



**Jennifer L. McClellan**  
Regulatory Counsel  
Virginia

600 E. Main St., Suite 1100  
Richmond, VA 23219-2441  
Voice 804-772-1512  
Fax 804-772-2143  
E-mail: [jennifer.l.mcclellan@verizon.com](mailto:jennifer.l.mcclellan@verizon.com)

April 7, 2003

Mr. Joel H. Peck, Clerk  
State Corporation Commission  
Document Control Center  
Post Office Box 2118  
Richmond, Virginia 23216

Dear Mr. Peck:

Re: Case No. PUC-2001-00226

Enclosed for filing is the original and fifteen (15) copies of Verizon Virginia Inc.'s Comments in the above-referenced case.

I have e-mailed, mailed or hand-delivered copies to the parties shown below. Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

**Original signed by JLM**

Enclosure

Copy to:  
William Irby (letter only)  
Kathleen A. Cummings  
Service List

**BEFORE THE  
STATE CORPORATION COMMISSION  
OF THE COMMONWEALTH OF VIRGINIA**

**Commonwealth of Virginia, ex rel.** :  
**State Corporation Commission** :  
 : **Case No. PUC-2001-00226**  
**Ex Parte: Establishment of a** :  
**Performance Assurance Plan for** :  
**Verizon Virginia Inc.** :

**VERIZON VIRGINIA INC.'s  
COMMENTS ON THE MARCH 7, 2003 REVISIONS TO THE VA PAP**

In accordance with the “Order of Amendment” issued by the Virginia State Corporation Commission (“Commission”) on March 12, 2003,<sup>1</sup> Verizon Virginia Inc. (“Verizon VA”) provides the following comments on the revisions to the “Performance Assurance Plan Verizon Virginia Inc.” (“VA PAP”) submitted by Verizon VA to the Commission on March 7, 2003. The Commission should adopt these revisions to the VA PAP. The Commission should also adopt the implementation schedule for these revisions proposed by Verizon VA in Section II below.

**I. The Commission Should Adopt the Revisions to the VA PAP.**

On January 24, 2003, the New York Public Service Commission (“PSC”) adopted an order approving revisions to the “Performance Assurance Plan Verizon New York Inc.” (“NY PAP”).<sup>2</sup> The revised NY PAP was filed with the New York PSC on February 3, 2003.

---

<sup>1</sup> *Establishment of a Performance Assurance Plan for Verizon Virginia Inc., Order of Amendment, Case No. PUC-2001-00226 (3/12/03).*

<sup>2</sup> *Petition Filed by Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan, filed in C 97-C-0271, Order Amending Performance Assurance Plan, NY PSC Case 99-C-0949 (1/24/03).*

Corrections to Appendices C and E of the NY PAP were filed with the New York PSC on February 11, 2003.

Pursuant to Section II.K.2 of the VA PAP, on February 13, 2003, Verizon VA submitted to the Commission a draft revised VA PAP that incorporated into the VA PAP the January 24, 2003 revisions to the NY PAP. On March 7, 2003 Verizon VA submitted to the Commission a corrected draft revised VA PAP that included a small number of changes to the February 13, 2003 draft revised VA PAP. These changes were needed to better conform the draft revised VA PAP to the revised NY PAP and the NY PSC order adopting the revised NY PAP.

The Commission should adopt the revised VA PAP submitted by Verizon VA on March 7, 2003. There are strong reasons that support updating the VA PAP to include the January 24, 2003 revisions to the NY PAP.

First, the existing VA PAP is substantially the same as the January 2001 NY PAP. Adopting the January 24, 2003 revisions to the NY PAP will be consistent with the Commission's July 18, 2002 decision to adopt a performance assurance plan that is based on the NY PAP<sup>3</sup> and will allow the VA PAP to continue to conform to the PAP that is in effect in New York, as well as to the PAP that Verizon VA expects will soon be in effect in almost all of the other jurisdictions served by the Verizon telephone companies in the Mid-Atlantic and Northeastern portions of the United States.<sup>4</sup>

---

<sup>3</sup> *Establishment of a Performance Assurance Plan for Verizon Virginia Inc., Order*, Case No. PUC-2001-00226 (7/18/02).

<sup>4</sup> In addition to Virginia, performance assurance plans based on the NY PAP have been adopted in Connecticut, Delaware, the District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, Pennsylvania, Rhode Island, Vermont and West Virginia. The PAP revisions that are being proposed by Verizon VA are also being proposed by Verizon for the PAPs in the other jurisdictions that have adopted a PAP that is based on the NY PAP.

Second, the NY PAP provides a good model for a PAP for Virginia and other jurisdictions because the NY PAP is the product of more than three years of litigation and regulatory commission review in New York. It has received the most extensive review and consideration of any of the carrier-to-carrier service quality financial incentive plans adopted in the jurisdictions served by the Verizon telephone companies.

Third, having a common PAP in the Verizon jurisdictions based on the NY PAP has substantial practical advantages for Verizon, the CLECs and utility commissions. It allows Verizon and the CLECs to avoid contesting the form of the performance assurance plan over-and-over, jurisdiction-by-jurisdiction. This greatly reduces the burden of regulatory litigation for commissions, CLECs and Verizon. Further, the existence of a common performance assurance plan permits Verizon's performance in one jurisdiction to be compared with its performance in other jurisdictions. Finally, uniformity of the performance assurance plans reduces the cost and administrative burden for Verizon to implement them, and for CLECs to review performance results.

