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August 10, 2001

David Waddell
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: *Docket to Establish Generic Performance Measures, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear David:

Enclosed please find the original and thirteen copies of the pre-filed rebuttal testimony of Karen Furbish and Karen Kinard on behalf of WorldCom, Inc in the above-captioned proceeding. Please contact me with any questions.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: Jon E. Hastings by WLM
Jon E. Hastings

JEH/wlm

BEFORE

THE TENNESSEE REGULATORY AUTHORITY

IN RE:	)	
DOCKET TO ESTABLISH GENERIC	)	
PERFORMANCE MEASUREMENTS,	)	Docket No. 01-00193
BENCHMARKS AND ENFORCEMENT	)	
MECHANISMS FOR BELLSOUTH	)	
TELECOMMUNICATIONS, INC	)	

REBUTTAL TESTIMONY OF KAREN FURBISH ON BEHALF OF WORLDCOM, INC.

Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS ADDRESS.

A. My name is Karen Furbish, Sr. Analyst – Access, WorldCom, Inc. My business address is 8521 Leesburg Pike, Vienna, Virginia 22182. Since September 2000, I have been responsible for development and implementation of access-related policies in WorldCom's National Carrier Management organization.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND WORK EXPERIENCE.

Prior to joining WorldCom, I served as an independent local market regulatory consultant and trade publications columnist between June 1999 and September 2000. From 1997-1999, I was director of research and consulting for Telecommunications Reports International, Inc., where I authored and edited numerous books and reports on telecommunications business and regulatory issues.

Previously, I was employed for 10 years at the Connecticut Department of Public Utility Control from 1984-1993, the last four years of which I served as Director of Utility Regulation and Research. I left the Connecticut DPUC upon my appointment as Executive Director of the Connecticut General Assembly's 1993-94 Telecommunications Task Force, where I was responsible for facilitating a negotiated agreement amongst rivalrous parties on exact language for new state laws opening all of Connecticut's intrastate telecommunications markets to competition.

I subsequently worked as an independent telecommunications regulatory consultant from 1994 to 1997 for consumer organizations, law firms, other consulting firms, and new market entrants. In that capacity, I appeared before numerous state commissions and at the FCC on matters pertaining to local market entry policies, quality of service, alternative regulation of ILECs, consumer issues, competition rules, and numbering issues.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

The purpose of my testimony is to rebut the proposal set forth by Time Warner Telecom regarding the appropriate scope of a performance incentive plan for high capacity "Special Access" services provided by BellSouth Telecommunications, Inc. ("BellSouth") via intrastate and interstate tariffs.[1] Though WorldCom agrees with Time Warner Telecom that there is a need for such a plan, WorldCom

[1] [1] Currently, the only way CLECs may electronically order an EEL (Enhanced Extended Link), also known as a DS-1 combo, is via an access service request ("ASR"), so for present purposes I will include EELs within the term "Special Access," even though they are really UNE loop and transport combinations ordered out of interconnection agreements rather than tariffs. Eventually, BellSouth is expected to permit CLECs to order EELs electronically using a local service request, at which point it will no longer be necessary to use ASRs to order EELs.

believes that its plan is more comprehensive than Time Warner Telecom's and respectfully requests that the Authority consider adopting it.

Q. IS IT YOUR POSITION THAT SPECIAL ACCESS SERVICES ARE IMPORTANTTO THE DEVELOPMENT OF EFFECTIVE COMPETITION?

A. Yes. Timely and nondiscriminatory provisioning of Special Access services is critical to the development of effective local and intrastate competition. Special Access circuits provide dedicated connections between locations served by BellSouth's network. These circuits are widely purchased by businesses, government, and carriers to gain access to BellSouth's network. Special Access is offered at a number of connection speeds, from voice grade services to very large capacity SONET services. Special Access components include local loops – known as local distribution channels, interoffice transport, and multiplexing. CLECs need Special Access to be able to serve a wider market of customers by purchasing local distribution channels that connect to customers. WorldCom and other competitors of BellSouth purchase Special Access Services from BellSouth for the same purposes that unbundled network elements or resold services are used – to complete the link to the customer.

Critically, BellSouth is not only WorldCom's retail competitor; it is also WorldCom's wholesale supplier of essential facilities. When WorldCom analyzes how best to serve a particular customer, it first determines whether it can provide such services over its own network. If no such facilities are available, WorldCom typically searches for facilities owned by other competitive access providers, because CAP services tend to be less expensive and their service organizations are

more flexible to work with. Unfortunately, however, there are no CAPs or CLECs that have the ubiquitous facilities of an ILEC such as BellSouth. BellSouth is therefore the dominant provider of Special Access services in Tennessee in its serving territory. Consequently, CLECs must depend on BellSouth for provisioning of Special Access services just as they do for the provision of equivalent high capacity services on an unbundled or resale basis.

Business and government customers do not tolerate unanticipated delays or problems in obtaining service. If a CLEC promises a customer service on a certain date and the date is not met because of poor service from BellSouth, the CLEC's reputation suffers irreparable harm. If dissatisfied, that customer typically blames WorldCom and will frequently return to the ILEC for service, to the extreme detriment of WorldCom and competition generally. For even the most patient business or government customer, if WorldCom or another CLEC relying on BellSouth's Special Access services receives bad service from BellSouth, the end user may have no alternative but to (re)turn to BellSouth. It is clear that BellSouth has every incentive to provide poor service to CLECs in provisioning Special Access. The purpose of the performance plan I am advocating is to change this and provide necessary incentives for BellSouth to provide Special Access to CLECs on a par with what it provides to its own retail business customers.

The availability of high quality Special Access service, whether the CLEC orders that service out of a tariff or an interconnection agreement, is essential to the development of robust competition. Moreover, as summarized below, recent state evidence shows that following Sec. 271 approval to offer long distance,

Regional Bell Operating Companies (RBOCs) show a decline in provisioning Special Access services to competitors and have an incentive to discriminate against competitors.

4. Q. WHAT ACTIONS HAVE OTHER STATES TAKEN REGARDING RBOC PERFORMANCE IN THE DELIVERY OF SPECIAL ACCESS SERVICES TO CLECS?

A. As mentioned in Mr. Kagele's Testimony on behalf of Time Warner Telecom, an increasing number of states are taking steps to ensure that local competition develops fairly and to the benefit of customers by reviewing the need for performance metrics and standards for Special Access services.

- The New York Public Service Commission (NYPSC) concluded an investigation into Verizon's performance in business services, including Special Access services, in June.[2] (Exhibit KF-1, attached) The NYPSC found that Verizon remains the dominant provider of such services in New York, and that there is evidence that Verizon has been discriminating against competitors in favor of its own retail customers in the provision of Special Services.

- The Texas PUC has ordered SBC to include Special Access in its post-271 performance plan. The Texas Commission found that, "... to the extent a CLEC orders special access in lieu of UNEs, SWBT's performance shall be measured as another level of disaggegation in all UNE measures."[3] The Texas Commission was responding to CLEC reports of worsening Special Access service provisioning by Southwestern Bell in the wake of Sec. 271 approval to offer in-region Long Distance service in Texas.

- The Massachusetts DTE is currently considering petitions by CLECs to expand a DTE-initiated investigation into Verizon's provision of Special Access services in that state to include interstate Special Access services.

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[2] NY PSC Case 00-C-2051 – *Proceeding to Investigate Methods to Improve and Maintain High Quality Special Services Performance* by Verizon New York, Inc.; and NY PSC Case 92-C-0665 – *Proceeding on Motion of the Commission to Investigate Performance Based Incentive Regulatory Plans for New York Telephone Company.* Order issued June 16, 2001.

[3] Texas PUC Project No, 20400 - *Section 271 Compliance Monitoring of Southwestern Bell Telephone Company of Texas*, Order No. 33, Approving Modification to Performance Remedy Plan and Performance Measurements, May 24, 2001.

Q. ARE WORLDCOM'S SPECIAL ACCESS PERFORMANCE METRICS COMPARABLE TO THOSE PROPOSED BY TIME WARNER TELECOM?

A. Yes. WorldCom's Access Metrics (Exhibit KF-2, attached) are similar to the metrics proposed by Time Warner Telecom. The goal of both parties' proposed metrics is to ensure timely and nondiscriminatory provisioning of Special Access services by BellSouth to CLECs. WorldCom believes that its proposed Metrics will promote this goal more effectively than those proposed by Time Warner Telecom. WorldCom's Access metrics will ensure and/or indicate:

- Timely delivery by BellSouth of committed service dates;
- The dates that are promised for installation will be met;
- How the average installation interval compares to the promised installation interval;
- How long its takes BellSouth to return a firm commitment date;
- The magnitude of days late on missed due dates;
- The quality of newly installed as well as existing circuits; and,
- How long it takes BellSouth to restore failed circuits.

5. Q. HOW COULD HIGH CAPACITY SPECIAL ACCESS SERVICE BE INCLUDED IN A BELLSOUTH PERFORMANCE PLAN?

A. Because Special Access usually entails the purchase of high-speed circuits like DS1s and DS3s for business and government customers, these premium-priced circuits must have separate benchmarks and associated remedies that reflect the greater incentive by BellSouth to discriminate against competitors so as to attract or retain customers providing larger margins and greater profits.

The Authority can incorporate Special Access performance into the existing docket, set up a separate track in the existing docket, or establish a separate concurrent docket specifically for Special Access performance that would result in a timely, comprehensive performance plan for BellSouth.

5. **Q. CAN YOU SUMMARIZE WHY SPECIAL ACCESS SHOULD BE A PART OF BELLSOUTH'S PERFORMANCE INCENTIVE PLAN?**

A. Yes. Adding WorldCom's Special Access metrics to BellSouth's Performance Plan will permit the Authority to assess the manner in which all critical "wholesale" services will be measured and reported by BellSouth. The Authority, as well as CLECs, would have all of the data necessary to ensure timely provisioning and non-discriminatory treatment by BellSouth for all services necessary for the development of robust competition in Tennessee.

7. **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes.

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

OPINION NO. 01-1

CASE 00-C-2051 - Proceeding on Motion of the Commission to Investigate Methods to Improve and Maintain High Quality Special Services Performance by Verizon New York Inc.

CASE 92-C-0665 - Proceeding on Motion of the Commission to Investigate Performance-Based Incentive Regulatory Plans for New York Telephone Company.

OPINION AND ORDER MODIFYING SPECIAL SERVICES GUIDELINES FOR VERIZON NEW YORK INC., CONFORMING TARIFF, AND REQUIRING ADDITIONAL PERFORMANCE REPORTING

Issued and Effective June 15, 2001

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

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Issued and Effective: June 15, 2001

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STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

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CASE 00-C-2051 - Proceeding on Motion of the Commission to Investigate Methods to Improve and Maintain High Quality Special Services Performance by Verizon New York Inc.

CASE 92-C-0665 - Proceeding on Motion of the Commission to Investigate Performance-Based Incentive Regulatory Plans for New York Telephone Company.

OPINION NO. 01-1

OPINION AND ORDER CONCERNING METHODS TO IMPROVE AND MAINTAIN HIGH QUALITY SPECIAL SERVICES PERFORMANCE BY VERIZON NEW YORK, INC.

(Issued and Effective June 15, 2001)

BY THE COMMISSION:

INTRODUCTION

We instituted this proceeding to investigate ways to improve the service quality performance of Verizon for Special Services.[1] Special Services are non-basic services, most of which are non-switched, that require engineering design review before being installed. Special Services include alarm, video, foreign exchange and other services, but mostly high speed data circuits of 1.5 megabits and higher transmission rates. These services are known as "special access" when provided pursuant to federal tariffs.[2] Verizon New York Inc. (Verizon) files reports

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[1] Cases 00-C-2051 et al., Special Services Performance, Order Instituting Proceeding (issued November 24, 2000).

[2] Special access services are provided pursuant to federal tariff if the customer advises that more than 10% of the traffic will be interstate.

on both special and special access services pursuant to our Special Service Guidelines and its performance regulatory plan.[3] Demand for such circuits has increased dramatically in recent years, placing unprecedented strain on Verizon's ability to serve and meet expected performance levels. Performance deficiencies have characterized Verizon's service over the past four years despite efforts of Verizon, prior Commission directives and monitoring by our Staff.

On November 24, 2000 we initiated this proceeding and directed Verizon to submit plans to improve service quality, and to demonstrate nondiscriminatory treatment of Verizon's customers, affiliates and other carriers. Further, we sought comment on Verizon's proposed rebate tariff for missed commitments, and the need for revised or additional standards and metrics to monitor Special Services, incentives tied to performance targets, changes in Verizon's ordering practices to permit a single ordering interface, and the sharing by competitors of forecast information with Verizon to allow it to meet demand in a more timely fashion. Finally, we directed Staff and Verizon to work together to ensure that network capacity remains adequate to meet expected demand.

PROCEDURAL HISTORY

In accord with the Commission's order, Administrative Law Judge Jaclyn A. Brilling convened technical conferences, in part on-the-record, to review and discuss all filings and assist

[3] Case 92-C-0665, Opinion No. 95-13 (issued August 16, 1995), p. 51.

the parties with these issues.[4] Conferences were held on December 21, 2000 and February 6-8 and 28, 2001. In addition to these technical conferences at which Verizon, Staff and others made presentations to educate the parties, Staff and Verizon met to discuss forecasting methods and network capacity monitoring. Pursuant to the Order, Verizon filed a rebate tariff on December 4, 2000, and a performance improvement plan on December 15. Other parties commented on Verizon's filing on January 15, and Verizon responded at that time to comments made at the December 21 technical conference. Comments on the rebate tariff were filed on December 26, 2000.

Although consensus was achieved on some issues, parties did not agree on certain fundamental issues, and the proceeding was converted from a consensus to a consultative process, to allow parties a full opportunity to present their positions, with evidentiary support, for our consideration. Accordingly, parties submitted written statements of position concerning the guidelines on March 15, 2001. On March 23 and March 30, parties submitted initial and reply statements, respectively, on the need for incentives to insure Verizon's performance at established targets.[5]

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[4] Active participants besides Staff and Verizon include the following: the Office of the Attorney General (OAG), Independent Wireless One Corporation (IWO), Allegiance Telecom of New York, Inc. (Allegiance), e.spire Communications, Inc. (e.spire), Focal Communications Corporation of New York (Focal), Time Warner Telecom-NY, L.P.,(Time Warner), WorldCom, Inc. (WorldCom), the Communications Workers of America (CWA), the New York State Telecommunications Association, Inc. (NYSTA), and AT&T Communications of New York, Inc., TC Systems, Inc., and ACC Corporation (collectively, AT&T).

[5] WorldCom, Verizon, Focal, Allegiance and Time Warner, also submitted unsolicited letters concerning the extent of competition in the New York market for Special Services. Unsolicited comments on jurisdictional issues were submitted by AT&T, IWO and Verizon.

No party requested formal evidentiary proceedings;[6] no such proceedings were necessary in light of the parties' submissions. The uncontested data filed by parties, and Verizon's own submissions constitute a record sufficient to support our findings.

BACKGROUND

Verizon's provision of Special Services, previously of excellent quality, began to deteriorate during 1995, and continued to decline in 1996. As a result, Verizon was directed, by an Order dated August 30, 1996, to submit a plan within 30 days to restore service quality for Special Services to previous, acceptable levels within six months, and to sustain that level of performance thereafter. One full year after that Order, service results were mixed, at best. Consequently, on August 29, 1997, Verizon was again directed to improve the service quality of Special Services to acceptable levels, and to maintain or improve upon those levels thereafter. We cautioned that failure to comply could lead to the institution of a penalty action under Section 25 of the Public Service Law. On July 15, 1998, we were informed that Verizon had finally improved its performance results. At the time, the company had achieved acceptable performance on most metrics, and was showing significant improvement on the remainder. Unfortunately, this improvement was not sustained.

Staff met with company representatives to better understand the problems affecting Special Services. During these discussions, Verizon enumerated process steps it had taken to improve service quality and pointed to forecast shortfalls that resulted in a failure to address increased demand. At these discussions, the company projected improved results by October 1999; however, it did not realize these improvements. In February 2000, the company offered further service improvement commitments; however, Staff considered these

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[6] Many carriers asked for technical conferences to explore appropriate incentives.

inadequate, as the provisioning of Special Services continued to be unacceptable despite informal discussion with the company, Staff efforts to revise targets, and the company's efforts to improve practices and provision additional facilities.

CURRENT STATUS OF SPECIAL SERVICES

Service Quality and Nondiscriminatory Performance

Service quality data[7] through March 2001 indicate that Verizon continues to fall below our targets for provisioning.[8] Verizon's two exchange access (wholesale) bureaus are averaging 74% appointments met during the first quarter 2001, and delays on missed appointments are over 14 days in the same period. The company's 14 intraLATA (retail) bureaus are averaging 94% appointments met during the same period, but delays on missed appointments are also averaging over 14 days. We find that these delays indicate Verizon's provision of Special Services is below the threshold of acceptable quality.

The data also suggest that Verizon treats other carriers less favorably than its retail customers. On average, it meets only 74% of its appointments on carrier service requests, but meets 94% of its retail customer appointments.[9] Verizon's explanation for this disparity is that it attempts to renegotiate appointments when necessary, and is more successful in changing appointments with retail customers. Verizon asserts it does not count renegotiated appointments as missed

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[7] The CWA raises concerns about inaccurate reporting of service quality data. We addressed these concerns recently in the monitoring of Verizon's compliance with the terms of its Performance Regulatory Plan, and found Verizon's reporting procedures and controls generally adequate. Case No. 01-C-0040, *CWA Allegations of Improper Practices*, Order Adopting Report (issued May 17, 2001).

[8] Maintenance service, however, continues to meet the established objectives.

[9] This is based on an average of the three months ending March 2001.

appointments and thus its retail performance appears better than its carrier performance. Verizon denies discrimination, but provides no data to explain the 20% difference in performance or to refute the prima facie indicia of discrimination. The November 24, 2000, Order required Verizon to substantiate nondiscriminatory treatment of its affiliates in comparison to other carriers. Substantiation was to be filed in a fashion similar to monthly service reports made for carrier-to-carrier performance in Case 97-C-0139. Verizon's compliance filings, however, did not refute the presumption of discrimination indicated by this difference in provisioning performance.

Accordingly, we find that Verizon has failed to refute this prima facie evidence indicating it provides special wholesale services in a discriminatory manner.

Verizon's Market Dominance

Verizon asserts it is a nondominant provider of Special Services and that the existence of competitive alternatives lessens the need for regulation. Verizon offered evidence of its market position including data on the number of competitors, their switches, and fiber network development as well as overall comparative market penetration data.[10]

Verizon claims that its percentage of total in-service high speed data circuits is less than the sum of its competitors' circuits in Southern/Midtown Manhattan. In support, Verizon submitted statewide data compiled by its consultant, Quality Strategies.[11] Verizon showed that in March 1999 it enjoyed a 76% share of the retail Special Services High

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[10] Data filed by Verizon on October 3, 2000 in response to a Staff request, and Verizon presentation on February 6, 2001 during the technical conferences (subsequently filed with the Secretary on February 16, 2001).

[11] WorldCom asserts the FCC determined that Quality Strategies, Inc. presented flawed findings and unsubstantiated results in similar reports filed on behalf of Verizon and other incumbent carriers. However, the Quality Strategies. Inc. data offered here are construed against Verizon.

Speed Data Circuit Market outside of New York City, 51% in greater Metro, and 43% in the most contested area, Southern/Midtown Manhattan.

To better reflect the circuits Verizon actually provides in the marketplace, it is necessary to combine Verizon's retail circuits with circuits it resells to other carriers. Verizon's combined market share data demonstrate its continued dominance in all geographic areas.

In March 1999, Verizon served 88% of the market for all Special Services, high speed data circuits, and special access outside New York City. In Greater Metro, 67% of the Market was served by Verizon, and in Southern/Midtown Manhattan, 51%. On March 22, 2001, Verizon also provided a more complete picture of its fiber optic network in comparison to competing carriers. Its data demonstrate that Verizon dwarfs its competitors. In the 132 LATA, for example, Verizon has 8,311 miles of fiber compared to a few hundred for most competing carriers; Verizon has 7,364 buildings on a fiber network compared to less than 1,000 for most competing carriers. In Southern and Midtown Manhattan, where it is relatively easy for competitors to bring their own local loop facilities to large buildings, competition is concentrated. In other areas of New York City and throughout the rest of the state it becomes increasingly difficult for competitors to serve end users through the use of their own facilities because customers are more dispersed. As Verizon acknowledged, cost considerations force competitors to rely on Verizon's ubiquitous local loop facilities to reach most end users.[12]

Verizon supplied other data on the number of buildings served by competitors in New York City, which show a maximum of 900 buildings served by individual competitors' fiber facilities. However, according to the New York City Department of City Planning, there are 775,000 buildings in the entire city, over 220,000 of which are mixed use, commercial,

[12] Verizon's Initial Comments, p. 12.

industrial, or public institutions.[13] Verizon, the incumbent historical monopoly provider, has fiber or copper facilities present in virtually all of these buildings.

There is other evidence of Verizon's dominance. We continue to receive consumer complaints concerning installation delays for high speed data circuits where Verizon is acting either as a retailer or as a wholesaler to another carrier wishing to serve end users.[14] Competitors rely on Verizon's network. They express a need for intraLATA interoffice facilities as well as local loops, and are willing to routinely share forecast data with Verizon in order to be sure that facilities are available in a timely manner. In addition, under FCC pricing flexibility rules, Verizon must demonstrate the level of competition according to specific pre-defined measures for special access services in order to gain flexibility. There are separate tests for interoffice and local loop. While Verizon has been granted interoffice flexibility in some New York areas, it has neither petitioned the FCC for local loop flexibility anywhere in New York, nor demonstrated it would meet the necessary criteria.[15] In addition, Data Verizon supplied showing its FCC (interstate) and New York (intrastate) tariffs

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[13] Land Use Facts, Department of City Planning, www.nyc.gov/html/dcp/html/lufacts.html.

[14] See, for example, Case 00-C-1390, Verified Complaint of Focal Communications Corporation of New York Against New York Telephone Company d/b/a Bell Atlantic-New York, dated September 5, 2000; Letters (dated February 22, 2001), from Adelphia Business Solutions, Tilcon New York Inc. (dated January 23, 2001); New York City Health and Hospitals Corporation (dated January 2, 2001); and Wilber National Bank dated December 28, 2000. (AT&T and WorldCom have indicated similar problems).

[15] We note that Verizon recently filed with the FCC for permission to remove dedicated transport and high capacity loops from its list of unbundled network element pricing. In the Matter of the Local Competition Provisions of the Telecommunications Act of 1996, Joint Petition of Bellsouth SBC and Verizon for Elimination of Mandatory Unbundling of High-Capacity Loops and Dedicated Transport, CC Docket No. 96-98.

demonstrates, prices, especially for intrastate services, significantly exceed TELRIC cost, a result inconsistent with expectations for a competitive market.

Finally, Verizon asserts competition is healthy because competitors' fiber optic facilities pass a high percentage of metropolitan businesses: 89% in New York, 69% in Syracuse, 48% in Buffalo and 20% in Albany. WorldCom notes that Verizon has not defined "buildings passed", or whether these competitors' facilities provide Special Services. While competitor fiber cables may actually pass these buildings, the data do not reflect how often fiber actually enters these buildings. Gaining facility access to a building, especially an established building in which Verizon is already present, can be difficult. Spare cable conduits are often not available, and building owners may be unwilling to pay the cost of placing additional conduits. Therefore, this data appear of limited use in estimating the percentage of establishments where end users actually have competitive alternatives available.

Verizon's data, as well as the advantages attendant upon its historical incumbent position, indicate it continues to occupy the dominant position in the Special Services market, and by its dominance is a controlling factor in the market. Because competitors rely on Verizon's facilities, particularly its local loops, Verizon represents a bottleneck to the development of a healthy, competitive market for Special Services. In this situation, regulation is needed to assure the development of competitive choices, and good service quality when choices are not available.

Accordingly, we find that a competitive facilities-based market for Special Services has yet to emerge and that Verizon continues to dominate the market overall.

Summary of Findings

Based on this record, we find, that Verizon remains the dominant provider of facilities for Special Services, that Verizon's provisioning performance for Special Services is significantly below Commission targets, and that the record

suggests Verizon treats other carriers less favorably than its own end users. Because Verizon's facilities are used by carriers as they are entering the market, including the local market, on a facilities basis, Verizon's Special Services offerings are crucial for the development of facilities-based competition in the local market, and for the New York economy.

SERVICE IMPROVEMENT MEASURES

We directed Verizon to file a service improvement plan and a warranty tariff, and to work with Staff in identifying capacity shortages. As discussed below, we find the plan has not yet produced the necessary improvement, the warranty tariff should be expanded, and Verizon has not yet provided reports needed to identify capacity problems.

Verizon's Service Improvement Plan and Capacity Concerns

On December 15, 2000, Verizon submitted, as directed, its Special Services Performance Improvement Plan. Verizon contended that performance concerns center only on the timeliness of provisioning new circuits, not maintenance service performance. The parties generally agree with Verizon. Verizon also states that recent unprecedented and unpredictable demand for new Special Services, both from retail customers and carriers, is an endemic, nationwide problem. Verizon indicates that carriers with which it competes have fallen short in their provisioning performance as well.

Verizon's plan for improving its provisioning performance contains five aspects: increased capital spending; deployment of new technologies; revised capacity relief strategies; increased provisioning workforce; and improved ordering processes for interexchange carriers. In 1997 and 1998, Verizon's capital expenditures for new interoffice facilities, many of which are used to provide Special Services, were $205 million and $260 million, respectively. In 1999, the level of capital spending increased about 2.5 times to $605 million, although the amount initially budgeted for that year

was only $430 million. In 2000, although the initial budget was set at $560 million, the actual capital spending level increased to $780 million, nearly 4 times the amount spent just 3 years earlier. In 2001, Verizon currently projects interoffice capital spending will be $805 million, much of it as a result of projected Special Services demand. Verizon argues that these figures demonstrate that it has been trying in earnest for the past three years to meet Special Services demand, but that exponentially increasing demand during that period has made the task very difficult. Verizon believes that the capital spending levels it has now reached are fully adequate to accomplish the task.

In addition to significantly increasing its capital spending over the past 3 to 4 years, Verizon indicates that it is aggressively utilizing the latest technologies available. Advancements in digital signal transmission and switching technologies are similar to those in computer technology. While prices decrease, capacities increase per unit purchased. The technologies being used include increasingly higher speed SONET[16] systems, and DWM[17] electronics. DWM significantly increases the signal carrying capacity of installed interoffice optic fiber facilities, and Verizon claims this may be done at a lower capital cost per circuit in comparison to deploying new interoffice facilities.

Traditionally, Verizon planned capital additions to insure more capacity would be added to interoffice SONET

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[16] SONET stands for Synchronous Optical Network. It is an interoffice signal transport design approach that uses optic fiber cables and various levels of high speed digital signaling. SONET system optic fiber cables are configured in rings that pass through multiple central office buildings. They have the capability, in the event of a failure in any interoffice segment, to reroute the signals between offices in the opposite direction around the ring, thus protecting customers from many service outages.

[17] DWM stands for Dense Wave Multiplexing. DWM allows several high speed digital signals to be transmitted over an optic fiber simultaneously in different spectrum ranges, thereby increasing the capacity of the fiber by orders of magnitude.

routes where existing capacity was projected to be 90% utilized. Verizon claims this strategy worked well when growth was slower and more predictable. In light of the recent explosive growth in demand, and increased market volatility, however, Verizon now supplements its interoffice capacity when existing facilities are only 65% to 75% utilized (depending on the particular growth characteristics of specific interoffice routes). Verizon will continue this planning strategy.

Over the past few years, Verizon increased the size of its workforce involved in engineering, interfacing with customers, and installing new Special Service circuits, both on the end-user (retail) and the carrier (wholesale) sides of the business. In total, the count of employees involved in these activities has increased by 50%, from 1300 to 1950. Verizon points to this increase as demonstrating its commitment to addressing provisioning problems.

