VI – METRIC INPUT QUALITY ASSURANCE
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A. – BACKGROUND

In order to audit the processes intended to ensure the accuracy of performance measures, DCI consultants reviewed relevant Verizon PA training documentation, reviewed relevant Verizon PA Methods and Procedures documentation, and interviewed Managers in numerous Verizon PA organizations which impact metrics capture and/or creation. Observations were made of the management of the Installation and Maintenance Service Technicians, the Designed Services technicians, the Wholesale Dispatch Resource Center, Central Office operations, and various Centers involved with the provision and maintenance of Competitive Local Exchange Carrier (CLEC) products and services.

INSTALLATION AND MAINTENANCE (I&M)- NON DESIGNED SERVICE

Three Verizon PA Installation and Maintenance Local Managers were interviewed on-site by DCI consultants with a specific emphasis on quality control and auditing. In order to develop a more complete profile of the situations and environment faced by the full range of Verizon PA Service Technicians, the Local Managers that were interviewed were from three different demographic and geographic areas listed below:

- Urban Service Center location (south Philadelphia)
- Suburban Service Center location (southern Chester County)
- Rural Service Center location (Coatesville, PA)

It is believed that this mix of customer environments provided the DCI consultants with an opportunity to evaluate whether or not Service Technicians were properly equipped and trained to handle their specific situations, in a wide range of customer service environments. The regions varied in terms of the saturation of business clients and the names and number of CLECs providing service to the regions visited. All three Local Managers reported that the number of Verizon PA customer lines within their respective service areas had been declining recently due to the increasing use of telecommunications services supplied by CLECs and wireless providers, for both business and residential customers. The interviews with and observations of the Local Managers in the three service areas revealed that there were strong similarities among the locations in terms of training, documentation, and organization in relation to the understanding of and efforts to achieve the applicable performance metrics.

Each of the Local Managers stressed the fact that their assigned Service Technicians had been trained to handle the CLEC-related work in the same manner that they handle retail work. The Local Managers also stated that they placed a significant amount of emphasis on this initiative in their staff meetings and daily tailgate sessions. There are only two significant operational differences between the CLEC work and the retail work that is performed by the Service Technicians. First, for the CLEC work, the Service
Technicians do not leave any paperwork at the customer site. Second, the Service Technicians generally do not communicate with the customer of the CLEC, as Verizon PA is only responsible for providing service to the point of demarcation, which is generally at the Network Interface Device (NID), or Minimum Point of Entry (MPOE) for certain business customers.

The CLEC is responsible for the provision of service on the customer side of the NID or MPOE. CLEC work is generally considered as being a bit easier than retail work by the Service Technicians as they only have to deal with getting service to the demarcation point and do not have to get involved with any Customer Premise Equipment (CPE) or inside wiring issues. In general, all of the Service Technicians perform CLEC related work; it is not specifically assigned to certain Technicians or work groups.1

It was the stated opinion of the Local Managers that the Technicians treat the CLEC work as a priority over the retail work, due to the attention that this work, and its timely performance, receives from management. CLEC work has a high level of visibility within Verizon PA due to the presence of management reports (such as the monthly Customer Care Index report, which includes retail as well as CLEC customer responses) that are focused on tracking the performance of the Service Technicians versus the applicable performance standards.2

As a further method of ensuring the accurate and timely completion of the CLEC work, the Dispatch Resource Center (DRC) is required to contact the Local Manager immediately when a problem is identified with respect to a CLEC job, so that the problem can be quickly resolved. If a priority CLEC job is received, the DRC is responsible for contacting the assigned Service Technician directly via cell phone or pager. The Technician will be instructed to pick up the new job by dialing in (or docking in their communication device at the Service Center) to get the details of the priority CLEC job so that they can reprioritize their work schedules. It was the opinion of the Local Managers that, in general, the field operations groups have become much more efficient at handling CLEC work over the past year as both sides (Verizon PA and the CLECs) have become more familiar with the work, systems and processes.3