Fourth, the revisions to the NY PAP that will be incorporated into the VA PAP will substantially improve the VA PAP. Among the most important of the improvements to the VA PAP will be the following:

- In the Mode of Entry ("MOE") section of the VA PAP, the Unbundled Network Element ("UNE") MOE is divided into two new MOEs, UNE-Platform and UNE-Loop. The revised VA PAP allocates \$31,632,000 annually at risk to the UNE-Platform MOE (the same amount that was annually at risk for the UNE MOE in the October 1, 2002 VA PAP), and

allocates \$7,029,333 annually at risk to the UNE-Loop MOE, which is funded by amounts reallocated from the Resale MOE and Trunks MOE.<sup>5</sup>

The Critical Measures section of the revised VA PAP also splits the UNE measures into UNE-Platform and UNE-Loop measures. The revised VA PAP allocates \$31,631,818 annually at risk to the UNE-Platform measures (compared with \$28,118,519 annually at risk for the UNE measures in the October 1, 2002 VA PAP) and allocates \$11,246,869 annually at risk to the UNE-Loop measures. The increases in UNE incentive amounts are funded by amounts reallocated from the EDI Special Provisions and the Trunks and Collocation Critical Measures.<sup>6</sup>

These changes, which both increase the total incentive dollars-at-risk for UNEs and create separate incentives for UNE-Platform and UNE-Loop, will provide Verizon VA with an increased incentive to provide service that meets applicable standards for UNEs and will help ensure a focus on both UNE-Platform and UNE-Loops.<sup>7</sup>

- Special Services. Metrics for Special Services (“Specials”)<sup>8</sup> are moved from the Mode of Entry section of the VA PAP to the Critical Measures section of the VA PAP. Under the MOE section of the VA PAP, incentives are calculated only on a CLEC-aggregate basis and the amount of incentives due under an MOE ultimately depends on Verizon VA’s performance

---

<sup>5</sup> See, *Petition Filed by Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan, filed in C 97-C-0271, Order Amending Performance Assurance Plan, NY PSC Case 99-C-0949, at 17 (1/24/03).*

<sup>6</sup> See, *Petition Filed by Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan, filed in C 97-C-0271, Order Amending Performance Assurance Plan, NY PSC Case 99-C-0949, at 17 (1/24/03).*

<sup>7</sup> See, *Petition Filed by Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan, filed in C 97-C-0271, Order Amending Performance Assurance Plan, NY PSC Case 99-C-0949, at 17 (1/24/03).*

<sup>8</sup> Special Services (“Specials”) are services that require engineering design intervention. Specials include such services as DS-1 and DS-3 services, primary rate ISDN, 4-Wire xDSL services, and private lines.

as to all of the types of services included in the MOE. By establishing Critical Measures for Specials performance, the revised VA PAP provides separate incentives for Specials and allows the assessment of Verizon VA's performance on a CLEC-specific basis, as well as a CLEC-aggregate basis. This will provide an enhanced incentive for Verizon VA to focus attention on its performance for Specials.<sup>9</sup>

- Resolution Process. A new Critical Measure for "Resolution Process" is added to the VA PAP. This Critical Measure will provide an enhanced incentive for Verizon VA to timely address CLEC inquiries about "missing" order notifiers and CLEC claims for billing adjustments.<sup>10</sup>

- Metrics Revisions. The revisions update the metrics used in the VA PAP.<sup>11</sup> In addition to conforming the VA PAP metrics to the metrics set out in the "Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports" ("VA Guidelines"), the update also introduces new metrics into the VA PAP and removes metrics that experience has shown are no longer useful in assuring that CLECs receive an appropriate quality of service.

---

<sup>9</sup> See, *Petition Filed by Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan, filed in C 97-C-0271, Order Amending Performance Assurance Plan, NY PSC Case 99-C-0949, at 17 (1/24/03).*

<sup>10</sup> See, *Petition Filed by Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan, filed in C 97-C-0271, Order Amending Performance Assurance Plan, NY PSC Case 99-C-0949, at 19 (1/24/03).* The Billing metrics in the "Resolution Process" Critical Measure, Metrics BI-3-04 and 05, will not apply until the current interim version of these metrics is replaced by the New York PSC with a permanent version of these metrics and that permanent version of the metrics is adopted for the VA Guidelines and VA PAP by the Commission and implemented by Verizon VA. Until the permanent version of Metrics BI-3-04 and 05 is adopted by the New York PSC and the Commission and implemented by Verizon VA, the incentive amounts assigned to these metrics will be allocated, proportionately, to the other metrics in the "Resolution Process" Critical Measure. See proposed VA PAP, Appendix B, Table B-1, Note D.

<sup>11</sup> See, *Petition Filed by Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan, filed in C 97-C-0271, Order Amending Performance Assurance Plan, NY PSC Case 99-C-0949, at 18 (1/24/03).*

Examples of the metrics updates include:

- Disaggregation of UNE measures into UNE-Platform and UNE-Loop measures;
- Disaggregation of some measures into Business and Residence measures;
- Addition of new order completion notifier measures (OR-4-11, 16 and 17) (and deletion of OR-4-09);
- Addition of an order accuracy measure (OR-6-03);
- Addition of resolution timeliness measures (OR-10-01 and 02, and BI-3-04 and 05) (and deletion of PO-9); and
- Addition of “% Out of Service” measures (MR-4-06 and 07).

A more detailed summary of the changes to the VA PAP metrics is set out in Attachment 1.

- **Statistical Methodology.** The revisions update the statistical methodology used in the VA PAP to include the statistical methodology used in the VA Guidelines.

In addition to the NY PAP revisions, the proposed VA PAP also includes a small number of Virginia-specific changes. In particular, Verizon VA has proposed removing the footnotes related to the ramp-up of Flow-Through standards, since the ramp-up period expired at the end of 2002. Verizon VA also has revised the language of the VA PAP at several points to address the

effective date of the revised VA PAP.<sup>12</sup> Finally, Verizon VA has corrected the statement of the standards for Metrics PR-4-04 and PR-6-02 in Appendix C.<sup>13</sup>

For all of the foregoing reasons, the Commission should adopt the March 7, 2003 revisions to the VA PAP.