Verizon has taken steps to improve its installation processes associated with interexchange carrier orders. These include: deploying two new "Build Request Control Centers," which endeavor to minimize delays when facilities are congested or exhausted; maintaining closer contacts with customers to reduce delays caused by "customer not ready" situations; standardizing the ordering process for high speed access services; improving the on-site management of its Wholesale Carrier Centers; and, deploying a new Special Services test system called REACT.

In addition to the above, Verizon believes exchanging forecasts with other carriers would improve performance.

These measures appear substantial; however, in 1996 and 1997 Verizon provided improvement plans for Special Services in response to Commission directives. The Staff continued to address performance directly with Verizon over the last several years and Verizon has repeatedly offered steps to improve provisioning performance. Those steps have not resulted in sustained service quality improvements. During the technical conference in December, Verizon estimated that improvements

should occur after the first quarter of 2001.[18] Results through April 2001 are only slightly improved over the first quarter 2001 results.

We directed Verizon to work with Staff to ensure adequate network capacity.[19] There is a concern, based on poor Special Service installation results, that overall network capacity may not be adequate to meet telephone demand.

Because basic telephone and Special Services ride on common facilities an unpredicted spike in Special Service demand could negatively impact basic telephone service provisioning. Verizon has yet to provide information relating to local loop and interoffice capacity shortages. Accordingly, we direct Verizon to provide monthly reports of held orders for services including basic and special services, showing, as to each held order, the type of service requested, its geographic location (exchange and customer), the length of time the order has been held, the reason it was held (lack of interoffice versus local loop facilities as well as other pertinent facts relating to the service requested and the delay), and the expected service date. Such reporting should continue until service improves to the thresholds defined in the revised guidelines.

The Warranty Tariff

We directed Verizon to file a warranty tariff that would provide rebates to customers whose appointments are missed by Verizon. The intent of the warranty tariff is to provide recompense to those who receive poor service. In response, on December 4, 2000, Verizon filed a tariff introducing a High Capacity Service Provisioning Warranty Plan. The purpose of this tariff is to waive installation charges and the first month's recurring charges for selected Special Services should Verizon fail to meet the "confirmed due date" of the

[18] Tr. 73.

[19] Order Instituting Proceeding (issued November 24, 2000).

installation. The tariff became effective on a temporary basis and subject to refund, pending a Commission decision.

The significant aspects of the tariff are:

- The confirmed due date is the date provided by Verizon to the customer once the availability of facilities has been secured;
- The warranty applies only to Superpath 1.5 Mbp/s or Superpath Optical 45 Mbp/s Services, provided out of the company's PSC No. 900 intrastate tariff; and
- Failure to meet the installation due date must be attributable solely to Verizon, and not because of any end user action.

Verizon also proposes additional exceptions to the application of a warranty. The warranty would not be given when an end user requests an expedited appointment date; any other communications carrier or transport provider is involved in the installation; special construction is required; or, services are derived from a multiplexed[20] Superpath 1.5 Mbp/s service.

WorldCom, XO, e.spire, Focal, and Time Warner contend that the monetary penalties are inconsequential and that the tariff is discriminatory because it benefits only Verizon's retail customers, and not customers of other carriers.

The warranty was not envisioned to, and will not, by itself provide sufficient incentive for Verizon to improve its overall Special Services performance. However, it may satisfy customers when Verizon misses installation appointments. To ensure nondiscriminatory service, competitors ordering Special Services should qualify for the same waiver of charges as Verizon end use customers. Therefore, Verizon is directed to amend the tariff language such that rebates apply to carriers who place orders with Verizon for their own customers, or themselves. In addition, Verizon is directed to modify the

[20] Multiplexing is a technique of combining two or more signals onto a common signal path, such as a copper cable pair or an optical fiber, through use of electronic or opto-electronic equipment.

tariff to state that a rebate should be made whenever Verizon not only misses a confirmed date, but also proposes to change a confirmed due date. It is not necessary to extend the warranty plan to Verizon's resale tariff (No. 915), as those wholesale services are already protected by the Performance Assurance Plan.[21]

Incentives

We sought comment on whether it was necessary to provide incentives for Verizon to improve service. Comments and replies on incentives were filed on March 23, 2001, and March 30, 2001, respectively.

Parties, with the exception of Verizon, assert that Verizon would have no reason to improve its service, especially to competing carriers, without incentives.[22] Most support the use of the Performance Assurance Plan for this purpose because it is self-executing and the incentives are relatively large. Some parties call for a third party audit of performance, including root cause analysis, should Verizon fail to meet the proposed targets. Others urge holding a technical conference to explore incentive options. AT&T, in contrast, urges immediate Commission action to adopt an incentive mechanism.

Verizon responds that imposing incentives is inconsistent with sound rulemaking and violative of Public Service Law §25, which requires a finding by the Commission that a utility knowingly failed or neglected to obey a Commission Order. Verizon claims that the Warranty Plan will improve service quality but requires time to do so. Further, it believes that adding Special Services to the Performance Assurance Plan would inhibit its use for monitoring service

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[21] The only other carrier offerings provided on an intrastate basis are UNE and EEL. These are already subject to the Performance Assurance Plan. Thus, the special access service offering, taken under federal tariff, would be the only carrier offering not subject to an incentive.

[22] NYSTA did not comment on incentives.

quality on truly wholesale services (e.g., Unbundled Network Elements, resale and interconnection) because Special Services are retail services.[23]

The record demonstrates that Verizon provides inferior service to competitive carriers in the provisioning of special services. Based on the complaints of the parties and Staff's analysis, it appears that carriers rely heavily on Verizon to provide special access, and that these services are used by competitive carriers to offer local, as well as other telecommunications services. Thus, a failure by Verizon to adequately serve the needs of competitive carriers could undermine local competition.

We find that additional data should be gathered before we apply additional incentives to Verizon's performance. Verizon will be given 120 days from the date of this Opinion and Order to show, by filing with the Commission performance results under the modified Special Services Guidelines, improved overall service quality as well as nondiscriminatory performance. Incentives tied to retail Special Services performance, if appropriate, may be considered in Case 00-C-1945, Proceeding on Motion of the Commission to Consider Cost recovery by Verizon and to Investigate the Future Regulatory Framework.

Single Point of Ordering Interface

We sought comment on Verizon's ordering practices and the need for a single ordering method (or electronic interface) where competitors would be offered the best terms and conditions of service for substantially similar services.

Verizon opposes creation of a single ordering interface, claiming that customers do not necessarily want the same terms and conditions. It also indicates that many carriers do not use the electronic interface currently available to them,

[23] Verizon also asserts that the Public Service Commission has no jurisdiction to enforce regulations over access services ordered from the FCC tariff. Because we do not apply incentives to federally tariffed access services, we do not address this issue here.

instead preferring to use non-electronic means. Finally, Verizon states that its systems for ordering retail and wholesale services are different, and claims a significant cost to implement a single ordering interface for both retail and wholesale services.

Other carriers expressed interest in a consistent method for placing high capacity special access orders, but no interest in best terms and conditions of service across retail and wholesale tariffs. In fact, carriers agree that Verizon should be free to have differing retail and wholesale tariff conditions which would allow for differentiation of services provided to end users by all carriers, especially those that resell Verizon services.

The parties agreed to use Verizon's Access Service Request (ASR) form when ordering high capacity services. Carriers will use Verizon's electronic methods of placing an ASR, if available for placing high capacity service requests. During periods when electronic methods are unavailable, carriers may order by use of facsimile. Individual carriers will be expected to phase in use of electronic methods over a one year period, or as negotiated between that carrier and Verizon.

This ordering method will substantially lessen confusion associated with placing orders as it provides a consistent ordering method for special access services but will permit flexibility between ordering parties. Some interest was expressed by Verizon and others to keep an open dialog perhaps through Verizon's ongoing process control meetings associated with carrier-to-carrier issues. Such dialog is encouraged as it leads to better understanding among the carriers.

MODIFICATION OF SPECIAL SERVICES GUIDELINES

The Special Services Guidelines set forth standards for service quality and describe how data is to be reported to demonstrate compliance with the targets. Based upon the record and suggestions of the parties, we will continue to require Verizon's monthly reporting of metrics and standards as revised here.

Reporting Levels

The current guidelines require Verizon to report monthly maintenance and installation service results at the Installation/Maintenance Center (i.e., Special Service Bureau, or bureau) level.

Verizon believes reporting should be discontinued at the bureau level, and that monthly results should be reported, if at all, for two levels: the New York Metropolitan LATA (LATA 132) and the "Rest of New York State." Most parties opined that limited reporting on such an aggregate level could mask poor performance in areas that are currently being monitored and thus, Verizon should continue to report at the bureau level[24] and also report results for LATA 132 and the Remainder of the State.

In order to adequately monitor retail end-user service quality, most parties require disaggregation of data for LATA 132 and Remainder of State, and for Verizon's retail end users, other telephone carriers as a group (carrier aggregate data), and Verizon's affiliates as a group. In addition, parties recommend that performance provided to individual carriers (carrier specific data) should be available upon request from Verizon by a requesting carrier and/or Commission Staff on a confidential basis. These reporting requirements are similar to those in use for carrier-to-carrier metrics as established in Case 97-C-0139.

Further, most parties seek LATA 132 and Remainder of State monthly performance results disaggregated for special access services (those special services ordered from federal tariffs) to show separate results for specific data speed products such as DS0, DS1, DS3, OCX, and Other.[25] The parties

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[24] Staff opposes bureau level reporting with respect to one proposed metric, Percent On Time ASR Response. Staff's position on this metric is adopted.

[25] DS0, DS1, DS3 refer to a hierarchy of digital signal speeds used to classify electronic transmission capacity on a transport facility. Similarly, OC3, OC12, OCX refer to a hierarchy of optical signal speeds to classify optical transmission capacity on a transport facility.

believe that aggregation may mask poor service. Verizon considers this unnecessary, and indicates that maintenance data cannot be disaggregated because low speed data services often are transported in the network on higher speed facilities. Staff supports limited disaggregation of ordering and provisioning, but not maintenance metrics. It proposes two groups of "DS0" and "DS1 and above" for reporting to prevent masking poor installation performance for high capacity data services with more easily installed low capacity services.

We direct Verizon to report performance showing disaggregation of high capacity data services to "DS0" and "DS1 and Above" and to report by bureau (except for Percent On Time ASR Response), LATA 132, and Rest of State. Within these last two categories, reports must disaggregate the subgroups of retail, carriers other than Verizon and its affiliates, Verizon affiliates, and individual carriers. Performance data associated with LATA 132 and Rest of State will be provided in a manner that allows the recombination of any of the subgroups of retail, Verizon affiliates, or carriers other than Verizon in order that parity comparisons can easily be made. These reporting requirements will allow us to monitor the quality of service for Special Services at the bureau level and will also support, if necessary, parity comparisons where reasonable analogs are available, and absolute standards elsewhere for possible future incentive application.

Performance Levels

The current guidelines specify two levels of performance for each service quality metric: generally good service is termed Objective Level while generally poor service is termed Weakspot Level. To obtain more specificity, a total of four service quality performance ranges are derived from these two levels: Objective, Satisfactory, Mediocre and Weakspot.

Most parties support replacing the four levels with a single bright line, or "threshold" level of performance that Verizon would be expected to meet or exceed. This is consistent

with the recently adopted revisions to 16 NYCRR 603, Service Standards Applicable to Telephone Corporations. Verizon provided the only contrary opinion, arguing that the four performance ranges should be maintained.

Threshold levels are set for each metric. For existing metrics, most parties would set the threshold levels at, or better than, the current Objective Level. Staff would set thresholds at the current Objective levels while Verizon recommends the current Weakspot Level. Verizon believes that the bright line should be set where negative consequences are currently expected to occur.

The single threshold set at the current Objective levels is adopted as it accords with the approach for end user service standards. Verizon should strive for good performance rather than merely avoiding poor performance. Indeed, setting the threshold at the current Weakspot could allow Verizon's performance to backslide on metrics where the company is now performing well. There is no persuasive evidence that the current Objective levels are inappropriate.

Existing Metrics

The current guidelines contain five metrics; two associated with maintenance, and three associated with installation. We will not revise these metrics, except to change the reporting basis from links to circuits where applicable, and require reports to show performance for LATA 132 and the rest of the state. The guidelines currently require reporting for Installation Quality and Customer Trouble Report Rate on the basis of 100 links rather than circuits. A link is a portion of a circuit and there are on average 1.7 links per circuit according to Verizon. All parties advocate reporting by circuits rather than links.

Percent Installations Completed On Time (SS-PR-1)[26]

Most parties propose that those orders not completed on time due to "Customer Not Ready" (CNR) situations should first be verified with the customer before excluding them from data reported in this metric. They urge, further, that only customer-initiated changes to due dates should be included to prevent Verizon from modifying any due dates for its own reasons.

Verizon proposes to continue including CNR situations in both the numerator and denominator of this metric. Verizon believes that excluding them effectively raises the performance standard by lowering the overall volume of measured orders. Staff concurs, noting that in order to count an order as "CNR" means that Verizon must first attempt to install service and be blocked from doing so either because the customer's premises were closed, or the customer failed to make the necessary provisions to complete the order. Thus, Verizon should not exclude data if an attempt has been made to install the service and the carrier was prepared to met the agreed upon due date. This approach is consistent with NYCRR 603 and the Carrier-to-Carrier Guidelines.

The majority of the parties also allege unilateral, unannounced due date changes by Verizon, but offer no support for these claims. Verizon suggests the need for flexibility, and that customers often place orders for Special Services well in advance of required due dates such that Verizon-initiated changes are not harmful to customers. Inasmuch as the record lacks evidence of any unilateral due date changes, it appears unnecessary to modify the metric definition. So long as all due date changes are made known in advance, then carriers should be able to keep their customers informed.

[26] The coding in parenthesis identifies the specific metric as it appears in the guidelines.

New Metrics

Verizon objects to the addition of any new metrics. Other parties proposed adding 15 new measures, most of them disaggregated by product (an additional 79 metrics). Staff proposes adding three new metrics. Below we discuss the new metrics we adopt. A listing of those new metrics proposals we do not adopt, and the parties' positions, is attached as Appendix I.

Percent On Time ASR Response (Staff) (SS-OR-1)

All parties except Verizon agree on the need to establish a degree of certainty into the ordering process. Carriers want responses to the orders they submit in a consistent, timely manner. Verizon objects, stating that this metric would require it to accept all orders whether or not facilities are available, that it cannot provide the required responses in the proposed time periods and that setting unrealistic targets might give it an incentive to reject orders rather than miss the metric.

Most carriers suggest accurate Firm Order Confirmations (FOC) for all orders, within 72 hours for electronic submissions and 96 hours for faxed/mailed orders, regardless of whether the required facilities exist. Staff would apply commitments only to electronic orders and require one of two responses within 72 hours: either a FOC where facilities are available, or an estimated in-service date where facilities are not available and might need to be constructed followed by a FOC within three weeks. Staff does not support a metric on faxed orders as the carriers have agreed to place orders electronically within six months.

While the carriers' desire for a three-day response time in all cases is understandable, it may not be possible. Based on Verizon's descriptions of the work steps involved in its ordering process, it cannot provide a firm in-service date within three days if facilities do not exist. Staff's proposal allows for more certainty in the in-service date, and is adopted with a modification. In cases where facilities do not exist,

Verizon will provide a firm in-service date within the shorter of three weeks from provision of the estimated date, or (in cases where facilities may quickly be made available) ten days prior to the in-service date.

Most parties support disaggregated reporting by bureau on this metric as well as by geography and product. Verizon states that it has a single regional ordering center rendering disaggregation to bureau or geography (LATA 132, etc.) meaningless. Staff recommends reporting on New York State results through the regional bureau as this approach is used in Section 603 for basic service ordering. The Staff proposal is reasonable, consistent with existing practice, and is adopted.

Finally, parties unanimously agree that an electronic Access Service Request (ASR) is the desirable vehicle for carriers to order Special Services and have agreed to move towards use of ASRs. As an incentive for parties to do so, Verizon will not be required to report performance separately on faxed or mailed orders. Carriers who continue to fax or mail orders may monitor Verizon's performance on their own.

Percent Missed Appointments Due to Lack of Facilities (SS-PR-4)

Verizon notes that this measure is a subset of SS-PR-1, Percent Met Appointments, that the company does not measure today and could only begin to measure at some cost for no demonstrable benefit. All other parties agree that some measure of appointments missed due to facilities (either through this metric or jeopardy coding on SS-PR-2 Average Delay Days On Missed Installation Orders) would be valuable. No threshold is proposed for this metric as it is meant as a diagnostic tool.

Verizon does report SS-PR-5-01, Percent Missed Appointment-Verizon-Facilities, in Carrier-to-Carrier reports. Reporting for services covered by the Special Service Guidelines should not cause undue hardship. Given that Verizon attributes its past provisioning problems to its failure to anticipate an unprecedented increase in demand for facilities, it is desirable to monitor and analyze instances of facilities shortfalls.

Reporting this measure should serve to alert all parties to requirements for additional facilities. Verizon is directed to report performance for this adopted metric.

Percent Jeopardies (SS-PR-8)

This metric measures the percentage of missed appointments where advance notice (of a possible miss) was provided to the customer or carrier requesting service. Most parties proposed a standard that requires notice as soon as Verizon has knowledge of an impending miss for 100% of missed committed due dates. Some parties would also require this notice to be no later than five days prior to the committed due date. Verizon claims it cannot measure this metric and that jeopardy codes are an internal control mechanism used at the discretion of the employee.

Jeopardy notices keep customers informed of order status. This metric is adopted as a diagnostic tool without a threshold performance level. It is desirable for customers to receive advanced notice that an appointment will be missed, and establishing a metric will indicate how often Verizon actually does so. Because Verizon's internal use of jeopardy codes is apparently discretionary, it is permitted three months from the issuance of this opinion and order to organize its internal processes and to begin reporting on this metric such that it will properly indicate notification to customers of pending missed appointments.

Overall Targets

The current guidelines require Verizon to "strive to achieve" the objectives on each metric in each of 16 centers. We established additional targets specifying the percent of centers that must be in the objective range and we sought comment on modification of these service targets to reflect fewer centers.

During the proceeding Verizon opposed an incentive plan, or modifications of the guidelines that would replace the "strive to achieve" objective. Staff proposes requiring Verizon

to attain the specified performance thresholds in at least 90% of its opportunities to do so in a given calendar year, with no more than five Service Inquiry situations in the same calendar period.

Several of the parties oppose Staff's proposed overall targets, but offer no explanation or alternatives. Verizon provided a statistical analysis of the implications of Staff's proposal claiming that the overall targets, and even the thresholds of each of the individual metrics are unreasonable and unattainable.[27]

Verizon's statistical analysis purports to show a high probability of failure to avoid a Service Inquiry situation, or 90% threshold performance on all metric measurements in a given calendar year. It presumes that the sample size of service measurements is large enough to be described as a normal distribution. It also presumes that performance on a single metric (e.g., percent on time installation appointments) results in a normal distribution representative of all five existing metrics, and that the company chooses to perform at a level where 50% of the time the threshold is met, and the other 50% of the time it is not.

Verizon's objections to the proposed overall targets and the thresholds for individual metrics are not compelling. The statistical analysis is flawed. First, it assumes a normal distribution about the threshold level for each metric where it would fail to meet the threshold 50% of the time. This is an unacceptable performance expectation as failure should be much less infrequent. Verizon should be making the appropriate management decisions to routinely meet the standards of the

[27] "The Probability of Achieving Selected Proposed Special Service Standards: A Statistical Analysis of Their Reasonability," by Dr. Donald Pardew, President of Cybernetica Consulting, Inc., March 2001, appended to Verizon's March 15, 2001 comments filed in this proceeding.

guidelines,[28] indeed that is why a service improvement plan was required of the company. Second, it is not reasonable to assume all metrics have the same distribution about the threshold when it is already known that performance on some metrics is consistently above the thresholds month after month (e.g., reliability of service, and the quality of installation work). Staff's proposed overall targets are adopted.

Applicability

The revised guidelines and new standards and metrics we adopt apply to Verizon. We tentatively find that these standards and metrics should apply to all local exchange carriers providing these services to customers because these services are critically important to business and economic growth in New York. In a separate notice to be published in the State Register, we will seek comment on whether these standards and metrics should apply to all local exchange carriers. We will also seek comment on whether reporting of performance results should be limited to those carriers serving 500,001 or more access lines as defined in 16 NYCRR 603.

FORECAST SHARING

We directed the parties to address methods by which competitors who use Verizon's facilities to serve customers can assist in improving Verizon's forecasting. Verizon proposed that competing carriers be required to provide the following information: (1) Forecasts of demand for DS3 rates and above by type, e.g., DS3, OC3, OC12, etc.; (2) Forecasts for "A" to "Z" interoffice facilities, where "A" and "Z" represent a Verizon

[28] While the goal is for Verizon to comply with the guidelines 100% of the time, it is recognized that unusual events can occur that may prevent such performance. In fact, the guidelines recognize this in that metric thresholds are not set at 100% compliance, and allow for events negatively affecting service quality (Appendix I and NYCRR 603.1(c)).

office and/or another Verizon office and a competitor's Point of Presence (POP);[29] and, (3) Provision of quarterly forecasts.

Verizon also proposed use of a special access forecast template, similar to those used in the Carrier-to-Carrier Guidelines for trunks, collocation, network elements and resale products. Parties suggested some changes to the template, and agreed to work with Verizon. While parties recognized that a standardized format facilitates aggregation of the forecasts by Verizon, not all parties could commit to a common form at this time.

Consensus on several other forecasting issues was achieved. It was acknowledged that forecasts have value, they should be provided and aggregated on a consistent schedule, and that end-user specific information would not be required. Parties that currently perform Verizon end-office-to-POP planning agreed to provide such forecasts. This is included in the modified Special Service Guidelines (Appendix I) and is specific to sharing forecasts with Verizon until additional future needs for sharing between other carriers are demonstrated.

Carriers should continue to work with Verizon on this issue to the extent that they may need or rely on Verizon for facilities. Continued involvement of Staff is not necessary at this time. Verizon should take the lead in encouraging further discussions, so as to facilitate improvement in its provisioning service results.

CONCLUSION

Verizon is directed to modify its Warranty Tariff to ensure its availability in a nondiscriminatory manner consistent with this order. We adopt the modifications of the Special Services Guidelines as shown in Appendix I. Verizon is allowed 90 days from this order to develop the necessary processes and procedures to report in the manner defined in the modified

[29] A POP is a physical location within a LATA where a long distance carrier interfaces with the local exchange carrier.

Special Service Guidelines.[30] Staff should continue to work with federal authorities to ensure improvement in Verizon's special access service performance. These measures are necessary to improve Verizon's provisioning of services important to competition in the local telecommunications market and to the economy of New York.

The Commission orders:

1. Not later than 15 days of the release of this Order Verizon New York Inc. shall file revisions to its Warranty Tariff consistent with this Order.

2. The revisions to the warranty tariff will be effective upon filing with the Commission.

3. The requirement of Section 92(2)(b) of the Public Service Law as to newspaper publication of these further revisions is waived.

4. The Special Services Guidelines are modified in accordance with this Order, as contained in Appendix I.

5. Verizon New York Inc. shall file service results pursuant to the revised Special Service Guidelines we are adopting for performance beginning October 1, 2001.

6. These proceedings are continued.

By the Commission,

(SIGNED) JANET HAND DEIXLER
Secretary

[30] In addition, a separate notice will be issued, seeking comment on whether these metrics standards and reporting should apply to all local exchange carriers.

Effective June 15, 2001

SPECIAL SERVICE GUIDELINES
QUALITY OF SERVICE MEASUREMENTS

Overview

The Special Service Guidelines are performance criteria by which the quality of Special Services provided by Local Exchange Telecommunications Carriers is assessed by the New York State Public Service Commission. The Guidelines were last revised in 1987. The current revisions result from the Commission's findings and directives in Case 00-C-2051 - Proceeding to Investigate Methods to Improve and Maintain High Quality Special Services Performance by Verizon New York Inc. The services addressed by these guidelines are listed in Attachment 1.

Areas of Performance Measurement

Performance in providing Special Services is measured in three basic areas: ordering of service, installation of service and ongoing maintenance or repair of service. One indicator of ordering performance is evaluated under the guidelines, Order Confirmation Timeliness which measures the percentage of on time access service responses.

Five indicators of installation performance are evaluated under the guidelines. The first indicator, on Time Performance, is measured by the percentage of installations completed on or before their due dates. The second indicator, Missed Installation Appointment Delays, is measured by the average number of business days that missed installations are delayed. The third indicator of installation performance, Quality of Installation Work, is measured by the customer trouble report rate during the first 30 days of operation of Special Service circuits. The fourth indicator, Percent Missed Appointments - Due to a Lack of Facilities, measures the percentage of missed

appointments due to a lack of facilities. The fifth indicator, Percent Jeopardies, measures the number of missed orders where advance notice is provided of a miss.

Two indicators of ongoing maintenance and repair performance are evaluated under the guidelines. The first, Reliability of Service, utilizes customer trouble report rates on the total base of Special Service circuits as a unit of measurement. Promptness of Repair is the second ongoing maintenance and repair performance indicator, and its unit of measurement is the interval of time between reporting of a trouble by a customer and the clearance of that trouble by the carrier.

Performance Criteria and Ranges

This section sets forth the specific metrics and performance thresholds that Local Exchange Telecommunications Carriers are expected to meet or exceed in providing service to end users and/or other carriers. The reporting requirements specified in these guidelines envision parity comparisons where appropriate, in place of the specified threshold performance levels when incumbent local exchange telecommunications carriers provide Special Services to other carriers. Attachment 2 provides a more detailed definition of each indicator, or metric. Metric identification numbers as shown in Attachment 2 are shown in parenthesis below.

I. - **Ordering Performance**

Indicator 1A - Percent on Time Access Service Request Response - (Electronic - No Flow-through) (SS-OR-1)

Unit of Measurement - Percent of responses to electronic access service requests where the confirmed in-service date and/or estimated in-service date is provided within 72 hours from receipt of the request.

Threshold Performance Range 95.0 - 100

II. - Installation Performance

Indicator 2A - On Time Performance (SS-PR-1)

Unit of Measurement - Percent of Installations Completed On or Before the Due Date

Threshold Performance Range 96.0 - 100

Indicator 2B - Missed Installation Appointment Delays (SS-PR-2)

Unit of Measurement - Average Number of Business Days by Which Unkept Appointments Are Missed

Threshold Performance Range 0 - 3.0

Indicator 2C - Quality of Installation Work (SS-PR-3)

Unit of Measurement - Customer Trouble Reports per 100 Special Service Circuits During First 30 Days of Service

Threshold Performance Range 0 - 4.0

Indicator 2D - Missed Appointments Due to Lack of Facilities (SS-PR-4)

Unit of Measurement - Percent of Orders Missed Due to a Lack of Facilities

This indicator has no associated threshold performance level.

Indicator 2E - Percent Jeopardies (SS-PR-5)

Unit of Measurement - Percent of Missed Orders Where Advance Notice is Provided

This indicator has no associated threshold performance level.

III. - Maintenance And Repair Performance

Indicator 3A - Reliability of Service (SS-MR-1)

Unit of Measurement - Customer Trouble Reports Per Month Per 100 Special Service Circuits

Threshold Performance Range 0 - 3.5

Indicator 3B Promptness of Repair (SS-MR-2)

Unit of Measurement - Average Duration In Hours Between Customer Reporting and Telephone Company Clearing of Troubles

Threshold Performance Range 0 - 9.0

Performance Threshold Service

The specified performance thresholds apply to each Repair Service Bureau or Special Service Center as well as to the 132 Local Access and Transport Area (LATA 132) and to the remainder of New York State ("Remainder of State" - all other areas combined). Local Exchange Telecommunications Carriers shall report performance monthly on each of the above metrics in each bureau, LATA 132 and the Remainder of the State. Additionally, LATA 132 and Remainder of State monthly performance results shall be disaggregated to show performance provided to retail end users distinct from that provided to other telephone carriers as a group, and from that provided to the reporting carrier's affiliates as a group. Performance provided by the reporting carrier to an individual telephone carrier will be provided to that individual carrier and/or Commission staff, upon request.

