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Approved as Recommended
and so Ordered
by the Commission

JACLYN A. BRILLING
Secretary

Issued and Effective July 20, 2007

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

July 5, 2007

TO: THE COMMISSION

FROM: CWG STAFF TEAM - Office of Telecommunications, Office of Accounting, Finance, and Economics and Office of General Counsel

SUBJECT: CASE 97-C-0139 - Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies.

RECOMMENDATION: It is recommended that the Commission approve the proposed modifications to the Inter-Carrier Service Quality Guidelines (C2C Guidelines). These modifications consist of administrative changes and revisions to OR-06-01. These proposed modifications represent the consensus recommendation of the Carrier Working Group (CWG).

BACKGROUND

The C2C Guidelines is a comprehensive document that establishes standards and metrics for measuring and reporting

Verizon's inter-carrier service quality performance.¹ Since the adoption of the C2C Guidelines in 1999, the CWG, whose active membership includes Department Staff and the major incumbent and competitive local exchange carriers (CLECs) operating in New York State, has continued to work in a fully collaborative manner to modify the C2C Guidelines when and where appropriate justification has been presented by Verizon and/or the CLEC community. The recommendations of the CWG have been the subject of many past Commission Orders; the last one was May 23, 2007. Notice of the Commission's intent to further modify the C2C Guidelines was published in the State Register on May 30, 2007 (SAPA No. 97-C-0139SA29). No comments have been received.

DISCUSSION

The proposed modifications to the C2C Guidelines are classified into two categories: non-process changes of an administrative nature and changes that affect the C2C Guideline process. The modifications recommended herein are the result of

¹ Case 99-C-0139, Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies, Order Adopting Inter-carrier Service Quality Guidelines (issued February 16, 1999). The Guidelines are a comprehensive document that provides the metrics and performance standards applicable to Verizon's state level operating entities in Connecticut, Delaware, the District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania (not applicable to former GTE territory), Rhode Island, Vermont, Virginia, and West Virginia. They include comprehensive explanations of the standard's definitions, measurement methodologies, reporting levels, geography covered, and the current product intervals. In addition, the document includes a glossary and appendices that provide explanatory material related to the metrics and standards, such as, a description of the statistical methodology that will be applied to help assess whether there is any difference between the delivery of Verizon retail services and its wholesale products and services.

many collaborative sessions where the CWG reviewed and unanimously agreed to the proposed changes.

(i) Administrative Changes

The nine administrative modifications to the C2C Guidelines, detailed in Section A of Attachment 1, clarify and/or update the language in the C2C Guidelines.² Two of the proposed administrative changes (OD-01 Operator Services/Directory Assistance - Speed of Answer and PO-7 Software Problem Resolution Timeliness) are based on recommendations from the CWG's Joint Subcommittee (JSC) to incorporate audit findings from other state C2C proceedings.

(ii) Process Changes

Process modifications to the C2C Guidelines, detailed in Section B of Attachment 1, are changes that affect the manner in which a performance measurement is processed (i.e. how the measurement is calculated or which products are measured in accordance with the performance measurement). These changes require time to be implemented by Verizon.

Currently, the C2C Guidelines include a performance metric that determines whether the service order generated by Verizon matches the service request sent by the CLEC (OR-6 - Order Accuracy). Sub-metric OR-6-01 (Percent of Service Order Accuracy), compares ten required fields on the latest version of

² There are nine administrative changes recommended at this time. The changes range from updating the metric language (i.e. replacing references from Wholesale Customer Care Center (WCCC) to Partner Solution Customer Care (PSCC); revising language in Appendix M to coincide with the process changes recommended for OR-6-01 in this item; adding a parenthetical in PO-7 to clarify its definition) to defining enhanced extended link (EEL) in the glossary.

the CLEC's local service request (LSR) to the completed Verizon service order for errors. Fields that do not match are manually reviewed and corrected. The comparison in the metric is based on Verizon's audit of an automated random monthly sample of 400 manually handled Resale and UNE Loop orders.³

Over the years, Verizon has significantly automated its service order processing which has enhanced its accuracy. For example, 8 of 10 fields on the local service request confirmation are available for CLECs to review and the error rate has recently been measured at less than .5%. Based on the increased accuracy of the automated process, the CWG reviewed OR-6-01 and is recommending that some aspects of Verizon's manual review of the fields be changed or eliminated.