**II. The Commission Should Adopt the Implementation Schedule for the revised VA PAP Proposed by Verizon VA.**

Verizon VA proposes that the revised VA PAP become effective on the first day of the second calendar month after the month in which the Commission approves the revised VA PAP. For example, if the revised VA PAP is approved in May 2003, the revised VA PAP would become effective July 1, 2003. Verizon VA's first VA PAP performance report that would reflect the revisions to the VA PAP would be the report for the July 2003 data month. This report would be issued at the end of August 2003 and include performance data for July 2003.

Verizon VA's proposed implementation schedule for the revised VA PAP is the same as the implementation schedule adopted by the New York PSC for the revisions to the NY PAP. The New York PSC order approving the revisions to the NY PAP was adopted on January 24, 2003. The New York PSC directed that the revised NY PAP become effective for March 2003.<sup>14</sup>

The implementation schedule proposed by Verizon VA will assure that the revised VA PAP is implemented promptly, within two months after it is approved by the Commission. It

---

<sup>12</sup> Verizon VA also has deleted references contained in the October 1, 2002 VA PAP to particular Commission orders. With the series of orders that has been issued, and that can be expected to be issued in the future, in the Commission's carrier-to-carrier service quality proceedings, references to particular orders will soon become outdated.

<sup>13</sup> A more detailed summary of the proposed revisions to the VA PAP is set out in Attachment 1.

<sup>14</sup> *Petition Filed by Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan, filed in C 97-C-0271, Order Amending Performance Assurance Plan, NY PSC Case 99-C-0949, at p. 21 (1/24/03).*



also will allow Verizon VA the time that it needs to properly undertake the complex process of revising the calculations that will be performed for the VA PAP each month and assuring that the revisions have been properly implemented.

**III. Conclusion.**

The Commission should adopt the revised VA PAP submitted by Verizon VA to the Commission on March 7, 2003 and the implementation schedule for the revised VA PAP proposed by Verizon VA.

Respectfully submitted,

---

Lydia R. Pulley  
Jennifer L. McClellan

600 East Main Street, 11<sup>th</sup> Floor  
Richmond, Virginia 23219  
Telephone No. 804-772-1547

Attorneys for  
Verizon Virginia Inc.

Dated: April 7, 2003

# **ATTACHMENT 1**

# Verizon Virginia Inc.

Summary of March 7, 2003  
Proposed Revisions to the  
Performance Assurance Plan

# New York Performance Plan Review

## *Timeline*

- The 2001 review started in Fall 2001.
- Verizon & CLECs submitted comments in October 2001.
- NY PSC Staff Proposal was posted on the NY PSC website on 10/18/02.
- Comments were filed on 11/6/2002.
- Reply comments were filed on 11/13/2002.
- The final Commission Order was issued on January 24, 2003 to be effective for March 2003 performance.
- Verizon made its compliance filing on February 3, 2003 and filed corrections to Appendices C and E on February 11, 2003.

# New York 2003 Performance Plan Revisions

## *Structural Changes:*

- UNE is split into “Platform” and “Loop” in both Mode of Entry and Critical Measures.
- Specials are added to Critical Measures and removed from Mode of Entry.
- A “Resolution Process” category is added to Critical Measures to measure PON-related Trouble Tickets and Billing Claims.
- Bill Credits are shifted from Special Provisions to Critical Measures (total dollars at risk remain unchanged).
- Electronic Data Interface (EDI) Measures are removed from Special Provisions.

# New York 2003 Performance Plan Revisions

## *Small Samples:*

- Expands the use of small sample tables to all absolute standards.

## *Statistical Changes:*

- Adopts changes in statistical methodology to be consistent with C2C Guidelines.
  - Expanded use of Fisher's Exact test for percentages.
  - Defines sample sizes needed for statistical testing.
- Uses additional months' performance to make final determination of -1 performance scores when there is no activity.
- Uses an additional month's performance for the Critical Measures "Individual Rule" when there is no activity.

# New York 2003 Performance Plan Revisions

## *Changes in Measures:*

- Disaggregate UNE measures for Platform and Loop to be consistent with C2C Guidelines.
- Disaggregate some measures for Business and Residence to be consistent with C2C Guidelines.
- Hot Cuts MOE Measures - Must meet standards for both On-Time Performance and Installation Quality
- PR-4-15 (% On-Time) for Interconnection Trunks replaces PR-4-01 (% Missed Appt.) to be consistent with the C2C Guidelines.



# New York 2003 Performance Plan Revisions

## *Measures Added:*

- Completion Notifiers (OR-4-11, OR-4-16 & OR-4-17)
- Order Accuracy (OR-6-03)
- Resolution Timeliness (OR-10-01, OR-10-02, BI-3-04\* & BI-3-05\*)
- % Out of Service > 4 Hours and > 12 Hours (MR-4-06, MR-4-07)

\* BI-3 Measures are currently interim with final measures to be determined. These measures are not included in the PAP until permanent VA Guidelines BI-3 Measures are adopted and implemented.