These thresholds represent good service, but failure to attain the threshold range does not by itself indicate poor service. However, each Local Exchange Telecommunications Carrier shall attain these performance thresholds in at least

90% of its monthly opportunities to do so in a given calendar year. Additionally, the carrier shall not experience any more than five Service Inquiry situations as defined below in the same 12-month calendar period.

Service Inquiry Situations

Service inquiry situations identify Special Service problem areas where immediate improvements are needed. Service inquiry situations are defined as non-threshold performance in the current month and any two of the previous four months by any reporting entity (bureau or larger entity). For each service inquiry situation, a report is required from the carrier as set forth below. Commission staff will analyze the report, and conduct any investigations necessary to fully disclose the nature of the problem and its means of elimination.

A Service Inquiry Report will provide an in-depth analysis of service including Pareto Analysis of defects with root cause statements, and is required when overall bureau/center or higher-level entity performance is in a service inquiry situation. This report will detail the carrier's plans for corrective action, addressing each stated root cause, and include commitment dates for service improvement and reasons for any previously missed commitments. It will also be provided on or before the 5th day of the second month following the report period.

Miscellaneous Application and Performance Measurement Procedures

The following procedures shall be used in administering the Special Service Guidelines and determining performance levels. The application of these procedures and the Special Service Guidelines generally will be consistent with current administrative practices pertaining to the Telephone Service Standards, 16 NYCRR 603.

A Local Exchange Telecommunications Carrier serving fewer than 500,001 access lines will not be required to report performance results or provide information specific to it in reference to Attachments 1 and 3.

A Local Exchange Telecommunications Carrier may request an exemption from any or all of the reporting requirements of these guidelines, if that carrier can demonstrate that its services are provided through resale of another carrier's tariffed services or purchase of another carrier's Unbundled Network Elements over which it has no direct control. The Director of the Office of Communications will grant or deny such exemption requests on a case-by-case basis.

Standard Special Service Installation Appointments shall be scheduled in accordance with a standard installation interval table filed by the carrier, accepted by Staff and appended to these guidelines. An installation interval is the period from the date on which the carrier receives an order for a Special Service circuit (the "application date") to the date on which that circuit should be installed, tested, and accepted by the customer (the "due date"). The carrier may periodically update its standard interval table (Attachment 3) after consulting with Commission staff. For Verizon New York Inc. installation intervals shall be consistent with those specified in the Carrier-to-Carrier Guidelines for similar services. A copy of the current interval table will be provided by the Local Exchange Telecommunications Carrier to customers upon request.

The standard installation interval does not apply to "Large Jobs" which, in the case of Verizon New York Inc., are defined as all single orders for more than 15 analog or five digital Special Service circuits to the same customer premise. Verizon

New York Inc. establishes installation intervals for Large Jobs on a case-by-case basis, and must cooperatively work with individual customers to arrange mutually satisfactory installation schedules. Customers who are unable, after consultation with a Local Exchange Telecommunications Carrier, to obtain satisfactory intervals on Large Jobs may bring their concerns to the Commission staff's attention. Verizon shall maintain consistent treatment for installation intervals on "Large Jobs" with respect to its intervals for similarly sized orders for Special Services in the Carrier-to-Carrier Guidelines.

In measuring Promptness of Repair, the "stop clock" method of timing trouble intervals is used. Under this method, when a trouble requires the field dispatch of a telephone technician, the timing clock is run whenever the Special Service customer's premise is open and accessible to telecommunications carrier repair personnel from the time the dispatch occurs until the time the trouble is cleared. Whenever the customer's premise is closed or otherwise inaccessible to telecommunications carrier repair personnel during that period, however, the timing clock is stopped. For troubles which do not require access to the customer's premise, however, there is no stopping of the timing clock.

Forecast Sharing

Carriers that use Verizon New York Inc. facilities to provision Special Services may to the extent possible provide forecast information to Verizon. The forecast data may include interoffice facility requirements for Digital Signal Level 1 (DS1, or 1.544 megabits per second) and above, and Optical Carrier Level 1 (OC1, or 51.840 megabits per second) and above, between a Verizon central office and a carrier's location, or only at specific Verizon central offices. It need not include

end user location facility requirements, but may if the carrier chooses to share such data. Carriers may use forms and procedures defined by Verizon to provide such forecasts. Forecast data should be updated on a scheduled basis.

Carrier Ordering Process for Verizon's High Capacity Services

Carriers ordering high capacity services (i.e., data transmission service equal to, or in excess of 1.544 megabits per second) from Verizon New York Inc. will use Verizon's Access Service Request (ASR). Carriers will use Verizon's electronic methods of placing an ASR, if available for placing high capacity service requests. During periods when electronic methods are unavailable, carriers may use facsimile. Individual carriers will be expected to phase in use of electronic methods over a one year period, or as negotiated between that carrier and Verizon.

The following listing is based on the Special Services offered by Verizon New York Inc.

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Access Analog	KC	Local Area Data Channel	
Access Analog	LB	Voice - Non-switched Line	
Access Analog	LC	Voice - Switched Line	
Access Analog	LD	Voice - Switched Trunk	
Access Analog	LE	Voice and Tone - Radio Land Line	
Access Analog	LF	Data Low Speed	
Access Analog	LG	Basic Data and Voice	
Access Analog	LH	Voice and Data - PSN Access Tie Trunk	
Access Analog	LJ	Voice and Data - SSN Access	
Access Analog	LK	Voice and Data - SSN Access - Intermachine Trunk	
Access Analog	LN	Data Extension Voice Grade Data	
Access Analog	LP	Telephoto and Facsimile	
Access Analog	LQ	Voice Grade Customized	
Access Analog	LR	Protective Relay - Voice Grade	
Access Analog	LV	Simultaneous Data and Voice Service	
Access Analog	LZ	Base Line Voice	
Access Analog	MQ	Metallic Customized	
Access Analog	MR	Obsolete Code (Morse Channel)	
Access Analog	NQ	Telegraph Customized	
Access Analog	NT	Protective Alarm - Metallic	
Access Analog	NU	Protective Alarm - Simplex	
Access Analog	NV	Protective Relaying Telegraph Grade	
Access Analog	NW	Telegraph Grade Facility - 75 Baud	
Access Analog	NY	Telegraph Grade Facility - 150 Baud	
Access Analog	PB	Program Audio, 300-2500 Hz - Non-Equalized	
Access Analog	PE	Program Audio, 200-3500 Hz	
Access Analog	PF	Program Audio, 100-5000 Hz	
Access Analog	PJ	Program Audio, 50-8000 Hz	
Access Analog	PK	Program Audio, 50-15,000 Hz	

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Access Analog	PN	Obsolete Code (Network Program Channel)	
Access Analog	PQ	Program Grade Customized	
Access Analog	SB	Switched Access - Standard	
Access Analog	SD	Switched Access - Improved	
Access Analog	SE	Special Access - WATS Access Line - Standard	
Access Analog	SF	Special Access - WATS Access Line - Improved	
Access Analog	SJ	Limited Switched Access Line (LSAL)	
Access Analog	SV	Switched Access Line Dedicated IC	
Access Analog	SZ	Electronic Business Service	
Access Analog	TQ	Television Grade Customized	
Access Analog	TW	TV Channel, One Way 5 kHz Audio	
Access Analog	WA	Wideband Analog	
Access Analog	WJ	Wideband Analog, 60-108 kHz	
Access Analog	WL	Wideband Analog, 312-552 kHz	
Access Analog	WN	Wideband Analog, 10-20 kHz	
Access Analog	WP	Wideband Analog, 29-44 kHz	
Access Analog	WQ	Wideband Analog, 10 Hz-50kHz	
Access Analog	WR	Wideband Analog, 584-3084 kHz	
Access Analog	XL	Obsolete code (TWX access line)	
Access Digital	HS	High Capacity Sub Rate	
Access Digital	WB	Wideband Digital, 19.2 kb/s	
Access Digital	WC	Obsolete code (Special facility w/800 service)	
Access Digital	WD	Wideband Digital, Cellular, 824-894 mHz	
Access Digital	WE	Wideband Digital, 50 kb/s	
Access Digital	WF	Wideband Digital, 230.4 kb/s	
Access Digital	XA	Dedicated Digital, 2.4 kb/s	
Access Digital	XB	Dedicated Digital, 4.8 kb/s	
Access Digital	XC	Obsolete code (TWX concentrator trunk)	
Access Digital	XD	Obsolete code (TWX data trunk)	
Access Digital	XE	Dedicated Digital, Bit Speed Generic	
Access Digital	XF	Obsolete (cross-over trunk facility, temp)	
Access Digital	XG	Dedicated Digital, 9.6 kb/s	

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Access Digital	XH	Dedicated Digital, 56.0 kb/s	
Access Digital	XR	Dedicated Digital, Variable Bit Rate	
Access Digital	YG	Frame Relay (less than 1.544 mb/s)	
Access Digital	YN	Digital Transmission Channel - 64 kb/s	
Access Highcap (DS1)	AH	Obsolete code	
Access Highcap (DS1)	HC	Digital High Capacity 1.544 mb/s	
Access Highcap (DS1)	HJ	Digital High Capacity, Non ANSI Rate	
Access Highcap (DS1)	HX	Fractional T-1	
Access Highcap (DS1)	JE	Digital High Cap, SONET, VT1 Signal	
Access Highcap (DS1)	SY	Timing Signal, 1.544 mb/s	
Access Highcap (DS1)	YB	Frame Relay (1.544 mb/s or higher)	
Access Highcap (DS3)	HD	Digital High Capacity 3.151 mb/s	
Access Highcap (DS3)	HE	Digital High Capacity 6.312 mb/s	Analog category in PA/DE
Access Highcap (DS3)	HF	Digital High Capacity 44.736 mb/s	
Access Highcap (DS3)	HG	Digital High Capacity 274.176 mb/s	
Access Highcap (DS3)	HH	Digital High Capacity Greater than 45 mb/s	
Access Highcap (DS3)	HT	Transparent LAN	
Access Highcap (DS3)	JI	Digital High Capacity, SONET, STS1 Signal	
Access Highcap (DS3)	LX	Dedicated Facility - Without Equipment	
Access Highcap (DS3)	LY	Dedicated Facility - With Equipment	
Access Highcap (DS3)	OA	Digital High Capacity, SONET, OC1 Signal	
Access Highcap (DS3)	OE	Digital High Capacity, SONET, OC24 Signal	
Access Highcap (DS3)	TV	TV Channel, Video and Optional Audion Service	
Access Highcap (DS3)	TZ	Non Commercial TV	
Access Highcap (OC3)	JJ	Digital High Capacity, SONET, STS3 Signal	
Access Highcap (OC3)	OB	Digital High Capacity, SONET, OC3 Signal	
Access Highcap (OC12)	OD	Digital High Capacity, SONET, OC12 Signal	
Access Highcap (OC48)	OF	Digital High Capacity, SONET, OC48 Signal	
Access Highcap (OC192)	OG	Digital High Capacity, SONET, OC192 Signal	
Non-access Analog	AA	Packet Analog Access Line	
Non-access Analog	AD	Attendant	

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Non-access Analog	AF	Commercial Audio (Full Time)	
Non-access Analog	AI	Automatic Identified Outward Dialing	
Non-access Analog	AL	Alternative Service	
Non-access Analog	AN	Announcement service	
Non-access Analog	AP	Commercial Audio (Part Time)	
Non-access Analog	AU	Auto Script	
Non-access Analog	BL	Bell and Lights	
Non-access Analog	BS	Siren Control	
Non-access Analog	CA	SSN Access	
Non-access Analog	CE	SSN Station Line	
Non-access Analog	CF	Obsolete code (OCC Special facility)	
Non-access Analog	CG	Obsolete code (OCC telegraph grade facility-medium speed)	
Non-access Analog	CI	Concentrator Identifier Trunk	
Non-access Analog	CK	Obsolete code (OCC overseas connecting facility-wideband)	
Non-access Analog	CN	SSN Network Trunk	
Non-access Analog	CP	Concentrator Identifier Signaling Link	
Non-access Analog	CR	Obsolete code (OCC backup facility)	
Non-access Analog	CS	Channel service	
Non-access Analog	CT	SSN Tie Trunk	
Non-access Analog	CV	Obsolete code (OCC Voice grade facility)	
Non-access Analog	CW	Obsolete code (OCC wire pair facility)	
Non-access Analog	CX	Obsolete code (Centrex CU Station line)	
Non-access Analog	CZ	Obsolete code (OCC access facility)	
Non-access Analog	DD	Direct-in-Dial-Alternate Design	
Non-access Analog	DJ	Digit Trunk	
Non-access Analog	DK	Data Link	
Non-access Analog	DL	Dictation Line	
Non-access Analog	DT	Obsolete code (Data line concentrator trunk)	
Non-access Analog	DU	Dialed Data Transmission	
Non-access Analog	EA	Switched Access	
Non-access Analog	EB	Electronic Business Service	

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Non-access Analog	EC	Obsolete code (Enfia tandem trunk)	
Non-access Analog	EE	Combined Access	
Non-access Analog	EF	Entrance Facility - Voice Grade	
Non-access Analog	EG	Obsolete code (Type 2 telegraph)	
Non-access Analog	EL	Emergency Reporting Line	
Non-access Analog	EM	Emergency Reporting Center Trunk	
Non-access Analog	EN	Obsolete code (Exchange network access facility)	
Non-access Analog	EP	Emergency Private-Switch Trunk - 911	
Non-access Analog	EQ	Equipment-Only (Network Element) Assignment	
Non-access Analog	ES	Obsolete code (extension service voice grade)	
Non-access Analog	EV	Enhanced Emergency Reporting Trunk Service Code	
Non-access Analog	EW	Obsolete code (Off network MTS/WATS Equiv service	
Non-access Analog	FA	Fiber Analog Service	
Non-access Analog	FD	Private Line – Data	
Non-access Analog	FR	Fire Dispatch	
Non-access Analog	FT	Foreign Exchange Trunk	
Non-access Analog	FV	Voice Grade facility	
Non-access Analog	FW	Wideband Channel	
Non-access Analog	FX	Foreign Exchange Line	
Non-access Analog	HV	Simultaneous Data and Voice	
Non-access Analog	IT	Intertandem Tie Trunk	
Non-access Analog	LA	Local Area Data Channel	
Non-access Analog	LL	Long Distance Terminal Line	
Non-access Analog	LS	Local Service	
Non-access Analog	LT	Long Distance Terminal trunk	
Non-access Analog	MA	Cellular Access Trunk 2-Way	
Non-access Analog	MC	Obsolete code (Data multiplex channel)	
Non-access Analog	ML	Obsolete code (multiplex link)	
Non-access Analog	MT	Wired Music	
Non-access Analog	NA	Obsolete code (CSACC Links (EPSCS))	
Non-access Analog	NC	Obsolete code (CNCC Links (EPSCS))	
Non-access Analog	OC	Obsolete code (Centrex CU STN Line-Off premises	

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Non-access Analog	OI	Off Premises Intercommunications Station Line	
Non-access Analog	ON	Off Network Access Line	
Non-access Analog	OP	Off premises extension	
Non-access Analog	OS	Off premises PBX Station Line	
Non-access Analog	PA	Protective Alarm (AC Interface at Customer Premises)	
Non-access Analog	PG	Paging	
Non-access Analog	PL	Private Line – Voice	
Non-access Analog	PM	Protective Monitoring	
Non-access Analog	PR	Protective Relaying - Voice Grade	
Non-access Analog	PS	MSC Constructed Spare Facility	
Non-access Analog	PT	Obsolete code (Local program channel)	
Non-access Analog	PV	Protective Relaying - Telegraph Grade	
Non-access Analog	PW	Protective Relaying - Signal Grade	
Non-access Analog	PZ	PBX Station Line	
Non-access Analog	QU	Packet –Asynchronous Access Line	
Non-access Analog	RA	Remote attendant	
Non-access Analog	RD	Reconfigurable Network - Trunk	
Non-access Analog	RL	Reconfigurable Network - CO Switch Line side	
Non-access Analog	RT	Radio Land Line	
Non-access Analog	SA	Satellite/tributary Tie Trunk	
Non-access Analog	SG	Control/Remote Metering - Signal Grade	
Non-access Analog	SM	Sampling	
Non-access Analog	SN	SSN Special Access Termination	
Non-access Analog	SQ	Equipment – Only (Customer Premises Assignment)	
Non-access Analog	SS	Dataphone Select-a-Station	
Non-access Analog	TA	Tandem Tie trunk	
Non-access Analog	TC	Control/remote Metering – Telegraph Grade	
Non-access Analog	TD	Obsolete code (Transaction network -Dial line)	
Non-access Analog	TF	Telephoto/Facsimile	
Non-access Analog	TG	CO Trunk Side Termination	
Non-access Analog	TL	Nontandem Tie Trunk	
Non-access Analog	TM	Obsolete code (Transaction network Switched)	

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Non-access Analog	TN	Obsolete code (Transaction Polled access line)	
Non-access Analog	TR	Turret or Automatic Call Distributor (ACD) Trunk	
Non-access Analog	TT	Teletypewriter Channel	
Non-access Analog	TU	Turret or Automatic Call Distributor (ACD) Line	
Non-access Analog	UN	Low Speed Signaling Custom	
Non-access Analog	VF	Commercial Television (Full-Time)	
Non-access Analog	VH	Commercial Television (Part-Time)	
Non-access Analog	VI	Obsolete code (Industrial television)	
Non-access Analog	VM	Control/Remote Metering - Voice Grade	
Non-access Analog	VN	Obsolete code (Network video)	
Non-access Analog	VT	Obsolete code (Local video)	
Non-access Analog	WG	Obsolete code (Western Union Teletypewriter)	
Non-access Analog	WI	WATS Service Trunk	
Non-access Analog	WO	WATS Line (OUT)	
Non-access Analog	WS	WAST Trunk (Out)	
Non-access Analog	WU	Obsolete code (Western Union Telegraph)	
Non-access Analog	WV	Obsolete code (Western Union Voice Channel)	
Non-access Analog	WX	WATS Service Line	
Non-access Analog	WY	WATS Trunk (2-way)	
Non-access Analog	WZ	WATS line (2-way)	
Non-access Analog	XX	Obsolete code (TWX data test line)	
Non-access Analog	TX	Dedicated Facility - Without Equipment	
Non -access Company Circuits	ZA	Alarm Circuits	
Non -access Company Circuits	ZC	Call and Talk Circuits	
Non -access Company Circuits	ZD	Obsolete code (data line switching test circuits)	
Non -access Company Circuits	ZE	Emergency Patching Circuits	
Non -access Company Circuits	ZF	Order Circuits Facility	
Non -access Company Circuits	ZM	Measurement and Recording Circuits	
Non -access Company Circuits	ZP	Test Circuits, Plant Service Center	
Non -access Company Circuits	ZQ	Qual Control and Management Circuits	
Non -access Company Circuits	ZS	Switching Control and Transfer Circuits	

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Non -access Company Circuits	ZT	Test Circuits, Central Office	
Non -access Company Circuits	ZV	Order Circuits, Service	
Non-access Digital	AB	Packet Network Trunk	
Non-access Digital	DA	Digital Data Off Net Extension	
Non-access Digital	DC.	Digital Data, 64 CCC	
Non-access Digital	DM	Digital Data - 19.2 kb/s	
Non-access Digital	DP	Digital Data - 2.4 kb/s	
Non-access Digital	DQ	Digital Data - 4.8 kb/s	
Non-access Digital	DR	Digital Data – 9.6 kb/s	
Non-access Digital	DS	Canada	
Non-access Digital	DW	Digital Data – 56 kb/s	
Non-access Digital	DX	Obsolete code (Digital Data - Subrate speed)	
Non-access Digital	DY	Digital Service (under 1 mb/s)	
Non-access Digital	DZ	64 kb/s On the "D" Channel	
Non-access Digital	HA	Non DDS Digital Data 1.2 kb/s	
Non-access Digital	HB	Non DDS Digital Data 19.2 kb/s	
Non-access Digital	HP	Non DDS Digital Data 2.4 kb/s	
Non-access Digital	HQ	Non DDS Digital Data 4.8 kb/s	
Non-access Digital	HR	Non DDS Digital Data 9.6 kb/s	
Non-access Digital	HW	Non DDS Digital Data 56 kb/s	
Non-access Digital	HY	Non DDS Digital Data 64 kb/s	
Non-access Digital	ID	Derived Services	
Non-access Digital	PC	Switched Digital Access Line	
Non-access Digital	QD	Packet DDD Access Line	
Non-access Digital	QE	Frame Relay - 56 kb/s	
Non-access Digital	QJ	Frame Relay - 384 kb/s	
Non-access Digital	QK	Frame Relay - 64 kb/s	
Non-access Digital	QL	Frame Relay - 128 kb/s	
Non-access Digital	QR	Frame Relay - 256 kb/s	
Non-access Digital	QS	Packet – Synchronous Access Line	
Non-access Digital	QY	Frame Relay - 768 kb/s	
Non-access Digital	ST	Digital Trunk	

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Non-access Digital	US	Digital Data	
Non-access Highcap (DS1)	AS	Asynchronous Transfer Mode (ATM) Circuit	
Non-access Highcap (DS1)	CH	Obsolete code (OCC Digital facility high speed)	
Non-access Highcap (DS1)	DB	Satellite Access Line	
Non-access Highcap (DS1)	DF	HSSDS-Hub to Hub - 1.5 mb/s	
Non-access Highcap (DS1)	DG	HSSDS-Hub to Earth Station - 1.5 mb/s	
Non-access Highcap (DS1)	DH	Digital Data	
Non-access Highcap (DS1)	FL	Fractional T-1	
Non-access Highcap (DS1)	HK	Timing Signal - 1.544 mb/s	
Non-access Highcap (DS1)	HL	Digital Service Fiber	
Non-access Highcap (DS1)	HN	Digital Voice Circuit	In the Digital category in NE
Non-access Highcap (DS1)	QA	SMDS DS1 Circuit	
Non-access Highcap (DS1)	QG	Frame Relay - 1.544 mb/s or higher	
Non-access Highcap (DS1)	UF	Fractional T-1 (RPL)	
Non-access Highcap (DS1)	UH	Digital High Capacity	
Non-access Highcap (DS1)	UM	High Capacity Custom	
Non-access Highcap (DS3)	FI	FDD – 100 mb/s	
Non-access Highcap (DS3)	HI	Digital Service 45 mb/s or higher	
Non-access Highcap (DS3)	HZ	Private Line Service - 200 mb/s	
Non-access Highcap (DS3)	LI	LAN Connection Operating at 4 mb/s	
Non-access Highcap (DS3)	LM	Transparent LAN	
Non-access Highcap (DS3)	LO	LAN Connection Operating at 10 mb/s	
Non-access Highcap (DS3)	LW	LAN Connection Operating at 16 mb/s	
Non-access Highcap (DS3)	MB	LAN Connection Operating at 2.5 mb/s	
Non-access Highcap (DS3)	MD	SONET - STS1 Signal	
Non-access Highcap (DS3)	MF	SONET - OC1 Signal	
Non-access Highcap (DS3)	MM		
Non-access Highcap (DS3)	QC	SMDS DS3 Circuit	
Non-access Highcap (DS3)	QH	Frame Relay - End-to-end service	
Non-access Highcap (DS3)	TY	Dedicated Facility - With Equipment	In the Analog category NY

Services Covered by the Special Service Guidelines			Attachment 1
Category	**Service Code**	**Service**	**Notes**
Non-access Highcap (DS3)	VR	Non Commercial Television	
Non-access Highcap (ISDN PRI)	IP	ISDN Primary Access Line	
Non-access Highcap (OC3)	ME	SONET - STS3 Signal	
Non-access Highcap (OC3)	MG	SONET - OC3 Signal	
Non-access Highcap (OC12)	MH	SONET - OC12 signal	
Non-access Highcap (OC12)	MP	SONET - STS12 Signal	
Non-access Highcap (OC48)	MJ	SONET - OC48 Signal	
Non-access Highcap (OC192)	MK	SONET - OC192 Signal	
Non-access Local Specials	BA	Protective Alarm (DC Interface at Customer Premises)	
Non-access Local Specials	CL	Centrex Company Line	
Non-access Local Specials	DI	Direct-In-Dial	
Non-access Local Specials	DO	Direct-Out-Dial	
Non-access Local Specials	ND	Network Data Link	
Non-access Local Specials	PX	PBX Station Line	
Non-access Local Specials	SL	Secretarial Line	
Non-access Local Specials	TK	Local PBX Trunk	

Attachment 2

The following metric definitions provide information on how to measure and report performance under the Special Service Guidelines. For purposes of these definitions and reporting performance, the word "Other Carrier" is meant to include carriers other than the reporting carrier and its affiliates (e.g., competitive local exchange carriers, long distance carriers, and wireless carriers). Retail is meant to include end user service, but exclude any service to carriers.

Function:

Percent On Time ASR Response
(electronic – no flow-through) SS-OR-1

Definition:

This metric measures Response Timeliness in terms of the percentage of responses within the agreed upon timeframes as specified in the Performance Standards with either a firm in-service date or an estimated in-service date where facilities are not currently available.

Order Response Time: The amount of elapsed time (in hours and minutes) between receipt of a valid order request (e.g., VZ Ordering Interface) and distribution of a Service Order confirmation, or an estimated completion date based on an engineering estimate. Rejected orders will have the clock re-started upon receipt of a valid order.

Facility Checks are completed on all orders. If facilities are available, a firm order in-service date will be provided with the response to the service order request. When facilities are not available, an engineering review will be performed, and an estimated in-service date will be provided in response to the service order request rather than a firm order in-service date. The date will be identified as a "best estimate" which will be subsequently confirmed or modified by providing a firm order in-service date within the shorter of three weeks from provision of the estimated date (which allows time to accurately project when facilities will become available), or 10 days prior to the in-service date.

Notes: This measurement is based on ASR electronically submitted orders only. The reporting carrier will include carrier requests for resent confirmations that are submitted electronically as well as resent confirmations due to reporting carrier error in initial confirmation in the Order Confirmation Timeliness measurement. Resent confirmations due to other carrier error are excluded from the measurement. If no order confirmation time exists due to a missing order confirmation, the reporting carrier will use the completion notification time. This measurement includes orders confirmed in the calendar month.

Exclusions:

- Reporting carrier Test and administrative orders
- Weekend and holiday hours (other than flow-through)
  Weekend hours are from 5:00PM Friday to 8:00AM Monday
  Holiday hours are from 5:00PM of the business day preceding the holiday to 8:00AM of the first business day following the holiday. These hours are excluded from the elapsed time when calculating the response times for non-flow-through requests.

Performance Standard:

Percent On Time ASR Response (electronic – no flow-through):

95%or More On Time - Order Response Time within 72 Hours.

Report Dimensions

Company:	Geography:
• Other Carrier Aggregate • Other Carrier Specific	New York State orders as handled by each ordering center.

• Reporting Carrier Affiliates Aggregate	

Metric Calculation Specifics		
SS-OR-1-01	**Percent On Time ASR Response (electronic – no flow-through)**	
Products	ASR Submitted Orders for DS0; and ASR Submitted Orders for DS1 and above (i.e., two product groups).	
Calculation	**Numerator**	**Denominator**
	Number of electronic ASRs where response date and time minus submission date and time is less than standard.	Total number of electronic ASRs.

Function:

Provisioning On Time Performance - Met Commitments SS-PR-1

Definition:

This metric measures the Percent of Orders completed as verified by the customer on or before the first confirmed commitment date, or a subsequent customer initiated and verified change in the order due date.

Each circuit is counted as a separate order, even if multiple circuits are ordered at the same time.

For carriers: A requested change in order due date is communicated by a supplemental issue of the ASR ("supp").

Exclusions:

- Reporting Carrier Test Orders
- Disconnect Orders
- Reporting Carrier Administrative orders
- Record Orders
- Orders that are not complete. (Orders are included in the month that they are completed)
- Customer Not Ready (CNR), No Access (NA) and Lost Access (LA).

