the report indicated blocking of 5.93% for hour 21, and further review of the raw data files for June showed this trunk group with blocking of 5.93%. Based on the STD RMK field entry of FOTO, it was excluded from NP-1-01, but included in NP-1-02 of the published metrics.

NP-2: COLLOCATION PERFORMANCE

Definition

This metric includes collocation arrangements ordered via both the state and federal tariffs. Regardless of which tariff is used for ordering, the collocation arrangements are provisioned per the intervals listed in the state tariffs. There are two basic intervals specified: (1) the response interval, which is the elapsed time in business days (per the C2C Guidelines) between the order application date and the notification of space availability (the response date), and (2) the completion interval, which is the elapsed time in business days from the order application date to the completion date. The order application date is defined as the date a valid service request (one that is populated in accordance with the collocation instructions published at a web site accessible by the CLECs) is received. A collocation case is considered completed when the arrangement is suitable for use by the CLEC, and the necessary cable assignment information has been furnished. The NP-2 metric provides the results for Verizon PA in meeting the response intervals and the completion intervals. Separate reports are rendered for new requests and requests for augment to existing locations.

Pennsylvania Tariff P.U.C.–No.218, Section 2 specifies the response and completion intervals to which Verizon must adhere. Applications must be responded to within ten calendar days after receipt to inform the CLEC whether space is available to meet the CLECs request. Should the application be found deficient, Verizon must respond in writing within eight business days specifying the information that is needed to complete the application. The tariff also provides standard intervals for completion of the various collocation arrangements. The interval to establish a caged Physical Collocation arrangement is 90 days (the tariff is not specific as to calendar or business days), and an initial Secured Open Collocation Environment (SCOPE) is 90 calendar days. The interval for Cageless Collocation-Open Environment (CCOE) is 60 calendar days where Verizon’s equipment is secure, and 70 calendar days where Verizon’s equipment is unsecured. To establish additional SCOPE arrangements at the same central office location, the interval is 60 calendar days. The interval to establish a Virtual Collocation arrangement is 60 business days. For metric reporting purposes, caged Physical, SCOPE, and CCOE are reported as physical arrangements.

Sub-metrics

There are a number of sub metrics within NP-2 which are shown below by new and augment categories.

19 Data Request B-058, Question 5 Response
20 Data Request B-087 Response
21 Verizon PA C2C Guidelines NP-2 Collocation Performance, page 90
22 Pennsylvania Tariff P.U.C.-No. 218, Section 2, Sheets 4 and 9
Collocation Performance-New

- **NP-2-01**: % On Time Response to Request for Physical Collocation
- **NP-2-02**: % On Time Response to Request for Virtual Collocation
- **NP-2-03**: Average Interval –Physical Collocation
- **NP-2-04**: Average Interval-Virtual Collocation
- **NP-2-05**: % On Time-Physical Collocation
- **NP-2-06**: % On Time-Virtual Collocation
- **NP-2-07**: Average Delay Days-Physical Collocation
- **NP-2-08**: Average Delay Days-Virtual Collocation

Collocation Performance-Augments

- **NP-2-01**: % On Time Response to Request for Physical Collocation
- **NP-2-02**: % On Time Response to Request for Virtual Collocation
- **NP-2-03**: Average Interval-Physical Collocation-76 Days and 45 Days
- **NP-2-04**: Average Interval-Virtual Collocation
- **NP-2-05**: % On Time-Physical Collocation-76 Days and 45 Days
- **NP-2-06**: % On Time-Virtual Collocation
- **NP-2-07**: Average Delay Days-Physical Collocation
- **NP-2-08**: Average Delay Days-Virtual Collocation

**Exclusions**

When a collocation request is delayed due to a CLEC caused issue, a CLEC jeopardy is initiated in the Customer Business Services/Customer Network Engineering (CBS/CNE) system, a database used to track collocation application information. The jeopardy continues in effect for the duration of the delay. The Local Collocation Coordinator (LCC) has the responsibility for notifying the CLEC that the jeopardy has been started. The jeopardy codes in use are as follows:

- C1 CLEC Requests Delay
- C2 CLEC Equipment Delay
- C3 CLEC Vendor Delay
- C4 CLEC Monies Not Received
- C5 Waiting for CLEC Approval
- C6 CLEC Controls Installation
- C7 CLEC No Forecast
- C8 CLEC High Application Volume (+20)

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23 C2C Performance Standards and Reports, Verizon PA, Network Performance-NP-2
24 Ibid
• C9 CLEC Changed or Revised
• C10 CLEC Application Missing
• C11 CLEC Not Reviewed
• C12 CLEC Bankruptcy

As will be discussed below as part of the metric creation, there is in place a “stop clock” procedure that is used to deduct the time from when Verizon PA indicates that a collocation arrangement is jeopardized for CLEC reasons until the jeopardy is stopped.25

Formula26

• **NP-2-01 and NP-2-02:** The number of requests for Physical or Virtual Collocation arrangements respectively where a response to the request was due in the report period and was answered on time/the number of requests for Physical or Virtual Collocation respectively where the initial response was due in the report period.

• **NP-2-03 and NP-2-04:** Sum of the duration from application date to completion date for Physical or Virtual Collocation arrangements respectively completed during the report period, excluding time for CLEC milestone misses/the number of Physical or Virtual Collocation arrangements respectively completed.

• **NP-2-05 and NP-2-06:** The number of Physical or Virtual Collocation arrangements respectively completed on or before the due date (adjusted for DD extensions resulting from CLEC milestone misses)/the number of Physical or Virtual Collocation arrangements respectively completed.

