

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PERFORMANCE MEASURES :
REMEDIES : **M-00011468**

**VERIZON PENNSYLVANIA INC.’s
SUBMISSION OF REVISED PA GUIDELINES TO CONFORM
THE PA GUIDELINES TO THE SEPTEMBER 2004 NY GUIDELINES
AND REVISIONS TO THE PA PAP TO CONFORM
THE PA PAP TO THE REVISED PA GUIDELINES**

In accordance with the “Final Opinion and Order On Performance Measures and Remedies For Wholesale Performance for Verizon Pennsylvania Inc. (PMO II)” issued by the Pennsylvania Public Utility Commission (“Commission”) on December 10, 2002, Verizon Pennsylvania Inc. (“Verizon PA”) submits the attached revised “Carrier-to-Carrier Guidelines Performance Standards and Reports” for Verizon PA (“PA Guidelines”).¹ The revised PA Guidelines conform the PA Guidelines to the September 2004 “Carrier-to-Carrier Guidelines Performance Standards and Reports” for Verizon New York Inc. (“NY Guidelines”).²

Pursuant to the Commission’s “Order” entered July 27, 2004, Verizon PA also submits revisions to the “Performance Assurance Plan Verizon Pennsylvania Inc.” (“PA PAP”).³ The revisions to the PA PAP conform the PA PAP to the revised PA Guidelines.

¹ *Performance Measures Remedies, Final Opinion and Order On Performance Measures and Remedies For Wholesale Performance for Verizon Pennsylvania Inc. (PMO II)*, M-00011468, at 87 and 97-98 (12/10/02).

² *Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies, Order Establishing Modifications to the Inter-Carrier Service Quality Guidelines*, NY PSC Case 97-C-0139 (8/27/04).

³ *Performance Metrics and Remedies—2004 Updates, Order*, M-00011468, at 8 and 9-10 (7/27/04).

I. Revised PA Guidelines.

On August 27, 2004, the New York Public Service Commission (“PSC”) adopted an order approving revisions to the NY Guidelines.⁴ The revised NY Guidelines were filed with the New York PSC on September 28, 2004.⁵

The Guidelines document for New York has been revised in three ways. First, the Guidelines document has been revised to include the changes that were approved by the New York PSC in its order of August 27, 2004.

Second, based upon the consensus of the participants in the New York Carrier Working Group,⁶ the Guidelines document in New York has been revised into a Verizon East combined regional Guidelines document that includes in a single document not only the metrics, appendices and other Guidelines provisions applicable to New York, but also the metrics, appendices and Guidelines provisions not applicable to New York that have been adopted for the Verizon telephone companies in the jurisdictions in the Mid-Atlantic and Northeastern portions of the United States that base their Guidelines on the NY Guidelines. This has been done in order to allow a single Regional Guidelines document to be used in New York and the Verizon jurisdictions that have elected to adopt Guidelines based on the NY Guidelines, including Pennsylvania.

⁴ *Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies, Order Establishing Modifications to the Inter-Carrier Service Quality Guidelines*, NY PSC Case 97-C-0139 (8/27/04).

⁵ Revised NY Guidelines were initially filed with the NY PSC on September 13, 2004. The revised NY Guidelines, with additional revisions, were refiled with the NY PSC on September 28, 2004.

⁶ The New York Carrier Working Group includes New York State Department of Public Service staff, Verizon NY and interested CLECs, who participate in the New York PSC’s on-going collaborative on carrier-to-carrier service quality measurements and standards. *Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies, Order Establishing Modifications to the Inter-Carrier Service Quality Guidelines*, NY PSC Case 97-C-0139, p. 1 (8/27/04).

The bulk of the metrics, appendices and other provisions in the Regional Guidelines document apply to New York and to all of the jurisdictions that have adopted the NY Guidelines as the basis for their Guidelines, including Pennsylvania. Where there is a metric, appendix or Guidelines provision whose application is limited to a particular jurisdiction or group of jurisdictions (such as a metric or appendix that has been adopted by only one jurisdiction, or a Guidelines provision that relates to a Verizon system that is used only in a portion of the Verizon East service area⁷), that jurisdiction-specific metric, appendix or Guidelines provision is set out in the Regional Guidelines, but with an identification of the jurisdiction(s) to which it applies.⁸

As a result, the revised PA Guidelines will be composed of those portions of the Regional Guidelines that are applicable to Pennsylvania. This will include the portions of the Regional Guidelines that apply to all jurisdictions, including Pennsylvania, and any other portions of the Regional Guidelines that are specifically stated to be applicable to Pennsylvania.