Performance Standard:

% Installation Commitments On Time:
Greater Than or Equal to 96.0%

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-PR-1-01	**% Met Appointments – Verizon – Total**	
Description	The percent of orders completed on or before the commitment date.	
Products	"DS0;" and "DS1 and above."	
Calculation	**Numerator**	**Denominator**
	Number of Orders where the Order completion date is on or before the order due date.	Number of orders completed for product group.

Function:

Average Delay Days On Missed Installation Orders SS-PR-2

Definition:

For orders where the installation commitment was missed due to Reporting Carrier reasons, this metric measures the average number of days between the first confirmed commitment due date (or a subsequent customer initiated due date that was verified by the customer) and the actual work completion date as verified by the customer.

Each circuit is counted as a separate order, even if multiple circuits are ordered at the same time.

For carriers: A requested change in order due date is communicated by a supplemental issue of the ASR ("supp").

Exclusions:

- Reporting Carrier Test Orders
- Disconnect Orders
- Reporting Carrier Administrative orders
- Record Orders
- Orders that are not complete. (Orders are included in the month that they are completed)
- Saturdays, Sundays, and Legal Holidays are not counted as Delay Days.

Performance Standard:

Average Delay Days:

Less Than or Equal to 3.0

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-PR-2-01	**Average Delay Days – Total**	
Description	For orders missed due to Verizon reasons, the average number of days between committed due date and actual work completion date.	
Products	"DS0;" and "DS1 and above."	
Calculation	**Numerator**	**Denominator**
	Sum of the completion date minus due date for orders missed due to company reasons.	Number of orders missed for company reasons.

Function:

Installation Quality SS-PR-3

Definition:

This metric measures the percent of circuits installed where a reported trouble was found in the network within 30 days of order completion.

Trouble Report: Includes Disposition Codes 03 (Drop Wire), 04 (Cable), 05 (Central Office), 07 (Test-OK) and 09 (Found-OK). For Carriers, Disposition Code 05 includes translation troubles closed automatically by the carrier.

Exclusions:

- Subsequent reports (additional customer calls while the trouble is pending).
- Troubles closed due to customer action.
- Troubles reported by Reporting Carrier employees in the course of performing preventative maintenance, where no customer has reported a trouble.
- Customer Premises Equipment (CPE) troubles

Performance Standard:

Percent Installation Troubles Reported Within 30 Days:
Less than or equal to 4.0 trouble reports within 30 days per 100 circuits installed during the calendar month.

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-PR-3-01	**% Installation Troubles reported within 30 Days**	
Description	The trouble report rate on circuits installed where a trouble was reported within 30 days of order completion. Includes Disposition Codes 03 (Drop Wire), 04 (Cable), 05 (Central Office), 07 (Test-OK) and 09 (Found-OK).	
Products	Special Services	
Calculation	**Numerator**	**Denominator**
	Number of trouble reports on circuits installed within 30 days of trouble report.	Total circuits installed in calendar month.

Function:

Percent Missed Appointments Due to a Lack of Facilities SS-PR-4

Definition:

This metric measures facility missed orders.

Facility Missed Orders: The Percent of Orders completed after the commitment date, where the cause of the delay is lack of facilities.

Exclusions:

- Reporting Carrier Test Orders
- Disconnect Orders
- Reporting Carrier Administrative orders
- Record Orders
- Orders that are not complete. (Orders are included in the month that they are completed)
- Customer Not Ready (CNR), No Access (NA) and Lost Access (LA).

Performance Standard:

Percent Missed Appointments Due to a Lack of Facilities:

No performance standard is associated with this metric.

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-PR-4-01	**Percent Missed Appointments Due to a Lack of Facilities**	
Description	The percent of Dispatched Orders completed after the commitment date, due to a lack of facilities.	
Products	"DS0;" and "DS1 and above."	
Calculation	**Numerator**	**Denominator**
	Number of dispatched orders where the order completion date is greater than the order DD due to Reporting Carrier Facility reasons for the product group.	Number of dispatched orders completed for the product group.

Function:

% Jeopardies SS-PR-5

Definition:

This metric measures the number of orders with missed due dates that receive jeopardy notices prior to close of business on the due date.
Note: For Verizon, this is to be measured after a new transaction type is developed in ordering systems.

Exclusions:

- Reporting Carrier Test Orders
- Disconnect Orders.
- Reporting Carrier Administrative orders.
- Orders that are not complete or cancelled.

Performance Standard:

Jeopardy Status Notification:

No performance standard is associated with this metric.

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-PR-5	**% Jeopardies**	
Products	"DS0;" and "DS1 and above."	
Calculation	**Numerator**	**Denominator**
	Number of missed committed due dates where advance notice is provided.	Number of missed committed due dates.

Function:

Customer Trouble Report Rate SS-MR-1

Definition:

This metric measures the total initial customer direct or referred troubles reported, where the trouble disposition was found to be in the network or a trouble condition was not found (Found OK and Test OK), per 100 circuits in service. A Network Trouble means a trouble with a Disposition Codes of 03 (Drop-wire), 04 (Outside Plant Loop), or 05 (Central Office). A Found-OK means a trouble with a Disposition Codes of 07, and a Test-OK means a trouble with a Disposition Codes of 09.

Subsequent Reports: Additional customer trouble calls while an existing trouble report is pending – typically for status or to change or update information.

Exclusions:

- Report rate excludes subsequent reports (additional customer calls while the trouble is pending)
- Troubles reported on Reporting Carrier official (administrative lines)
- Troubles closed due to customer action.
- Troubles reported by Reporting Carrier employees in the course of performing preventative maintenance, where no customer has reported a trouble
- Customer Premises Equipment (CPE) troubles

Performance Standard:

Report Rate:

Less than or Equal to 3.5 trouble reports per 100 circuits.

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-MR-1-01	**Network Trouble Report Rate**	
Products	Special Services	
Calculation	**Numerator**	**Denominator**
	Number of all trouble reports with found network troubles (trbl_cd is FAC or CO) or not-found troubles (Test-OK or Found-OK) .	Number of circuits in service stated in hundreds.

Function:

Trouble Duration Intervals SS-MR-2

Definition:

This metric measures average trouble duration interval per month. Mean Time to Repair: (MTTR) measures the average duration time from trouble receipt to trouble clearance. It includes Disposition Codes 03 (Drop Wire), 04 (Cable), 05 (Central Office), 07 (Test-OK) and 09 (Found-OK).

For Special Services, including Special Access service, this is measured on a stop clock basis (e.g., the clock is stopped when Carrier testing is occurring, the Reporting Carrier is awaiting carrier acceptance, or the Reporting Carrier is denied access).

Exclusions:

- Subsequent reports (additional customer calls while the trouble is pending)
- Customer Premises Equipment (CPE) troubles
- Troubles closed due to customer action.
- Troubles reported by Reporting Carrier employees in the course of performing preventative maintenance, where no customer reported a trouble.

Performance Standard:

Mean Time To Repair:

Less than or Equal to 9.0 hours

Report Dimensions

Company:	Geography:
• Reporting Carrier Retail • Other Carrier Aggregate • Other Carrier Specific • Reporting Carrier Affiliates Aggregate	• Intra LATA Services: Special Service Bureau and New York State LATA 132 and Remaining State • Exchange Access Services: Special Service Bureau, New York State LATA 132 and Remaining State

Metric Calculation Specifics

SS-MR-2-01	**Mean Time To Repair – Total**	
Products	Special Services	
Calculation	**Numerator**	**Denominator**
	Sum of trouble clear date and time minus trouble receipt date and time for trouble reports with Disposition Codes 03, 04, 05, 07 and 09. (Exclude time when clock is stopped).	Number of trouble reports with Disposition Codes 03, 04, 05, 07 and 09.

Attachment 3

Verizon will routinely update the following standard installation intervals and maintain consistency in the intervals with the intervals of the Carrier-to-Carrier Guidelines for similar services.

Verizon Special Access Installation Intervals

WHOLESALE (CARRIER)		NON CARRIER END USER	
Service	Interval	Service	Interval
Special	Special	Special	Special
VOICE GRADE	1-24 lines 9 days with facilities; 25+ lines negotiated interval. Without facilities, all intervals are negotiated	VOICE GRADE	1-24 lines 9 days with facilities; 25+ lines negotiated interval. Without facilities, all intervals are negotiated
DIGITAL DATA	1-24 lines 9 days with facilities; 25+ lines negotiated interval. Without facilities, all intervals are negotiated	DIGITAL DATA	1-24 lines 9 days with facilities; 25+ lines negotiated interval. Without facilities, all intervals are negotiated
DS1	1-8 systems 9 days with facilities and this interval includes a 3-day facility check; 9+ systems negotiated interval. Without facilities, all intervals are negotiated.	DS1	1-8 DS1s 3 day facility check prior to applying interval. With facilities 6 days, without facilities apply 6 days use longest facility available date as LAM to calculate 6-day interval. 9+ DS1s intervals are negotiated.
DS3	1-4 systems 20 days with facilities and this interval includes a 5-day facility check; 5+ systems negotiated interval. Without facilities, all intervals are negotiated.	DS3	1-4 DS3s 6 day facility check prior to applying interval. With facilities 14 days, without facilities apply 14 days use longest facility available date as LAM to calculate 14-day interval. Over 5 DS3s intervals are negotiated.

Attachment 3

New York Non-Access Installation Intervals

Unless otherwise specified below requests for six (6) lines / circuits or greater for Non-High Cap Special Services require a Facility Availability Check be performed before assigning a due date to the order.

- For 6-9 lines, the facility check must be completed and the due date negotiated with the customer within 24 hours of the customer's original request / call to BA.
- For 10 or more lines, the facility check must be completed and the due date negotiated with the customer within 72 hours of the customer's original request / call to Verizon.
- If NO facilities are currently available, the FMC response must include a facilities availability date. The due date is derived by using the Facilities Availability Date (FAD) plus the standard interval for the lines / products ordered.
- If the facilities check is not completed in the prescribed timeframe, the sales channel may apply a 10 business day or product interval to the order, whichever is longer, and negotiate the date with the customer.

Service	Interval
Analog Private Lines: 1 - 12 circuits	9 Days
Analog Private Lines: 13 - 24 circuits	14 Days
Analog Private Lines: 25-38 circuits	18 Days
Analog Private Lines: 39 - 50 circuits	22 Days

Pulsenet	3 Days

Switchway Low Speed Data	12 Days
LADS- Must meet tariff qualifications	12 Days

Dovpath	12 Days
Infopath	12 Days

Attachment 3

High Cap Services

Project Note	References to "Project" is that the various departments involved in the provision of the service determine the date due with the driver being facility availability.
DS1 High Cap (Includes all types muxed and non muxed, I.e. Flexpath, ADC, LTS, PRI (all types), ENTERPRISE, and Network Reconfiguration Service non access, non FCC DS1 service	Note 1: INTERVALS BELOW BASED ON FACILITIES AVAILABILTY. IF NO FACILITIES, apply 6-day interval using latest available date as LAM calculated with the 6-day interval. A 3-day facility check is done prior to applying any interval.
Quantity	
1 to 8	6 Days
9+	Project
DS3 High Cap (Includes all types muxed and non muxed, I.e. LTS, ENTERPRISE, and Network Reconfiguration Service non access, non FCC DS3 service	Note 1: INTERVALS BELOW BASED ON FACILITIES AVAILABILITY. IF NO FACILITIES, apply 14-day interval using latest available date as LAM calculated with the 14-day interval. A 14-day facility check is done prior to applying any interval.
Quantity	
1 to 4	14 Days
5+	Project

DS0 Ordered with High Cap	
DS1/DS0 services riding High Cap (including PRI)	Date Due intervals must follow at least 2 days after the DS1/DS0 service

ILEC PERFORMANCE MEASUREMENTS & STANDARDS

in the

Ordering, Provisioning,

and

Maintenance & Repair

of

ACCESS SERVICE

National Carrier Management and Initiatives

Issued: June 26, 2001

TABLE OF CONTENTS

ILEC Performance Measurements and Standards

Overview

The purpose of this document is to establish a core set of measures to monitor the quality and timeliness of access services being provided to WorldCom by the Regional Bell Operating Companies (RBOC's) and certain Non-RBOC Incumbent Local Exchange Carriers, hereinafter collectively referred to as "ILECs". These measures cover the essential aspects of Ordering, Provisioning, and Maintenance & Repair activities, and will become the model for WorldCom internal ILEC performance reporting as well as the proposed model for ILEC Self Reporting

Our intent is to measure ILEC performance on all WorldCom requests for exchange access service ordered via an Access Service Request (ASR). The scope is inclusive of both special access and switched access service requests. It is also inclusive of dedicated exchange access connections utilizing any of WorldCom's IXC, or local service, based products, not addressed in a Local Interconnection Agreement, when requested on an ASR

This document will be reviewed with each RBOC and certain ILECs in the hope that they will incorporate this set of common measures and methodology into their self-reporting, and assist in driving toward industry standard performance measures. Industry standard measures, along with the use of common methods and terminology, will benefit all parties by reducing misunderstandings and focusing efforts on the shared goal of providing excellent customer service.

WorldCom, as a very large customer of ILEC access services, has also developed these performance measurements and standards to: 1) help insure we are receiving the quality of service we and our customers expect, both now and over time; and 2) help insure we are being treated fairly, in our dual role as both customer and competitor, as the RBOC's, and other ILECs, increasingly participate in the competitive long distance business.

Reporting Dimensions

All WorldCom business units, including UUNET, are combined into one WorldCom total, with the following reporting dimensions for all measurements.

- Special Access disaggregated by bandwidth
- Switched Access
- State Total
- ILEC Total

Special Access is any exchange access service that provides a transmission path between two or more points, either directly, or through a central office, where bridging or multiplexing functions are performed, not utilizing ILEC end office switches.

Special access services include dedicated and shared facilities configured to support analog/voice grade service, metallic and/or telegraph service, audio, video, digital data service (DDS), digital transport and high capacity service (DS1, DS3 and OCn), collocation transport, links for SS7 signaling and database queries, SONET access including OC-192 based dedicated SONET ring access, and broadband services.

> **Exclusions:** Special access requests related to unbundled transport or unbundled multiplexing orders are excluded, as these orders/circuits should be accounted for in Local Performance Measures.

Switched Access is an exchange access service comprised of a local switching function, multiplexing equipment, and a switch termination, connected by a transport facility configured, or connected to, another carrier's location and providing access to end user dial tone lines served by an ILEC.

Switched access services include all feature group trunk services, and related local switching services, common carrier line services and functions, and local transport services, such as entrance facilities, 'direct-trunked transport' or direct end office trunks, and switched transport over dedicated, shared, or tandem-based connections.

> **Exclusions:** Switched access requests related to local interconnection, E911 trunks, Local Operator Services, and Local Directory Assistance trunks are excluded, as these orders/circuits should be accounted for in Local Performance Measures.

The reporting period is the calendar month, unless otherwise noted, with all averages or percentages displayed to two decimal points.

ILEC Performance Measurements and Standards

ORDERING

Measurement: FOC Receipt

Description

The Firm Order Confirmation (FOC) is the ILEC response to a WorldCom Access Service Request (ASR), whether an initial or supplement ASR, that provides WorldCom with the specific Due Date on which the requested circuit or circuits will be installed. The performance standard for FOCs received within the standard interval is expressed as a percentage of the total FOCs received during the reporting period.

Calculation Methodology

FOC Receipt - Distribution:

(FOC Receipt Date – ASR Sent Date), for each FOC received during reporting period, distributed by: 0 day, 1 day, 2 days, through 10 days and > 10 days

Percent Meeting Performance Standard:

[Count FOCs received where (FOC Receipt Date – ASR Sent Date) < = Performance Standard] / Total FOCs received during reporting period x 100

Business Rules

1. Counts are based on each instance an FOC is received from the ILEC. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured.
2. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
3. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

Special Access

- DS0
- DS1
- DS3
- OCn

Switched Access

Performance Standard

Percent FOCs Received within Standard

Special Access - DS0 98% within 2 business days
- DS1 98% within 2 business days
- DS3 98% within 5 business days

Switched Access - TBD

FOC Receipt Distribution - Diagnostic

ILEC Performance Measurements and Standards

ORDERING

Measurement: FOC Receipt Past Due

Description

The FOC Receipt Past Due measure tracks all open ASR requests that have not received an FOC from the ILEC within the expected FOC receipt interval, as of the last day of the reporting period. This measure gauges the magnitude of late FOCs and is essential to ensure that FOCs are being received in a timely manner from the ILECs.

Calculation Methodology

FOC Receipt - Percent Past Due:

Sum of ASRs without a FOC Received where (End of Reporting Period – ASR Sent Date > Expected FOC Receipt Interval) / Total number of ASRs sent during reporting period x 100

Business Rules

1. All counts are based on the latest ASR request sent to the ILEC. Where an ASR was not responded to, and a subsequent ASR is sent, only the latest ASR would be recorded as Past Due.
2. The Expected FOC Receipt Interval, used in the calculations, will be the interval identified in the Performance Standards for the FOC Receipt measure.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

Special Access

Without Open Query/With Open Query

- DS0
- DS1
- DS3
- OCn

Switched Access

Without Open Query/With Open Query

Performance Standard

FOC Receipt Past Due - Without Open Query - < 2 % FOC Receipt Past Due

FOC Receipt Past Due - With Open Query - Diagnostic

ILEC Performance Measurements and Standards

ORDERING

Measurement: Offered Versus Requested Due Date

Description

The Offered Versus Requested Due Date measure reflects the degree to which the ILEC is committing to install service on the WorldCom Requested Due Date (WRDD), when WorldCom specifically requests a Due Date that is equal to or greater than the ILEC stated interval.

Calculation Methodology

Percent Offered with WorldCom Requested Due Date:
[Count of circuits where (FOC Due Date = WRDD] / [Total number of circuits where (WRDD – ASR Sent Date) = > ILEC Stated Interval] x 100

Business Rules

1. Measures are based on the last ASR sent and the associated FOC Due Date received from the ILEC.
2. Selection is based on circuits completed by the ILEC during the reporting period. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

Special Access
- DS0
- DS1
- DS3
- OCn

Switched Access

Performance Standard

ILEC Stated Intervals – To be determined by ILEC

Special Access
- DS0 - TBD
- DS1 - TBD
- DS3 - TBD
- OCn - TBD

Switched Access - TBD

Percent Offered with WRDD where WRDD = > ILEC Stated Interval - 100%

ILEC Performance Measurements and Standards

PROVISIONING

Measurement: On Time Performance To FOC Due Date

Description

On Time Performance To FOC Due Date measures the percentage of circuits that are completed on the FOC Due Date, as recorded from the FOC received in response to the last ASR sent. Customer Not Ready (CNR) situations may result in an installation delay. The On Time Performance To FOC Due Date is calculated both with CNR consideration, i.e. measuring the percentage of time the service is installed on the FOC due date while counting CNR coded orders as an appointment met, and without CNR consideration.

Calculation Methodology

Percent On Time Performance to FOC Due Date – With CNR Consideration:
[(Count of Circuits Completed on or before ILEC Committed Due Date + Count of Circuits Completed after FOC Due Date with a verifiable CNR code) / (Count of Circuits Completed in Reporting Period)] x 100

Percent On Time Performance to FOC Due Date – Without CNR Consideration:
[(Count of Circuits Completed on or before ILEC Committed Due Date) / (Count of Circuits Completed in Reporting Period)] x 100

Note: The denominator for both calculations is the total count of circuits completed during the reporting period, including all circuits, with and without a CNR code.

Business Rules

1. Measures are based on the last ASR sent and the associated FOC Due Date received from the ILEC.
2. Selection is based on circuits completed by the ILEC during the reporting period. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. The ILEC Completion Date is the date upon which the ILEC completes installation of the circuit, as noted on a completion advice to WorldCom.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: WorldCom is not ready; end user is not ready; connecting company, or third party supplier, is not ready. The ILEC must ensure that established procedures are followed to notify WorldCom of a CNR situation and allow a reasonable period of time for WorldCom to correct.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

Special Access
With CNRs/Without CNRs
- DS0
- DS1
- DS3
- OCn

Switched Access
With CNRs/Without CNRs

Performance Standard

On Time to FOC Due Date - With CNR Consideration	- 98 % On Time
On Time to FOC Due Date - Without CNR Consideration	- Diagnostic

ILEC Performance Measurements and Standards

PROVISIONING

Measurement: Days Late

Description

Days Late captures the magnitude of the delay, both in average and distribution, for those circuits not completed on the FOC Due Date, and the delay was not a result of a verifiable CNR situation.

Calculation Methodology

Average Days Late:

Σ[Circuit Completion Date – ILEC Committed Due Date (for all Circuits Completed Beyond ILEC Committed Due Date without a CNR code)] / (Count of Circuits Completed Beyond ILEC Committed Due Date without a CNR code)

Distribution:

ASR Completion Date – ILEC Committed Due Date (for all ASRs Completed Beyond ILEC Committed Due Date without a CNR code) distributed by: 1 day, 2-5 Days, 6-10 Days, 11-20 Days, 21- 30 Days, 31-40 Days, and > 40 Days

Business Rules

1. Measures are based on the last ASR sent and the associated FOC Due Date received from the ILEC.
2. Selection is based on circuits completed by the ILEC during the reporting period. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: WorldCom is not ready; end user is not ready; connecting company, or third party supplier, is not ready. The ILEC must ensure that established procedures are followed to notify WorldCom of a CNR situation and allow a reasonable period of time for WorldCom to correct.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

Special Access

- DS0
- DS1
- DS3
- OCn

Switched Access

Performance Standard

Days Late - Average < 3 Days
Days Late Distribution - Diagnostic

ILEC Performance Measurements and Standards

PROVISIONING

Measurement: Average Intervals – Requested / Offered / Installation

Description

The intent of this measure is to capture three important aspects of the provisioning process and display them in relation to each other. The Average WorldCom Requested Interval, the Average ILEC Offered Interval, and the Average Installation Interval provide a comprehensive view of provisioning with the ultimate goal to have these three intervals equal.

Calculation Methodology

Average WorldCom Requested Interval:
Sum (WRDD – ASR Sent Date) / Total Circuits Completed during reporting period

Average ILEC Offered Interval:
Sum (FOC Due Date – ASR Sent Date) / Total Circuits Completed during reporting period

Average Installation Interval:
Sum (ILEC Completion Date– ASR Sent Date) / Total Circuits Completed during reporting period

Business Rules

1. Measures are based on the last ASR sent and the associated FOC Due Date received from the ILEC.
2. Selection is based on circuits completed by the ILEC during the reporting period. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.
5. The Average Installation Interval includes all completions.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation

Special Access
- DS0
- DS1
- DS3
- OCn

Switched Access

Performance Standard

Average Requested Interval	- Diagnostic
Average Offered Interval	- Diagnostic
Average Installation Interval	- Diagnostic

ILEC Performance Measurements and Standards

PROVISIONING

Measurement: Past Due Circuits

Description

The Past Due Circuits measure provides a snapshot view of circuits not completed as of the end of the reporting period. The count is taken from those circuits that have received an FOC Due Date but the date has passed. Results are separated into those held for ILEC reasons and those held for WorldCom reasons (CNRs). A diagnostic measure, Percent Cancellations After FOC Due Date, is included to show a percent of all cancellations processed during the reporting period where the cancellation took place after the FOC Due Date had passed and is shown as a percentage of total circuits cancelled or completed.

Calculation Methodology

Held Circuits Distribution:

Count of all circuits past the FOC Due Date that have not been reported as completed (Calculated as last day of reporting period - FOC Due Date) Distributed by: 1-5 days, 6-10 days, 11-20 days, 21-30 days, 31-40 Days, > 40 days

Percent Cancellations After FOC Due Date:

[Count (All circuits cancelled during reporting period, that were Past Due at the end of the previous reporting period, where (Date Cancelled > FOC Due Date) / (Total circuits Past Due at the end of the previous reporting period) x 100

Business Rules

1. Calculation of Held Circuits is based on the most recent ASR and associated FOC Due Date.
2. An ASR may provision more than one circuit and ILECs may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all segments are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is or is not identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: WorldCom is not ready; end user is not ready; connecting company, or third party supplier, is not ready. The ILEC must ensure that established procedures are followed to notify WorldCom of a CNR situation and allow a reasonable period of time for WorldCom to correct.

Exclusions

- Unsolicited FOCs
- Disconnect ASRs
- Record ASRs

Levels of Disaggregation

ILEC Reasons/WCOM Reasons including CNRs

Special Access

- DS0
- DS1
- DS3
- OCn

Switched Access

Performance Standard

Past Due Circuits for ILEC Reasons - Less than 3 % > 5 days beyond FOC Due Date

Percent Cancellation After FOC Due Date - Diagnostic

ILEC Performance Measurements and Standards
PROVISIONING

Measurement: New Installation Trouble Report Rate

Description
New Installation Trouble Report Rate measures the quality of the installation work by capturing the rate of trouble reports on new circuits within 30 calendar days of the installation.

Calculation Methodology

Trouble Report Rate Within 30 Calendar Days of Installation:
[Count (trouble reports within 30 Calendar Days of Installation) / (Total Number of Circuits Installed in the Report Period)] x 100

Business Rules
1. The ILEC Completion Date is the date upon which the ILEC completes installation of the circuit, as noted on a completion advice to WorldCom.
2. The calculation for the preceding 30 calendar days is based on the creation date of the trouble ticket.

Exclusions
- Trouble tickets that are canceled at WorldCom's request
- WorldCom, IXC, CPE (Customer Premise Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- Tickets used to track referrals of misdirected calls
- WorldCom request for informational tickets

Levels of Disaggregation
Special Access
- DS0
- DS1
- DS3
- OCn

Switched Access

Performance Standard
New Installation Trouble Report Rate - < 1.5 Trouble Reports per 100 circuits installed

Measurement: Failure Rate

Description

Failure Rate measures the overall quality of the circuits being provided by the ILEC and is calculated by dividing the number of troubles resolved during the reporting period by the total number of "in service" circuits, at the end of the reporting period, and is then annualized by multiplying by 12 months.

Calculation Methodology

Failure Rate – Annualized:

{[(Count of Trouble Reports resolved during the Reporting Period) / (Number of Circuits In Service at the end of the Report Period)] x 100} x 12

Business Rules

1. A trouble report/ticket is any record (whether paper or electronic) used by the ILEC for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. A trouble is resolved when the ILEC issues notice to WorldCom that the circuit has been restored to normal operating parameters.
3. Where more than one trouble is resolved on a specific circuit during the reporting period, each trouble is counted in the Trouble Report Rate.

Exclusions:

- Trouble tickets that are canceled at WorldCom's request
- WorldCom, IXC, CPE (Customer Premise Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- WorldCom request for informational tickets
- Tickets used to track referrals of misdirected calls

Levels of Disaggregation

Special Access
- Below DS3 (i.e. DS0 + DS1)
- DS3 and Above

Switched Access

Performance Standard

Failure Rate Annualized

Special Access	- Below DS3	- 10%
	- DS3 and Above	- 10%
Switched Access		- 10%

Measurement: Mean Time to Restore

Description

The Mean Time To Restore interval measures the promptness in restoring circuits to normal operating levels when a problem or trouble is referred to the ILEC. Calculation is the elapsed time from WorldCom submission of a trouble report to the ILEC to the time the ILEC closes the trouble, less any Customer Hold Time or Delayed Maintenance Time due to valid customer or WorldCom caused delays.

Calculation Methodology

Mean Time To Restore:

Σ [(Date and Time of Trouble Ticket Resolution Closed to WorldCom – Date and Time of Trouble Ticket Referred to the ILEC) – (Customer Hold Times)] / (Count of Trouble Tickets Resolved in Reporting Period)]

Business Rules

1. A trouble report or trouble ticket is any record (whether paper or electronic) used by the ILEC for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. Elapsed time is measured on a 24-hour, seven-day per-week basis, without consideration of weekends or holidays.
3. Multiple reports in a given period are included, unless the multiple reports for the same customer is categorized as "subsequent" (an additional report on an already open ticket).
4. "Restore" means to return to the normally expected operating parameters for the service regardless of whether or not the service, at the time of trouble ticket creation, was operating in a degraded mode or was completely unusable.
5. A trouble is "resolved" when the ILEC issues notice to WorldCom that the customer's service is restored to normal operating parameters.
6. Customer Hold Time or Delayed Maintenance Time resulting from no access to the end user's premises, or other WorldCom caused delays, such as holding the ticket open for monitoring, is deducted from the total resolution interval.