**CLEC Reporting**

Several situations were cited by the Local Managers in which problems that had been reported by CLEC customers were not problems with the service provision by Verizon PA, but rather they were CLEC technical problems. Such incorrect reports of trouble to Verizon PA are generally due to the fact that some customers do not understand which entity is responsible for which portion of the provision of their service. Local Managers stated that there were some initial problems encountered with the accurate and timely entry of CLEC job completion data in the time period when CLECs first appeared on the scene in Pennsylvania. This was primarily a systems problem that

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1 Interview Requests B-024, B-025, and B-026
2 Interview Requests B-024, B-025, and B-026
3 Interview Requests B-024, B-025, and B-026
has since been resolved by software script changes which were instituted in early 2003. These changes reduced the number of job codes that were applicable to CLEC work, thereby simplifying the data entry process for Service Technicians. This made the process of closing out the CLEC work much more straight-forward, and resulted in a significant reduction in the number of errors that were being experienced.

Closeout information related to CLEC work (as well as retail work) is entered into the Intelligent Field Access System (IFAS) through the truck-mounted laptop terminals (which are docked and downloaded in the Service Centers each day). As part of the close-out procedure, the Technician also enters a narrative that describes the work done and any complications that may have been encountered in performing it. To complete the close-out of CLEC jobs, the Service Technician calls the CLEC and informs it that the work has been completed. When the CLEC-related work first began, the Technicians encountered frequent problems with contacting the CLECs once the job had been completed, but that situation has improved greatly over the past year. Related billings for the work performed are sent out by Verizon PA, based on the Service Technician’s close out documentation and coding.

**Installation and Maintenance (I&M) Training and Review**

To ensure the quality of the work performed by the Service Technicians (in terms of both work performed and job completion data entered) the Local Managers perform a minimum of one quality inspection per month for each Service Technician. Generally, more frequent inspections (two-to-three times per month) are performed on the work of any Technicians who are new, or who have had recent performance or quality problems. These quality inspections generally include both post-work completion inspections and in-progress work inspections. As part of these inspections, the Local Manager verifies both the technical quality of the work completed, and the accuracy of the resulting data entry and paperwork. This includes review of the related timesheets and closeout documentation (including closeout codes and narratives) for accuracy. Local Managers frequently talk with Verizon PA customers when they are on-site, to get direct feedback on the quality of work and level of customer service provided by the Technician.

After inspections are competed, Local Managers meet with Technicians to review the results of inspections, and implement corrective action, if required. When the Local Manager encounters a quality problem, he or she will review the problem with the Service Technician and/or assign more training to be provided to the Technician. Most of the quality problems that Local Managers identify are detail-related, rather than anything major. The results of these quality reviews are documented and become part of the formal mid-year and annual Service Technician performance reviews.4

If a significant performance or quality problem is identified, the Local Manager performs a 3-day ride-along with the subject Technician to observe performance and implement necessary improvements. These ride-alongs are generally driven by productivity problems, rather than quality problems. The results of the rides are summarized by the

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4 Information Request B-037
Local Manager and are submitted to the Quality Manager for the Service Center area. The Local Managers stated that these ride-alongs have historically proved to be effective at improving the performance of the subject employees. Local Managers are also responsible for performing two safety inspections per Technician per month. Local Manager’s paperwork and performance are reviewed on a regular basis by the Area Manager, who also accompanies the Local Manager on a sampling of the field inspections.5

Service Technicians are supplied with full documentation related to the proper procedures to be used in closing out jobs, which they use for reference purposes, as required, such as the Verizon PA Method and Procedures Manual and training guides. 6 They are also provided with on-line access to documentation, and updates and changes via their IFAS terminals. In addition, some of the Local Managers have produced summary sheets that include those codes that are used on a regular basis to document or close out jobs. All three of the Local Managers interviewed stated that they continually emphasize accuracy of data entry.7

Data related to the Jobs-per-Day performance statistics for each of the Service Technicians and the number of repeaters (jobs which have to be revisited for whatever reason) for each Technician are published weekly, and the Local Manager shares these data with them as a form of feedback on their performance. Jobs-per-Day is a very straightforward number that is easy to calculate. However, repeaters have to be researched by the Local Manager to determine if they are valid repeats. An example of a repeat that would not be considered valid is one for which access was not available for the technician. The reports used by the local managers to evaluate repeaters per technician do not contain this information; the manager must do some additional research to obtain it.