• **NP-2-07 and NP-2-08:** The sum of the duration between actual Physical or Virtual Collocation arrangements respectively completions and the due date for missed Collocation arrangements (adjusted for DD extensions resulting from CLEC milestone misses)/the number of missed Physical or Virtual Collocation arrangements respectively.

DCI Derived Metric Statement

Not Applicable

Report Dimension

This report is rendered monthly for CLEC specific and for the CLECs in aggregate for Pennsylvania. Separate reports are issued for new applications and for augment requests. A summary of the applications included in the aggregate level metric report follows. For the review period of April, May, and June there were five requests for new physical collocation, and no new requests for virtual collocation. Augment requests during this period were 112 for physical arrangements, and two for virtual arrangements. Also reported for the review period were completions for seven new physical

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25 Response to Data Request B-059
26 Verizon PA C2C Guidelines NP-2 Collocation Performance, pp 90,91
arrangements and one new virtual arrangement. There were 93 augment completions for 76 day physical arrangements, none for 45 day physical arrangements (the 76 and 45 day phenomenon is discussed at length in Finding NP-2:2 below), and none for virtual arrangements. A data request was issued to obtain information on the use of “stop clock” time for the job completions intervals, specifically to identify those jobs where a CLEC disputed the jeopardy, or the stop and start time for the jeopardy.27 The response indicated no applications were determined to be in this situation for the review period.28 An additional data request identified two applications where the due date (DD) was changed from that automatically entered in the system based on the Pennsylvania tariff. For application 121689, a physical augment, it was determined that Verizon PA could meet an earlier DD, so the CLEC was given June 19, 2003, rather than the regulatory date of July 10, 2003. For application 119561, a physical augment, it was determined that the system had assigned a 60 day interval, rather than the 90 days allowed by the Pennsylvania tariff. Consequently, the date was changed to reflect the proper interval.29

**Performance Standard**

For NP-2-01, NP-2-02, NP-2-05, and NP-2-06 the performance standard is 95% on time. NP-2-03, NP-2-04, NP-2-07 and NP-2-08 do not have a standard, since they are average calculations that show the average intervals achieved. However, the applicable intervals are listed in the state tariff.30 For the review period, the results are listed on the following two tables: (For ease of reference, the numbers in parentheses reflect the number of applications in the metric for the reporting period.)31

<table>
<thead>
<tr>
<th>New Applications</th>
<th>April</th>
<th>May</th>
<th>June</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standard</td>
<td>95% On Time</td>
<td>95% On Time</td>
<td>95% On Time</td>
</tr>
<tr>
<td>NP-2-01</td>
<td>100.00 (2)</td>
<td>100.00 (2)</td>
<td>100.00 (1)</td>
</tr>
<tr>
<td>NP-2-02</td>
<td>N/A (0)</td>
<td>N/A (0)</td>
<td>N/A (0)</td>
</tr>
<tr>
<td>NP-2-05</td>
<td>100.00 (3)</td>
<td>100.00 (3)</td>
<td>100.00 (1)</td>
</tr>
<tr>
<td>NP-2-06</td>
<td>N/A (0)</td>
<td>100.0 (1)</td>
<td>N/A (0)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Augment Applications</th>
<th>April</th>
<th>May</th>
<th>June</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standard</td>
<td>95% On Time</td>
<td>95% On Time</td>
<td>95% On Time</td>
</tr>
<tr>
<td>NP-2-01</td>
<td>100.00 (45)</td>
<td>97.82 (42)</td>
<td>100.00 (25)</td>
</tr>
<tr>
<td>NP-2-02</td>
<td>N/A (0)</td>
<td>100.00 (1)</td>
<td>100.00 (1)</td>
</tr>
<tr>
<td>NP-2-05</td>
<td>100.00 (24)</td>
<td>100.00 (24)</td>
<td>100.00 (45)</td>
</tr>
<tr>
<td>NP-2-06</td>
<td>N/A (0)</td>
<td>N/A (0)</td>
<td>N/A (0)</td>
</tr>
</tbody>
</table>

27 Document Request Data Request B-072
28 Response to Data Request B-069
29 Response to Data Request B-070
30 Verizon PA C2C Guidelines NP-2 Collocation Performance, page 91
31 C2C Performance Standards and Reports, Verizon PA, Network Performance-NP-2
Table E-3 – NP-2-03, 04, 07 and 08

<table>
<thead>
<tr>
<th>Metric Creation</th>
<th>April</th>
<th>May</th>
<th>June</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>New Applications</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Standard</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>NP-2-03</td>
<td>46.66</td>
<td>56.33</td>
<td>49.00</td>
</tr>
<tr>
<td>NP-2-04</td>
<td>N/A</td>
<td>56.00</td>
<td>N/A</td>
</tr>
<tr>
<td>NP-2-07</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>NP-2-08</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Augment Applications</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Standard</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>NP-2-03</td>
<td>65.13</td>
<td>47.63</td>
<td>46.56</td>
</tr>
<tr>
<td>NP-2-04</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>NP-2-07</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>NP-2-08</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

The collocation process begins with the application, which can be accessed via a web site. The application must be completed and sent to the Collocation organization in Wholesale Network Services with appropriate fees. DCI was advised that most of them are sent via Email. When received, the Collocation group acknowledges the receipt to the sending CLEC, advising if additional information or fees are needed. Within the Collocation organization, the applications processing group makes the determination that the application is complete, correct, and fees are in hand. With this step in the process completed, the CLEC is notified, and the clock is started. The application may already have been loaded for tracking in the CBS/CNE database. If so, it is updated with the start date; if not, it is entered with all information. CBS/CNE is used by Central Office Engineering to track a number of things, and it has a module exclusively for collocation. The system automatically calculates a due date (DD) based on the type of application and the applicable state tariff.

