

Date Mailed June 29, 2001

BEFORE THE

PUBLIC SERVICE COMMISSION OF WISCONSIN

Administration of the Mechanisms of Price Regulation Pertaining to
Verizon North Incorporated on the Sixth Anniversary Date

2180-TI-135

FINAL DECISION

This decision establishes updated company-specific service quality benchmarks and performance ranges, determines prospective adjustments to the price cap index for Verizon North Incorporated (Verizon), and authorizes the amount by which Verizon may increase its rates or mandating the amount it shall reduce them.

Verizon is authorized to file tariffs that increase its rates by an average of 1.40 percent for price-regulated services. The quality of service benchmarks and performance ranges set forth in Appendix F shall be used in calculating the adjustment to the productivity offset on Verizon's anniversary date in the year 2002.

Background

On June 7, 2001, the Commission issued a Notice of Proceeding and Investigation and Assessment of Costs (Notice) in this docket. The Notice initiated an investigation to administer the mechanisms of price regulation pertaining to the amount that Verizon may increase or must decrease its rates for price-regulated services. The price cap index is the mechanism established by the legislature in 1993 Wisconsin Act 496 (Act 496) for setting reasonable rates in lieu of rate-of-return regulation. The Commission applies Wis. Stat. § 196.196(1)(c), and Wis. Admin.

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Code § PSC 163.04 to determine prospective adjustments in the price cap index. Under Wis. Stat. § 196.196(1)(a), price-regulated services include basic local exchange service as defined in Wis. Stat. § 196.01(1g), and standard business access lines and usage by small businesses with no more than three access lines.¹

In addition, the Commission initiated this proceeding to set new company-specific benchmarks for service quality to administer the mechanisms of price regulation pertaining to Verizon's anniversary date in the year 2002. Industry-wide service quality standards for price-regulated telecommunications utilities' anniversary dates in the year 2001 and 2002 were established in docket 05-TI-348.

Verizon's anniversary date is June 1. Pursuant to Wis. Admin. Code § PSC 163.04(8)(a), the Commission shall issue an order no later than 30 days after the utility's anniversary date authorizing the amount the utility may increase its rates or mandating the amount it shall reduce them. If a hearing is held, the time within which the Commission shall issue an order may be extended by 30 days.

A Notice was mailed to all parties listed on Appendix A. Any comments received have been considered in approving this final decision. No hearing was held in this docket and none was requested. As a result, this is not a Class 1 proceeding as defined in Wis. Stat. § 227.01(3)(a).

¹ In the order in docket 2180-TI-111, the Commission suspended the application of Wis. Stat. § 196.196(1)(a) to the extent that section regulates the provision of Basic Message Telecommunications Services.

Findings of Fact

1. The gross domestic product price index for the fourth quarter of 2000 was 107.75. This represented a 2.32 percent increase over the index value of 105.31 for the fourth quarter of 1999. It is reasonable to give approximately equal weight to each of the seven service quality components specified in Wis. Admin. Code § PSC 163.04(2)(c)2., so that the maximum increase in the productivity offset for each component is 0.05 or 0.06 percent.

2. Verizon's most recent actual performance for average time interval for installation, percent of trunks exceeding threshold, average employee answer time for repair calls, and average employee answer time for business office calls meets the industry-wide standard and the company-specific 3-year average performance.

3. Verizon's most recent actual performance for overall network quality fails to meet one of the dual industry-wide standards, but meets the company-specific 3-year average performance.

4. Verizon's most recent actual performance for speed of repair fails to meet one of the dual industry-wide standards, but meets the company-specific 3-year average performance.

5. Verizon's most recent actual performance for percent repeat trouble reports fails to meet the industry-wide standard and fails to improve upon the company's most recent 3-year average performance.

6. Verizon's performance as of December 31, 2000 in actual deployment of Asynchronous Digital Subscriber Lines (ADSL), a self-healing interoffice fiber ring and interoffice fiber as well as actual replacement of VIDAR switches met the thresholds set to receive a full incentive for infrastructure deployment.