Internal reviews of Service Technician work quality are performed by Verizon PA subject matter experts from the Network Operations staff. These reviewers are responsible for performing these reviews on a full-time, year-round basis. Such reviews are not performed on a regularly scheduled basis, but rather are done on a random timeframe with no prior notice to Service Center management. These reviews include timesheet and time and material reviews. In advance of the review, Local Managers are directed to submit documentation associated with a selected set of completed jobs. This documentation is then reviewed by the subject matter experts for accuracy and completeness. These reviews may also include field inspections of the work that was performed. The results of these reviews are transmitted to the responsible Local Manager so that they can gauge the performance of their Service Technicians, and institute any necessary corrective actions.

DCI requested copies of all of the reports resulting from the audits and reviews performed on the field operations groups. The resultant documents did not include any

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5 Interview Requests B-024, B-025, and B-026
6 Information Request B-015
7 Interview Requests B-024, B-025, and B-026
that verified that the disposition coding was reviewed and validated as a result of these analyses. Therefore, DCI consultants cannot confirm that this coding verification is being done on a regular basis.

**Service Centers**

The Service Centers are also subject to occasional DRC reviews. Additionally, Service Center managers are occasionally sent to review other Service Centers. These internal reviews are performed following a standardized routine and using standardized forms to report on the results.

There is a Quality Manager assigned to each of the designated geographic areas who is responsible for the quality program at the Service Centers within that area. This Quality Manager works primarily on developing and updating procedures for the Service Technicians, and also coordinates the 3-day ride-along program, and other initiatives focused on reducing the rate of repeaters.

The Service Technicians get their initial training at the Verizon PA Plant School which is located in Valley Forge, PA. This (three-week) program focuses on safety, climbing, communication tool usage and testing, customer contact, and technical training. The Technicians are then sent to the field with an experienced Technician for about three weeks to learn, in an on-the-job environment. Continuing training is being performed via training handouts and at the tailgate meetings that are held by the Local Managers every morning before the Technicians go into the field. In the case of the introduction of new equipment (for example, the Sidekick testing units that the Technicians now use), a representative from the equipment vendor conducts formal classes in the Service Center, for all Technicians.

The Technicians have been educated in the performance metrics process and are, therefore, very aware of the role that they play in the overall process. Because of this, they tend to watch their CLEC-related commitments very closely. The Local Managers get regular reports from corporate in instances in which a CLEC commitment is missed, or other CLEC-related problems are encountered. The Local Manager is assigned the responsibility of investigating, in detail, all missed commitments (both CLEC and retail) to determine a cause and a resolution to the problem, in order to avoid a recurrence in the future.

The Local Managers receive Customer Care Index (CCI) reports on a monthly basis, which report the performance results for each of the Service Technicians reporting to each of the Local Managers. These CCI reports are produced by a Verizon PA corporate entity. The reviews may include phone calls made to a random sampling of customers

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8 Information Request B-019  
9 Interview Requests B-024, B-025, and B-026  
10 Interview Requests B-024, B-025, and B-026  
11 Interview Requests B-024, B-025, and B-026  
12 Interview Requests B-024, B-025, and B-026
who have had work done recently, to determine their satisfaction with the work that was performed.\textsuperscript{13}

Monthly CCI meetings are held to review the CCI reports with all of the Local Managers, their Area Managers, and the appropriate Vice President to cover the performance of the previous month and investigate any issues that may have occurred. (Note: These meetings had been discontinued prior to the interviews by DCI consultants due to the contract negotiations process, but they were scheduled to be reestablished after the contract was settled.) Each of the Local Managers is responsible for discussing monthly performance of assigned Service Technicians, and the efforts that are being made to improve performance and quality of the work performed.\textsuperscript{14}