The system automatically forwards the application to the appropriate LCC, who is in the Network Engineering organization. Internally, the LCC is given seven days to respond to the CLEC that the request can or cannot be met, though the Pennsylvania tariff allows ten calendar days for a response. The original DD cannot be changed, but the LCC can document to Wholesale Network Services that there are insurmountable problems that require a change in the complete date. The CLEC is notified, agreement is reached on a complete date, and this date becomes the official measurement date for meeting the request. As noted above, two DD’s were modified during the review period, both of which appear to be reasonable and proper.

At this time, the LCC issues a Telephone Equipment Order (TEO) to get the necessary work accomplished. The TEO establishes an internal ready date that is three weeks earlier than the official DD, and DD minus three weeks is used for all internal tracking. A site visit is made by a Verizon PA representative at scheduled TEO completion to ensure that the location is complete. If everything is satisfactory, the job is shown complete in CBS-CNE with the actual complete date (this
is called the unconfirmed completion date), and a site visit is scheduled with the CLEC for acceptance. When the CLEC representative cannot make an immediate site visit, the LCC enters a CLEC jeopardy code (C11) in the database that causes a “stop clock” condition to be in place until the CLEC can visit the site and accept it, which is then entered in the system as a confirmed date. For calculation of the PA PAP metric, the stop clock time for any CLEC jeopardy code associated with the application is subtracted from the overall interval, and the calculated date is then compared with the committed date to determine whether the DD was met or not. 32 DCI requested information on all collocation jobs during the review period with unconfirmed completion dates that were contested by the CLEC, thus requiring additional work and potential changes in stop clock time. DCI was advised that there were no applications of this nature during April, May, and June of 2003. 33

As a further review of the use of the “stop clock” process, DCI requested information on all applications that had CLEC jeopardies issued against them during the review period. Twenty-seven applications were furnished for analysis. Of the twenty-seven, four were found to have two CLEC delays. The jeopardy codes used were as follows: 1-C2, CLEC Equipment Delay; 5-C11, CLEC Not Reviewed; 11-C10, CLEC Application Missing Information; and 14-C6, CLEC Controls Installation. Included in this analysis was a review of the documentation supporting the jeopardy start and stop dates, since these dates define the time deducted from the overall completion interval, thus becoming a key determinant in meeting the committed due date. The analysis showed applications with documentation that supported jeopardy start and stop dates (13), applications with verifiable documentation for start dates, with none for stop dates (10), applications with documentation for stop dates, with none for start dates (2), and applications with no documentation (6).

Some specific examples will serve to illustrate the difficulties associated with this process. Application 1221942 was given a C6 jeopardy (CLEC controls installation) of May 12, 2003, and was shown with a jeopardy stop date of June 2, 2003. There was no documentation on the start date, and the stop date was supported by an E-mail dated June 2, 2003 to the CLEC stating that the job would complete “shortly”. Thus the date of the E-mail became the stop date. Application 122438 was given a C11 jeopardy (CLEC not reviewed), with a start date of June 23, 2003 and a stop date of July 7, 2003, and no documentation for either. 34 The Verizon PA C2C Guidelines state “Verizon PA will not be deemed to have completed work on a collocation case until the arrangement is suitable for use by the CLEC, and the cable assignment information necessary to use the facility has been provided to the CLEC.” 35 A last example is Application 109309, shown with a C6 jeopardy start date of November 18, 2002, and stop date of July 17, 2003. Supporting documentation consists of an E-mail dated November 25, 2002 that states the application is “to be completed as expected”, and another one dated July 22, 2003 stating that the application “has been completed”. 36

32 Interview Summaries B-019 and B-023
33 Response to Data Request B-069
34 Response to Data Request B-072
35 Verizon PA C2C Guidelines NP-2 Collocation Performance, page 90
36 Response to Data Request B-072
For the April and May results, the metric group in the Collocation organization made manual calculations using data from CBS-CNE to prepare the metrics for NP-2. For the June results, the data were sent to the Network Metrics Platform (NMP) for calculation of the metrics. The metric team reviews the data on each job prior to sending the information to NMP each month, and then reviews the NMP calculations prior to the results being published.\(^3^7\)

**OD-1: OPERATOR SERVICES/DIRECTORY ASSISTANCE SPEED OF ANSWER**

**Definition**

Metric OD-1 measures speed of answer for calls to Operator Services and Directory Assistance for Verizon PA retail (and Resale) customers and for Pennsylvania customers served by CLECs (facility based and Unbundled Network Element – Platform (UNE-P)). The performance standard is average speed of answer at parity with Verizon PA retail (and Resale). There are no exclusions to the metric.\(^3^8\)

**Sub-metrics**

- **OD-1-01**: Measures Average Speed of Answer (ASA) for calls to Call Completion Services.
- **OD-1-02**: Measures ASA for calls to Directory Assistance.