## *Measures Deleted:*

- MR-2 Report Rate
- PR-4 Average Delay Days for Trunks

## Comparison of dollars at risk in 2002 and 2003 Plans

- \$12.650 million shifted from EDI to Critical Measures
- Dollars reallocated among new and existing categories within MOE and Critical Measures

<b>2002 Annual Amount at Risk:</b>	<b>Resale</b>	<b>UNE</b>	<b>DSL</b>	<b>Trunks</b>	<b>Collocation</b>	<b>EDI</b>	<b>Total</b>
MOE	\$7,029,333	\$31,632,000	\$7,029,333	\$7,029,333			\$52,720,000
Critical Measures	\$7,029,630	\$28,118,519	\$7,029,630	\$12,301,852	\$2,460,370		\$56,940,000
Special Provisions:							
UNE Ordering		\$16,870,000					
UNE Flow Thru		\$7,030,000					\$7,030,000
UNE Hot Cut		\$16,870,000					\$16,870,000
EDI						\$12,650,000	\$12,650,000
Change Control							\$7,030,000
MOE Doubling	\$7,029,333	\$31,632,000	\$7,029,333	\$7,029,333			\$52,720,000
<b>Total At Risk</b>							<b>\$205,960,000</b>

<b>2003 Annual Amount at Risk:</b>	<b>Resale</b>	<b>UNE Platform</b>	<b>UNE Loop</b>	<b>DSL</b>	<b>Trunks</b>	<b>Collocation</b>	<b>Specials</b>	<b>Resolution Process</b>	<b>Total</b>
MOE	\$3,514,667	\$31,632,000	\$7,029,333	\$7,029,333	\$3,514,667				\$52,720,000
Critical Measures	\$7,029,293	\$31,631,818	\$11,246,869	\$7,029,293	\$8,435,152	\$1,405,859	\$2,108,788	\$702,929	\$69,590,000
Special Provisions:									
UNE Ordering		\$16,870,000							
UNE Flow Thru		\$7,030,000							\$7,030,000
UNE Hot Cut			\$16,870,000						\$16,870,000
EDI		\$0							\$0
Change Control									\$7,030,000
MOE Doubling	\$3,514,667	\$31,632,000	\$7,029,333	\$7,029,333	\$3,514,667				\$52,720,000
<b>Total At Risk</b>									<b>\$205,960,000</b>



# Mode of Entry - Pre-Order

**PO-1-06 and 2-02 are added for DSL CORBA**

**PO-1-01 and -03 appear in both Platform and Loop**

**PO-2-02 appears in both Platform and Loop**

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale
PO-1-01	Customer Service Record - CORBA		y	y	
	Customer Service Record - EDI		y	y	y
	Customer Service Record - Web GUI		y	y	y
PO-1-03	Address Validation - CORBA		y	y	
	Address Validation - Web GUI		y	y	y
	Address Validation - EDI		y	y	y
PO-1-06	Mechanized Loop Qualification - CORBA	y			
	Mechanized Loop Qualification - EDI	y			
	Mechanized Loop Qualification - Web GUI	y			
PO-2-02	OSS Interface Availability - Prime - CORBA	y	y	y	
	OSS Interface Availability - Prime - EDI	y	y	y	y
	OSS Interface Availability - Prime - Web GUI	y	y	y	y
PO-8-01	% On Time - Manual Loop Qualification	y			
PO-8-02	% On Time - Engineering Record Request	y			

## Pre-Order Measures that are dropped from MOE:

PO-1-01 and -03 for CORBA Resale

PO-1-02, -04 and -05

PO-3-02 and -04 for UNE and Resale



# Mode of Entry - Ordering OR-1

**OR-1-19 is added for Trunks**

**OR-1-02, -04 and -06 are disaggregated into Platform and Loop**

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks
OR-1-02	% On Time LSRC - Flow Through - Platform - 2hrs			y		
	% On Time LSRC - Flow Thru - Loop/Pre-Qual - 2hrs		y			
	% On Time LSRC -Flow Thru -POTS/Pre-Qualified Complex -2hrs				y	
OR-1-04	% On Time LSRC -No Facil Ck (E -No FT) -2W Digital -UNE/Resale	y				
	% On Time LSRC -No Facil Ck(E -No FT) -2W xDSL Loops	y				
	% OT LSRC -No Facil Check(Elec.-No Flow Thru) -Platform			y		
	% OT LSRC -No Facil Ck(E -No F/T) -Loop/LNP		y			
	% OT LSRC -No Facil Ck(E -No Flow Thru)-POTS/Pre-Qual Cmplx				y	
OR-1-06	% OT LSRC -No Facility Check (E -No FT) -Line Share/Split	y				
	% On Time LSRC/ASRC -Facility Check(Elec) -2W xDSL Loops	y				
	% On Time LSRC/ASRC -Facility Ck(E -No FT) -Line Share/Split	y				
	% OT LSRC/ASRC -Facil Ck(E -No F/T) -Loop/LNP		y			
	% OT LSRC/ASRC -Facil Ck(E -No F/T) -POTS/Pre-Qual Cmplx				y	
OR-1-06	% OT LSRC/ASRC -Facil Ck(Elec.-No Flow Thru) -Platform			y		
	% OT LSRC/ASRC -Facility Ck (E -No FT) -2W Digital -UNE/Resale	y				
	% OT Firm Order Confirmations (<=192 Forecasted Trunks)					y
OR-1-12	% On Time Design Layout Record					y
OR-1-13	% On Time Response - Request for Inbound Augment (<=192)					y

**Ordering Measures that are dropped from MOE:**

OR-1-04 and -06 for UNE and Resale Specials (moved to Critical Measures)



# Mode of Entry - Ordering OR-2,4,5,6

**OR-4-11, -16 and -17 are added for Platform, Loop, Resale and DSL**  
**OR-2-02, -04 and -06 are disaggregated into Platform and Loop**  
**OR-6-03 is added for Platform, Loop and Resale**