\textbf{I&M – DESIGNED SERVICES}

In locations with sufficient volume, there are organizations with responsibility for the installation and maintenance of wholesale designed services, including access services for Interexchange Carriers (IXC’s) and special services for the CLEC’s. The Wholesale Dispatch Resource Center (WDRC) handles designed wholesale services for Pennsylvania, Delaware, Western Maryland, and West Virginia. Dedicated technicians for these services are assigned to specific geographic areas and are dispatched by the WDRC. To review this operation, DCI interviewed the Area Manager-Business Operations for Eastern Pennsylvania and Delaware, a Local Manager in the organization, the Area Manager-WDRC, and the Director-National Operations, Mid-Atlantic-Wholesale Operations. In addition, a visit was made to the WDRC to review work operations and interview a Supervisor, National Operations, Mid-Atlantic-Wholesale Operations, who is charged with tracking the quality of technician reporting. This effort is discussed in some detail, after a brief review of overall order flow and local efforts on quality control.

\textbf{Overall Order Flow}

The Carrier Access Test Center (CATC) furnishes orders for new service and maintenance work from the IXC’s to the WDRC for dispatch, while the CLEC Loop Provisioning Center (CLPC) and the Regional CLEC Maintenance Center (RCMC) perform these functions for CLEC work. All work orders are handled via the Work Force Administration-Dispatch Out (WFA-DO) system. The CATC, CLPC, and RCMC, are control offices for their respective orders and troubles. As control offices they are responsible for monitoring, tracking, and controlling orders and trouble conditions; and interact directly with the technicians for testing, trouble closeouts, and order completions.\textsuperscript{15}

\textsuperscript{13} Interview Requests B-024, B-025, and B-026
\textsuperscript{14} Interview Requests B-024, B-025, and B-026
\textsuperscript{15} Interview Requests B-003, B-011, and B-013
The WDRC assigns and dispatches work to the technicians in accordance with a Dispatch Priority Matrix which is a standard in all Dispatch Resource Centers. Decisions are based on this matrix, with consideration being given to special commitments, access requirements at customer premises, and geography. A review of the matrix, a one page document, was performed by DCI. It was found to be very understandable, with the following general guidelines: “There may be occasions when there will be potential for missed appointments. The Dispatch Priority Matrix will guide personnel when selecting work to be dispatched.”

Visits to DRC’s verified that this matrix is in place and being used.

**Technician Reporting**

At the local level, technician accuracy and quality are addressed by the Local Manager, who is required to conduct two on-site inspections per technician per quarter, with follow-up to ensure deficiencies are corrected. The Area Manager participates in these inspections twice yearly with the Local Managers. DCI requested documentation of field reviews made for January 2003, through June 2003, for a Local Manager in this organization. Our analysis of this material indicates that the reviews are very comprehensive, including the physical work operations performed, and reporting. However, for the period noted there were only 26 reviews furnished for the Local Manager, indicating that the goal of two reviews per quarter per technician was not attained. DCI estimates that based on two reviews per quarter, 48 to 56 reviews should have been performed.

The Local Manager and the Area Manager also have Scorecards, which include extensive measurements and objectives. Included on the Local Manager Scorecard is a Quality section that addresses Riding Exercises and Inspections. A review of these scorecards for all of 2002 and for June YTD 2003 for all the Local Managers in this organization revealed that these lines of the Quality Section were not populated at all in most cases, and only sporadically in the remainder.

As a further review of efforts to ensure the accuracy of technician reporting, a visit was made to the WDRC to assess the efforts being made by the Center to assist field supervision. The intent of the Center effort is to develop information that the Local Manager or Area Manager can use to focus on specific groups or technicians that are the major contributors to poor performance for whatever metric is being addressed. At the time of this visit, particular emphasis was being given to correct disposition coding and Mean Time to Repair (MTTR). Based on requirements from staff and other support organizations for the correct coding and closeouts, a mechanized program was developed.