**Exclusions**

There are no exclusions.\(^3^9\)

**Formula**

- **OD-1-01**: This metric determines the ASA for Call Completion Services, or Operator Services (OS), the common usage term. The ASA is developed from a numerator determination that is the sum of call answer times for calls to Operator Services. The duration is measured from the time the calls are placed in queue until answered by an operator. The denominator is derived from a count of calls to OS that are answered. By definition, abandoned and deflected calls (a deflected call is one that is sent to a recording during periods of heavy load) are not included in this metric.\(^4^0\)

- **OD-1-02**: This metric determines the ASA for calls to Directory Assistance (DA). The numerator for this metric is developed from the sum of call answer time based on the elapsed time from when the calls are placed in queue until answered by an operator. The

\(^{37}\) Interview Summary B-019  
\(^{38}\) Data response B-060 (Metric Overview page1) and C2C Guidelines, OD-1 Operator Services/Directory Assistance Speed of Answer  
\(^{39}\) Verizon PA C2C Guidelines, OD-1 Operator Services/Directory Assistance Speed of Answer  
\(^{40}\) Data Response B-060 (Metric Overview page 3) and B-020 Interview Follow-up
denominator is derived from a count of calls to DA that are answered. Again, by definition, abandoned and deflected calls are not included in this metric.41

**DCI Derived Metric Statement**

Not Applicable.

**Report Dimension**

OD-01 is reported for Verizon PA retail and resale customers. While the C2C Guidelines specify that the standard is ASA provided at parity with Verizon PA retail, it is noted in the Report Dimensions that the measurement is for Pennsylvania retail and resale. DCI was advised that “Verizon is unable to identify and separate calls originating from resold lines at the Traffic Operator Position System (TOPS) switch.”42 In many cases the reseller uses the same customer ID code as Verizon PA, thus rendering the switch unable to differentiate between retail and resale customers. Other customers in Pennsylvania served by CLECs (facility based and UNE-P) can be separately identified and are reported in aggregate. Aggregate reporting is used for CLEC ASA metrics because of the difficulty in maintaining separate queues for each of the CLECs serving customers in Pennsylvania.

**Performance Standard**

Average speed of answer provided at parity with Verizon PA retail, is the stated performance standard. However, as was discussed above, Pennsylvania retail for metric purposes includes resale as well. For the review period, the results are shown in the table below.43 As can be seen, the Verizon PA results were substantially higher (longer wait times) than the CLECs, for both DA and OS. Given the common pool of operators that are used to answer the calls regardless of origination, this seemed to be a much wider variation than would be expected. DCI was advised that the metrics are correct, and the variation is because CLEC identified calls will be answered first whenever there are calls in queue. The TOPS switch is programmed to do this. The Verizon PA rationale provided was that owing to the relatively small number of CLEC calls, receipt of only a few of them during periods of heavy traffic (and longer ASA) would make it virtually impossible to achieve parity. Consequently, CLEC calls are given priority at all times.44

For the review period, Table E-4 shows the following results:

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41 Ibid
42 Data Response B-067 (Calculations)
43 C2C Performance Standards and Reports Verizon PA (April, May, June)
44 Interview Summary B-020 Follow-Up
Table E-4

<table>
<thead>
<tr>
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<th>June</th>
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<td>CLEC Aggregate</td>
<td>.32</td>
<td>.32</td>
<td>.31</td>
</tr>
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<table>
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<tr>
<th></th>
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<th>May</th>
<th>June</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verizon PA</td>
<td>10.85</td>
<td>10.45</td>
<td>10.82</td>
</tr>
<tr>
<td>CLEC Aggregate</td>
<td>4.42</td>
<td>4.25</td>
<td>5.81</td>
</tr>
</tbody>
</table>

**Metric Creation**

There are seven DA call centers handling calls for Pennsylvania customers, six of which are physically located in the State. The seventh is located in Delaware, and handles calls for both Delaware and Pennsylvania. The operators working in these centers are treated as a common pool for the answering of DA calls. A separate call queue is provided, so that average speed of answer can be calculated separately for DA and OS calls originated in each of the States. Three OS call completion call centers are located in Pennsylvania, but handle calls originated in Delaware as well. The operators working in these centers are treated as a common pool for the answering of OS calls. Both DA and OS calls are served by six Nortel DMS 200 TOPS switches, all located in Pennsylvania. (Delaware end offices are routed to one of these switches, located in Philadelphia.) The switches and the call receipt centers are managed by the National Force Management Center located in Framingham, Massachusetts.

Call processing operates as follows. An end user customer originates an OS call or a DA call from an end office, which routes the call based on the digits dialed to the TOPS switch via an interoffice trunk. The TOPS switch makes the determination that an operator is needed, and places the call in the appropriate queue based on the digits received. (Some OS calls, 0+ calls, for example, where the end user customer dials the appropriate digits for calling card and collect calls, do not require an operator. Since these calls are processed mechanically and no operator is involved, they are not included in the metric calculation.) Some CLECs have dedicated trunk groups that allow identification of their calls, while others use shared transport groups that carry multiple CLEC traffic, as well as calls for Verizon PA retail and resale end user customers. For shared transport groups, the TOPS switch uses the Line Information Data Base (LIDB), where each line has a customer ID code to identify the service provider for the line placing the call. With this information, separate ASA can be determined and reported for calls for CLEC end user customers (facility based and UNE-P), and for Verizon PA retail and resale customers.\(^45\)

The TOPS switch uses the Queue Management Information System (QMIS) to collect data on the call events, which are continuously fed into the Force Management System (FMS). There are two types of call events: call queue events and position events. Call queue events occur when a call arrives at a queue, is abandoned or deflected, or is presented to an operator. Since the algorithms for deflected calls are controlled by the Verizon PA team managing OS and DA, DCI asked for a count