- 1) In many service centers, it is not possible to obtain a random sample of 400 manual orders. However, by combining Resale and UNE orders, a reasonable sample for monthly review can be obtained, and this would save Verizon a substantial amount of production expenses each month.⁴ Therefore, we recommend that UNE and Resale orders be combined for the sample.
- 2) Service representatives usually use the Account Telephone number information to review the account, before taking any action. This ensures that any error in the billed telephone number (BTN) on the local service request is corrected before issuing an order. Verizon's recent review of the BTN field reflected that less than one percent of the scored service orders were BTN misses. Therefore, removing the BTN as a reviewed field is recommended.

³ Twenty orders are randomly sampled each business day.

⁴ Verizon suggests that its costs approach \$1 million annually to process this metric.

- 3) Local service requests to port telephone numbers result in two service orders. The local service request only addresses the telephone number that the CLEC wishes to take an action on and is captured in the PR-4-07 (Percent On-Time Performance - Local Number Portability Only). The second order is written to address the telephone numbers that are remaining with the original service provider; these always require manual review because the numbers are not on the local service request. Because one aspect of this field is captured in another metric and the other aspect of the process always requires manual review, removing the ported telephone number field is recommended.
- 4) Information from the listing field on the Service Order must match an entry in the Master Street Address Guide (MSAG) in order for the 911 database to accept the information. A CLEC can verify location fields by using the MSAG. If the location field does not match an entry in the MSAG the transaction (for 911 purposes only), the order is rejected and remains incomplete until the valid location information is entered. Verizon's downstream systems ensure accuracy of E911 listing information. Therefore, it is recommended that the E911 listing information field be removed.
- 5) For dispatched installations, due date availability is subject to change throughout the course of a day and is virtually impossible to automate. Changing the review process for the due date field to compare it to the local service request confirmation, (instead of the local service request) is a more accurate indicator of when service will be provisioned. Therefore, comparing the due date available to information on the local service request confirmation is recommended.

CONCLUSION

The modifications proposed here are reasonable, and help to both clarify the C2C Guidelines and enhance the efficient measurement of Verizon's operational processes. These proposed modifications represent the consensus recommendation of the Carrier Working Group. Team members from the Office of Accounting, Finance, and Economics have assisted with the preparation of this memorandum and agree with these recommendations.

RECOMMENDATION

It is recommended that:

1. Proposed modifications to the Inter-Carrier Service Quality Guidelines (C2C Guidelines) consisting of administrative changes and the revisions to the OR-6-01 performance metric be approved.

2. Within 15 days of the date this Order is issued, Verizon New York Inc. should file with the Secretary an original and five copies and serve upon each party the Inter-Carrier Service Quality Guidelines with the corrections, changes and additions recommended herein.

3. This proceeding be continued.

Respectfully submitted,

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Section A –Administrative Changes to the Guidelines

Product Code Table	Collocation Augments	
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1. Change Proposed:

Clarify the definition of product codes 6711 and 6712 in the product code table as follows:

6711:

~~Collocation – Augment Applications – 76 Days~~
 Collocation – Augment Applications – not subject to the 45 business day interval

6712:

~~Collocation – Augment Applications – 45 Days~~
 Collocation – Augment Applications subject to the 45 business day interval

Rationale:

Ensures consistency with the NP-2-03 products as stated in the Guidelines. CWG Consensus 3/15/07

NP-2-03	Average Interval – Physical Collocation
Products	<ul style="list-style-type: none"> • New Applications • Augment Applications not subject to the 45 business day interval • Augment Applications subject to the 45 business day interval

Global Change	Wholesale Customer Care Center (WCCC)	
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2. Change Proposed:

Replace all references from Wholesale Customer Care Center (WCCC) to Partner Solutions Customer Care (PSCC).

Rationale:

The WCCC is now referred to as the PSCC. NY CWG Consensus 6/21/07

ATTACHMENT 1

PO-7	Software Problem Resolution Timeliness	
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3. Change Proposed:

Clarify language by adding a parenthetical in the definition section as follows:

After each major CLEC-affecting software release, Verizon tracks the number of rejected Pre-Order and Order transactions reported to the Wholesale Customer Care Center (WCCC) (those rejected transactions resulting from the test deck execution) and the time frame to resolve the problem.

Rationale:

The insertion of a parenthetical clarifies the intent of the measure to look at only rejected transactions resulting from execution of the test deck. NY CWG Consensus 6/21/07

OR-6-01 Appendix M	Order Accuracy Order Accuracy Details	
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4. Change Proposed:

Remove language in Appendix M methodology pertaining to manual sampling process

Rationale:

The sampling is now mechanized (the review is still manually intensive). CWG Consensus 4/26/07

5. Change Proposed:

Remove language in OR-6-01 methodology pertaining to samples by centers that process CLEC orders. Also remove language in OR-6-01 and Appendix M pertaining to printing a copy of the Firm Order Confirmation (FOC).