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16 Data Request B-028
17 Interview Requests B-012, and B-016
18 Interview requests B-003, B-011, and B-013
19 Data Request B-013
20 Based on average spans of control for first levels of 12-14 technicians.
21 Data Request B-014
that compares the close out code used by the technician in WFA-DO to key words from the supporting narrative supplied by the technician.

Since the narratives are scripted for particular disposition codes, mismatches can be identified programmatically by keying on specific words and phrases. Manual reviews are undertaken if there appear to be gray areas. From these comparisons, reports are created at the Technician, Local Manager, and Area Manager levels, and forwarded weekly to appropriate management. With this information, management can readily identify technicians, or groups of technicians, that are adversely affecting coding compliance and provide appropriate coaching or training. Although this particular technique seemed especially effective to the DCI consultant review team, the Mid-Atlantic Wholesale organization appears to be the only group using it. 22

Central Office Operations

Pennsylvania Central Office (CO) operations were also reviewed by DCI. The Director-Network Operations, Pennsylvania is responsible for all central offices located in Pennsylvania, a dispatch center, and the Recent Change Memory Administration Center (RCMAC). Work operations for the technicians in this organization flow through the Work Force Administration-Dispatch In (WFA-DI) system, and the Frame Order Management System (FOMS). For CLEC related orders and troubles, the Regional CLEC Control Center (RCCC) is the primary interface for the CO technicians, and is the Center for closing out this work. Normal provisioning orders are sent to the CO as a single work ticket. However, coordinated cuts, or “hot cuts”, require two work tickets. The first calls for pre-wiring the cutover, and is completed the day prior to the scheduled coordinated cut. The “cut ticket” provides for the actual cut to be made with a specific schedule. To ensure compliance, these are managed manually, and are tracked by the RCCC for timing and adherence.

Quality control for the organization is accomplished through a system called Competitive Management Performance Standards (CMPS). Under this plan, the first level supervisor is required to conduct three observations per month per technician to assess work performance, including documentation. 23 The documentation for June 2003, for one technician in each supervisor group was requested. As a result, some 78 observations were reviewed. The observations are very comprehensive, addressing record keeping, proper use of systems, correct use of tools (for appropriate titles), effectiveness of customer contacts when appropriate, safety, and any training conducted for the individual during the period. The groups addressed ranged from the frame, to switch personnel, to power technicians, to clerical staff. Depending on the person being observed, each form provided an opportunity for as few as 15 yes/no responses to over 30, yes meaning they were in compliance; no meaning they were not. DCI found one “no” response among the 78 observations reviewed. 24

22 Interview Request B-016
23 Interview Requests B-005 and B-015
24 Data Request B-023
**VERIZON PA CENTERS HANDLING CLEC WORK**

DCI also reviewed various Centers, each discussed below, that are involved in CLEC order and trouble processing (the Centers are generally organized to handle a specific product or set of related products).

The Regional Resold Services Center (RRSC) handles Unbundled Network Element – Platform (UNE-P) special circuits for the Verizon PA footprint, functioning as the Order Control Office (OCO) and the Maintenance Control Office (MCO) for the products handled. Quality reviews are done by management to ensure that correct notes are entered in the WFA, that orders are statused and closed out properly, and that trouble tickets are closed out properly. The organization is ISO 9000 certified, and is reviewed periodically to ensure the certification is appropriate. A sample of the management quality reviews was requested and reviewed by DCI. In general, the review format was very good, and the reviews indicated that items needing attention were identified and addressed.

The RCCC does provisioning for unbundled loops. Regular dial tone orders are loaded into WFA-DO and sent to the appropriate DRC for dispatching. As noted earlier, in the CO discussion, this Center also handles the coordinated cuts. In this Center the team leads are required to make four observations per technician or Maintenance Administrator (MA) per month for quality purposes. This Center is ISO 9000 certified, with periodic reviews being conducted to ensure the rating should be maintained. DCI requested and reviewed the Report Card used to capture the review results for an MA and for a technician. This is a yearly scorecard that shows monthly results. The reviewed documents were current and comprehensive.