\(^45\) Interview Summary B-020
of the number of calls deflected for April, May, and June, 2003. The counts were provided by queue, and to gain perspective on their relative importance, were compared to the number of calls answered during the same period previous years. For OS, .244% of the calls answered were deflected for Pennsylvania Retail, and none were deflected for Pennsylvania CLEC. For DA, 1.34% of the calls answered were deflected for Pennsylvania Retail, and .072% of the calls answered were deflected for Pennsylvania CLECs.46

The message types sent from TOPS contain the information needed to identify the calls for placement in the correct queue, and provide the time-in-queue and time stamps associated with each call. Abandoned calls are uniquely identified, which allows FMS to exclude them from the calculations. Queue time, or wait time, is the elapsed time in seconds from when a call is placed in queue until an operator position is attached. Position events occur when the operator changes state, for example, to take a call, enter or exit the “make busy” state, or logs in or out. Data collection software (cqsvr) in FMS performs the counting, sorting, and summarization for queues, positions, agents, and offices based on database setups. Data are accumulated for quarter hours, and summaries can be provided quarter hourly, hourly, by session, daily, or monthly.47

The data contained in FMS provide the information needed to calculate the monthly OD-1 metrics. To accomplish this, FMS is queried for the OD-1 metrics information. The appropriate call queues are then identified for Verizon PA and the CLECs, and file transferred to the NMP. NMP performs the metric calculations, generates and publishes the results.48

The Verizon PA C2C Guidelines for this metric states: “Operator Services CLEC results are reported combined for PA/DE. When Verizon implements state specific reporting capability for Operator Services in DE, results will be implemented for PA only.”49 DCI was advised that this was changed in September 2002, and the results have been reported for Pennsylvania since that time. It was further noted, that the Verizon compare results were reported separately from the inception.50

**GE-1: DIRECTORY LISTING VERIFICATION REPORTS**

**Definition**

Metric GE-1 measures the timeliness and accuracy of the directory listing verification reports (DLVRs) and corrections to the electronically transmitted DLVR that the CLECs submit to correct any errors that may be contained therein. For the purposes of this metric, the due date for a directory listing verification report is designated as the date that is 30 business days prior to the close out date for the directory. The due date for CLEC submissions of corrections is 15 calendar days prior to the closeout date for the directory. The due date for Verizon PA’s corrected DLVR to the CLECs is 10 calendar days prior to the close out date for the directory. The process for obtaining listing

46 Data Response B-088 (Count of Deflected Calls)
47 Data Response B-060 (Metric Overview page 3), and Interview Summary B-020
48 Interview Summary B-020
49 Verizon PA C2C Guidelines, OD-1 Operator Services/Directory Assistance Speed of Answer
50 Interview Summary B-020 Follow-Up
verification reports is documented in Verizon PA’s CLEC and Reseller Handbooks, as supplemented by this performance metric. This metric also measures the completeness and accuracy of the listings contained in Verizon PA’s white pages directory.\(^51\)

For the purpose of this standard, the following definitions are used:\(^52\)

- **“Error”** is defined as any omission of a directory listing for which the CLEC requested the inclusion of the listing in the directory; the inclusion of a directory listing for which the CLEC requested the exclusion of a listing in the directory; incorrect telephone number; incorrect address; or incorrect name.
- **“Incorrect”** is defined as any deviation from the listing information contained in the Local Service Request (LSR) or DSR.

Metric GE-1 examines a statistically valid random sample of each individual CLECs white pages listings contained in each DLVR to determine whether those listings were provisioned accurately in accordance with the CLECs DSR/LSR. For LSR/DSR orders that select the “retain as is” or “ERL” field, Verizon PA must examine the listing information contained in the database prior to processing the CLEC order and subsequent to processing the CLEC order, to determine whether the CLEC order was provisioned accurately.\(^53\)

**Sub-metrics**

- **GE-1-01:** Measures the percentage of directory listing verification reports furnished on time.
- **GE-1-02:** Measures the percentage accuracy of DSR/LSR inclusion in DLVRs.
- **GE-1-03:** Measures the percentage of DLVR corrections that are furnished on time.
- **GE-1-04:** Measures the percentage accuracy of DLVR corrections.
- **GE-1-05:** Measures white pages errors and omissions.

**Formula**

- **GE-1-01:** This metric measures the percentage of directory listing verification reports that are furnished on time. The metric is developed from a numerator that is the number of DLVRs due in the reporting period that are transmitted on or before the due date. The denominator is the total number of DLVRs due in the reporting period.\(^54\)

- **GE-1-02:** This metric measures the percentage accuracy of DSR/LSR inclusion in DLVRs. The metric is developed from a numerator that is the number of CLEC-specific listings included in the random sample of listings contained in each DLVR transmitted within the

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\(^51\) Verizon PA C2C Performance Standards  
\(^52\) Verizon PA C2C Performance Standards  
\(^53\) Verizon PA C2C Performance Standards  
\(^54\) Verizon PA C2C Performance Standards
reporting period or the prior reporting period for which the due date for the submissions of DLVRs is within the reporting period, that were provisioned accurately in accordance with the original DLR/LSR. The denominator is derived from the total number of sampled CLEC-specific listings.\textsuperscript{55}

- **GE-1-03**: This metric measures the percentage of DLVR corrections that are furnished on time. The metric is developed from a numerator that is the number of DLVR revisions in the reporting period that are transmitted on or before the due date to the CLEC. The denominator is the total number of DLVRs revisions due in the reporting period provided to Verizon PA by the CLEC.\textsuperscript{56}