Exclusions:

- Trouble tickets that are canceled at WorldCom's request
- WorldCom, IXC, CPE (Customer Premise Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- WorldCom request for informational tickets
- Trouble tickets created for tracking and/or monitoring circuits
- Tickets used to track referrals of misdirected calls

Levels of Disaggregation

Special Access

- Below DS3 (i.e. DS0 + DS1)
- DS3 and above
- Found OK/Test OK

Switched Access

- Found OK/Test OK

Performance Standard

Mean Time to Restore

Special Access	- Below DS3	- 2 Hours
	- DS3 and Above	- 1 Hour
	- Found OK/Test OK	- Diagnostic
Switched Access	- TBD	
	- Found OK/Test OK	- Diagnostic

Measurement: Repeat Trouble Report Rate

Description

The Repeat Trouble Report Rate measures the percent of maintenance troubles resolved during the current reporting period that had at least one prior trouble ticket any time in the preceding 30 calendar days from the creation date of the current trouble report.

Calculation Methodology

Repeat Trouble Report Rate:
[(Count of Current Trouble Reports with a previous trouble, reported on the same circuit, in the preceding 30 calendar days)] / (Number of Reports in the Report Period) x 100

Business Rules

1. A trouble report or trouble ticket is any record (whether paper or electronic) used by the ILEC for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. A trouble is resolved when the ILEC issues notice to WorldCom that the circuit has been restored to normal operating parameters.
3. If a trouble ticket was closed out previously with the disposition code classifying it as FOK/TOK/CPE/IXC, then the second trouble must be counted as a repeat trouble report if it is resolved to ILEC reasons.
4. The trouble resolution need not be identical between the repeated reports for the incident to be counted as a repeated trouble.

Exclusions:

- Trouble tickets that are canceled at WorldCom's request
- WorldCom, IXC, CPE (Customer Premise Equipment), or other customer caused troubles
- ILEC trouble reports associated with administrative service
- Subsequent trouble reports – defined as those cases where a customer called to check on the status of an existing open trouble ticket

Levels of Disaggregation

Special Access
- Below DS3 (i.e. DS0 + DS1)
- DS3 and Above

Switched Access

Performance Standards

Repeat Trouble Report Rate

Special Access	- Below DS3	- 6%
	- DS3 and Above	- 6%
Switched Access		- 6%

ILEC Performance Measurements and Standards

GLOSSARY

Term	Definition
Access Service Request (ASR)	A WorldCom request to an ILEC to order new service, or request a change to existing service, which provides access to the local exchange company's network, under terms, specified in the local exchange company's special or switched access tariffs
Business Days	Monday thru Friday excluding holidays
Customer Not Ready (CNR)	A condition where the ILEC was unable to complete installation due to the end user customer, or WorldCom, not being ready
Facility Check	A pre-provisioning check performed by the ILEC, in response to an access service request, to determine the availability of facilities and assign the installation date
Firm Order Confirmation (FOC)	The notice returned from the ILEC, in response to an Access Service Request from WorldCom that confirms receipt of the request that a facility check has been made, and that a service request has been created with an assigned due date An Unsolicited FOC is a supplemental FOC issued by the ILEC to change the due date or for other reasons, although no change to the ASR was requested by WorldCom.
Projects	Service requests that exceed the line size and/or level of complexity, which would allow for the use of standard ordering and provisioning processes.
Repeat Trouble	Trouble that reoccurs on the same telephone number/circuit ID within 30 calendar days
Supplement ASR	A revised ASR that is sent to change due dates or alter the original ASR request. A "Version" indicator related to the original ASR number tracks each Supplement ASR.

BEFORE THE

TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 01-00193

REBUTTAL TESTIMONY

OF KAREN KINARD

ON BEHALF OF WORLDCOM, INC.

AUGUST 10, 2001

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME.

A. My name is Karen Kinard. My business address is 8521 Leesburg Pike, Vienna, Virginia 22182. I am employed by WorldCom, Inc. ("WorldCom") as a Senior Staff Member within the ILEC Performance Advocacy group of WorldCom's National Carrier Management and Initiatives organization.

Q. ARE YOU THE SAME KAREN KINARD THAT PREPARED AND CAUSED TO BE PREFILED WITH THE TENNESSEE REGULATORY AUTHORITY ("AUTHORITY") ON JULY 16, 2001 DIRECT TESTIMONY AND EXHIBITS IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my Rebuttal Testimony is to respond to portions of the Direct Testimony of BellSouth witness David A. Coon filed with the Authority on July 16, 2001. The fact that I may not respond to certain portions of BellSouth's testimony should not be interpreted as evidence of WorldCom's agreement with that testimony. I have addressed many of the issues raised by BellSouth in my Direct Testimony and will attempt to avoid repetition. Additionally, I concur with rebuttal testimony filed by AT&T and other witnesses and see no reason to repeat that testimony here.

II. THE AUTHORITY'S PREVIOUS DECISIONS

Q. DOES BELLSOUTH REJECT THE AUTHORITY'S PREVIOUS DECISIONS?

A. Yes. On many very important issues, BellSouth witness Coon continues to reject the Authority's decisions in the ITC^DeltaCom arbitration. BellSouth pays lip service to the Authority's previous decisions saying "in many ways, the Arbitration Order [in the ITC^DeltaCom Arbitration] has set the measurements, the performance standards and the enforcement mechanism as they should be." (*Coon Direct Testimony* at p. 17) Yet much of witness Coon's Direct Testimony is devoted to a frontal attack on the key measures adopted by the Authority. I understand BellSouth's attacks are the same ones the Authority considered in the ITC^DeltaCom arbitration. I also understand the Authority's Order in that docket was the subject of numerous attempts at reconsideration. BellSouth's positions are virtually unchanged from that docket. Indeed, BellSouth has stubbornly refused to accept the Authority's decisions and continues to resurrect its attacks on the Authority's past decisions in this docket. In colloquial terms, when it comes to performance measures and remedies, BellSouth's message is clear, "it's BellSouth's way or the highway."

Q. PLEASE DISCUSS WITNESS COON'S "AREAS OF DISAGREEMENT WITH THE [AUTHORITY'S] ADOPTED MEASUREMENTS..."

A. Witness Coon disagrees with many aspects of the Authority's policies. In effect, his testimony is argument serving as BellSouth's Motion for Reconsideration of the Authority's decisions in other dockets. Mr. Coon disagrees with the Authority's decisions regarding:

- Some of the performance measurements required.
- Some of the additional levels of measurement disaggregation required.
- Some of the standards (retail analogs or benchmarks) adopted by the Authority
- The initial choice of the parameter delta selected by the Authority.
- The appropriate level of remedy payments required by the Authority.
- The point at which the Authority required enforcement plan payments to begin.

(*Coon Direct Testimony* at p. 41).

The theme of Witness Coon's arguments is clear. BellSouth rejects anything ordered by the Authority that is not already embedded in BellSouth's SQM. For measures that relate to functions that are measured in some way by the BellSouth SQM, Mr. Coon asks the Authority to find the Authority-ordered measures to be unnecessary. For others, without offering any evidence of costs, BellSouth argues the costs of keeping a measure outweigh its value to CLECs.

Q. PLEASE ADDRESS THE SPECIFIC MEASUREMENTS ORDERED BY THE AUTHORITY THAT BELLSOUTH REFUSES TO ACCEPT.

A. 1. **Percent Firm Order Confirmation Returned Within Specified Time.**

BellSouth argues that this measure is "simply duplicative" of BellSouth's existing Firm Order Confirmation (FOC) Timelines measure. (*Coon*

Direct Testimony at p. 43). But it is not duplicative in at least one key way. The benchmark levels of the SBC-Texas plan are more favorable to CLECs. As Birch Telecom, Inc. witness Tad Jerret Sauder states (*Sauder Direct Testimony* at p. 5, 10-11) "Specifically, Texas requires SBC to return 95% of Fully Mechanized FOCs within 1 hour and 95% of Partially Mechanized FOCs within 5 business hours. Georgia requires BellSouth to return 95% of Fully Mechanized FOCs within 3 hours and only 85% of Partially Mechanized FOCs within 10 business hours." Mr. Sauder notes that SBC has been able to meet these intervals as order volumes have grown considerably over the levels at the time of adoption. Recently, the Florida Public Service Commission Staff has proposed to bring many of BellSouth's benchmarks up to the 90% and 95% levels:

> As to benchmarks, staff agrees with the ALEC Coalition that *benchmarks set below 90 or 95 percent do not generally allow the ALECs a meaningful opportunity to compete*. Staff is recommending an increase to many of the benchmarks that are set below this level for both reporting (Issue 1b) and compliance purposes (Issue 9).
>
> *Staff Recommendation* issued August 2, 2001, in Florida Public Service Commission Docket No. 000121-TP - *Investigation Into The Establishment of Permanent Performance Measures For Incumbent Local Exchange Telecommunications Companies*, p. 152. (emphasis added.)

I find the Florida Staff Recommendation on this issue to be persuasive.

2. **Percent of Accurate and Complete Formatted Mechanized Bills.** This measurement produces a report that reflects whether all the components of a BellSouth bill are formatted in accordance with industry standards to

ensure that the bill transmits properly to the CLEC. CLECs need properly formatted mechanized bills to audit the voluminous charges assessed by BellSouth for accuracy. BellSouth's paternalistic argument seems to be that it should not be required to produce this report because in BellSouth's opinion (despite the fact that the Authority ordered the report to be generated) the report is of limited use to CLECs. BellSouth's sole argument against this measure is that it will result in a use of its "limited resources" and that BellSouth does not think CLECs will find the report useful. (*Id.* at 45). BellSouth makes this argument without even estimating the cost to produce this Authority-ordered report. The Authority should not reverse itself based on BellSouth's flimsy assertion.

3. **Billing Completeness.** BellSouth argues that this measure duplicates information measured when two BellSouth SQM measures are considered. (*Id.* at 46). This is accurate, but here again the benchmark should be parity for all types of service delivery methods, not just resale. If BellSouth plans to use a benchmark, it should be 98%, not 90% for completeness.

4. **Unbillable Usage.** I have no disagreement with eliminating this metric. CLECs have agreed in Texas' last review to eliminate many metrics of marginal benefit and even some of greater value in order to gain the inclusion of a measurement and remedy plan for Special Access metrics as proposed by WorldCom and Time Warner.

5. **Percentage of LNP-only Due Dates within Industry Guidelines.** BellSouth argues this measurement is "unnecessary" and claims it "doesn't make sense" because it depends on a fixed industry guideline due date. (*Id.* at 47). Just as with other measurements of whether CLECs are receiving service within a standard interval—when requested—this metric could allow the exclusions of CLEC requests that are longer or shorter than the standard interval.

6. **Percentage of Time the Old Service Provider Releases the Subscription Prior to Expiration.** The intent of this measure is to ensure that BellSouth performs certain administrative activities prior to a number port. BellSouth contends that its LNP-Average time BellSouth Applies the 10-digit trigger prior to the LNP Order Due Date is a direct substitute for this measure. (*Id.* at p. 49). Yet BellSouth's substitute measures cover different aspects of these administrative processes. While the SBC-Texas plan measures the times SBC applies the trigger, the BellSouth proposal does not pick up whether BellSouth applies the trigger at all, just the average time the trigger was applied, whenever applied. BellSouth's substitute metric is part of its attempt to avoid reporting on the timely disconnection of its LNP translations, as reported in Georgia. This measure is not a substitute for the Georgia measure at issue, as BellSouth has even told the Georgia PSC that it does not apply the 10-digit trigger in all cases. The Texas measure is important but a measurement of disconnect timeliness is needed as well.

7. **Percentage of Time Customer Account Restructured Prior to LNP Due Date.** Witness Coon incorrectly argues that this measurement is duplicative of one done by the BellSouth SQMs. (*Coon Direct Testimony* at p. 48). This metric captures whether BellSouth has restructured its Centrex and other customer accounts prior to the switch to a new carrier so as not to avoid delays from such restructuring.

8. **Percentage of Premature Disconnects for LNP Orders.** Again, Witness Coon argues this measurement is not necessary because it is covered by BellSouth's SQMs (*Coon Direct Testimony* at p. 49). In particular, BellSouth argues its LNP-Average time BellSouth Applies the 10-digit triggers prior to the LNP Order Due Date covers this. I prefer a timeliness metric that includes early and late cuts as Missed Appointments. Mr. Coon is incorrect in saying that the 10-digit trigger is a substitute for measuring timely disconnects. The trigger may not have been applied at all, or removed too early. BellSouth's measure does not capture such occurrences.

9. Percentage of Updates Completed into the Database Within 72 Hours for Facility Based CLECs. Again, Witness Coon claims this measurement is unnecessary and is covered by BellSouth's SQM. (*Coon Direct Testimony* at p. 49). I agree that BellSouth has a similar metric in its current SQM, but a neutral third parity must determine whether the processes are parity by design for all service delivery methods, as BellSouth claims. This is not readily apparent.

10. **Percentage OA Database Accuracy for Manual Updates.** Witness Coon argues that this measurement relies on data provided by CLECs and thus is not consistent with the Authority's policies. (*Coon Direct Testimony* at p. 50). BellSouth nevertheless argues that this measurement is covered by a BellSouth SQM. (*Id.*) BellSouth's arguments are inconsistent. Moreover, there is nothing impermissible or illegal about requiring that BellSouth provide a report based in part on data provided by CLECs. The CLECs will provide the information and the Authority will consider the report for purposes of determining whether BellSouth is in violation of the Act's requirements for nondiscriminatory access.

11. **Percentage of Missed Mechanized INP Conversions.** Witness Coon argues that this measure is no longer necessary (*Coon Direct Testimony* at p. 51) because permanent LNP is now being implemented for much of Tennessee. While no metric of INP provisioning may be required if BellSouth has implemented LNP statewide, BellSouth's proposal does not cover BellSouth's conversions of INP-serviced customers to LNP-served customers.

12. **Average Days Required to Process a Request.** Witness Coon asserts that this measurement "just doesn't warrant inclusion in the final performance measures." (*Coon Direct Testimony* at p. 49). BellSouth argues that this measurement does not relate to what BellSouth considers to be a "problem area"—access to Rights of Way requests. (*Id.*) Incredibly, BellSouth seems to simply defy the Authority with regard to

this measurement. CLECs believe this measure is important. The Authority agreed that it is important, as evidenced by its decision in the ITC^DeltaCom arbitration. Yet, because BellSouth does not think it is important or because it "would require BellSouth to implement a new system capability to capture the data," Mr. Coon asks the Authority to reverse and abandon its previous decision. Further, the metric and remedies plan should be looked at as an insurance policy. Even if there are no problems in an area now, the fact that such problems can occur and hurt CLECs' ability to build out their networks should be enough reason to take out this added insurance against poor performance. A house does not have to be burning down or floating away in a flood before insurance protection is considered.

13. **Average Delay Days for NXX Loading and Testing.** Witness Coon argues that this measurement should be deleted because it is duplicative with a measure embedded in the BellSouth SQM. (*Coon Direct Testimony* at p. 52). The metrics are not the same, however. Average delay days captures *how late* BellSouth is when it misses the LERG effective date, while the SQM metric indicates only the percent loaded on time, without capturing how late the late loadings were.

14. **Mean Time to Repair NXX Trouble Reports.** This may have been deleted in Texas to accommodate special access reporting because there is not a lot of activity in this area. BellSouth should have a trouble code for fixing translation issues already. This report would show the accuracy of

its NXX loadings, complementing the metric on the timeliness of such loadings that already is part of its SQM.

15. **Bona Fide Requests Processed Within 30 Business Days and Percentage of Quotes Provided for Authorized BFRs Special Requests Within X (10, 30, 90) Days.** Witness Coon argues this measurement should be deleted because "there simply is not much activity to measure." (*Coon Direct Testimony* at p. 53). The fact that order volumes may not overwhelm BellSouth is not the appropriate standard for determining whether an activity should be measured and reported. Perhaps there is not much activity because CLECs are so frustrated by the lack of responsiveness or the lengthy process imposed on them by BellSouth. The permutation statistical test can be used on sample sizes as small as one (1) to determine whether parity exists. I would not be opposed to a quarterly reporting of this metric until volumes increase.

III. DISAGGREGATION

Q. DOES BELLSOUTH REJECT THE AUTHORITY'S ORDERS THAT REQUIRE MEASUREMENTS TO BE CONDUCTED AT THE TENNESSEE RATHER THAN REGIONAL LEVEL?

A. Yes. Witness Coon devotes a large part of his direct testimony to seeking reconsideration of the Authority's orders which prescribe that data be provided on a Tennessee-specific basis. (*See Coon Direct Testimony* at pp. 55-63). Tennessee-specific disaggregation is particularly important for the ordering metrics, so that the competitive activity in each state can be monitored. While

one system may handle an entire region, different USOC codes for products and rate plans, as well as regulator requirements can cause differences in flow through and how many orders fall to manual handling and receive longer confirmation and rejection intervals. Billing issues may differ as well.

BellSouth's proposal (first seen by WorldCom in its Alabama rebuttal testimony) to report Order Accuracy is a step in the right direction, except that the plan is for a regionwide and not state-specific measurement. CLECs need this information on a state and CLEC-specific basis. WorldCom also is concerned about whether an adequate sample size will be used for each state and still desires a description of the sampling process.

Q. IS THE AUTHORITY JUSTIFIED IN REQUIRING ALL MEASURES TO BE CONDUCTED ON A TENNESSEE-SPECIFIC BASIS?

A. Yes. The Authority's jurisdiction is limited to Tennessee. Its charge is to promote competition in the Tennessee local exchange markets. Measurements such as Average Response Time and Response Interval (Pre-Ordering/Ordering) must be understood for Tennessee purposes. BellSouth's position is that the Authority should simply accept regional data as if it were Tennessee-specific. BellSouth asks the Authority to extrapolate in this way because it may be costly to separate data on a Tennessee specific basis. BellSouth asks the Authority to accept regional data on some of the most critical measures, including Percent Flow-Through Summary and Percent Flow-Through Detail. (*Coon Direct Testimony* at pp. 60-61). In all, without any evidence or cost of service studies,

BellSouth asks the Authority to not require Tennessee information for twenty-five (25) crucial measures. (*Id.*) Rather than expending time and resources fighting the Authority's mandates, BellSouth should have devoted resources since the ITC^DeltaCom arbitration to establishing these measures on a Tennessee-specific basis.

Q. DO YOU HAVE ADDITIONAL COMMENTS ABOUT DISAGGREGATION?

A. I have discussed the importance of disaggregation in my Direct Testimony at pages 34-44. I would add that I agree with Witness Coon that it would be of value to disaggregate the UNE Loop and Port Combinations data from the other UNE Combinations data. BellSouth has done this for provisioning and maintenance and needs to do so for flow through as well. Mr. Coon's suggestion is consistent with the principle espoused by the CLECs that data should be disaggregated, both geographically and by product, where such disaggregation would be of value to the Authority. BellSouth should also follow its practice of separating primarily Business and primarily Residential services as well by separating UNE and Resale ISDN into Basic Rate and Primary Rate products.

Q. DO YOU HAVE ANY FURTHER COMMENTS ON GEOGRAPHIC DISAGGREGATION?

A. Yes. I failed to point out that SBC-Texas, SBC-Ameritech, Verizon-PA, New Jersey and New York all disaggregate on a geographic basis. Attached to this testimony is a document that Ameritech provides on its state regions which

mirrors its ordering and maintenance regions within its five states. The Authority should require this kind of disaggregation for Tennessee.

Q. DO YOU HAVE ANY ADDITIONAL COMMENTS ON BELLSOUTH's PROPOSED CHANGES TO SQMs?

A. Yes. BellSouth should adopt the Georgia interval of Parity Plus 2 Seconds adopted for PreOrder Query Response Times. BellSouth should also follow the Texas benchmark for electronic loop qualification information, or at the very least Parity Plus 2 Seconds standard, not to exceed the existing 95% within 1 minute standard proposed by CLECs and recommended by the Florida staff. WorldCom also disagrees that the Ordering Center Response Interval is not as important to CLECs as to retail customers. In many cases, CLECs cannot get orders through their systems without information provided by these centers, so the Texas benchmarks should stand.

The Authority also should adopt either a parity standard or the CLEC-proposed benchmarks for billing metrics because those proposed by BellSouth are longer than for most ILECs. WorldCom strongly believes that BellSouth should adhere to the benchmarks for collocation adopted in the ITC^DeltaCom arbitration. The Authority's decision is more in line with reflecting the process efficiencies most ILECs have gained in providing collos. It is also interesting that BellSouth wants to adopt the longer New York intervals for providing collocation arrangements but not New York's shorter intervals for responses to collocation requests.

IV. BELLSOUTH'S SQMs

Q. WHAT METRICS CRITICAL TO CLECS ARE MISSING FROM THE INTERIM METRIC PROPOSAL?

A. As I anticipated in my Direct Testimony, BellSouth's proposal to the Authority is completely deficient. A number of metrics still need to be added to BellSouth's SQM. I have previously described these metrics but think they are worthy of review. They are:

1. Additional Ordering Measures

Mean Time to Provide Response to Request for BellSouth-to-CLEC Trunks
Percent Responses to Requests for BellSouth-to-CLEC Trunks Provided within 7 Days
Percent Negative Responses to Requests for BellSouth-to-CLEC Trunks

CLECs cannot expand without adequate trunk capacity inbound from the ILEC as well as outbound to the ILEC. ILEC delays in providing reciprocal trunks or delays in providing CLECs a due date for such trunks force CLECs to delay installing new customers. CLECs would rather manage a single customer's expectation for a due date than install a customer that will cause further blocking on inbound calls to all CLEC local customers in the area. ILEC delays on trunk resizing keep CLECs from growing market share.

The Mean Time to Provide Response measurement is key when comparing service to affiliates for response to trunk requests. The Percent Responses to Requests for BellSouth-to-CLEC Trunks Provided Within 7 Days metric measures the response standard proposed by CLECs to be achieved 95% of the

time. Finally, the Percent Negative Responses to Requests for BellSouth-to-CLEC Trunks metric would allow tracking of BellSouth rejections of CLEC requests for more capacity. These are not rejections for CLEC errors but cases where BellSouth argues that additional trunks are not needed

2. Additional Provisioning Measures

Percent of Hot Cuts Not Working as Initially Provisioned

This metric captures when loops are provisioned on time but are not working. Often CLECs cannot log a trouble report until the order is completed in the ILEC's billing system, and that may take many hours or days. Consequently, these provisioning troubles are undetectable by BellSouth's current performance measures.

Mean Time to Restore a Customer to the ILEC
Percent of Customers Restored to the ILEC

These metrics measure the speed of restoring service to BellSouth when a customer conversion fails and the percent of accurate port-backs to BellSouth when necessary.

Call Abandonment Rate – Ordering and Provisioning
Call Abandonment Rate -Maintenance

BellSouth only captures the call center response time for customers who wait for their calls to be completed.

Percent Successful xDSL Service Testing

BellSouth has omitted a measure of whether the cooperative tests conducted show the loop to be working properly. CLECs need to have cooperative testing done on xDSL loops to determine if BellSouth has done all the appropriate work to

provide connectivity. In Florida BellSouth agreed in the hearing to add a statement to its existing cooperative testing metric that "successful testing" means that both it and the CLEC agree that the loop is working. That statement needs to be included in Tennessee as well.

Percent Completion of Timely Loop Modification/Conditioning on xDSL loops

Some loops require modification or conditioning before they can be used to provide a customer with xDSL service. This metric measures BellSouth's timeliness in making the needed modifications or performing the necessary de-conditioning. There is the need for a metric or at least disaggregation for interval metrics and held orders for loop provisioning where conditioning is required. Florida staff has proposed that this metric either be added as a separate measure or a level of disaggregation, and it shortened the intervals for delivery of conditioned and unconditioned loops as proposed by BellSouth.

3. Additional Billing Measures

Percent Billing Errors Correct in X Days

BellSouth's delays in providing adjustments to carrier bills or corrections of daily usage feed errors can harm the CLEC and its customer in several ways. Errors that do not get corrected promptly in the daily usage file either lead to the CLEC's holding up charges or passing on wrong charges to the customer, which is highly irritating to the customer and causes the CLEC unnecessary expense to correct. BellSouth's invoice accuracy measure does not capture whether errors are corrected within a reasonable time. This measure was recommended by the Florida Commission staff for inclusion in BellSouth's measurement plan, noting

that there is no measurement of how quickly BellSouth adjusts billing errors for CLECs.

4. Other Additional Measures

Percent Response Commitments Met On Time

Even more important than how quickly BellSouth representatives answer the phone is how quickly they answer questions or resolve problems. CLECs should not have to wait days for BellSouth to respond to a problem that has stalled production of orders for the CLEC. The addition of this metric would help address the slow response of BellSouth help desks. However, such a measure would not help with issues regarding BellSouth representatives accurately interpreting business rules.

Average Time Allotted To Proof Listing Updates Before Publication

CLECs need to ensure that their directory listings are printed without errors and need equal time to proof those listing before publication. Errors in listings could cause great inconvenience and often serious financial harm to CLECs' customers.

Percent ILEC vs. CLEC Changes Made

BellSouth has not yet included a metric in its SQM that tracks whether it responds fairly to CLEC requests for changes and new functionalities on its interfaces. While CLECs prioritize the change requests, BellSouth implements these changes whenever it chooses, and it ignores the prioritization. CLECs are willing to modify this metric to cover how quickly BellSouth accepts or rejects a CLEC's change control request and how long it takes to approve requests to be implemented. The metric could be limited to requests that impact the operation of

CLEC interfaces and are based on existing industry standards. For instance, WorldCom's has worked to obtain "interactive agent" capabilities for its EDI interface similar to what it has with other ILECs, parsed CSRs (Customer Service Records) for populating orders to avoid errors in addresses, and billing completion notices to avoid double when migrations error out of BellSouth's billing systems, etc.

Percent Software Certification Failures

This measurement provides some assurance that BellSouth will sufficiently test before a system is rolled out. CLECs need to be sure that their existing systems still will be able to function when BellSouth introduces software upgrades. Verizon has long had this metric and a special remedy plan just for its change control metrics.

Software Problem Resolution Timeliness
Software Problem Resolution Average Delay Days

This metric examines how quickly BellSouth fixes software errors caused by changes to an existing interface, establishment of a new query type or other changes. Different standards are set based on whether there is a work-around for the problem. If a CLEC is prevented from entering orders, extremely prompt responses are required. The delay day measure captures the degree to which the problem is allowed to continue. The New York and Texas plans also include such a metric.

Q. DOES TESTIMONY FROM OTHER CLECS SUPPORT THE NEED FOR ADDITIONAL METRICS, DISDAGGREGATION AND BUSINESS RULE CHANGES PROPOSED IN YOUR DIRECT TESTIMONY?

A. Yes. Access Integrated Networks' (AIN's) testimony supports the need for the proposed Response Commitments Metric (pages 8 and 9). Even if this measurement would be limited to measuring only the resolution of help desk problems impeding CLECs' ability to place an order or tracing missing notifiers (confirmations, completion notices), it would be of major benefit to competitors such as AIN that wait a long time for a response. AIN also mirrors WorldCom's concerns about lost dialtone due to "D" and "N" orders for UNE-P getting out of sequence. WorldCom's problems in this area since its Georgia launch continue to grow, but probably are masked because the retail analog used is not one with primarily non-dispatch products like WorldCom's UNE-P launch involves. Loss of dialtone in migration orders that require a mere billing change should not occur at all, and certainly not at the levels of about 10 a day that WorldCom currently is experiencing in Georgia.