One CLPC provisions and maintains the UNE High Capacity circuits for the CLEC customers. For the products handled, this Center is the OCO and MCO as appropriate. The Center is ISO 9000 certified and undergoes periodic reviews to ensure adherence. Team Leads make observations and reviews of the technicians to assess compliance. A sample of these was reviewed, and they appeared to be thorough and timely.

A second CLPC is responsible for Digital Service Line (DSL) products for the CLEC’s and Data Local Exchange Carriers (DLEC’s), to include VADI, a Verizon PA affiliate operating as a DLEC. Line sharing, line splitting, and digital loop Integrated Services Digital Network (ISDN) are handled by this CLPC. The Team Leaders are required to perform four quality inspections per craft employee per month. ISO 9000 certification has been completed for this Center, and it has recently been re-certified.

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25 Interview Request B-006  
26 Data Request B-037  
27 Interview Request B-007  
28 Data Request B-042  
29 Interview Request B-009  
30 Data Request B-045  
31 Interview Request B-008
The RCMC is the call receipt Center for trouble reporting and statusing for various CLEC products and services. It was noted that the RCMC is not in the Wholesale organization, but is part of National Operations. Reviews are done of the employees taking calls, to assess their performance. Generally two or three reviews are also done in the Center locations by the Staff group from National Operations each year. These review teams sit with the employees doing the work, as well as review documentation. DCI requested documentation for a review and was furnished one review made in Richmond, Virginia on June 3, 2003. The quality audit summary provided clear findings and action plans to address them.

NON-PAP METRICS

An element of the DCI investigation was a determination of the level of focus and attention given to those metrics which are included in the Carrier-To-Carrier (C2C) Guidelines, but which do not appear in the Pennsylvania Performance Assurance Plan (PA PAP), or have resulting penalties directly or indirectly attached. Obviously the concern is that those metrics which are not attached to financial penalties may not receive the emphasis that PA PAP metrics do. DCI’s review found that all metrics are given similar focus and attention.

Verizon PA addresses all CLEC activity and metrics equally, including those metrics which are not subject to the PA PAP. As discussed earlier, field operations are mostly driven towards performance standards that do not segregate CLEC from Verizon PA, let alone PAP from non-PAP metrics. The President – Wholesale Operations holds weekly conference calls in which any metrics which have been missed or are in danger of being missed are discussed. Managers who are responsible for the area/metrics involved are “invited” to join this call. A report which specifically address non-PAP metrics is produced for the President-Wholesale Operations. This report specifically highlights any non-PAP metric that has been missed in any state.

DOCUMENTATION

As part of this investigation, DCI consultants reviewed Verizon PA documentation related to performance metrics as they apply to field operations personnel. Such documents included the following:

- Copies of Verizon PA Pennsylvania training manuals and materials as they relate to performance metrics, with a particular emphasis on Service Center operations personnel. This included the course materials and student workbook for Course #DI5730, entitled System Expediting the Remote Verification and Input of Customer Enhancements (SERVICE) as developed by the Bell Atlantic Learning

32 Interview Request B-021  
33 Data Request B-055  
34 DR B-049, C2C outliers.xls (for both May and June 2003)
Center and dated April 1997. The course focused on using the SERVICE system, which is a Bell Atlantic-developed system that was initially designed to meet the requirements of the Maintenance Case Team for easy access to all central office switch types, for both verify and update functions. It focuses primarily on training in how to verify lines from different types of switches, and how to verify the presence of available CLASS features such as Caller ID, Call Block, Call Trace, and other switch features.35

• Methods and Procedures documentation used by the Verizon PA Service Technicians who provide wholesale services for IXC and CLEC customers. This included the Verizon PA Methods & Procedures Release Document Number 2003-00614-MDP, which focused on the description and uses of IFAS for use by Verizon PA Service Technicians in the Potomac Region, as issued in July 2003.36 The documentation focuses primarily on the process to be followed by Verizon PA Service Technicians in using IFAS to perform and record installation and maintenance tasks. Such tasks included the following:

  - Receive and view a new job
  - Usage of the Mechanized Loop Testing (MLT), Loop Facility Assignment Control System (LFACS), Cable Records Analysis System (CRAS)
  - View line record and trouble history
  - Close out an installation or maintenance job

• The Guide to Residential Product Knowledge for Maryland, issued by the Verizon PA Training and Education Department in April 2000. This document provides information concerning residential customer classes of service and the optional telephone services and maintenance service plans that are available.37

• The Verizon PA Basic Installation & Maintenance (I&M) Student Guide dated November 2001. This document is the basic training manual for Verizon PA Service Technicians. It covers a wide range of topics ranging from basic telephony circuitry principles through the basic concepts and processes for installation and maintenance procedures and circuit and equipment testing.38

• Mechanized Trouble Analysis System (MTAS) Trouble Reports-Type, Disposition and Cause Loop Maintenance Operations System (LMOS) document was reviewed. This 218 page document provides the definitions and descriptions of the codes used by the field technicians when closing out troubles. It covers the type code which generally describes the customer experience such as Type Code 100 No Dial Tone, Disposition Codes 01 through 1239 and Cause Codes 1 through 5.40

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35 Information Request B-016  
36 Information Request B-015  
37 Information Request B-015  
38 Information Request B-015  
39 Disposition Code 13 is not in use  
40 Data Request B-082 (a follow-up to Data Request B-068)
B. – FINDINGS

1. **Training, Support and Internal Supervisory Reviews Of Field Technicians Handling Of CLEC Work Activities Are Sufficient.**

   The training, technical documentation, methods and procedures, and wholesale operations supervisory reviews provided by Verizon PA to their Service Technicians in the field are sufficient to support them in properly fulfilling their role in achieving the targeted performance statistics. While the training and documentation that was reviewed was not specifically focused on the fulfillment of the requirements of performance metrics, it did focus on how to properly perform and document the installation and maintenance tasks for CLECs (as well as for retail customers). Such documentation is an important element in ensuring that the tasks that are assigned to the Verizon PA Service Technicians are performed properly and efficiently.\(^{41}\) As we note throughout the background section, technicians receive initial and follow-up training, and have access to proper procedures in hardcopy and electronic formats. Further, the local managers perform work evaluations which include evaluating jobs performed for CLECs.

2. **Verizon PA Local Managers Place Proper Emphasis On PA PAP Performance Metrics.**

   Verizon PA’s local managers in Pennsylvania Service Centers place proper emphasis on the importance of achieving the targeted performance statistics as measured by the PA PAP.\(^{42}\) Due partly to the strong emphasis placed on the achievement of the performance statistics by the Verizon PA Network Operations group management, Local Managers are very aware of the importance of the CLEC performance statistics and they, in turn, pass this emphasis on to their Service Technicians. The Local Managers also perform a standardized quality monitoring and control function that ensures that any problems that are experienced by the CLECs are identified and resolved on a priority basis. The Service Technicians have a strong awareness of their roles in fulfilling the service requirements of the PA PAP process.

3. **The Additional Follow Up Review Being Performed On Disposition Codes By The WDRC Is An Excellent Process That Should Be Used By Other Verizon PA Organizations.**

   The programmatic checking of designed services trouble disposition codes being done in the WDRC with field follow-up and review appears to DCI to be an excellent approach to maintaining or improving the accuracy of this coding. The importance of accurate coding has been recognized in the Wholesale Designed Services organization, and a mechanized approach to ensuring that it is maintained or improved has been developed. This programmatic effort allows for a much broader review than one requiring manual review of closed out troubles. It also provides for a much more focused approach, in that reports

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\(^{41}\) Information Requests B-015 and B-016  
\(^{42}\) Interview Requests B-024, B-025, and B-026
can be customized to address differing groups or metrics. Typically, coding reports are
developed at the individual technician level, if the Local Managers think this is warranted
based on their observations. Reports are also furnished weekly at the Local Manager and
Area Manager level. DCI did not find this process in any other organization reviewed. It
appears to be unique to the Wholesale Designed Services organization.