- **GE-1-04**: This metric measures the percentage accuracy of the DLVR corrections. The metric is developed from a numerator that is the number of DLVR corrections for which no further CLEC request for correction is submitted within the reporting month. The denominator is the total number of DLVR corrections transmitted during the reporting month.\textsuperscript{57}

- **GE-1-05**: This metric measures white pages errors and omissions. The metric is developed from a numerator that is the number of lines of white pages errors in the white pages directories previously identified in LVR on a per CLEC, per directory basis. The denominator is the total number of CLEC white pages listing lines in the white pages directories appearing in an LVR for each directory on a per CLEC, per directory basis.\textsuperscript{58}

**DCI Derived Metric Statement**

Not Applicable

**Report Dimensions**

GE-1 is reported for the Verizon PA service territory based on the following company dimensions:

- CLEC aggregate
- CLEC specific
- Verizon affiliate aggregate
- Verizon affiliate specific

**Exclusions**

The applicable exclusions are as follows:

\textsuperscript{55} Verizon PA C2C Performance Standards  
\textsuperscript{56} Verizon PA C2C Performance Standards  
\textsuperscript{57} Verizon PA C2C Performance Standards  
\textsuperscript{58} Verizon PA C2C Performance Standards
• Reports that the CLEC has requested be transmitted less than 30 business days prior to the close out date for the directory.
• GE-1-02 directory listings that were provisioned accurately in accordance with the original DSR or LSR.

**Performance Standard**

GE-1 is a tracking metric for a trial period after which it will be evaluated to determine if it captures the appropriate performance and measures it meaningfully. Therefore this metric was not reported on in the April, May, and June 2003 timeframe.\(^59\)

The applicable performance standards as they exist in the Verizon PA C2C Guidelines are as shown on Table E-5.\(^60\)

<table>
<thead>
<tr>
<th>Table E-5</th>
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<tbody>
<tr>
<td>GE-1-01</td>
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<td>GE-1-03</td>
</tr>
<tr>
<td>GE-1-04</td>
</tr>
<tr>
<td>GE-1-05</td>
</tr>
</tbody>
</table>

**Metric Creation**

The metric was in the trial stages during the review period and as such was not reviewed in detail.

**GE-3: TIMELY AND ACCURATE PROVISIONING OF WHITE PAGE DIRECTORY LISTINGS LSRs AND DSRs**

**Definition**

Metric GE-3 measures the timely and accurate provisioning of the LSR and DSR orders that result in the update of the directory assistance database and the database used for the publication of the directory white pages. This measurement is based on a statistically valid monthly sampling of all LSR and DSR orders for each CLEC individually to determine whether the orders were provisioned in a timely and accurately manner. Verizon PA and the CLECs must mutually agree on the random sampling methodology that is employed.\(^61\)

\(^{59}\) Verizon PA C2C Performance Standards

\(^{60}\) Verizon PA C2C Performance Standards

\(^{61}\) Verizon PA C2C Guidelines
Sub-metrics

- **GE-3-01**: Measures the percentage of the number of orders that are processed on time for updates to the directory assistance/white page listing database.\(^{62}\)

- **GE-3-02**: Measures the percentage of the number of lines in the sample for each CLEC that are processed accurately, when compared to the CLEC DSR/LSR.\(^{63}\)

Formula

- **GE-3-01**: This metric measures percentage of the number of orders that are processed on time for updates to the directory assistance/white page listing database. The metric is developed from a numerator that is the number of orders processed for update to the directory assistance/white pages listing database on time. The denominator is the number of orders pulled for a random sample on a per CLEC basis in a single month.\(^{64}\)

- **GE-3-02**: This metric measures the percentage of the number of lines in the sample for each CLEC that are processed accurately, when compared to the CLEC DSR/LSR. The numerator for this metric is developed from the number of lines in the sample for each CLEC that are without errors when compared with the CLEC DSR/LSR. The denominator is derived from the number of orders pulled for a random sample on a per CLEC basis in a single month.\(^{65}\)

DCI Derived Metric Statement

Not Applicable

Report Dimensions

GE-03 is reported for the Verizon PA service territory based on the following company dimensions:\(^{66}\)

- CLEC aggregate
- CLEC specific
- Verizon affiliate aggregate
- Verizon affiliate specific

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\(^{62}\) Verizon PA C2C Guidelines
\(^{63}\) Verizon PA C2C Guidelines
\(^{64}\) Verizon PA C2C Guidelines
\(^{65}\) Verizon PA C2C Guidelines
\(^{66}\) Verizon PA C2C Guidelines
Exclusions

The applicable exclusions are as follows:67

- Verizon test orders.
- Orders submitted by a means other than EDI or Web GUI (e.g., faxed or mailed orders), unless EDI or GUI is unavailable.

Performance Standard

GE-3 is a tracking metric for a trial period after which it will be evaluated to determine if it captures the appropriate performance and measures it meaningfully. Therefore this metric was not reported on in the April, May, and June 2003 timeframe.68 The applicable performance standards as they exist in the Verizon PA C2C standards are as follows:69

<table>
<thead>
<tr>
<th>GE-3-01</th>
<th>GE-3-02</th>
</tr>
</thead>
<tbody>
<tr>
<td>95% are on time</td>
<td>98% of orders are provisioned accurately</td>
</tr>
</tbody>
</table>

Metric Creation

Not Applicable

67 Verizon PA C2C Guidelines
68 Verizon PA C2C Guidelines
69 Verizon PA C2C Guidelines
C – FINDINGS

NP-1 FINDINGS

1. **Verizon PA Has No Process In Place To Notify CLECs That A Trunk Group Has Exceeded The Blocking Threshold And Is To Be Excluded From The NP-1 Metric.**

   The Verizon PA C2C Guidelines state, “Verizon PA will electronically notify CLECs (operational trunk staffs), of the following situations for blocked trunks. This notification will identify that Verizon PA has identified a blocked trunk group and that the trunk group should be excluded from Verizon PA performance. Unless the CLEC responds back with documentation that the information on the condition is inaccurate the trunk group will be excluded:

   - Trunks blocked due to CLEC network failure
   - Trunks that actually overflow to a final trunk, but are not designated as an overflow trunk
   - Trunks blocked when CLEC order for augmentation is overdue
   - Trunks blocked where CLEC has not responded to or has denied Verizon PA request for augmentation
   - Trunks blocked due to other CLEC trunk network rearrangements.”