Rationale:

Verizon has centers that provide services to multiple states. Orders are sampled by state, not by center. The language pertaining to printed copies is no longer relevant; data is stored electronically. CWG Consensus 4/26/07

ATTACHMENT 1

OR-6-01	Order Accuracy	
Appendix M	Order Accuracy Details	

6. Change Proposed:

Remove Platform language in Appendix M pertaining to review of the Telephone Number field.

Rationale:

Effective with the 12/1/05 NY PSC order, UNE Platform was removed from the ordering metrics in the Carrier-to-Carrier Guidelines.

MR-2-01	Network Trouble Report Rate	
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7. Change Proposed:

Remove word 'POTS' next to numerator and denominator definition as shown below.

MR-2-01	Network Trouble Report Rate		
Products	Resale: • Specials	UNE: • Specials	Trunks: • Interconnection Trunks (CLEC)
Calculation	Numerator		Denominator
POTS:	Number of all trouble reports with found network troubles (disposition codes FAC, CO, and STN).		Number of specials or trunks in service.

Rationale:

The use of the word 'POTS' is a carryover dating back to the December 15, 1998 Draft New York Guidelines, which had slightly different numerator/denominator definitions for POTS, Specials, and Trunks. The in-effect Guidelines use the same definition for all MR-2-01 products; therefore, the word 'POTS' should be removed. CWG Consensus 3/15/07

Glossary	Enhanced Extended Link (EEL)	
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8. Change Proposed:

Add the following glossary definition for the EEL product:

Enhanced Extended Link (EEL) is a combination of dedicated Unbundled Network Elements that includes loops, transport, and may include multiplexing.

Rationale:

EEL is reported in the Guidelines, and should have a product definition. CWG Consensus 3/15/07

OD-1	Operator Services/Directory Assistance - Speed of Answer
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9. Change Proposed:

Update the report dimensions for OD-1-01 and OD-1-02 as follows:

From:

<p>For metric OD-1-01 Operator Services Speed of Answer</p> <ul style="list-style-type: none"> • State Specific Retail/Resale combined • State Specific CLEC (facility based) <p>For metric OD-1-02 Directory Assistance – Speed of Answer</p> <ul style="list-style-type: none"> • State Specific Retail/Resale combined • State or regional Specific Operator Service Centers²⁵
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²⁵ If no NY CLEC traffic is handled by these centers, the data will not be reported.

To:

<p>OD-1-01 and OD-1-02:</p> <ul style="list-style-type: none"> • State or Regional Specific Retail/Resale combined • State or Regional Specific CLEC (facilities based)

Rationale:

The report dimensions for OD-1-01 and OD-1-02 are the same. Data is reported as Retail/Resale and CLEC, at either a state or regional level based on the quoc design. The footnote is superfluous, and is not germane for use in a regional document. JSC consensus 1/9/07. CWG Consensus 3/15/07

Section B—Modifications Requiring Process Changes

OR-6-01 Appendix M	Order Accuracy Order Accuracy Details	
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10. *Change Proposed:*

Update OR-6-01 metric as follows:

- i. Combine Resale and UNE Loop/Complex/LNP reporting
- ii. Remove Billed Telephone Number (BTN) as a reviewed field
- iii. Remove Ported Telephone Number as a reviewed field
- iv. Remove E911 listing information as a reviewed field
- v. Change review process for the due date field to compare the service order to the Local Service Request Confirmation (instead of the Local Service Request)

Rationale:

- a) Combining Resale and UNE reporting ensures an adequate sample size for monthly review
- b) Before taking any action, the Service Representative uses the Account Telephone number to review the account. This ensures that any error in the BTN on the LSR is corrected before issuing an order.
- c) Local service requests to port TNs result in at least two service orders. The LSR only addresses the telephone numbers that the CLEC wishes to take action on. The second order is written to address the TNs that are remaining with the original service provider. This second order always requires manual review because the TNs for comparison cannot be found on the LSR.
- d) Verizon has downstream systems to ensure accuracy of E911 listing information
- e) The due date on the Local Service Request Confirmation (LSRC) is a more accurate indicator of when service will be provisioned.

NY CWG Consensus 4/26/07