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks
OR-2-02	% On Time LSR Rej - Flow Thru - POTS/Pre-Qualified Complex				y	
	% On Time LSR Reject - Flow Through - Platform			y		
	% On Time LSR Reject - Flow Thru - Loop/Pre-Qual		y			
OR-2-04	% On Time LSR Rej -No Facil Ck(E- No FT) -2W Digital -UNE/Resale	y				
	% OT LSR Rej -No Facil Ck(E -No F/T) -Loop/LNP		y			
	% OT LSR Rej -No Facil Ck(E -No F/T) -POTS/Pre-Qual Cmplx				y	
	% OT LSR Rej -No Facil Ck(E- No FT) -2W xDSL Loops	y				
	% OT LSR Rej -No Facil Ck(E- No FT) -Line Share/Split	y				
	% OT LSR Rej.-No Facil Ck (Elec.-No Flow Thru) -Platform			y		
OR-2-06	% On Time LSR/ASR Rej -Facility Check(Elec) -2W xDSL Loops	y				
	% OT LSR/ASR Rej -Facil Ck(E -No F/T) -Loop/LNP		y			
	% OT LSR/ASR Rej -Facil Ck(E -No F/T) -POTS/Pre-Qual Cmplx				y	
	% OT LSR/ASR Rej -Facility Ck(E -No FT) -2W Digital -UNE/Resale	y				
	% OT LSR/ASR Rej -Facility Ck(E- No FT) -Line Share/Split	y				
	% OT LSR/ASR Rej. -Facil Ck(Elec.-No Flow Thru) -Platform			y		
OR-2-12	% On Time Trunk ASR Reject					y
OR-4-11	% Completed Orders with Neither a PCN or BCN Sent	y	y	y	y	
OR-4-16	% On Time PCN - 1 Business Day	y	y	y	y	
OR-4-17	% On Time BCN - 2 Business Day	y	y	y	y	
OR-5-03	% Flow Through - Achieved - POTS		y	y	y	
OR-6-03	% Accuracy - LSRC				y	
	% Accuracy - LSRC - Loop		y			
	% Accuracy - LSRC - Platform			y		

## Ordering measures that are dropped from MOE:

- OR-2-04 and -06 for UNE and Resale Specials (Moved to Critical Measures)
- OR-4-09



# Mode of Entry - Provisioning PR-3,4

**PR-3-01, 4-05, 4-14 and 4-15 are added for the products shown below  
PR-4-02 and -04 are disaggregated into Platform and Loop**

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks
PR-3-01	% Completed in 1 Day (1-5 Lines - No Disp) - Platform			y		
	% Completed in 1 Day (1-5 lines - No Disp) - POTS Total				y	
PR-3-03	% Completed w/in 3 Days (1-5 lines) No Disp -Line Share/Split	y				
PR-3-10	% Comp w/in 6 Days (1-5 lines) Tot -2WxDSL Loops	y				
PR-4-02	Average Delay Days - Total - POTS		y	y	y	
	Average Delay Days -Total -2W Digital -UNE/Resale	y				
	Average Delay Days -Total -2WxDSL Loops	y				
	Average Delay Days -Total -Line Share/Split	y				
PR-4-04	% Missed Appointment - VZ - Dispatch - Loop-New		y			
	% Missed Appointment - VZ - Dispatch - Platform			y		
	% Missed Appointment - VZ - Dispatch - POTS				y	
	% Missed Appointment -Dispatch -2W Digital -UNE/Resale	y				
	% Missed Appointment -Dispatch -Line Share/Split	y				
PR-4-05	% Missed Appointment -No Dispatch -2W Digital -UNE/Resale	y				
	% Missed Appointment -No Dispatch -Line Share/Split	y				
	% Missed Appointment- VZ - No Dispatch - Platform			y		
	% Missed Appointment- VZ - No Dispatch - POTS				y	
PR-4-07	% On Time Performance - LNP only					y
PR-4-14	% Completed On Time -2WxDSL Loops	y				
PR-4-15	% On Time Provisioning - Trunks					y

## Provisioning measures that are dropped from MOE:

- PR-3-08 and -09 for Resale and Platform (replaced by -3-01)
- PR-4-01 for Trunks (replaced by -4-15)
- PR-4-02 for Trunks
- PR-4-01 and -02 for UNE and Resale Specials (moved to Critical Measures)
- PR-4-04 for DSL Loops (Replaced by -4-14)



# Mode of Entry - Provisioning PR-5,6,8,9

**PR-8-01 is added for the products shown below**

**PR-5-01, 5-02 and 6-01 are disaggregated into Platform and Loop**

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks
PR-5-01	% Missed Appointment - Facilities					y
	% Missed Appointment - Facilities - Loop		y			
	% Missed Appointment - Facilities - Platform			y		
	% Missed Appointment - Facilities - POTS				y	
PR-5-02	% Orders Held for Facilities > 15 days - Loop		y			
	% Orders Held for Facilities > 15 days - Platform			y		
	% Orders Held for Facilities > 15 days - POTS				y	
	% Orders Held for Facilities >15 Days					y
PR-6-01	% Install. Troubles w/in 30 Days -2W Digital Loops -UNE/Resale	y				
	% Installation Troubles w/in 30 Days					y
	% Installation Troubles w/in 30 Days -2W xDSL Loops	y				
	% Installation Troubles w/in 30 Days -Line Share/Split	y				
	% Installation Troubles within 30 days - Loop		y			
	% Installation Troubles within 30 days - Platform			y		
	% Installation Troubles within 30 days - POTS				y	
PR-6-02	% Installation Troubles within 7 days - Hot Cut		y			
PR-8-01	Open Orders in a Hold Status >30 Days					y
	Open Orders In Hold Status >30 Days -2W Digital -UNE/Resale	y				
	Open Orders in Hold Status >30 Days -2W xDSL Loops	y				
	Open Orders in Hold Status >30 Days -Line Share/Split	y				
PR-9-01	% On Time Performance - Hot Cut		y			