   These same guidelines state in the metric calculation section, that applicable metrics (NP-1-01, NP-1-03 and NP-1-04) will be determined “exclusive of trunks that block due to CLEC network problems as agreed by CLECs”, emphasis added by DCI.70

   In a Data Request, DCI asked for the notification documentation for those trunks excluded during the review period, and was advised that “Verizon does not notify the CLEC party in regards to whether a trunk group that has exceeded the blocking threshold is excluded from the NP-1 metric.”71 A second Data Request requesting clarification of this response states, “Verizon does not have a process in place to notify the CLEC party in regards to whether a trunk group that has exceeded the blocking threshold is excluded from the NP-1 metric.”72 This clearly does not follow the exclusions portion of the Guidelines quoted above, nor does it adhere to the definitions for the metric calculations for three of the four sub-metrics.

2. **The Verizon PA C2C Guidelines Do Not Clearly Identify The Trunk Groups That Are To Be Excluded From The Metric Calculations.**

   The Guidelines state that “IXC Dedicated Trunks” and “Common Trunks carrying only IXC traffic” are not included; however, there are other types of FTGs that are excluded. In addition, the Performance Standard section of the Guidelines has language that needs clarification. For example, “individual trunks blocking”, and “An individual trunk should not be blocked for three consecutive

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70 Verizon PA C2C Guidelines NP-1 Percent Final Trunk Group Blockage, pages 88 and 89
71 Data Request B-058, Question 7 Response
72 Data Request B-091, Question 1 Response
months”. Moreover, the End User Standard section has references to apparent paragraph numbers that are not identified as to source document.73

NP-2 FINDINGS

1. The Guidelines Do Not Adequately Document The Usage And Definition Of The NP-2 “Stop Clock”.

The Verizon PA C2C Guidelines state that “Verizon PA will not be deemed to have completed work on a collocation case until the arrangement is suitable for use by the CLEC, and the cable assignment information necessary to use the facility has been provided to the CLEC.”74 Pennsylvania Tariff P.U.C.-No. 218, section 2, states, “The Telephone Company will use reasonable efforts to provide occupancy of the space(s) on the agreed date and will keep the CLEC advised of any delays. The interval clock will stop, and the final due date will be adjusted accordingly, for each day the CLEC delays in providing information to the Telephone Company or otherwise fails to meet its obligations.”75 The “stop clock” adjustments are referenced in the Guidelines for sub-metric calculations NP-2-03 through NP-2-08 for both new and augment applications.76

During the review period there were 101 applications shown as completed, with 23 having one CLEC jeopardy placed on them, while four of them had two. There were 2,036 total calendar delay days associated with these 27 applications, and the documentation for them is discussed at length above.77 DCI requested documentation on procedures for “stop clock” usage, to include who makes the decision to implement. The response states, “There are no documented procedures on the use of the “stop clocks”. However, the implementation practice is, when (sic) collocation request is delayed due to a CLEC caused issue, Verizon PA initiates a CLEC jeopardy in CBS/CNE for the duration of the delay. The CLEC is contacted by the LCC upon initiation of the jeopardy.”78

2. The Published Results For NP-2 Are Incorrect And Should Be Rerun.

The C2C Performance Standards and Reports, Verizon PA for April, May, and June, 2003, reports Augment results for NP-2-03-6702: Average Interval-Physical Collocation-76 days and NP-2-03-6712: Average Interval-Physical Collocation-45 days. Also, NP-2-05-6702: % On Time-Physical Collocation-76 days and NP-2-05-6712: % On Time-Physical Collocation-45 days is reported for Augment results.79 Pennsylvania Tariff P.U.C.-No.218, Section 2, addresses intervals of 90 days to establish a caged physical arrangement, 60 or 70 days for CCOE where Verizon PA’s equipment is secured or unsecured respectively, and 90 days to establish a SCOPE arrangement, with 60 days for additions to an existing SCOPE arrangement.80 The C2C Guidelines do not address intervals per se,
but make reference to a web site where state-specific tariffs can be found. No reference to either 76-day or 45-day intervals for Pennsylvania could be located, even though these intervals were reported as noted in the official report for the NP-2 metrics.

A Data Request was issued to request an explanation of this apparent incongruity. The response states, “There was a mispopulation of the New York naming scheme in the Pennsylvania C2C template, when Verizon PA implemented the adoption of the NY C2C guidelines in PA. This issue however was uncovered in July 2003, which resulted in Change Control Request (CCR) # 10,261 with an effective date of the August 2003 data month.”

CCR # 10,261 was reviewed, and it does address the issue raised, showing the data months of April, May, June, and July, 2003, as being affected before the change was implemented. Further, the CCR indicates that there will be no impact on metric reporting, since all pertinent information was summarized under NP-2-03-6702 and NP-2-05-6702.