Covad underscores the need for measurement of loop conditioning intervals and the nonparity results of BellSouth's extremely long conditioning intervals for CLECs. Both Covad (pg. 7-8) and Birch (9-10) also endorse the concern about the aberrant way that BellSouth measures Average Order Completion Intervals from the FOC receipt rather than the receipt of a clean order as Verizon and SBC use as the starting point for their average interval metrics.

Birch also echoes WorldCom's direct comments about the need for a Total as well as BellSouth's Designed to Flow Through metric. The standard for Designed to

Flow Through should be higher than 95% at least. BellSouth's benchmarks are more appropriate for total flow through. Like Birch (pg. 7-8), WorldCom is finding that many of its UNE-P orders that it believes are designed to flow through requirements are falling to manual, which can introduce errors and delay WorldCom's provision of due dates to customers.

The importance of disaggregation by type of loop is highlighted by Covad. At the very least, BellSouth should weight its retail analog to match the CLEC ordering activity. For instance, if the CLEC's ordering is 100% HDSL loops, then BellSouth's retail analog should give HDSL that same weight. Otherwise, comparisons of different products with different intervals because of loop length and other issues could cause errors in determining whether parity service is provided.

V. ENFORCEMENT

Q. WITNESS COON AGRUES THAT "THE TRA SHOULD NOT ORDER AN ENFORCEMENT PLAN AND ATTENDANT PENALTIES TO TAKE EFFECT PRE-271..." (*Coon Direct Testimony* at p. 89). DO YOU AGREE WITH HIS POSITION?

A. Absolutely not. First, the Authority has previously considered this precise issue in the ITC^DeltaCom arbitration and rejected BellSouth's position. BellSouth's testimony on this issue is an attempt to take yet another bite at the apple. Second, the experience in Georgia teaches us that potential 271 authority is not a strong enough incentive for BellSouth to comply with the law by providing nondiscriminatory access to UNEs or services.

Q. PLEASE ELABORATE.

A. Like the Authority, the Georgia Public Service Commission ("GPSC") rejected BellSouth's arguments that it lacked legal authority to adopt self-executing remedies and rejected BellSouth's arguments that as a matter of policy any such remedies should not take effect until after BellSouth receives interLATA authority in its monopoly territories. BellSouth made the same tired arguments in Georgia that it made in the ITC^DeltaCom arbitration last year in Tennessee and that it resurrects in this docket. In Georgia, despite the fact that BellSouth has thus far failed to receive 271 authority, it must pay millions of dollars in remedies to CLECs precisely because of its poor performance in some very fundamental areas.

Q. PLEASE BRIEFLY DESCRIBE THE GEORGIA DEVELOPMENT.

A. On July 19, 2001 BellSouth paid a fine of more than $4.5 million for failing to meet the GPSC's performance standards for three consecutive months (March, April and May of 2001). The GPSC had established self-executing remedies in a January 16, 2001 order. GPSC Commissioner Burgess commented that "[t]hese fines show this Commission's commitment to a truly competitive local telephone market in Georgia." (*See* News Release Georgia Public Service Commission, July 19, 2001, <www.psc.state.ga.us/newsinfo/071901.pdf>). I understand that Georgia has ordered that the held penalties be paid but has agreed to review the metric at issue and the proposed substitutes filed by BellSouth.

Q. PLEASE DESCRIBE THE FLORIDA STAFF RECOMMENDATION REGARDING ENFORCEMENT.

A. The Florida staff has just recommended a Delta Function process for setting the Balancing Critical Value. The Florida staff accepted the recommendation of Z-Tel Economist George Ford. The Delta Function does not carry the balancing of Type I and Type II errors to extremes for large sample sizes, thus making it harder to detect discrimination at these higher activity levels. Both the BellSouth and CLEC plans have this problem but it is not reached as quickly with the CLEC 0.25 parameter.

> In staff's opinion, Witness Ford advances the correct principle, namely that balancing should be done in a reasonable fashion in order to minimize the deviation from a true test of parity. (TR 1191-1192) Staff recognizes that BellSouth Witness Mulrow's position that balancing should be done in the same fashion (i.e., fixed delta) across all sample sizes is probably rooted in the idea that since balancing assists ALECs at small sample sizes, it is only fair the balancing disadvantage ALECs at larger sample sizes. Staff does not find this rationale compelling. Far more compelling from staff's perspective is the principle advanced by Witness Ford that the Commission should adhere as closely as possible to a strict test of parity, since BellSouth is required to provide non-discriminatory service under the Telecommunications Act of 1996.
>
> Staff recommends that Z-Tel Witness Ford's delta function and recommended parameter values be adopted since this approach will do a better job of achieving our objective than any of the other proposals. Through the delta function, the delta value will be inversely related to the ALEC sample size. This will ensure that balancing will have less practical effect as the sample size increases, minimizing the extent to which the statistical test deviates from a true test of parity. Moreover, Witness Ford's delta function covers the range of delta values proposed by the various parties in this proceeding. Finally, and importantly, Witness Ford's proposal is inherently applicable to Tier 1 and Tier 2, since delta is a function of sample size.

Staff Recommendation issued August 2, 2001, in Florida PSC Docket No. 000121-TP - *Investigation Into The Establishment of Permanent Performance Measures For Incumbent Local Exchange Telecommunications Companies*, p. 170.[1]

[1] The Florida staff recommendation, George Ford's testimony and all pleadings in that case can be viewed at:

The Florida staff has also proposed a per-measure rather than a per-occurrence plan initially and does not tie the plan's effectiveness to 271 authority.

Q. DO YOU HAVE ANY CONCERNS ABOUT THE OVERALL LEVELS OF THE BELLSOUTH PER-OCCURRENCE REMEDIES?

A. Yes. I have mentioned my concerns about the low level of the per-occurrence billing remedies ($1). I also want to note that the Illinois Commerce Commission (ICC) staff recently has noted that remedies similar in size to most other BellSouth-proposed remedies do not appear to be an adequate deterrent to poor parity performance by SBC-Ameritech. There is no reason to believe that such remedy levels will be an adequate deterrent to BellSouth. The ICC Staff has rated all the metrics now as high starting with a remedy of $150 per occurrence for all the metrics in SBC-Ameritech's plan for the first month miss, which would be the base for multiplying the remedy for further month misses.

In her July 11 direct testimony in docket no. 01-0120 ICC policy analyst Melanie K. Patrick, PH.D said:

> A more coherent strategy that would provide better incentive for Ameritech Illinois to provide good performance overall would be to make all measurements of equal importance. I recommend making all performance measurements of `high' importance, for two reasons. First, using the 'high' designation emphasizes to Ameritech that these measurements represent services provided to CLECs that will have a critical impact on the service provided, in turn, by CLECs to their own customers. The provision of good service is important to the ability of individual CLECs

"http://www.psc.state.fl.us/psc/dockets/index.cfm?event=documentFilings&docket=000121&requestTimeout=240"

> to develop their own market share. In addition, as staff witness (Samuel) McClerren points out in his testimony, good wholesale service quality provision is essential to the overall development of a competitive telecommunications environment. These performance measurements are important, and their measurement designation should be a reflection of that importance. Second, in the Ameritech proposed remedy plan the measurements designated as having `high' importance also have the largest penalties associated with them. Applying the highest penalty amounts to all performance measures will reinforce the incentive nature of the performance remedy plan used by Ameritech. (p. 56).

Dr. Patrick based her conclusions on reviewing remedy calculations for actual Ameritech performance during the last quarter of 2000. WorldCom supports the CLEC remedy plan described in Cheryl Bursh's testimony. But if that plan is not adopted, the BellSouth per occurrence remedies need to be increased for most metrics.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY AT THIS TIME?

A. Yes.

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
248004	S LYON	DETROIT METRO	MI
248028	NORTHVILLE	DETROIT METRO	MI
248261	PONTIAC MN	DETROIT METRO	MI
248262	PONTIAC NE	DETROIT METRO	MI
248263	PONTIAC N	DETROIT METRO	MI
248264	CLARKSTON	DETROIT METRO	MI
248265	OXFORD	DETROIT METRO	MI
248266	AUBURN HTS	DETROIT METRO	MI
248267	ROCHESTER	DETROIT METRO	MI
248268	COMMERCE N.	DETROIT METRO	MI
248269	DRAYTON PLAINS	DETROIT METRO	MI
248270	PONTIAC W	DETROIT METRO	MI
248271	LAKE ORION	DETROIT METRO	MI
248284	ROYAL OAK	DETROIT METRO	MI
248285	TROY	DETROIT METRO	MI
248291	TROY SOMERSET	DETROIT METRO	MI
248292	COMMERCE	DETROIT METRO	MI
248294	FARMNGTN HLS	DETROIT METRO	MI
248295	BIRMINGHAM	DETROIT METRO	MI
248296	W BLOOMFIELD	DETROIT METRO	MI
248297	WALLED LAKE	DETROIT METRO	MI
248322	OAKFIELD	DETROIT METRO	MI
248323	SOUTHFIELD	DETROIT METRO	MI
248324	FARMINGTON	DETROIT METRO	MI
248576	AUBURN HLS	DETROIT METRO	MI
313022	KENWOOD	DETROIT METRO	MI
313037	FAIRBORN	DETROIT METRO	MI
313038	LOGAN	DETROIT METRO	MI
313039	LUZON	DETROIT METRO	MI
313056	DUNKIRK	DETROIT METRO	MI
313057	VINEWOOD	DETROIT METRO	MI
313062	VERMONT	DETROIT METRO	MI
313063	WEBSTER	DETROIT METRO	MI
313187	VALLEY	DETROIT METRO	MI
313188	TUXEDO	DETROIT METRO	MI
313194	LAKEVIEW	DETROIT METRO	MI
313195	WALNUT	DETROIT METRO	MI
313196	TWINBROOK	DETROIT METRO	MI
313205	WOODWARD	DETROIT METRO	MI
313206	RIVERFRONT	DETROIT METRO	MI
313207	TEMPLE	DETROIT METRO	MI
313308	UNIVERSITY	DETROIT METRO	MI
313309	TOWNSEND	DETROIT METRO	MI
313315	TRINITY	DETROIT METRO	MI
313316	TYLER	DETROIT METRO	MI
734001	DEXTER	DETROIT METRO	MI
734002	MANCHESTER	DETROIT METRO	MI

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
734003	ANN ARBOR SE	DETROIT METRO	MI
734005	WHITMORE LAKE	DETROIT METRO	MI
734006	CHELSEA	DETROIT METRO	MI
734007	YPSILANTI	DETROIT METRO	MI
734008	ANN ARBOR MN	DETROIT METRO	MI
734009	PINCKNEY	DETROIT METRO	MI
734027	LIVONIA	DETROIT METRO	MI
734029	PLYMOUTH MN	DETROIT METRO	MI
734030	LIVONIA NW	DETROIT METRO	MI
734048	MONROE MN	DETROIT METRO	MI
734049	MONROE NE	DETROIT METRO	MI
734050	CARLETON	DETROIT METRO	MI
734070	WYANDOTTE	DETROIT METRO	MI
734071	ROCKWOOD	DETROIT METRO	MI
734072	MILAN	DETROIT METRO	MI
734073	WILLIS	DETROIT METRO	MI
734074	TRENTON	DETROIT METRO	MI
734075	BELLEVILLE	DETROIT METRO	MI
734076	NEW BOSTON	DETROIT METRO	MI
734077	FLATROCK	DETROIT METRO	MI
734088	WICK	DETROIT METRO	MI
734089	WAYNE	DETROIT METRO	MI
734090	WAYNE NW	DETROIT METRO	MI
734091	ROMULUS	DETROIT METRO	MI
734957	BELLEVILLE NE	DETROIT METRO	MI
810131	CLINTON	DETROIT METRO	MI
810132	UTICA	DETROIT METRO	MI
810133	MT CLEMENS MN	DETROIT METRO	MI
810134	NEW BALTIMORE	DETROIT METRO	MI
810135	HARSENS ISLAND	DETROIT METRO	MI
810136	NEW HAVEN	DETROIT METRO	MI
810137	ROMEO	DETROIT METRO	MI
810138	MARINE CITY	DETROIT METRO	MI
810139	WASHINGTON	DETROIT METRO	MI
810140	ARMADA	DETROIT METRO	MI
810141	ALGONAC	DETROIT METRO	MI
810142	MT CLEMENS N	DETROIT METRO	MI
810155	ST CLAIR	DETROIT METRO	MI
810156	LEXINGTON	DETROIT METRO	MI
810157	MARYSVILLE	DETROIT METRO	MI
810159	PT HURON N	DETROIT METRO	MI
810160	PT SANILAC	DETROIT METRO	MI
810162	APPLEGATE	DETROIT METRO	MI
810163	CARSONVILLE	DETROIT METRO	MI
810165	PECK	DETROIT METRO	MI
810166	PT HURON MN	DETROIT METRO	MI
810179	ROSEVILLE N	DETROIT METRO	MI

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
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810214	WARREN	DETROIT METRO	MI
810215	CENTERLINE	DETROIT METRO	MI
810216	TECHLINE	DETROIT METRO	MI
248620	HOLLY	SAGINAW LANSING JACKSON	MI
517696	LANSING NW	SAGINAW LANSING JACKSON	MI
517697	DIMONDALE	SAGINAW LANSING JACKSON	MI
517698	E LANSING	SAGINAW LANSING JACKSON	MI
517699	HASLETT	SAGINAW LANSING JACKSON	MI
517700	OKEMOS	SAGINAW LANSING JACKSON	MI
517701	LANSING MN	SAGINAW LANSING JACKSON	MI
517702	LANSING S	SAGINAW LANSING JACKSON	MI
517703	DANSVILLE	SAGINAW LANSING JACKSON	MI
517704	POTTERVILLE	SAGINAW LANSING JACKSON	MI
517705	PORTLAND	SAGINAW LANSING JACKSON	MI
517706	MULLIKEN	SAGINAW LANSING JACKSON	MI
517707	MASON	SAGINAW LANSING JACKSON	MI
517708	HOLT	SAGINAW LANSING JACKSON	MI
517795	HILLSDALE	SAGINAW LANSING JACKSON	MI
517796	CLARKLAKE	SAGINAW LANSING JACKSON	MI
517797	NAPOLEON	SAGINAW LANSING JACKSON	MI
517798	CHARLOTTE	SAGINAW LANSING JACKSON	MI
517799	LESLIE	SAGINAW LANSING JACKSON	MI
517800	ALBION	SAGINAW LANSING JACKSON	MI
517801	EATON RPDS	SAGINAW LANSING JACKSON	MI
517802	NSHVLE-VRMNTVLE	SAGINAW LANSING JACKSON	MI
517803	SPRING ARBOR	SAGINAW LANSING JACKSON	MI
517804	MI CENTER	SAGINAW LANSING JACKSON	MI
517805	JACKSON NE	SAGINAW LANSING JACKSON	MI
517806	JACKSON	SAGINAW LANSING JACKSON	MI
517807	JONESVILLE	SAGINAW LANSING JACKSON	MI
517903	FOWLERVILLE	SAGINAW LANSING JACKSON	MI
517906	HOWELL	SAGINAW LANSING JACKSON	MI
810617	FLINT MN	SAGINAW LANSING JACKSON	MI
810618	BYRON	SAGINAW LANSING JACKSON	MI
810619	FENTON	SAGINAW LANSING JACKSON	MI
810621	LAPEER	SAGINAW LANSING JACKSON	MI
810622	GR BLANC	SAGINAW LANSING JACKSON	MI
810633	FLINT NE	SAGINAW LANSING JACKSON	MI
810634	FLUSHING	SAGINAW LANSING JACKSON	MI
810635	CLIO	SAGINAW LANSING JACKSON	MI
810636	FLINT NW	SAGINAW LANSING JACKSON	MI
810637	FLINT E	SAGINAW LANSING JACKSON	MI
810638	FLINT N	SAGINAW LANSING JACKSON	MI
810904	BRIGHTON	SAGINAW LANSING JACKSON	MI
810905	HAMBURG	SAGINAW LANSING JACKSON	MI
810907	HARTLAND	SAGINAW LANSING JACKSON	MI

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
989366	AUBURN	SAGINAW LANSING JACKSON	MI
989367	BAY CITY W	SAGINAW LANSING JACKSON	MI
989368	LINWOOD	SAGINAW LANSING JACKSON	MI
989369	BAYCITY/TWINBRK	SAGINAW LANSING JACKSON	MI
989374	MIDLAND SE	SAGINAW LANSING JACKSON	MI
989375	MIDLAND-MELROSE	SAGINAW LANSING JACKSON	MI
989379	CLARE	SAGINAW LANSING JACKSON	MI
989380	GLADWIN	SAGINAW LANSING JACKSON	MI
989381	BEAVERTON	SAGINAW LANSING JACKSON	MI
989382	ROSEBUSH	SAGINAW LANSING JACKSON	MI
989383	COLEMAN	SAGINAW LANSING JACKSON	MI
989384	HARRISON	SAGINAW LANSING JACKSON	MI
989385	FARWELL W	SAGINAW LANSING JACKSON	MI
989386	FARWELL	SAGINAW LANSING JACKSON	MI
989395	W BRANCH	SAGINAW LANSING JACKSON	MI
989396	E TAWAS	SAGINAW LANSING JACKSON	MI
989397	ST HELEN	SAGINAW LANSING JACKSON	MI
989398	OSCODA	SAGINAW LANSING JACKSON	MI
989399	STANDISH	SAGINAW LANSING JACKSON	MI
989445	BAD AXE	SAGINAW LANSING JACKSON	MI
989446	FREELAND	SAGINAW LANSING JACKSON	MI
989447	BIRCH RUN	SAGINAW LANSING JACKSON	MI
989448	FRANKENMUTH	SAGINAW LANSING JACKSON	MI
989449	BAY PORT	SAGINAW LANSING JACKSON	MI
989450	UBLY	SAGINAW LANSING JACKSON	MI
989451	GAGETOWN	SAGINAW LANSING JACKSON	MI
989452	UNIONVILLE	SAGINAW LANSING JACKSON	MI
989453	OWENDALE	SAGINAW LANSING JACKSON	MI
989454	FAIRGROVE	SAGINAW LANSING JACKSON	MI
989455	SAGINAW MN	SAGINAW LANSING JACKSON	MI
989456	BRIDGEPORT S	SAGINAW LANSING JACKSON	MI
989457	SAG BRIDGEPORT	SAGINAW LANSING JACKSON	MI
989458	SAGINAW SHIELDS	SAGINAW LANSING JACKSON	MI
989459	SAGINAW W	SAGINAW LANSING JACKSON	MI
989460	VASSAR	SAGINAW LANSING JACKSON	MI
989461	MAYVILLE	SAGINAW LANSING JACKSON	MI
989462	ST CHARLES	SAGINAW LANSING JACKSON	MI
989463	REESE	SAGINAW LANSING JACKSON	MI
989464	SEBEWAING	SAGINAW LANSING JACKSON	MI
231851	NEWAYGO	GRAND RAPIDS KALAMAZOO	MI
231853	WHITE CLOUD	GRAND RAPIDS KALAMAZOO	MI
231855	BIG RPDS	GRAND RAPIDS KALAMAZOO	MI
231856	GRANT	GRAND RAPIDS KALAMAZOO	MI
231857	MORLEY	GRAND RAPIDS KALAMAZOO	MI
231858	FREMONT	GRAND RAPIDS KALAMAZOO	MI
231859	CORAL	GRAND RAPIDS KALAMAZOO	MI
616728	GR RPDS EMPIRE	GRAND RAPIDS KALAMAZOO	MI

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
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616730	GR RPDS BELL	GRAND RAPIDS KALAMAZOO	MI
616731	ADA	GRAND RAPIDS KALAMAZOO	MI
616732	MARNE	GRAND RAPIDS KALAMAZOO	MI
616733	GRATTAN	GRAND RAPIDS KALAMAZOO	MI
616734	COMSTOCK PARK	GRAND RAPIDS KALAMAZOO	MI
616735	ROCKFORD	GRAND RAPIDS KALAMAZOO	MI
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616737	SPARTA	GRAND RAPIDS KALAMAZOO	MI
616738	LOWELL	GRAND RAPIDS KALAMAZOO	MI
616739	GR RPDS E	GRAND RAPIDS KALAMAZOO	MI
616753	PORTAGE LAKE	GRAND RAPIDS KALAMAZOO	MI
616754	KALAMAZOO	GRAND RAPIDS KALAMAZOO	MI
616756	KALAMAZOO W	GRAND RAPIDS KALAMAZOO	MI
616757	SCOTTS	GRAND RAPIDS KALAMAZOO	MI
616758	RICHLAND	GRAND RAPIDS KALAMAZOO	MI
616759	VICKSBURG	GRAND RAPIDS KALAMAZOO	MI
616760	GALESBURG	GRAND RAPIDS KALAMAZOO	MI
616761	MARTIN	GRAND RAPIDS KALAMAZOO	MI
616762	PLAINWELL	GRAND RAPIDS KALAMAZOO	MI
616763	OTSEGO	GRAND RAPIDS KALAMAZOO	MI
616779	ATHENS	GRAND RAPIDS KALAMAZOO	MI
616780	OLIVET	GRAND RAPIDS KALAMAZOO	MI
616781	BELLEVUE	GRAND RAPIDS KALAMAZOO	MI
616782	FULTON	GRAND RAPIDS KALAMAZOO	MI
616783	MARSHALL	GRAND RAPIDS KALAMAZOO	MI
616785	BATTLE CREEK	GRAND RAPIDS KALAMAZOO	MI
616786	BATTLE CREEK S	GRAND RAPIDS KALAMAZOO	MI
616822	ST JOE S	GRAND RAPIDS KALAMAZOO	MI
616823	EAU CLAIRE	GRAND RAPIDS KALAMAZOO	MI
616824	COLOMA/WTRVLT	GRAND RAPIDS KALAMAZOO	MI
616825	NEW BUFFALO	GRAND RAPIDS KALAMAZOO	MI
616826	BERRIEN SPRING	GRAND RAPIDS KALAMAZOO	MI
616827	GALIEN	GRAND RAPIDS KALAMAZOO	MI
616828	NILES	GRAND RAPIDS KALAMAZOO	MI
616829	BUCHANAN	GRAND RAPIDS KALAMAZOO	MI
616830	THREE OAKS	GRAND RAPIDS KALAMAZOO	MI
616831	BNTN HRBR/RVRSDE	GRAND RAPIDS KALAMAZOO	MI
616832	BNTN HRBR/ST.JOE	GRAND RAPIDS KALAMAZOO	MI
616833	BNTN HRBR E	GRAND RAPIDS KALAMAZOO	MI
616850	SAND LAKE	GRAND RAPIDS KALAMAZOO	MI
616852	CASNOVIA	GRAND RAPIDS KALAMAZOO	MI
616854	CEDAR SPRINGS	GRAND RAPIDS KALAMAZOO	MI
616859	TRUFANT	GRAND RAPIDS KALAMAZOO	MI
616871	GR HAVEN	GRAND RAPIDS KALAMAZOO	MI
616873	MACATAWA PARK	GRAND RAPIDS KALAMAZOO	MI
616874	HOLLAND	GRAND RAPIDS KALAMAZOO	MI

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
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616876	ZEELAND	GRAND RAPIDS KALAMAZOO	MI
616881	LAKE ODESSA	GRAND RAPIDS KALAMAZOO	MI
616882	IONIA	GRAND RAPIDS KALAMAZOO	MI
616883	SARANAC	GRAND RAPIDS KALAMAZOO	MI
616884	CLARKVILLE	GRAND RAPIDS KALAMAZOO	MI
616885	GREENVILLE	GRAND RAPIDS KALAMAZOO	MI
616886	FREEPORT	GRAND RAPIDS KALAMAZOO	MI
616887	BELDING	GRAND RAPIDS KALAMAZOO	MI
616888	WAYLAND	GRAND RAPIDS KALAMAZOO	MI
616889	HOPKINS	GRAND RAPIDS KALAMAZOO	MI
616890	MIDDLEVILLE	GRAND RAPIDS KALAMAZOO	MI
616891	HASTINGS	GRAND RAPIDS KALAMAZOO	MI
616911	GR RPDS S HALL	GRAND RAPIDS KALAMAZOO	MI
616912	DUTTON	GRAND RAPIDS KALAMAZOO	MI
616913	HUDSONVILLE	GRAND RAPIDS KALAMAZOO	MI
616914	GR RPDS LENOX	GRAND RAPIDS KALAMAZOO	MI
616915	DORR	GRAND RAPIDS KALAMAZOO	MI
616916	ALTO	GRAND RAPIDS KALAMAZOO	MI
616917	BYRON CTR	GRAND RAPIDS KALAMAZOO	MI
616918	MOLINE	GRAND RAPIDS KALAMAZOO	MI
616919	CALEDONIA	GRAND RAPIDS KALAMAZOO	MI
616920	JAMESTOWN	GRAND RAPIDS KALAMAZOO	MI
231521	LAKE LEELANAU	TRAVERSE CITY U P	MI
231522	KALKASKA	TRAVERSE CITY U P	MI
231523	ELK RPDS	TRAVERSE CITY U P	MI
231524	WILLIAMSBURG	TRAVERSE CITY U P	MI
231525	GRAWN-INTRLCHN	TRAVERSE CITY U P	MI
231526	FRANKFORT	TRAVERSE CITY U P	MI
231527	NORTHPORT	TRAVERSE CITY U P	MI
231528	FOUNTN/FREESOIL	TRAVERSE CITY U P	MI
231529	MANCELONA	TRAVERSE CITY U P	MI
231530	MANISTEE	TRAVERSE CITY U P	MI
231531	SCOTTVILLE	TRAVERSE CITY U P	MI
231532	BEULAH	TRAVERSE CITY U P	MI
231533	ONEKAMA	TRAVERSE CITY U P	MI
231534	ACME	TRAVERSE CITY U P	MI
231535	TRAVERSE CITY	TRAVERSE CITY U P	MI
231569	INDIAN RIVER	TRAVERSE CITY U P	MI
231570	PETOSKEY	TRAVERSE CITY U P	MI
231571	MACKINAW CITY	TRAVERSE CITY U P	MI
231572	WOLVERINE	TRAVERSE CITY U P	MI
231573	HARBOR SPRINGS	TRAVERSE CITY U P	MI
231574	PELLSTON	TRAVERSE CITY U P	MI
231575	WALLOON LAKE	TRAVERSE CITY U P	MI
231576	E JORDAN	TRAVERSE CITY U P	MI
231577	CHARLEVOIX	TRAVERSE CITY U P	MI