Third, as part of the process of creating the Regional Guidelines, two of the Appendices in the Regional Guidelines have been revised to incorporate updated Verizon business documentation (Appendix H, “Flow-Through Order Scenarios,” and Appendix J, “Collocation Forecasting Guide”).

⁷ For instance, Metrics BI-6, 7 and 8 apply only to New Jersey and Pennsylvania. Appendix U applies only to Maryland. In the “Exclusions” section of Metric OR-1, there are separate statements of the Verizon SOP scheduled hours for each of Verizon North and New Jersey, and separate statements of the Verizon SOP scheduled downtime hours for each of Pennsylvania/Delaware and Maryland/District of Columbia/Virginia/West Virginia.

⁸ In reviewing the Regional Guidelines document submitted in New York, Verizon has discovered that it inadvertently failed to include in that document (a) Maryland Appendix P, which sets out the process adopted by the Maryland Public Service Commission for revising the MD Guidelines, and (b) West Virginia Exhibit 1, which sets out the distribution dates for the WV Guidelines monthly performance reports. These omissions have been corrected for the Regional Guidelines that are being submitted in Delaware, the District of Columbia, Maryland, Pennsylvania, Virginia and West Virginia, which include Maryland Appendix P (as Appendix Q), and West Virginia Exhibit 1. At an appropriate time, these omissions also will be corrected in New York, New Jersey and the New England states. Maryland Appendix P (Appendix Q) continues to apply only to Maryland. West Virginia Exhibit 1 continues to apply only to West Virginia.

Set out in Attachment 1 are the revised PA Guidelines in the Regional Guidelines format with the August 27, 2004 New York PSC ordered revisions shown in “red-line.” Attachment 2 contains a plain text version of the revised PA Guidelines in the Regional Guidelines format with the August 27, 2004 New York PSC ordered revisions.⁹

II. PA PAP Revisions

Pursuant to the Commission’s order of July 27, 2004, Verizon PA also submits for the Commission’s consideration the attached revisions to the PA PAP. The revisions conform the PA PAP to the revised PA Guidelines. The revisions are set out in Attachments 3 and 4 in “red-line” and plain text formats.¹⁰

III. Implementation Schedule.

If the Commission elects to adopt the revised PA Guidelines, Verizon PA recommends the following implementation schedule for the revised PA Guidelines.

To make better use of its Information Technology resources, in 2005 Verizon plans to adopt a process that provides for quarterly updates to its Wholesale measurement systems. At present, Verizon contemplates making updates to its Wholesale measurement systems for the February 2005 data month, for which performance reports will be issued at the end of March 2005, for the May 2005 data month, for which performance reports will be issued at the end of June 2005, and for the August 2005 data month, for which performance reports will be issued at the end of September 2005.

⁹ If the Commission approves the revised PA Guidelines, Verizon PA will submit to the Commission a final version of the revised PA Guidelines that includes the effective date of the revised PA Guidelines.

¹⁰ If the Commission approves the revisions to the PA PAP, Verizon PA will submit to the Commission a final version of the revised pages that includes the effective date of the revisions.

In order for Verizon PA to include the revised PA Guidelines in a quarterly update, Verizon PA will need to receive a Commission order approving the revised PA Guidelines no later than the 15th day of the second calendar month prior to the calendar month in which the quarterly update is to be implemented. For instance, if on or prior to December 15, 2004 the Commission issues an order approving the revised PA Guidelines, Verizon PA will implement the revised PA Guidelines for the February 2005 data month, for which performance reports will be issued at the end of March 2005. If between December 16, 2004 and March 15, 2005 the Commission issues an order approving the revised PA Guidelines, Verizon PA will implement the revised PA Guidelines for the May 2005 data month, for which performance reports will be issued at the end of June 2005. If between March 16, 2005 and June 15, 2005 the Commission issues an order approving the revised PA Guidelines, Verizon PA will implement the revised PA Guidelines for the August 2005 data month, for which performance reports will be issued at the end of September 2005.¹¹

These implementation intervals will be needed in order to allow Verizon PA to undertake the complex work of making the system and process changes necessary to perform and report the modified measurements. They will also allow Verizon PA to test whether these changes have been properly made.

¹¹ These implementation intervals assume that the revised PA Guidelines will be adopted in the form in which they were submitted by Verizon PA, without change. If the Commission adopts changes to the revised PA Guidelines, implementation of the revised PA Guidelines could be delayed.

If the Commission elects to adopt the revisions to the PA PAP, the implementation schedule for these revisions should be the same as the implementation schedule for the revised PA Guidelines. This will help to assure that the measurements used for the PA PAP are consistent with those used for the PA Guidelines.

Respectfully submitted,

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ATTACHMENT 1

ATTACHMENT 2

ATTACHMENT 3

ATTACHMENT 4