3. **The Verizon PA C2C Guidelines Do Not Address The Type Of Collocation Application Exclusions Or Inclusions Per Se, Though In The Sub-Metrics Section Under Calculations, It Is Noted That Time Is Excluded For CLEC Milestone Misses.**

The April C2C Guidelines state that, “This metric includes collocation arrangements ordered via the state and federal tariffs.” However, there are a number of collocation arrangements that are addressed by the Pennsylvania Tariff P.U.C.-No. 218 that are not included in the metric. Some examples of these include Competitive Alternate Access Transport Terminals, Collocation Remote Terminal Equipment Enclosures, Feeder/Distribution Interconnection Interfaces, Line Sharing, Shared/Sub-leased Cages, Transfer of Ownership Applications, Notice of Terminations, Records Only, and Reductions. In response to a data request, Verizon PA advised that these are treated as exclusions since “they do not fall within the identified list of metric inclusions. The supporting documentation is the C2C Guidelines …” Further, the Guidelines address new and augment applications (products) for sub-metrics NP-2-01, NP-2-02, NP-2-04, and NP-2-05; new applications for NP-2-03; but specify no products for NP-2-06, NP-2-07, and NP-2-08.

**OD-1 FINDINGS**

1. **The Verizon PA April C2C Guidelines Did Not Accurately Reflect What Is Being Reported For The OS CLEC Results.**

The April C2C Guidelines stated that OS results were for Pennsylvania and Delaware combined, when in fact, the results have been separately reported since September 2002. Thus, they no longer reflect what the PA PUC has ordered, or what is being reported.

**GE-1 AND GE-3 FINDINGS**

None.

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81 Response to Data Request B-089 SUPP
82 Verizon PA C2C Guidelines NP-2 Collocation Performance, page 90
83 Response to Data Request B-090, Question 2
84 Verizon PA C2C Guidelines NP-2 Collocation Performance, pages 90, 91
**D – RECOMMENDATIONS**

**NP-1 RECOMMENDATIONS**

1. **Verizon PA Should Immediately Develop And Implement A Notification Process To Notify And Elicit A Response From The CLEC Party When It Is Determined That A Trunk Group Exceeding The Blocking Threshold Is To Be Excluded. (Refers to Finding 1, Metric NP-1)**

   Such a procedure should provide a reasonable time for the CLEC to respond, with the time clearly defined. Since the metric calculation indicates the CLEC must agree to the exclusion, provisions for dispute resolution should also be included with binding time frames for the involved parties.

2. **The Process Developed Above Should Be Used For The Five CLEC Trunk Groups Excluded In April, The Seven In May, And The Two In June. (Refers to Finding 1, NP-1)**

   DCI believes the NP-1-01, NP-1-03, and NP-1-04 metrics for the review period are not valid, in that the proper notification was not made per the C2C Guidelines. Assuming a worst case scenario, Verizon PA would be out of parity for two of the three months for NP-1-01, and would have four trunk groups in May that exceeded the blocking threshold for two consecutive months, and one group in June that exceeded the blocking threshold for three consecutive months. To gain validity for these measurements, the process developed above should be used for the five CLEC trunk groups excluded in April, the seven in May, and the two in June. From the outcome of the process, the metrics may stand as published. If there are groups with which the CLEC parties disagree, then the dispute resolution process should be followed. If this process results in groups that should not be excluded, the metrics should be withdrawn and re-published.

3. **This Section Of The Guidelines Should Be Revised To Include A Definitive List Of The Types Of FTGs That Are Not Included. (Refers to Finding 2, NP-1)**

   This section of the Guidelines should be revised to include a definitive list of the types of FTGs that are not included, such as 911 trunks, Operator Services trunks, final two-way dedicated trunk groups, etc. Language in the Performance Standard section should be clarified, and appropriate references cited. Further, pertinent information from the process developed in Recommendation No. 1 - NP-1 should be added to the Guidelines.

**NP-2 RECOMMENDATIONS**

1. **Verizon PA Should Develop And Implement Guidelines For The Use Of All CLEC Jeopardies, To Include Documentation Requirements With Retention Intervals Clearly Spelled Out. (Refer to Finding 1, NP-2)**

   As noted in Finding No. 1 – NP-2, above, the amount of “stop clock” time attributable to the jeopardies can be substantial, with major potential impact on the percent on time accomplishments.
Documented procedures are essential to ensure that the jeopardies are used appropriately, started and stopped on a timely basis, and that the involved CLEC is consistently notified per the C2C Guidelines, and the Pennsylvania tariff.

2. **With CC # 10261 In Place The Metrics Should Be Rerun For The Affected Months And The Results Should Be Re-Published. (Refer to Finding 2, NP-2)**

While DCI agrees that the reported metric results should not change, the report format will change. A re-published NP-2 result will provide for consistency from the inception of the PA PAP, providing a definitive base for future analysis and reviews.

3. **The C2C Guidelines Should Be Revised To Accurately Reflect The Intent, In That The Metric Results As They Are Presently Published Do Not Include All Collocation Arrangements Ordered Via The State And Federal Tariffs. (Refer to Finding 3, NP-2)**

Since the Guidelines do not contain a list of metric inclusions, clarity requires that those arrangements that are excluded be specifically identified. Further, the Guidelines should be revised to accurately reflect the product types that are measured by each sub-metric. The Verizon PA C2C Performance Standards and Reports, provide for reporting NP-2-01 through NP-2-08 results for both new and augment applications, but the PA C2C Guidelines do not accurately reflect this.