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
231578	BOYNE CITY	TRAVERSE CITY U P	MI
231579	CHEBOYGAN	TRAVERSE CITY U P	MI
231580	CHEBOYGAN S	TRAVERSE CITY U P	MI
231591	IRONS	TRAVERSE CITY U P	MI
231592	HARRIETTA	TRAVERSE CITY U P	MI
231593	EVART	TRAVERSE CITY U P	MI
231594	MARION	TRAVERSE CITY U P	MI
231595	BALDWIN	TRAVERSE CITY U P	MI
231596	LEROY	TRAVERSE CITY U P	MI
231597	CADILLAC	TRAVERSE CITY U P	MI
231598	LUTHER	TRAVERSE CITY U P	MI
231599	MANTON	TRAVERSE CITY U P	MI
231600	MCBAIN	TRAVERSE CITY U P	MI
231601	TUSTIN	TRAVERSE CITY U P	MI
231602	REED CITY	TRAVERSE CITY U P	MI
231603	FIFE LAKE	TRAVERSE CITY U P	MI
906406	MARQUETTE	TRAVERSE CITY U P	MI
906407	HARVEY	TRAVERSE CITY U P	MI
906408	MICHIGAMME	TRAVERSE CITY U P	MI
906409	CHAMPION	TRAVERSE CITY U P	MI
906411	GWINN	TRAVERSE CITY U P	MI
906412	REPUBLIC	TRAVERSE CITY U P	MI
906413	NEGAUNEE	TRAVERSE CITY U P	MI
906414	ISHPEMING	TRAVERSE CITY U P	MI
906425	ROCK PERKINS	TRAVERSE CITY U P	MI
906426	CORNELL	TRAVERSE CITY U P	MI
906427	GLADSTONE	TRAVERSE CITY U P	MI
906428	BARK RIVER	TRAVERSE CITY U P	MI
906429	RAPID RIVER	TRAVERSE CITY U P	MI
906430	PWRS/HRMNSVLLE	TRAVERSE CITY U P	MI
906431	STEPHENSON	TRAVERSE CITY U P	MI
906432	ESCANABA	TRAVERSE CITY U P	MI
906433	MENOMINEE	TRAVERSE CITY U P	MI
906489	WAKEFIELD	TRAVERSE CITY U P	MI
906490	IRON RIVER	TRAVERSE CITY U P	MI
906491	WATERSMEET	TRAVERSE CITY U P	MI
906492	CHANNING	TRAVERSE CITY U P	MI
906493	HAMILTON LAKE	TRAVERSE CITY U P	MI
906494	BERGLAND	TRAVERSE CITY U P	MI
906495	BESSEMER	TRAVERSE CITY U P	MI
906496	IRON MT	TRAVERSE CITY U P	MI
906497	AMASA	TRAVERSE CITY U P	MI
906498	CRYSTAL FALLS	TRAVERSE CITY U P	MI
906499	IRONWOOD	TRAVERSE CITY U P	MI
906511	KEWEENAW	TRAVERSE CITY U P	MI
906512	LAKE LINDEN	TRAVERSE CITY U P	MI
906513	CALUMET	TRAVERSE CITY U P	MI

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
906514	HNCOCK/HOUGHTN	TRAVERSE CITY U P	MI
906515	CHASSEL	TRAVERSE CITY U P	MI
906552	NEWBERRY	TRAVERSE CITY U P	MI
906553	ENGADINE	TRAVERSE CITY U P	MI
906556	CURTIS	TRAVERSE CITY U P	MI
906557	S S MARIE	TRAVERSE CITY U P	MI
906558	BREVORT	TRAVERSE CITY U P	MI
906559	MACKINAC ISLAND	TRAVERSE CITY U P	MI

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
262241	GOOD HOPE/FLAGSTONE	MILWAUKEE METRO	WI
262242	COUNTY LN/CHESTNUT	MILWAUKEE METRO	WI
262243	CEDARBURG	MILWAUKEE METRO	WI
262246	SUSSEX	MILWAUKEE METRO	WI
262251	MENOMONEE FALLS	MILWAUKEE METRO	WI
262252	PILGRIM RD/MARCY	MILWAUKEE METRO	WI
262284	PORT WASHINGTON	MILWAUKEE METRO	WI
262334	WEST BEND	MILWAUKEE METRO	WI
262367	HARTLAND	MILWAUKEE METRO	WI
262422	MUSKEGO	MILWAUKEE METRO	WI
262542	PEWAUKEE/BELL DRIVE	MILWAUKEE METRO	WI
262567	OCONOMOWOC	MILWAUKEE METRO	WI
262628	HUBERTUS	MILWAUKEE METRO	WI
262662	BIG BEND	MILWAUKEE METRO	WI
262673	HARTFORD	MILWAUKEE METRO	WI
262675	NEWBERG	MILWAUKEE METRO	WI
262677	JACKSON	MILWAUKEE METRO	WI
262691	PEWAUKEE	MILWAUKEE METRO	WI
262782	FAIRWAY DR/SUNSET	MILWAUKEE METRO	WI
262792	BROOKFIELD LAKES	MILWAUKEE METRO	WI
414224	BROADWAY	MILWAUKEE METRO	WI
414241	GOOD HOPE/FLAGSTONE	MILWAUKEE METRO	WI
414242	COUNTY LN/CHESTNUT	MILWAUKEE METRO	WI
414257	AETNA CT	MILWAUKEE METRO	WI
414263	W WRIGHT/CONCORD	MILWAUKEE METRO	WI
414281	GRANGE AV/ATLANTIC	MILWAUKEE METRO	WI
414321	CLEVELAND/LINCOLN	MILWAUKEE METRO	WI
414342	N 26 ST/WEST	MILWAUKEE METRO	WI
414353	FOND DU LAC/HOPKINS	MILWAUKEE METRO	WI
414359	PARK PLACE	MILWAUKEE METRO	WI
414422	MUSKEGO	MILWAUKEE METRO	WI
414425	FOREST HOME AVENUE	MILWAUKEE METRO	WI
414445	N 41 ST/HILLTOP	MILWAUKEE METRO	WI
414643	S 26 ST/MITCHELL	MILWAUKEE METRO	WI
414744	LOGAN AV/SHERIDAN	MILWAUKEE METRO	WI
414762	S HOWELL	MILWAUKEE METRO	WI
414961	CAPITOL DR/U W M	MILWAUKEE METRO	WI
920261	WATERTOWN	MILWAUKEE METRO	WI
262245	WILLIAMS BAY	WISCONSIN NORTH SOUTH	WI
262248	LAKE GENEVA	WISCONSIN NORTH SOUTH	WI
262279	GENOA CITY	WISCONSIN NORTH SOUTH	WI
262472	WHITEWATER	WISCONSIN NORTH SOUTH	WI
262551	PARKSIDE	WISCONSIN NORTH SOUTH	WI
262632	RACINE MAIN	WISCONSIN NORTH SOUTH	WI
262639	RACINE NORTH	WISCONSIN NORTH SOUTH	WI
262652	KENOSHA MAIN	WISCONSIN NORTH SOUTH	WI
262694	KENOSHA SOUTH	WISCONSIN NORTH SOUTH	WI

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
262728	DELAVAN	WISCONSIN NORTH SOUTH	WI
262763	BURLINGTON	WISCONSIN NORTH SOUTH	WI
262835	CALEDONIA	WISCONSIN NORTH SOUTH	WI
262859	SOMERS	WISCONSIN NORTH SOUTH	WI
262878	UNION GROVE	WISCONSIN NORTH SOUTH	WI
262886	STURTEVANT	WISCONSIN NORTH SOUTH	WI
608221	MADISON PFLAUM	WISCONSIN NORTH SOUTH	WI
608231	MADISON SYLVAN	WISCONSIN NORTH SOUTH	WI
608241	MADISON KEDZIE	WISCONSIN NORTH SOUTH	WI
608251	MADISON MAIN	WISCONSIN NORTH SOUTH	WI
608262	MADISON SPRING	WISCONSIN NORTH SOUTH	WI
608271	MADISON BLACK OAK	WISCONSIN NORTH SOUTH	WI
608362	BELOIT	WISCONSIN NORTH SOUTH	WI
608752	JANESVILLE	WISCONSIN NORTH SOUTH	WI
608873	STOUGHTON	WISCONSIN NORTH SOUTH	WI
608882	EVANSVILLE	WISCONSIN NORTH SOUTH	WI
608883	RICHMOND	WISCONSIN NORTH SOUTH	WI
715235	MENOMONIE	WISCONSIN NORTH SOUTH	WI
715258	WAUPACA	WISCONSIN NORTH SOUTH	WI
715273	ELLSWORTH	WISCONSIN NORTH SOUTH	WI
715341	STEVENS POINT	WISCONSIN NORTH SOUTH	WI
715386	HUDSON	WISCONSIN NORTH SOUTH	WI
715425	RIVERFALLS	WISCONSIN NORTH SOUTH	WI
715549	HOULTON	WISCONSIN NORTH SOUTH	WI
715723	CHIPPEWA FALLS	WISCONSIN NORTH SOUTH	WI
715749	ROBERTS	WISCONSIN NORTH SOUTH	WI
715832	EAU CLAIRE	WISCONSIN NORTH SOUTH	WI
815362	SOUTH BELOIT	WISCONSIN NORTH SOUTH	WI
920231	OSHKOSH	WISCONSIN NORTH SOUTH	WI
920324	WAUPUN	WISCONSIN NORTH SOUTH	WI
920336	DEPERE	WISCONSIN NORTH SOUTH	WI
920386	JUNEAU	WISCONSIN NORTH SOUTH	WI
920387	MAYVILLE	WISCONSIN NORTH SOUTH	WI
920388	KEWAUNEE	WISCONSIN NORTH SOUTH	WI
920432	GREEN BAY JEFFERSON	WISCONSIN NORTH SOUTH	WI
920434	GREEN BAY CARD LN	WISCONSIN NORTH SOUTH	WI
920452	SHEBOYGAN	WISCONSIN NORTH SOUTH	WI
920465	GREEN BAY HUTH	WISCONSIN NORTH SOUTH	WI
920467	SHEBOYGAN FALLS	WISCONSIN NORTH SOUTH	WI
920485	HORICON	WISCONSIN NORTH SOUTH	WI
920487	ALGOMA	WISCONSIN NORTH SOUTH	WI
920494	GREEN BAY RIDGE	WISCONSIN NORTH SOUTH	WI
920532	WRIGHTSTOWN	WISCONSIN NORTH SOUTH	WI
920563	FORT ATKINSON	WISCONSIN NORTH SOUTH	WI
920582	WINNECONNE	WISCONSIN NORTH SOUTH	WI
920623	COLUMBUS	WISCONSIN NORTH SOUTH	WI
920674	JEFFERSON	WISCONSIN NORTH SOUTH	WI

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
920682	MANITOWOC	WISCONSIN NORTH SOUTH	WI
920685	OMRO	WISCONSIN NORTH SOUTH	WI
920688	VAN DYNE	WISCONSIN NORTH SOUTH	WI
920722	NEENAH	WISCONSIN NORTH SOUTH	WI
920731	APPLETON	WISCONSIN NORTH SOUTH	WI
920743	STURGEON BAY	WISCONSIN NORTH SOUTH	WI
920757	GREENVILLE	WISCONSIN NORTH SOUTH	WI
920766	KAUKAUNA	WISCONSIN NORTH SOUTH	WI
920779	HORTONVILLE	WISCONSIN NORTH SOUTH	WI
920788	LITTLE CHUTE	WISCONSIN NORTH SOUTH	WI
920885	BEAVER DAM	WISCONSIN NORTH SOUTH	WI
920921	FOND DU LAC	WISCONSIN NORTH SOUTH	WI
920982	NEW LONDON	WISCONSIN NORTH SOUTH	WI

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
216251	CLEARWATER	OHIO NORTH	OH
216267	CLEARWATER S	OHIO NORTH	OH
216321	FAIRMONT	OHIO NORTH	OH
216381	EVERGREEN	OHIO NORTH	OH
216421	GARFIELD	OHIO NORTH	OH
216431	HENDERSON	OHIO NORTH	OH
216451	GLENVILLE	OHIO NORTH	OH
216521	LAKEWOOD	OHIO NORTH	OH
216524	INDEPENDENCE	OHIO NORTH	OH
216531	KENMORE	OHIO NORTH	OH
216621	CLEVELAND MN	OHIO NORTH	OH
216631	MELROSE	OHIO NORTH	OH
216641	MICHIGAN	OHIO NORTH	OH
216662	MONTROSE	OHIO NORTH	OH
216731	REDWOOD	OHIO NORTH	OH
216741	SHADYSIDE	OHIO NORTH	OH
216831	TERRACE	OHIO NORTH	OH
216921	WASHINGTON	OHIO NORTH	OH
216977	AERO SPACE SYS	OHIO NORTH	OH
330227	ROGERS	OHIO NORTH	OH
330253	BLACKSTONE	OHIO NORTH	OH
330274	MANTUA	OHIO NORTH	OH
330296	RAVENNA	OHIO NORTH	OH
330325	ROOTSTOWN	OHIO NORTH	OH
330332	SALEM	OHIO NORTH	OH
330385	EAST LIVERPOOL	OHIO NORTH	OH
330424	LISBON	OHIO NORTH	OH
330426	EAST PALESTINE	OHIO NORTH	OH
330427	LEETONIA	OHIO NORTH	OH
330448	BROOKFIELD	OHIO NORTH	OH
330452	GLENDALE	OHIO NORTH	OH
330457	NEW WATERFORD	OHIO NORTH	OH
330477	GREENWOOD	OHIO NORTH	OH
330482	COLUMBIANA	OHIO NORTH	OH
330484	HUXLEY	OHIO NORTH	OH
330488	IVANHOE	OHIO NORTH	OH
330494	NORTH CANTON	OHIO NORTH	OH
330532	WELLESVILLE	OHIO NORTH	OH
330533	CANFIELD	OHIO NORTH	OH
330534	HUBBARD	OHIO NORTH	OH
330536	LOWELLVILLE	OHIO NORTH	OH
330538	NORTH JACKSON	OHIO NORTH	OH
330542	NORTH LIMA	OHIO NORTH	OH
330549	NORTH LIMA	OHIO NORTH	OH
330626	KENT	OHIO NORTH	OH
330628	MOGADORE	OHIO NORTH	OH
330633	MEADOWBROOK	OHIO NORTH	OH

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
330644	MIDLAKE	OHIO NORTH	OH
330652	NILES	OHIO NORTH	OH
330673	ORCHARD	OHIO NORTH	OH
330679	SALINEVILLE	OHIO NORTH	OH
330688	OVERDALE	OHIO NORTH	OH
330699	UNIONTOWN	OHIO NORTH	OH
330724	PARKWAY	OHIO NORTH	OH
330743	RIVERSIDE	OHIO NORTH	OH
330745	SHERWOOD	OHIO NORTH	OH
330755	PLAZA	OHIO NORTH	OH
330757	SKYLINE/POLAND	OHIO NORTH	OH
330758	SKYLINE	OHIO NORTH	OH
330759	NORTH RIVERSIDE	OHIO NORTH	OH
330782	STERLING	OHIO NORTH	OH
330784	STADIUM	OHIO NORTH	OH
330799	SWEETBRIAR	OHIO NORTH	OH
330821	ALLIANCE	OHIO NORTH	OH
330825	VALLEY	OHIO NORTH	OH
330828	DALTON	OHIO NORTH	OH
330833	MASSILLON	OHIO NORTH	OH
330854	CANAL FULTON	OHIO NORTH	OH
330864	UNIVERSITY	OHIO NORTH	OH
330866	MAGNOLIA	OHIO NORTH	OH
330875	LOUISVILLE	OHIO NORTH	OH
330877	HARTVILLE	OHIO NORTH	OH
330879	NAVARRE	OHIO NORTH	OH
330882	MANCHESTER	OHIO NORTH	OH
330896	GREENSBURG	OHIO NORTH	OH
330928	WALBRIDGE	OHIO NORTH	OH
330935	MARLBORO	OHIO NORTH	OH
330938	SEBRING	OHIO NORTH	OH
330947	ATWATER	OHIO NORTH	OH
440232	BEDFORD	OHIO NORTH	OH
440234	BEREA	OHIO NORTH	OH
440235	OLMSTED FALLS	OHIO NORTH	OH
440237	NORTH ROYALTON	OHIO NORTH	OH
440238	STRONGSVILLE	OHIO NORTH	OH
440247	CHAGRIN FALLS	OHIO NORTH	OH
440248	SOLON	OHIO NORTH	OH
440254	LEROY	OHIO NORTH	OH
440255	MENTOR	OHIO NORTH	OH
440256	KIRTLAND	OHIO NORTH	OH
440257	MENTOR ON THE LK	OHIO NORTH	OH
440331	EDISON	OHIO NORTH	OH
440352	PAINESVILLE	OHIO NORTH	OH
440442	HILLCREST	OHIO NORTH	OH
440526	BRECKSVILLE	OHIO NORTH	OH

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
440729	SCOTLAND	OHIO NORTH	OH
440777	SPRING	OHIO NORTH	OH
440834	BURTON	OHIO NORTH	OH
440842	VICTORY	OHIO NORTH	OH
440871	TRINITY	OHIO NORTH	OH
440942	WILLOUGHBY	OHIO NORTH	OH
419241	TOLEDO 25	OHIO SOUTH	OH
419294	UPPER SANDUSKY	OHIO SOUTH	OH
419332	FREEMONT	OHIO SOUTH	OH
419359	BLOOMINGVILLE	OHIO SOUTH	OH
419382	TOLEDO 38	OHIO SOUTH	OH
419422	FINDLAY	OHIO SOUTH	OH
419435	FOSTORIA	OHIO SOUTH	OH
419447	TIFFIN	OHIO SOUTH	OH
419472	TOLEDO 47W	OHIO SOUTH	OH
419476	TOLEDO 47E	OHIO SOUTH	OH
419531	TOLEDO 53	OHIO SOUTH	OH
419595	NEW REIGEL	OHIO SOUTH	OH
419625	SANDUSKY	OHIO SOUTH	OH
419665	LINDSEY	OHIO SOUTH	OH
419666	TOLEDO 66	OHIO SOUTH	OH
419684	CASTALIA	OHIO SOUTH	OH
419691	TOLEDO 69	OHIO SOUTH	OH
419726	TOLEDO 72	OHIO SOUTH	OH
419865	HOLLAND	OHIO SOUTH	OH
419874	PERRYSBURG	OHIO SOUTH	OH
419877	WHITEHOUSE	OHIO SOUTH	OH
419893	MAUMEE	OHIO SOUTH	OH
513422	MIDDLETOWN	OHIO SOUTH	OH
513539	MONROE	OHIO SOUTH	OH
513988	TRENTON	OHIO SOUTH	OH
614221	COLUMBUS 22	OHIO SOUTH	OH
614231	COLUMBUS 23	OHIO SOUTH	OH
614252	COLUMBUS 25	OHIO SOUTH	OH
614262	COLUMBUS 26	OHIO SOUTH	OH
614274	COLUMBUS 27	OHIO SOUTH	OH
614291	AXMINSTER	OHIO SOUTH	OH
614443	COLUMBUS 44	OHIO SOUTH	OH
614451	COLUMBUS 45	OHIO SOUTH	OH
614471	GAHANNA	OHIO SOUTH	OH
614486	COLUMBUS 48	OHIO SOUTH	OH
614491	LOCKBOURNE	OHIO SOUTH	OH
614836	CANAL WINCHESTER	OHIO SOUTH	OH
614855	NEW ALBANY	OHIO SOUTH	OH
614866	REYNOLDSBURG	OHIO SOUTH	OH
614875	GROVE CITY	OHIO SOUTH	OH
614876	HILLIARD	OHIO SOUTH	OH

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
614877	HARRISBURG	OHIO SOUTH	OH
614878	ALTON	OHIO SOUTH	OH
614879	W JEFFERSON	OHIO SOUTH	OH
614882	WESTERVILLE	OHIO SOUTH	OH
614885	COLUMBUS 644	OHIO SOUTH	OH
614889	DUBLIN	OHIO SOUTH	OH
740245	RIO GRANDE	OHIO SOUTH	OH
740246	THORNVILLE	OHIO SOUTH	OH
740254	GNADENHUTTEN	OHIO SOUTH	OH
740256	GUYAN	OHIO SOUTH	OH
740264	STEUBENVILLE 26	OHIO SOUTH	OH
740282	STEUBENVILLE 28	OHIO SOUTH	OH
740335	WASHINGTON	OHIO SOUTH	OH
740342	NEW LEXINGTON	OHIO SOUTH	OH
740347	CORNING	OHIO SOUTH	OH
740367	CHESHIRE	OHIO SOUTH	OH
740373	MARIETTA	OHIO SOUTH	OH
740377	S POINT	OHIO SOUTH	OH
740379	WALNUT	OHIO SOUTH	OH
740388	VINTON	OHIO SOUTH	OH
740394	SHAWNEE	OHIO SOUTH	OH
740423	BELPRE	OHIO SOUTH	OH
740425	BARNESVILLE	OHIO SOUTH	OH
740426	JEFFERSONVILLE	OHIO SOUTH	OH
740437	BLOOMINGBURG	OHIO SOUTH	OH
740446	GALLIPOLIS	OHIO SOUTH	OH
740452	ZANESVILLE	OHIO SOUTH	OH
740458	CALRINGTON	OHIO SOUTH	OH
740472	WOODSFIELD	OHIO SOUTH	OH
740473	NEWPORT	OHIO SOUTH	OH
740483	DUFFY	OHIO SOUTH	OH
740484	BETHESDA	OHIO SOUTH	OH
740495	NEW HOLLAND	OHIO SOUTH	OH
740498	NEWCOMERSTOWN	OHIO SOUTH	OH
740532	IRONTON	OHIO SOUTH	OH
740535	MINGO JUNCTION	OHIO SOUTH	OH
740536	RUSHVILLE	OHIO SOUTH	OH
740537	TORONTO	OHIO SOUTH	OH
740545	W LAFAYETTE	OHIO SOUTH	OH
740567	LEWISVILLE	OHIO SOUTH	OH
740622	COSHOCTON	OHIO SOUTH	OH
740633	MARTINS FERRY	OHIO SOUTH	OH
740643	ARABIA	OHIO SOUTH	OH
740653	LANCASTER	OHIO SOUTH	OH
740659	GLENFORD	OHIO SOUTH	OH
740674	PHILO	OHIO SOUTH	OH
740676	BELLAIRE	OHIO SOUTH	OH

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
740695	ST CLAIRSVILLE	OHIO SOUTH	OH
740697	ROSEVILLE	OHIO SOUTH	OH
740743	SOMERSET	OHIO SOUTH	OH
740746	SUGAR GROVE	OHIO SOUTH	OH
740753	LANCASTER	OHIO SOUTH	OH
740754	DRESDEN	OHIO SOUTH	OH
740756	CARROLL	OHIO SOUTH	OH
740762	MURRAY CITY	OHIO SOUTH	OH
740829	CONESVILLE	OHIO SOUTH	OH
740849	FULTONHAM	OHIO SOUTH	OH
740852	LONDON	OHIO SOUTH	OH
740865	NEW MATAMOROS	OHIO SOUTH	OH
740872	NORWICH	OHIO SOUTH	OH
740874	SEDALIA	OHIO SOUTH	OH
740922	URICHSVILLE	OHIO SOUTH	OH
740926	BEALLSVILLE	OHIO SOUTH	OH
740934	GRAYSVILLE	OHIO SOUTH	OH
740948	MILLEDGEVILLE	OHIO SOUTH	OH
937222	DAYTON 22	OHIO SOUTH	OH
937233	DAYTON 23	OHIO SOUTH	OH
937252	DAYTON 25	OHIO SOUTH	OH
937262	DAYTON 26	OHIO SOUTH	OH
937265	PITCHEN	OHIO SOUTH	OH
937274	DAYTON 27	OHIO SOUTH	OH
937288	DANVILLE	OHIO SOUTH	OH
937293	DAYTON 29	OHIO SOUTH	OH
937322	SPRINGFIELD 32	OHIO SOUTH	OH
937365	RAINSBORO	OHIO SOUTH	OH
937368	FLETCHER	OHIO SOUTH	OH
937372	XENIA	OHIO SOUTH	OH
937392	RIPLEY	OHIO SOUTH	OH
937393	HILLSBORO	OHIO SOUTH	OH
937399	SPRINGFIELD 39	OHIO SOUTH	OH
937426	BEAVERCREEK	OHIO SOUTH	OH
937434	DAYTON 43	OHIO SOUTH	OH
937453	BOWERSVILLE	OHIO SOUTH	OH
937462	S CHARLESTON	OHIO SOUTH	OH
937466	MARSHALL	OHIO SOUTH	OH
937568	S VIENNA	OHIO SOUTH	OH
937675	JAMESTOWN	OHIO SOUTH	OH
937695	WINCHESTER	OHIO SOUTH	OH
937746	FRANKLIN	OHIO SOUTH	OH
937764	BELFAST	OHIO SOUTH	OH
937766	CEDARVILLE	OHIO SOUTH	OH
937767	YELLOW SPRINGS	OHIO SOUTH	OH
937773	PIQUA	OHIO SOUTH	OH
937795	ABERDEEN	OHIO SOUTH	OH

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
937845	NEW CARLISLE	OHIO SOUTH	OH
937848	BELLBROOK	OHIO SOUTH	OH
937849	MIDWAY	OHIO SOUTH	OH
937857	CHRISTIANSBURG	OHIO SOUTH	OH
937862	SPRING VALLEY	OHIO SOUTH	OH
937864	ENON	OHIO SOUTH	OH
937866	MIAMISBURG	OHIO SOUTH	OH
937878	FAIRBORN	OHIO SOUTH	OH
937882	DONNELSVILLE	OHIO SOUTH	OH
937883	S SOLON	OHIO SOUTH	OH
937885	FIVE POINTS	OHIO SOUTH	OH
937890	VANDALIA	OHIO SOUTH	OH
937927	SUGAR TREE RIDGE	OHIO SOUTH	OH
937964	NORTH HAMPTON	OHIO SOUTH	OH
937969	TREEMONT CITY	OHIO SOUTH	OH

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
219218	MORROCCO	INDIANA NORTH SOUTH	IN
219222	LAKE VILLAGE	INDIANA NORTH SOUTH	IN
219261	LAGRO	INDIANA NORTH SOUTH	IN
219262	ANDREWS	INDIANA NORTH SOUTH	IN
219263	SPENCERVILLE	INDIANA NORTH SOUTH	IN
219264	HUNTINGTON	INDIANA NORTH SOUTH	IN
219265	BLUFFTON	INDIANA NORTH SOUTH	IN
219266	AUBURN	INDIANA NORTH SOUTH	IN
219267	KENDALVILLE	INDIANA NORTH SOUTH	IN
219411	ST JOHN	INDIANA NORTH SOUTH	IN
219412	CEDAR LAKE	INDIANA NORTH SOUTH	IN
219413	LOWELL	INDIANA NORTH SOUTH	IN
219414	CROWN POINT	INDIANA NORTH SOUTH	IN
219415	CEDAR CREEK	INDIANA NORTH SOUTH	IN
219416	MERRILLVILLE	INDIANA NORTH SOUTH	IN
219421	GARY NORTH	INDIANA NORTH SOUTH	IN
219422	GARY MILLER	INDIANA NORTH SOUTH	IN
219432	GARY WEST	INDIANA NORTH SOUTH	IN
219433	GARY SOUTH	INDIANA NORTH SOUTH	IN
219441	DYER	INDIANA NORTH SOUTH	IN
219442	HAMMOND E	INDIANA NORTH SOUTH	IN
219443	HIGHLAND	INDIANA NORTH SOUTH	IN
219451	HAMMOND W	INDIANA NORTH SOUTH	IN
219452	E CHICAGO	INDIANA NORTH SOUTH	IN
219453	WHITING	INDIANA NORTH SOUTH	IN
219461	MICH CTY	INDIANA NORTH SOUTH	IN
219471	OSCEOLA	INDIANA NORTH SOUTH	IN
219472	CULVER	INDIANA NORTH SOUTH	IN
219473	MISHAWAKA	INDIANA NORTH SOUTH	IN
219474	S BND NORTH	INDIANA NORTH SOUTH	IN
219475	S BND	INDIANA NORTH SOUTH	IN
219481	S BND MN	INDIANA NORTH SOUTH	IN
317254	SHERIDAN	INDIANA NORTH SOUTH	IN
317336	FAIRLAND	INDIANA NORTH SOUTH	IN
317338	SHELBYVILLE	INDIANA NORTH SOUTH	IN
765201	GASTON	INDIANA NORTH SOUTH	IN
765202	EATON	INDIANA NORTH SOUTH	IN
765203	YORKTOWN	INDIANA NORTH SOUTH	IN
765204	ALBANY	INDIANA NORTH SOUTH	IN
765205	MONTPILIER	INDIANA NORTH SOUTH	IN
765206	HARTFORD CITY	INDIANA NORTH SOUTH	IN
765207	MUNCIE	INDIANA NORTH SOUTH	IN
765209	NEW CASTLE	INDIANA NORTH SOUTH	IN
765210	OTTERBEIN	INDIANA NORTH SOUTH	IN
765211	MELLOTT	INDIANA NORTH SOUTH	IN
765212	W. LEBANON	INDIANA NORTH SOUTH	IN
765213	STEWART	INDIANA NORTH SOUTH	IN