## Provisioning measures that are dropped from MOE:

PR-5-01 and -02 for UNE and Resale Specials (moved to Critical Measures)

PR-6-01 for UNE and Resale Specials (moved to Critical Measures)



# Mode of Entry - Maintenance MR-1,3

**MR-3-01 and -02 are disaggregated into Platform and Loop and also for Residence and Business**

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks
MR-1-01	Average Response Time - Create Trouble	y			y	
	Avg. Response Time - Create Trouble		y	y		
MR-1-06	Average Response Time - Test Trouble (POTS only)				y	
	Avg. Response Time - Test Trouble (POTS only)			y		
MR-3-01	% Missed Repair Appointment-Loop-Line Share/Split	y				
	% Missed Repair Appointments - Loop - Bus.				y	
	% Missed Repair Appointments - Loop - Loop		y			
	% Missed Repair Appointments - Loop - Platform - Bus			y		
	% Missed Repair Appointments - Loop - Res.				y	
	% Missed Repair Appointments - Loop -Platform - Res			y		
	% Missed Repair Appt-Loop-2W Digital-UNE/Resale	y				
	% Missed Repair Appt-Loop-2W xDSL Loops	y				
MR-3-02	% Missed Repair Appointment-CO-2W xDSL Loops	y				
	% Missed Repair Appointment-CO-Line Share/Split	y				
	% Missed Repair Appointments - CO - Bus.				y	
	% Missed Repair Appointments - CO - Loop		y			
	% Missed Repair Appointments - CO - Platform - Bus			y		
	% Missed Repair Appointments - CO - Platform - Res			y		
	% Missed Repair Appointments - CO - Res.				y	
	% Missed Repair Appt-CO-2W Digital-UNE/Resale	y				

**Maintenance measures that are dropped from MOE:**

MR-1-03 and -04 for UNE and Resale

MR-2-01 and -02 for UNE, Resale and DSL



**MR-4-02 and -03 are disaggregated into Platform and Loop and for Residence and Business**

**MR-4-04 is added for 2 Wire Digital, DSL and Line Share/Split**

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks
MR-4-01	Mean Time to Repair - Total					y
MR-4-02	Mean Time To Repair - Loop Trouble - Bus.				y	
	Mean Time to Repair - Loop Trouble - Loop		y			
	Mean Time to Repair - Loop Trouble - Platform - Bus			y		
	Mean Time to Repair - Loop Trouble - Platform - Res			y		
	Mean Time To Repair - Loop Trouble - Res.				y	
	Mean Time To Repair -Loop -2W Digital -UNE/Resale	y				
	Mean Time To Repair -Loop -2W xDSL Loops	y				
	Mean Time To Repair -Loop -Line Share/Split	y				
MR-4-03	Mean Time To Repair - CO Trouble - Bus.				y	
	Mean Time to Repair - CO Trouble - Loop		y			
	Mean Time to Repair - CO Trouble - Platform - Bus			y		
	Mean Time to Repair - CO Trouble - Platform - Res			y		
	Mean Time to Repair - CO Trouble - Res.				y	
	Mean Time To Repair -CO -2W xDSL Loops	y				
	Mean Time To Repair -CO -Line Share/Split	y				
	Mean Time To Repair -CO Trouble -2W Digital -UNE/Resale	y				
MR-4-04	% Cleared (all troubles) w/in 24 Hours -2W Digital -UNE/Resale	y				
	% Cleared (all troubles) w/in 24 Hours -2W xDSL Loops	y				
	% Cleared (all troubles) w/in 24 Hours -Line Share/Split	y				

**Maintenance measures that are dropped from MOE:**  
 MR-4-01 for Specials (moved to Critical Measures)



# Mode of Entry - Maintenance MR-4,5

MR-4-05, -06, -07 and -08 are added for the products shown below

MR-4-08 is disaggregated into Platform and Loop and for Residence and Business

MR-5-01 is disaggregated into Platform and Loop

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks
MR-4-05	% Out of Service >2 Hours					y
MR-4-06	% Out of Service > 4 Hours - POTS - Bus				y	
	% Out of Service > 4 Hours - POTS - Res.				y	
	% Out of Service >4 Hours					y
	% Out of Service >4 Hours - Platform - Bus			y		
	% Out of Service >4 Hours - Platform - Res			y		
MR-4-07	% Out of Service > 12 Hours - Loop		y			
	% Out of Service > 12 Hours - POTS - Bus.				y	
	% Out of Service > 12 Hours - POTS - Res.				y	
	% Out of Service >12 Hours					y
	% Out of Service >12 Hours - Platform - Bus			y		
	% Out of Service >12 Hours - Platform - Res			y		
	% Out of Service >12 Hours -2W Digital -UNE/Resale	y				
	% Out of Service >12 Hours -2W xDSL Loops	y				
% Out of Service >12 Hours -Line Share/Split	y					
MR-4-08	% Out of Service > 24 Hours - Loop		y			
	% Out of Service > 24 Hours - Platform - Bus			y		
	% Out of Service > 24 Hours - Platform - Res			y		
	% Out of Service > 24 Hours - POTS - Bus.				y	
	% Out of Service > 24 Hours - POTS - Res.				y	
	% Out of Service >24 Hours					y
MR-5-01	% Repeat Reports w/in 30 Days					y
	% Repeat Reports w/in 30 days - Loop		y			
	% Repeat Reports w/in 30 days - Platform			y		
	% Repeat Reports w/in 30 days - POTS				y	
	% Repeat Reports w/in 30 Days -2w Digital -UNE/Resale	y				
	% Repeat Reports w/in 30 Days -2W xDSL Loops	y				
	% Repeat Reports w/in 30 Days -Line Share/Split	y				