4. Verizon PA Does Not Perform Formal Internal Audits Or Staff Reviews Of Disposition Coding.

DCI was not provided any evidence of formal Internal Audits or Reviews of customer
trouble report disposition coding, nor was there any data provided for comparative
analysis of retail and wholesale disposition coding of trouble reports.\textsuperscript{43} Trouble Report
disposition code accuracy is critical to the accuracy of the parity measurements, and in
addition to the accuracy of CLEC billing for trouble handling. Since many of the 123X
codes and the 1207 code are chargeable to the CLEC, CLEC billing is affected by
technicians inaccurately closing out CLEC troubles. DCI requested a history of
disposition codes by retail and wholesale in an effort to determine trends in their use, but
was advised that the information would not be furnished, since Verizon PA thought it did
not apply to performance metrics, and would require writing code to get the detail
requested.

However, as part of the review of the Maintenance and Repair Metrics, DCI was able to
develop a comparison of disposition codes for the April, May and June 2003, time frame.
While all codes were reviewed, of particular interest is the comparison of the percent of
total troubles coded as 09’s and 12’s for the retail versus the UNE product. For the
period noted, 13.6 percent of the retail troubles were closed with a disposition code
09XX, while 2.9 percent of the UNE product troubles were closed as code 09XX.
Conversely, for the same period, 22.4 percent of the retail troubles were closed to
disposition code 12XX, while 41.9 percent of the UNE product troubles were closed as
code 12XX. This indicates that Verizon PA may be incorrectly closing a higher
percentage of CLEC troubles to Code 12 than they are closing Verizon PA retail troubles.
This not only has the potential to affect the accuracy of the parity metrics, but also could
be a CLEC billing issue as well. DCI understands that disposition codes are reviewed by
local managers. However, DCI believes that disposition coding Internal Audits and
Reviews are required because of the criticality of disposition coding to the accuracy of
the parity measurements as well as billing to CLECs for trouble handling.

\textsuperscript{43} As stated in this section, DCI was made aware of informal reviews of disposition codes by local
managers; however DCI does not consider this sufficient.
C. — RECOMMENDATIONS

1. **Continue Providing Support To Field Technicians Through Training And Supervisory Reviews. (Refer to Finding No. 1)**

Verizon PA should continue to support field technicians with training and supervisory reviews currently provided. Depending on the findings of the Internal Audit recommended in Recommendation 4 below, additional training should be provided to address any deficiencies identified.

2. **Encourage Local Managers To Continue To Emphasize PA PAP Metrics With Field Technicians. (Refer to Finding No. 2)**

Local Verizon PA Managers place adequate emphasis on performance measures including the PA PAP performance measures. They should be encouraged to continue this effort, through emphasizing the measuring and reporting of specific PA PAP performance measures at the local manager level.

3. **Expand The Approach Of Programmatic Checking Used In The WDRC To Include The POTS Installation And Maintenance Organizations. (Refer to Finding No. 3)**

The mechanized approach to coding in use by the Wholesale Designed Services organization was noted in Finding No. 3 as an excellent method for addressing coding accuracy. However, a similar approach was not found in the Plain Old Telephone Service (POTS) organization that handles both retail and wholesale work. Verizon PA should examine the process used by the WDRC and adapt it for other Verizon PA Installation and Maintenance organizations and Centers. Of particular note is the mechanized review process which is made possible by standardization of phases.

4. **Perform Internal Audits Of Field Technician Disposition Coding. (Refer to Finding No. 4)**

DCI was unable to validate the accuracy of disposition coding by Field Technicians with any degree of certainty. This not only has the potential to affect the accuracy of the parity metrics, but also could be a CLEC billing issue as well. Internal audits of this area should be undertaken as soon as practical. At a minimum, the audits should examine, on a retail versus wholesale comparative basis, a statistically valid sampling of tickets closed out to Code 12 and to Code 9. The internal audits should include multiple locations in the Pennsylvania service territory. Based on the findings of the initial audits, a schedule of future audits should be developed. The PA PUC should be notified when the internal audits are completed, and the audit results should be furnished to the PA PUC upon completion.