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
765214	VEEDERSBURG	INDIANA NORTH SOUTH	IN
765215	KINGMAN	INDIANA NORTH SOUTH	IN
765216	CAYUGA	INDIANA NORTH SOUTH	IN
765217	COVINGTON	INDIANA NORTH SOUTH	IN
765219	OXFORD	INDIANA NORTH SOUTH	IN
765221	BOSWELL	INDIANA NORTH SOUTH	IN
765223	ATTICA	INDIANA NORTH SOUTH	IN
765224	FOWLER	INDIANA NORTH SOUTH	IN
765230	ROCKVILLE	INDIANA NORTH SOUTH	IN
765232	DARLINGTON	INDIANA NORTH SOUTH	IN
765233	LADOGA	INDIANA NORTH SOUTH	IN
765234	WAVELAND	INDIANA NORTH SOUTH	IN
765235	MARSHAL	INDIANA NORTH SOUTH	IN
765236	W DANA	INDIANA NORTH SOUTH	IN
765237	MONTEZUMA	INDIANA NORTH SOUTH	IN
765238	ROSEDALE	INDIANA NORTH SOUTH	IN
765239	CLINTON	INDIANA NORTH SOUTH	IN
765240	BELLMORE	INDIANA NORTH SOUTH	IN
765241	CRAWFORDSVILLE	INDIANA NORTH SOUTH	IN
765242	NEW MARKET	INDIANA NORTH SOUTH	IN
765243	WAYNETOWN	INDIANA NORTH SOUTH	IN
765251	MICHIGANTOWN	INDIANA NORTH SOUTH	IN
765252	KIRKLIN	INDIANA NORTH SOUTH	IN
765253	BUCK CREEK	INDIANA NORTH SOUTH	IN
765255	MECHANICSBURG	INDIANA NORTH SOUTH	IN
765256	FRANKFORT	INDIANA NORTH SOUTH	IN
765257	LEBANON	INDIANA NORTH SOUTH	IN
765271	BURLINGTON	INDIANA NORTH SOUTH	IN
765272	GREENTOWN	INDIANA NORTH SOUTH	IN
765273	RUSSIAVILLE	INDIANA NORTH SOUTH	IN
765274	BUNKER HILL	INDIANA NORTH SOUTH	IN
765275	KOKOMO MN	INDIANA NORTH SOUTH	IN
765276	PERU	INDIANA NORTH SOUTH	IN
765277	KOKOMO SO	INDIANA NORTH SOUTH	IN
765281	UPLAND	INDIANA NORTH SOUTH	IN
765282	AMBOY-COV	INDIANA NORTH SOUTH	IN
765283	MARION NORTH	INDIANA NORTH SOUTH	IN
765284	MARION ORLEANS	INDIANA NORTH SOUTH	IN
765291	MIDDLETOWN	INDIANA NORTH SOUTH	IN
765292	CHESTERFIELD	INDIANA NORTH SOUTH	IN
765293	ANDERSON	INDIANA NORTH SOUTH	IN
765294	SUMMITVILLE	INDIANA NORTH SOUTH	IN
765295	ALEXANDRIA	INDIANA NORTH SOUTH	IN
765296	ELWOOD	INDIANA NORTH SOUTH	IN
765312	PARAGON	INDIANA NORTH SOUTH	IN
765318	MARTINSVILLE	INDIANA NORTH SOUTH	IN
812311	SPENCER	INDIANA NORTH SOUTH	IN

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
812313	MORGANTOWN	INDIANA NORTH SOUTH	IN
812314	NASHVILLE	INDIANA NORTH SOUTH	IN
812315	HELTONVILLE	INDIANA NORTH SOUTH	IN
812317	BLOOMINGTON	INDIANA NORTH SOUTH	IN
812319	BEDFORD	INDIANA NORTH SOUTH	IN
812321	BRUCEVILLE	INDIANA NORTH SOUTH	IN
812322	BLOOMFIELD	INDIANA NORTH SOUTH	IN
812323	DUGGER	INDIANA NORTH SOUTH	IN
812324	JASONVILLE	INDIANA NORTH SOUTH	IN
812325	VINCENNES	INDIANA NORTH SOUTH	IN
812326	LINTON	INDIANA NORTH SOUTH	IN
812327	WASHINGTON	INDIANA NORTH SOUTH	IN
812331	EDINBURG	INDIANA NORTH SOUTH	IN
812332	HOPE	INDIANA NORTH SOUTH	IN
812333	ELIZABETHTOWN	INDIANA NORTH SOUTH	IN
812335	FLAT ROCK	INDIANA NORTH SOUTH	IN
812337	COLUMBUS	INDIANA NORTH SOUTH	IN
812339	COL. SOUTH	INDIANA NORTH SOUTH	IN
812341	SELLERSBURG	INDIANA NORTH SOUTH	IN
812342	CHARLESTOWN	INDIANA NORTH SOUTH	IN
812343	NEW WASHINGTON	INDIANA NORTH SOUTH	IN
812344	GALENA	INDIANA NORTH SOUTH	IN
812345	JEFFERSONVILLE	INDIANA NORTH SOUTH	IN
812346	NEW ALBANY	INDIANA NORTH SOUTH	IN
812350	MT VERNON	INDIANA NORTH SOUTH	IN
812351	NEWBURGH	INDIANA NORTH SOUTH	IN
812352	McCUTCHENVILLE	INDIANA NORTH SOUTH	IN
812353	ST JOSEPH	INDIANA NORTH SOUTH	IN
812354	ST PHILLIP	INDIANA NORTH SOUTH	IN
812355	CHANDLER	INDIANA NORTH SOUTH	IN
812356	EVANSVILLE GNA	INDIANA NORTH SOUTH	IN
812357	EVANSVILLE HA	INDIANA NORTH SOUTH	IN
812358	NEW HARMONY	INDIANA NORTH SOUTH	IN
812359	SOLITUDE	INDIANA NORTH SOUTH	IN
812361	SANDRIDGE	INDIANA NORTH SOUTH	IN
812362	CHRISNEY	INDIANA NORTH SOUTH	IN
812363	ROCKPORT	INDIANA NORTH SOUTH	IN
812364	DALE	INDIANA NORTH SOUTH	IN
812365	TENNYSON	INDIANA NORTH SOUTH	IN
812366	TELL CITY	INDIANA NORTH SOUTH	IN
812367	BOONEVILLE	INDIANA NORTH SOUTH	IN
317111	MELROSE	INDIANAPOLIS METRO SUBURB	IN
317121	FLEETWOOD	INDIANAPOLIS METRO SUBURB	IN
317122	LIBERTY	INDIANAPOLIS METRO SUBURB	IN
317123	TWINBROOK	INDIANAPOLIS METRO SUBURB	IN
317124	ACTON	INDIANAPOLIS METRO SUBURB	IN
317125	GREENFIELD	INDIANAPOLIS METRO SUBURB	IN

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
317127	NEW PALESTINE	INDIANAPOLIS METRO SUBURB	IN
317128	OAKLANDON	INDIANAPOLIS METRO SUBURB	IN
317132	AXMINISTER	INDIANAPOLIS METRO SUBURB	IN
317133	WALNUT	INDIANAPOLIS METRO SUBURB	IN
317134	TRINITY	INDIANAPOLIS METRO SUBURB	IN
317141	STATE	INDIANAPOLIS METRO SUBURB	IN
317142	GREENWOOD	INDIANAPOLIS METRO SUBURB	IN
317143	WEST NEWTON	INDIANAPOLIS METRO SUBURB	IN
317151	ZIONSVILLE	INDIANAPOLIS METRO SUBURB	IN
317152	CLIFFORD	INDIANAPOLIS METRO SUBURB	IN
317153	VICTOR	INDIANAPOLIS METRO SUBURB	IN
317154	FISHERS	INDIANAPOLIS METRO SUBURB	IN
317155	NOBLESVILLE	INDIANAPOLIS METRO SUBURB	IN
317171	CHAPEL	INDIANAPOLIS METRO SUBURB	IN
317172	BROWNSBURG	INDIANAPOLIS METRO SUBURB	IN
317173	DANVILLE	INDIANAPOLIS METRO SUBURB	IN
317174	MOORESVILLE	INDIANAPOLIS METRO SUBURB	IN
317175	PLAINFIELD	INDIANAPOLIS METRO SUBURB	IN
317176	WESTWOOD	INDIANAPOLIS METRO SUBURB	IN

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
312401	SUPERIOR	CHICAGO	IL
312402	IL/DEARBORN	CHICAGO	IL
312403	LAKESHORE	CHICAGO	IL
312404	FRANKLIN	CHICAGO	IL
312405	CANAL	CHICAGO	IL
312406	WABASH	CHICAGO	IL
312407	CALUMET	CHICAGO	IL
312408	MONROE	CHICAGO	IL
773409	EDGEWATER	CHICAGO	IL
773410	ROGERSPARK	CHICAGO	IL
773411	LAKEVIEW	CHICAGO	IL
773412	KILDARE	CHICAGO	IL
773413	NEWCASTLE	CHICAGO	IL
773415	IRVING	CHICAGO	IL
773416	HUMBOLDT	CHICAGO	IL
773501	STEWART	CHICAGO	IL
773502	KEDZIE	CHICAGO	IL
773503	LAWNDALE	CHICAGO	IL
773504	AUSTIN	CHICAGO	IL
773505	MERRMC	CHICAGO	IL
773506	PULLMAN	CHICAGO	IL
773507	BEVERLY	CHICAGO	IL
773508	S.CHICAGO	CHICAGO	IL
773509	MITCHL	CHICAGO	IL
773510	OAKLAND	CHICAGO	IL
773511	DORCHESTER	CHICAGO	IL
773513	PROSPECT	CHICAGO	IL
773514	PORTSMOUTH	CHICAGO	IL
773515	LAFAYETTE	CHICAGO	IL
307620	BENSVL	CHICAGO SUBURBAN	IL
630119	BARLETT	CHICAGO SUBURBAN	IL
630123	W.CHGO	CHICAGO SUBURBAN	IL
630126	GENEVA	CHICAGO SUBURBAN	IL
630127	ELBURN	CHICAGO SUBURBAN	IL
630128	W.CHICAGO	CHICAGO SUBURBAN	IL
630133	WHEATON	CHICAGO SUBURBAN	IL
630134	GLEN ELLYN	CHICAGO SUBURBAN	IL
630135	WARNVL	CHICAGO SUBURBAN	IL
630136	LOMBARD	CHICAGO SUBURBAN	IL
630138	ROSELLE	CHICAGO SUBURBAN	IL
630256	HINSDALE	CHICAGO SUBURBAN	IL
630265	DOWNERSGRV	CHICAGO SUBURBAN	IL
630266	NAPERVILLE	CHICAGO SUBURBAN	IL
630267	NAPERVILLENE	CHICAGO SUBURBAN	IL
630571	OAKBROOK	CHICAGO SUBURBAN	IL
630619	ELMHURST	CHICAGO SUBURBAN	IL
630620	BENSENVILLE	CHICAGO SUBURBAN	IL

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
708136	LOMBARD	CHICAGO SUBURBAN	IL
708237	MOKENA	CHICAGO SUBURBAN	IL
708606	CHICAGOHTS	CHICAGO SUBURBAN	IL
708607	FORDHT	CHICAGO SUBURBAN	IL
708613	HARVEY	CHICAGO SUBURBAN	IL
708614	HOMEWOOD	CHICAGO SUBURBAN	IL
708615	RIVERDALE	CHICAGO SUBURBAN	IL
708616	CALUMETCITY	CHICAGO SUBURBAN	IL
708617	BELLWOOD	CHICAGO SUBURBAN	IL
708618	HILLSIDE	CHICAGO SUBURBAN	IL
708621	CICERO	CHICAGO SUBURBAN	IL
708622	SUMMIT	CHICAGO SUBURBAN	IL
708623	HICKORYHILLS	CHICAGO SUBURBAN	IL
708624	LAGRANGE	CHICAGO SUBURBAN	IL
708625	BLUE ISLAND	CHICAGO SUBURBAN	IL
708626	OAK LAWN	CHICAGO SUBURBAN	IL
708627	TINLEY PARK	CHICAGO SUBURBAN	IL
708628	ORLAND PARK	CHICAGO SUBURBAN	IL
708629	PALOS PARK	CHICAGO SUBURBAN	IL
708630	OAK PARK	CHICAGO SUBURBAN	IL
708631	RIVER GROVE	CHICAGO SUBURBAN	IL
773102	O'HARE	CHICAGO SUBURBAN	IL
773414	O'HARE	CHICAGO SUBURBAN	IL
815248	WOODSTOCK	CHICAGO SUBURBAN	IL
815249	CRSTLK	CHICAGO SUBURBAN	IL
815250	HARVRD	CHICAGO SUBURBAN	IL
815251	MARENG	CHICAGO SUBURBAN	IL
815252	MCHNRY	CHICAGO SUBURBAN	IL
815253	UNION	CHICAGO SUBURBAN	IL
847101	ARLINGTONHTS	CHICAGO SUBURBAN	IL
847102	ELK GROVE	CHICAGO SUBURBAN	IL
847103	GLENVIEW	CHICAGO SUBURBAN	IL
847104	NORTHBROOK	CHICAGO SUBURBAN	IL
847105	LIBERTYVILLE	CHICAGO SUBURBAN	IL
847106	WHEELING	CHICAGO SUBURBAN	IL
847107	WAUKEGAN	CHICAGO SUBURBAN	IL
847108	N CHICAGO	CHICAGO SUBURBAN	IL
847109	ZION	CHICAGO SUBURBAN	IL
847110	HIGHLANDPK	CHICAGO SUBURBAN	IL
847111	DEERFIELD	CHICAGO SUBURBAN	IL
847112	LAKE FOREST	CHICAGO SUBURBAN	IL
847113	ANTIOCH	CHICAGO SUBURBAN	IL
847114	FOX LAKE	CHICAGO SUBURBAN	IL
847115	GRAYSLAKE	CHICAGO SUBURBAN	IL
847116	LAKE VILLA	CHICAGO SUBURBAN	IL
847117	ROUND LAKE	CHICAGO SUBURBAN	IL
847118	ELGIN	CHICAGO SUBURBAN	IL

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
847120	PLTCTR	CHICAGO SUBURBAN	IL
847121	DUNDEE	CHICAGO SUBURBAN	IL
847122	ALGONQUIN	CHICAGO SUBURBAN	IL
847123	HMPSHR	CHICAGO SUBURBAN	IL
847124	HUNTLEY	CHICAGO SUBURBAN	IL
847125	CARY	CHICAGO SUBURBAN	IL
847129	PALATINE	CHICAGO SUBURBAN	IL
847130	BARRINGTON	CHICAGO SUBURBAN	IL
847131	LAKE ZURICH	CHICAGO SUBURBAN	IL
847132	WAUCND	CHICAGO SUBURBAN	IL
847137	WILLOWCREST	CHICAGO SUBURBAN	IL
847139	SCHAUMBRG	CHICAGO SUBURBAN	IL
847140	SCHAUMBGN	CHICAGO SUBURBAN	IL
847141	BARRINGTONS	CHICAGO SUBURBAN	IL
847142	POPLAR	CHICAGO SUBURBAN	IL
847143	DESPLAINES	CHICAGO SUBURBAN	IL
847144	PARK RIDGE	CHICAGO SUBURBAN	IL
847601	EVANSTON	CHICAGO SUBURBAN	IL
847602	WILMET	CHICAGO SUBURBAN	IL
847603	WINTKA	CHICAGO SUBURBAN	IL
847604	SKOKIE	CHICAGO SUBURBAN	IL
847605	MORTONGROVE	CHICAGO SUBURBAN	IL
847632	SCHILLERPARK	CHICAGO SUBURBAN	IL
847657	NORTHBRK W	CHICAGO SUBURBAN	IL
217331	CHMPGNMA	ILLINOIS NORTH CENTRAL	IL
217332	CHMPGNUNV	ILLINOIS NORTH CENTRAL	IL
217333	GIBSONCITY	ILLINOIS NORTH CENTRAL	IL
217334	STJSPH	ILLINOIS NORTH CENTRAL	IL
217338	DANVILLE	ILLINOIS NORTH CENTRAL	IL
217339	CATLIN	ILLINOIS NORTH CENTRAL	IL
217340	FAIRMT	ILLINOIS NORTH CENTRAL	IL
217341	FITHIN	ILLINOIS NORTH CENTRAL	IL
217342	GEORTN	ILLINOIS NORTH CENTRAL	IL
217343	INDINL	ILLINOIS NORTH CENTRAL	IL
217344	OAKWD	ILLINOIS NORTH CENTRAL	IL
217345	RDGFRM	ILLINOIS NORTH CENTRAL	IL
217346	WESTVL	ILLINOIS NORTH CENTRAL	IL
309358	PEORIABLUFFS	ILLINOIS NORTH CENTRAL	IL
309359	PEORIA JEFF	ILLINOIS NORTH CENTRAL	IL
309360	PEORIANORTH	ILLINOIS NORTH CENTRAL	IL
309362	PEORIA EAST	ILLINOIS NORTH CENTRAL	IL
309363	BARTONVILLE	ILLINOIS NORTH CENTRAL	IL
309364	DELAVAN	ILLINOIS NORTH CENTRAL	IL
309365	HANNCT	ILLINOIS NORTH CENTRAL	IL
309366	SANJOS	ILLINOIS NORTH CENTRAL	IL
309367	SPRGBY	ILLINOIS NORTH CENTRAL	IL
309368	TRIVOL	ILLINOIS NORTH CENTRAL	IL

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
309369	CANTON	ILLINOIS NORTH CENTRAL	IL
309370	FRMNGT	ILLINOIS NORTH CENTRAL	IL
309371	FIATT	ILLINOIS NORTH CENTRAL	IL
309372	IPAVA	ILLINOIS NORTH CENTRAL	IL
309373	LEWSTN	ILLINOIS NORTH CENTRAL	IL
309374	STDAVD	ILLINOIS NORTH CENTRAL	IL
309375	ROCK ISLAND	ILLINOIS NORTH CENTRAL	IL
309376	COALVL	ILLINOIS NORTH CENTRAL	IL
309377	E MOLINE	ILLINOIS NORTH CENTRAL	IL
309378	MOLINE	ILLINOIS NORTH CENTRAL	IL
309379	EDGNTN	ILLINOIS NORTH CENTRAL	IL
309380	GREEN ROCK	ILLINOIS NORTH CENTRAL	IL
309381	MILAN	ILLINOIS NORTH CENTRAL	IL
630241	BOLINGBROK	ILLINOIS NORTH CENTRAL	IL
630242	LEMONT	ILLINOIS NORTH CENTRAL	IL
630243	LEMONT N	ILLINOIS NORTH CENTRAL	IL
630257	AURORAMAIN	ILLINOIS NORTH CENTRAL	IL
630258	AURORA EAST	ILLINOIS NORTH CENTRAL	IL
630259	BIG ROCK	ILLINOIS NORTH CENTRAL	IL
630260	KANEVL	ILLINOIS NORTH CENTRAL	IL
630261	OSWEGO	ILLINOIS NORTH CENTRAL	IL
630262	PLANO	ILLINOIS NORTH CENTRAL	IL
630263	SUGAR GROVE	ILLINOIS NORTH CENTRAL	IL
630264	YORKVL	ILLINOIS NORTH CENTRAL	IL
708608	BEECHER	ILLINOIS NORTH CENTRAL	IL
708609	CRETE	ILLINOIS NORTH CENTRAL	IL
708610	GVRNPK	ILLINOIS NORTH CENTRAL	IL
708611	PARK FOREST	ILLINOIS NORTH CENTRAL	IL
708612	PEOTON	ILLINOIS NORTH CENTRAL	IL
815201	KANKAKEE	ILLINOIS NORTH CENTRAL	IL
815202	GRNTPK	ILLINOIS NORTH CENTRAL	IL
815203	HRSCHR	ILLINOIS NORTH CENTRAL	IL
815204	MANTNO	ILLINOIS NORTH CENTRAL	IL
815205	MOMENC	ILLINOIS NORTH CENTRAL	IL
815206	HPKNPK	ILLINOIS NORTH CENTRAL	IL
815207	STANNE	ILLINOIS NORTH CENTRAL	IL
815208	MORRIS	ILLINOIS NORTH CENTRAL	IL
815209	BRAIDWOOD	ILLINOIS NORTH CENTRAL	IL
815210	COALCT	ILLINOIS NORTH CENTRAL	IL
815211	DWIGHT	ILLINOIS NORTH CENTRAL	IL
815212	GARDNR	ILLINOIS NORTH CENTRAL	IL
815213	JOLIET M	ILLINOIS NORTH CENTRAL	IL
815214	MAZON	ILLINOIS NORTH CENTRAL	IL
815215	MINOOK	ILLINOIS NORTH CENTRAL	IL
815216	NEWARK	ILLINOIS NORTH CENTRAL	IL
815217	PLATVL	ILLINOIS NORTH CENTRAL	IL
815218	VERONA	ILLINOIS NORTH CENTRAL	IL

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
815219	WATSEK	ILLINOIS NORTH CENTRAL	IL
815220	CRSTCT	ILLINOIS NORTH CENTRAL	IL
815221	FORRST	ILLINOIS NORTH CENTRAL	IL
815222	GILMAN	ILLINOIS NORTH CENTRAL	IL
815223	ONARGA	ILLINOIS NORTH CENTRAL	IL
815224	OTTAWA	ILLINOIS NORTH CENTRAL	IL
815225	HARDNG	ILLINOIS NORTH CENTRAL	IL
815226	LASALLE	ILLINOIS NORTH CENTRAL	IL
815227	OGLSBY	ILLINOIS NORTH CENTRAL	IL
815228	SENECA	ILLINOIS NORTH CENTRAL	IL
815229	UTICA	ILLINOIS NORTH CENTRAL	IL
815230	JOLIET M	ILLINOIS NORTH CENTRAL	IL
815231	JOLIET M	ILLINOIS NORTH CENTRAL	IL
815232	ELWOOD	ILLINOIS NORTH CENTRAL	IL
815233	FRANKFORT	ILLINOIS NORTH CENTRAL	IL
815234	MNHTTN	ILLINOIS NORTH CENTRAL	IL
815235	WLMNTN	ILLINOIS NORTH CENTRAL	IL
815236	NEW LENOX	ILLINOIS NORTH CENTRAL	IL
815238	LCKPRT	ILLINOIS NORTH CENTRAL	IL
815239	PLAINFIELD	ILLINOIS NORTH CENTRAL	IL
815240	ROMEOVILLE	ILLINOIS NORTH CENTRAL	IL
815244	ROCKFORD M	ILLINOIS NORTH CENTRAL	IL
815245	ROCKFORD E	ILLINOIS NORTH CENTRAL	IL
815247	ROCKFORD N	ILLINOIS NORTH CENTRAL	IL
815254	STERLING	ILLINOIS NORTH CENTRAL	IL
815255	GALENA	ILLINOIS NORTH CENTRAL	IL
217312	SPRNGFLD M	ILLINOIS SOUTH	IL
217314	SPRNGFLD LK	ILLINOIS SOUTH	IL
217315	SPRNGFLD W	ILLINOIS SOUTH	IL
217316	ATHENS	ILLINOIS SOUTH	IL
217317	BUFFALO	ILLINOIS SOUTH	IL
217318	CANTRL	ILLINOIS SOUTH	IL
217319	OAKFRD	ILLINOIS SOUTH	IL
217320	PTRSBG	ILLINOIS SOUTH	IL
217321	RIVRTN	ILLINOIS SOUTH	IL
217322	ROCHST	ILLINOIS SOUTH	IL
217323	TALLUL	ILLINOIS SOUTH	IL
217324	QUINCY	ILLINOIS SOUTH	IL
217325	BURTON	ILLINOIS SOUTH	IL
217326	COLMBS	ILLINOIS SOUTH	IL
217327	FOWLER	ILLINOIS SOUTH	IL
217328	LIBRTY	ILLINOIS SOUTH	IL
217329	PAYSON	ILLINOIS SOUTH	IL
217330	BEARDSTOWN	ILLINOIS SOUTH	IL
217335	DECATURMAIN	ILLINOIS SOUTH	IL
217336	DECATURNRTH	ILLINOIS SOUTH	IL
217337	HRRSTN	ILLINOIS SOUTH	IL

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
618275	ALTONCOLLEGE	ILLINOIS SOUTH	IL
618276	BETHALTO	ILLINOIS SOUTH	IL
618277	BRGHTN	ILLINOIS SOUTH	IL
618278	ELSAH	ILLINOIS SOUTH	IL
618279	WOODRIVER	ILLINOIS SOUTH	IL
618280	ROSEWD HTS	ILLINOIS SOUTH	IL
618281	GODFREY	ILLINOIS SOUTH	IL
618282	COLLINSVILLE	ILLINOIS SOUTH	IL
618283	EDWARDSVILE	ILLINOIS SOUTH	IL
618284	GLNCRB	ILLINOIS SOUTH	IL
618285	MARINE	ILLINOIS SOUTH	IL
618286	TROY	ILLINOIS SOUTH	IL
618287	CENTRALIA	ILLINOIS SOUTH	IL
618288	AVISTON	ILLINOIS SOUTH	IL
618289	BEKEMEYER	ILLINOIS SOUTH	IL
618290	BREESE	ILLINOIS SOUTH	IL
618291	CARLYLE	ILLINOIS SOUTH	IL
618292	GERMANTWN	ILLINOIS SOUTH	IL
618293	GREENVILLE	ILLINOIS SOUTH	IL
618294	IUKA	ILLINOIS SOUTH	IL
618295	KELL DIX	ILLINOIS SOUTH	IL
618296	KNMNDY	ILLINOIS SOUTH	IL
618297	SALEM	ILLINOIS SOUTH	IL
618298	TRENTON	ILLINOIS SOUTH	IL
618299	VANDALIA	ILLINOIS SOUTH	IL
618300	CAIRO	ILLINOIS SOUTH	IL
618301	MNDCTY	ILLINOIS SOUTH	IL
618302	MOUNDS	ILLINOIS SOUTH	IL
618303	OLVBCH	ILLINOIS SOUTH	IL
618304	OLMSTD	ILLINOIS SOUTH	IL
618305	TAMMS	ILLINOIS SOUTH	IL
618306	THEBES	ILLINOIS SOUTH	IL
618307	MT VERNON	ILLINOIS SOUTH	IL
618308	BLUFORD	ILLINOIS SOUTH	IL
618309	HARMNY	ILLINOIS SOUTH	IL
618310	NASHVILLE	ILLINOIS SOUTH	IL
618311	KELL DIX	ILLINOIS SOUTH	IL
618347	EASTSTLOUIS	ILLINOIS SOUTH	IL
618348	GRANITECITY	ILLINOIS SOUTH	IL
618349	PONTON	ILLINOIS SOUTH	IL
618350	CAHOKIADER	ILLINOIS SOUTH	IL
618351	BELLEVILLE AD	ILLINOIS SOUTH	IL
618352	EDGEMONT	ILLINOIS SOUTH	IL
618353	FREBRG	ILLINOIS SOUTH	IL
618354	LEBANN	ILLINOIS SOUTH	IL
618355	NATHNS	ILLINOIS SOUTH	IL
618356	O'FALLON	ILLINOIS SOUTH	IL

Reporting Wire Center Nbr	Office Name	METRO Area Name	State ID
618357	PIONER	ILLINOIS SOUTH	IL
618377	BETHALTO	ILLINOIS SOUTH	IL
######	XXXXXXXXXX	UNDETERMINED	XX
#####2	XXXXXXXXXX	UNDETERMINED	XX
#####3	XXXXXXXXXX	UNDETERMINED	XX
#####4	XXXXXXXXXX	UNDETERMINED	XX
#####5	XXXXXXXXXX	UNDETERMINED	XX
#####6	XXXXXXXXXX	UNDETERMINED	XX
#####7	XXXXXXXXXX	UNDETERMINED	XX
#####8	XXXXXXXXXX	UNDETERMINED	XX
#####9	XXXXXXXXXX	UNDETERMINED	XX
#####1	XXXXXXXXXX	UNDETERMINED	XX

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been hand delivered or mailed to the following persons on this 10th day of August, 2001.

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