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July 7, 2015

VIA FEDERAL EXPRESS

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**RE: PMO III – Administrative and Process Changes (Folder 19)
Docket No. M-2015-2464294**

**RE: PMO – Performance Metrics and Remedies – 2015 Changes (Folder 19)
Docket No. M-00011468¹**

**Verizon Pennsylvania LLC's Submission of Revised PA Guidelines
to Conform the PA Guidelines to the May 2015 NY Guidelines**

Dear Secretary Chiavetta:

Enclosed please find Verizon Pennsylvania LLC.'s Submission of Revisions to the PA Guidelines to Address the May 2015 Changes to the NY Guidelines, in the above-referenced matter, as well as an electronic copy of the Submission on disk in .pdf format. Please note that a copy of this Submission is being posted electronically on Verizon's website at: <http://www22.verizon.com/wholesale/cwgroup/Carrier-Working-Group.html>.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink that reads "Suzan D. Paiva".

SDP/slb
Enc.

Via Federal Express
cc: Louise Fink Smith
Cheryl Walker Davis

Via Electronic Mail
cc: Pennsylvania Carrier Working Group

¹ M-00011468 is the parent case for this filing.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PERFORMANCE MEASURES :
REMEDIES (F0019) :

**VERIZON PENNSYLVANIA LLC's
SUBMISSION OF REVISED PA GUIDELINES TO CONFORM
THE PA GUIDELINES TO THE JUNE 2015 NY 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 LLC (“Verizon PA”) submits revised “Carrier-to-Carrier Guidelines Performance Standards and Reports” for Verizon PA (“PA Guidelines”).¹ The revised PA Guidelines conform to the June 2015 “Carrier-to-Carrier Guidelines Performance Standards and Reports” for Verizon New York Inc. (“NY Guidelines”) and incorporate into the PA Guidelines revisions to the NY Guidelines adopted by the New York Public Service Commission (“PSC”) on May 14, 2015.

Verizon PA requests that the Commission adopt a schedule for comments and reply comments on the revisions to the PA Guidelines under which comments will be due on or about July 20, 2015 and reply comments due 10 calendar days thereafter.

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

I. Revised PA Guidelines.

On May 14, 2015, the New York PSC adopted an order approving revisions to the NY Guidelines.² A copy of this order is attached as Exhibit 1 hereto. The revised NY Guidelines were filed with the New York PSC on June 12, 2015.

The revisions to the Guidelines set out in the New York PSC's May 14, 2015 order are consensus changes to the Guidelines recommended by the New York Carrier Working Group ("NY CWG").³ They consist of 13 administrative changes and 108 process changes (metric deletions).⁴ Most of the changes are the deletion of metrics that the NY CWG concluded are no longer needed because of little to no activity. None of the deleted metrics is included in the Performance Assurance Plan.⁵ The revisions to the Guidelines are fully described in the NY PSC's May 14, 2015 order.

Attached as Exhibit 2 are the revised PA Guidelines with the revisions shown in "red-line." Exhibit 3 contains a plain text version of the revised PA Guidelines.

II. Implementation Schedule.

If the revisions to the PA Guidelines set out in Exhibits 2 and 3 of this submission are approved by September 30, 2015, Verizon PA recommends that these revisions be implemented

² *Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies*, Case 97-C-0139, Order Issued and Effective May 14, 2015; Errata Issued June 8, 2015. This order and the June 8, 2015 Errata to it are available on the New York PSC's website at: <http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=97-c-0139&submit=Search+by+Case+Number> ("May 14, 2015 NY PSC Order").

³ *May 14, 2015 NY PSC Order*, p. 2. 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.

⁴ *May 14, 2015 NY PSC Order*, pp. 2-7 and Attachment 1.

⁵ The Performance Assurance Plan ("PAP") is the Commission-approved financial incentives plan applicable to services Verizon PA provides to CLECs. The PAP uses some, but not all, of the metrics included in the PA Guidelines.

for the November 2015 data month.⁶ Implementing the revisions for the November 2015 data month will allow prompt implementation of the revisions. If the revisions to the PA Guidelines set out in Exhibits 2 and 3 of this Submission are not approved by September 30, 2015, implementation of these revisions will be delayed until after the November 2015 data month and Verizon PA will notify the Commission as to when the revisions will be implemented.

Respectfully submitted,



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Attorney for
Verizon Pennsylvania LLC

Dated: July 7, 2015

⁶ PA Guidelines reports for the November 2015 data month will be published in December 2015.