**Maintenance measures that are dropped from MOE:**

MR-4-08 and 5-01 for Specials (moved to Critical Measures)



## There are no changes in MOE Network Performance Measures

Metric#	Metric Description	Trunks
NP-1-03	# of Final Trunk Groups Blocked 2 months	y
NP-1-04	# of Final Trunk Groups Blocked 3 months	y

## There are no changes in MOE Billing Measures

Metric#	Metric Description	Platform	Resale
BI-1-02	% DUF in 4 Business Days	y	y



# Critical Measures - Pre-Ordering

## PO-1-06 is added for DSL CORBA

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale
PO-1-06	Mechanized Loop Qualification - CORBA	y			
	Mechanized Loop Qualification - EDI	y			
	Mechanized Loop Qualification - Web GUI	y			
PO-2-02	OSS Interface Availability - Prime - CORBA		y	y	
	OSS Interface Availability - Prime - EDI		y	y	y
	OSS Interface Availability - Prime - Web GUI		y	y	y

**Pre-Order measure that is dropped from Critical Measures:**

PO-1-01 for UNE and Resale



# Critical Measures - Ordering

**OR-1-04 and -2-04 are added for Line Share/Split**

**OR-1-19 is added for Trunks**

**OR-4-16 is added for Platform, Loop and Resale**

**OR-10-01 and -02 are added as new measures of Resolution Timeliness**

**OR-1-02 is disaggregated into Platform and Loop**

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks	Resolution Process	Specials
OR-1-02	% On Time LSRC -Flow Through		y	y	y			
OR-1-04	%OT LSRC -No Fac Ck(E-No FT) -2W Digital -UNE/Resale	y						
	%OT LSRC -No Fac Ck(E-No FT) -2W xDSL Loops	y						
	%OT LSRC -No Fac Ck(E-No FT) -Line Share/Split	y						
	%OT LSRC -No Fac Ck(E-No FT)-All Specials-UNE/Resale							y
OR-1-06	%OT LSRC/ASRC -Fac Ck(E-No FT) -All Specls -UNE/Resl							y
OR-1-12	% On Time FOC					y		
OR-1-13	% On Time Design Layout Record					y		
OR-1-19	% OT Response -Request for Inbound Augment (<=192)					y		
OR-2-04	%OT LSR Rej -No Fac Ck(E-No FT) -2W Digital -UNE/Resl	y						
	%OT LSR Rej -No Fac Ck(E-No FT) -2W xDSL Loops	y						
	%OT LSR Rej -No Fac Ck(E-No FT) -Line Share/Split	y						
	%OT LSR Rej -No Fac Ck(E-No FT) -UNE/Resale							y
OR-2-06	%OT LSR/ASR Rej-Fac Ck (Elec) -UNE/Resale							y
OR-4-16	% On Time PCN - 1 Business Day		y	y	y			
OR-10-01	% PON Exceptions Resolved w/in 3 Business Days						y	
OR-10-02	% PON Exceptions Resolved w/in 10 Business Days						y	

**Ordering measures that are dropped from Critical Measures:**

OR-1-04 and -06 for UNE and Resale

OR-2-02, -04 and -06 for UNE and Resale

OR-4-09



# Critical Measures - Provisioning PR-4

- PR-4-01 is disaggregated for Specials by product as highlighted below
- PR-4-02 is added for products highlighted below (Specials moved from MOE)
- PR-4-04 is disaggregated for Platform and Loop
- PR-4-05 is added for 2w Digital

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks	Specials
PR-3-01	% Completed in 1 Day (1-5 lines No Disp.)			y	y		
PR-4-01	% Missed Appointment -VZ -DSO -UNE/Resale						y
	% Missed Appointment -VZ -DS1 -UNE/Resale						y
	% Missed Appointment -VZ -DS3 -UNE/Resale						y
	% Missed Appointment -VZ -Other -UNE/Resale						y
	% Missed Appointment -VZ -Total -EEL						y
	% Missed Appointment -VZ -Total -IOF						y
PR-4-02	Average Delay Days -Total -Line Share/Split	y					
	Average Delay Days -Total		y	y	y		
	Average Delay Days -Total -2W Digital	y					
	Average Delay Days -Total -2W xDSL Loop	y					
	Average Delay Days -Total -UNE/Resale						y
	Average Delay Days -Total -EEL						y
	Average Delay Days -IOF						y
PR-4-04	% Missed Appointments -Dispatch		y	y	y		
	% Missed Appointments -Dispatch -2W Digital -UNE/Resale	y					
	% Missed Appointments -Dispatch -Line Share/Split	y					
PR-4-05	% Missed Appointment -No Dispatch -Line Share/Split	y					
	% Missed Appointments - No Dispatch			y	y		
	% Missed Appt -No Dispatch -2W Digital -UNE/Resale	y					

## Provisioning measures that are dropped from Critical Measures:

- PR-3-03 and -10 for DSL
- PR-4-01 for Trunks (replaced by -4-15)
- PR-4-04 for DSL Loops (Replaced by -4-14)



# Critical Measures - Provisioning PR-5,6,8,9

**PR-4-14 is added for DSL (replaces 4-04)**

**PR-4-15 is added for Trunks (replaces 4-01)**

**PR-5-01 and -02 are added for Specials (moved from MOE)**

**PR-6-01 is added for the products highlighted below (specials moved from MOE)**

**PR-8-01 is added for Specials**

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks	Specials
PR-4-07	% On Time Performance -LNP					y	
PR-4-14	% Completed On Time -2W xDSL Loops	y					
PR-4-15	% On Time Provisioning - Trunks					y	
PR-5-01	% Missed Appointment -Facilities -UNE/Resale						y
PR-5-02	% Orders Held for Facilities >15 days -UNE/Resale						y
PR-6-01	% Installation Troubles w/in 30 Days		y	y	y	y	
	% Installation Troubles w/in 30 Days -2W xDSL Loops	y					
	% Installation Troubles w/in 30 Days -Line Share/Split	y					
	% Install Trbls w/in 30 Days -2W Digital Loop -UNE/Resale	y					
	% Installation Troubles w/in 30 days -UNE/Resale						y
PR-6-02	% Installation Troubles within 7 days -Hot Cut		y				
PR-8-01	Open Orders in Hold Status >30 Days -UNE/Resale						y
	Open Orders in a Hold Status >30 Days -EEL						y
	Open Orders in a Hold Status >30 Days -IOF						y
PR-9-01	% On Time Performance -Hot Cut		y				



