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January 10, 2003

Via UPS Overnight Delivery  
James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, Pa. 17120

**Re: Performance Standards and Remedies - Docket No. M-00011468 (PMO II)**  
**Compliance Filing**

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Dear Secretary McNulty:

The Commission's recently adopted Order in the above referenced Docket required Verizon Pennsylvania Inc. ("Verizon PA") to make a compliance filing of the new Carrier-to-Carrier Guidelines ("Guidelines") and Performance Assurance Plan ("PAP") by December 30, 2002. On December 20, 2002, Verizon PA requested and was granted an extension of time for this filing until January 10, 2003. Verizon PA thanks the Commission for granting this extension. In compliance with the Commission's Order, attached please find the following:

- A complete copy of the new Pennsylvania Guidelines based upon the May 2002 New York Guidelines. The attached Guidelines contain the modifications required by paragraph five (5) of the Commission's Order, as well as the modifications necessary to reflect Pennsylvania-specific systems and processes. (A redline version of this document showing the changes from the New York Guidelines is available to interested parties upon request.)
- A complete copy of the PAP adopted by the Commission, which contains the modifications required by the Commission's Order. (A redline version of this document showing the changes from the original consensus PAP is available to interested parties upon request.)

In the event that interested parties have any questions regarding this filing, Verizon PA has arranged to have its subject matter experts available to answer questions on Wednesday, January 15, 2003, from 2 to 4 p.m. (EST). Any party interested in participating in this session should call 800-867-1117 (passcode 184903) promptly at 2 pm.

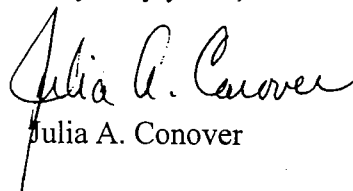
As required in the Order (page 70), Verizon PA stands ready to implement all new metrics and the new PAP, as detailed in this filing, effective April 1, 2003 (April data month) with the exception of the Directory Listing / White Page metrics included in Verizon's Petition for Reconsideration filed December 23, 2002. While Verizon PA's Petition for Reconsideration is pending, Verizon PA respectfully requests that it not be required to report the measurements that are the subject of this Petition.

The Commission Order also required Verizon PA to continue to file the existing CLEC aggregate metrics report and existing remedy report for a three month parallel reporting cycle to include the April, May and June 2003 data months. During this three-month dual reporting cycle, remedies will be paid only under the new PAP effective April 1, 2003. Verizon PA will be able to achieve this dual reporting requirement with the exception of the PO-1 and PO-2 metrics. This family of metrics requires the pre-establishment of a timeout at either 330 (old guidelines) or 60 (new guidelines) seconds; therefore dual reporting is not possible and we will be reporting under the new Guidelines.

Please note that ordering paragraph 19 requires "That within 10 days of the formal adoption by the New York Public Service Commission of any changes to the New York Carrier to Carrier Guidelines and or the New York Performance Assurance Plan, Verizon Pennsylvania Inc. shall file with this Commission and the Pennsylvania Carrier Working Group a full and complete copy of all such changes." As required in the Commission's Order, this compliance filing is based upon the New York May 2002 Guidelines. However, the New York Commission did approve additional changes to the Guidelines in October 2002. To avoid complicating this compliance filing, Verizon PA will file those changes separately with the Pennsylvania Commission and the Carrier Working Group in the near future.

Please let me know if you have any questions about this filing.

Very truly yours,



Julia A. Conover

JAC/dkf  
Att.

cc: Attached Certificate of Service