# Critical Measures - Maintenance MR-3,4

**MR-3-01 is added for Resale, Platform, Loop and DSL**

**MR-4-01 is disaggregated for Specials**

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks	Specials
MR-3-01	% Missed Repair Appointment -Loop -Line Share/Split	y					
	% Missed Repair Appt -Loop -2W Digital -UNE/Resale	y					
	Missed Repair Appointments -Loop -Business			y	y		
	Missed Repair Appointments -Loop -Residential			y	y		
	Missed Repair Appointments -Loop		y				
	% Missed Repair Appointment -Loop -2W xDSL Loops	y					
MR-4-01	Mean Time to Repair - nonDS0 & DS0 -UNE/Resale						y
	Mean Time to Repair - DS1 & DS3 -UNE/Resale						y

**Maintenance Measures that are dropped from Critical Measures:**

MR-4-01 for Trunks

MR-4-02 for Loop and DSL

MR-4-03 for Resale and UNE





# Critical Measures - Maintenance MR-4,5

MR-4-04 is added for DSL, 2w Digital and Line Share/Split

MR-4-06 is added for Specials

MR-4-08 is added for Trunks and Specials

MR-4-08 is disaggregated into Platform and Loop and for Residence and Business

MR-5-01 is disaggregated into Platform and Loop

MR-5-01 is added for Trunks and 2w Digital

New / changed measures highlighted

Metric#	Metric Description	DSL	Loop	Platform	Resale	Trunks	Specials
MR-4-04	% Cleared(all troubles) w/in 24hrs -2W Digital -UNE/Resale	y					
	% Cleared (all troubles) w/in 24hrs -2W xDSL Loops	y					
	% Cleared (all troubles) w/in 24hrs -Line Share/Split	y					
MR-4-06	% Out of Service >4hrs -nonDS0 & DS0 -UNE/Resale						y
	% Out of Service >4hrs -DS1 & DS3 -UNE/Resale						y
MR-4-08	Out of Service >24hrs -Business			y	y		
	Out of Service >24hrs -Residential			y	y		
	Out of Service >24hrs -Total		y			y	
	%Out of Service >24hrs -nonDS0 & DS0 -UNE/Resale						y
	% Out of Service >24hrs -DS1 & DS3 -UNE/Resale						y
MR-5-01	% Repeat Reports w/in 30 Days -2w Digital -UNE/Resale	y					
	% Repeat Reports w/in 30 Days -2W xDSL Loops	y					
	% Repeat Reports w/in 30 Days -Line Share/Split	y					
	% Repeat Reports within 30 Days		y	y	y	y	
	% Repeat Reports w/in 30 days -Specials -UNE/Resale						y



**There are no Network Performance Measures added**

Metric#	Metric Description	Trunks	Collocation
NP-1-04	Final Trunk Groups Blocked	y	
NP-2-01/2	% OT Response to Request for Collocation - Total		y
NP-2-05/6	% On Time - Physical Collocation - Total		y
NP-2-07/8	Average Delay Days - Total		y

**Network Performance Measures that are dropped from Critical Measures:**  
NP-1-03 for Trunks



# Special Provisions - UNE Measures

Ordering, Flow-through and Hot Cut measures and thresholds remained the same

Metric#	Metric Description	UNE
OR-1-04	% OT LSRC<10 Lines (Elec.-No Flow Through)-POTS	y
OR-1-06	% On Time LSRC >=10 Lines (Electronic) - POTS	y
OR-2-04	% OT LSR Ref.<10 lines (Elec.-No Flow Through)-POTS	y
OR-2-06	% On Time LSR Refect >= 10 Lines (Elec.) - POTS	y
OR-5-03	% Flow Through - Achieved - POTS	y
PR-5-01	% Flow Through - Total - POTS & Specials	y
PR-6-02	% Installation Troubles within 7 days - Hot Cut	y
PR-9-01	% On Time Performance - Hot Cut	y

## EDI measures that are dropped from Special Provisions

PO-9-01

OR-3-02

OR-4-09

## Other Revisions

### *Other New York Changes:*

- A two-year statute of limitations on challenges to PAP performance will be adopted and effective with the June 2003 Performance Report.

### *Other Virginia Changes:*

- Modified language to address the effective dates of the revisions.
- Deleted language referring to the Flow-Through ramp-up.
- Correct performance standards PR-6-02 and PR-4-04.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of April, 2003, a copy of Verizon Virginia Inc.'s Comments in Case No. PUC-2001-00226 was sent as stated below:

Don R. Mueller, Esquire  
State Corporation Commission  
Office of the General Counsel  
Post Office Box 1197  
Richmond, Virginia 23218  
**(Hand-delivered)**

C. Meade Browder, Esquire  
Office of Attorney General  
2<sup>nd</sup> Floor  
900 East Main Street  
Richmond, Virginia 23219  
**(U.S. Mail)**

Performance Standards/Remedy Plans Subcommittee of the Collaborative  
Committee  
**(E-Mail)**

---

Jennifer L. McClellan