7. Verizon met the threshold set for Wisconsin Advanced Telecommunications Foundation (WATF) contributions during 2000.

8. Based on the factors set forth in Wis. Admin. Code § PSC 163.04(2)(f), it is reasonable to grant Verizon a discretionary adjustment.

9. Based on Appendix E, it is reasonable to allow Verizon to increase its rates for price-regulated services by an average of 1.40 percent, so that its 3-year maximum actual price index (API), presently equal to 100.00, is no more than the authorized 3-year maximum price cap index (PCI) of 101.40.

10. The company-specific service quality benchmarks and performance ranges set forth in Appendix F are reasonable for use in calculating the adjustment to the productivity offset on Verizon's anniversary date in the year 2002.

Conclusion of Law

1. Verizon is a telecommunications utility, as defined in Wis. Stat. § 196.01, engaged in providing telecommunications service to the public.

2. Verizon is a price-regulated telecommunications utility as defined in Wis. Stat. § 196.196.

3. The productivity offset for Verizon is 2 percent.

4. The maximum increase in the productivity offset for quality of service for Verizon's anniversary date is 0.40 percent.

5. The total maximum increase in the productivity offset for infrastructure deployment for Verizon's 2001 anniversary date is 0.40 percent and the total maximum decrease is 0.80 percent.

6. The Commission has jurisdiction under Wis. Stat. § 196.196(1)(c) and Wis. Admin. Code ch. PSC 163 to issue an order establishing updated company-specific quality of service benchmarks and performance ranges, determining prospective adjustments to the price cap index for Verizon, and authorizing the amount by which Verizon may increase its rates or mandating the amount it shall reduce them.

Opinion

Under Wis. Stat. §§ 196.196(1)(c) and (cm), in determining the amount the utility may increase its rates or mandating the amount it shall reduce them, the Commission shall consider: (1) the annual percentage change in the Gross Domestic Product Price Index (GDPPI); (2) a statutory productivity factor offset; (3) an increase in the productivity offset for inadequate service or insufficient investment; and (4) a decrease in the productivity offset to encourage infrastructure investment. In determining the increase or decrease to the productivity offset, the Commission shall consider the extent to which Verizon has contributed to the WATF.

Gross Domestic Product Price Index (GDPPI)

According to Wis. Admin. Code § PSC 163.04(2)(a), the annual percentage change in GDPPI is calculated by using the most recent quarterly GDPPI index and the price index that was used in the calculation on the previous anniversary date. According to Wis. Admin. Code § PSC 163.02(4), GDPPI means the figure as reported by the U.S. Department of Commerce

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(USDOC) in its Survey of Current Business. As reported in the USDOC's April 2001 Survey of Current Business, the GDPPI chain-type index for the fourth quarter of 2000 was 107.75. This represented a 2.32 percent increase over the restated index value of 105.31 for the fourth quarter of 1999, which was used in order to reflect the revised GDPPI series.

Productivity Factor Offset

According to Wis. Stat. § 196.196(1)(c), the productivity offset is 2 percentage points for a telecommunications utility with less than 500,000 access lines at the time of electing to be price regulated. Since Verizon had less than 500,000 access lines as of January 1, 1995, the productivity offset for Verizon is 2 percent.

Increase in Productivity Offset for Inadequate Service

The service quality mechanism set forth in Wis. Admin. Code § PSC 163.04(2)(c), is based on comparing actual results to industry-wide standards and company-specific benchmarks. For Verizon's 2001 anniversary date, the maximum increase to the productivity offset for inadequate service specified in Wis. Admin. Code § PSC 163.04(2)(g) is 0.4 percent. The Commission finds that it is reasonable to give approximate equal weight to each of the seven service quality components specified in Wis. Admin. Code § PSC 163.04(2)(c)2., so that the maximum value for each component is either 0.05 or 0.06 percent.

The calculation of the sixth-year increase to the productivity offset for inadequate service is shown in Appendix B. Actual performance is compared against industry-wide standards, as well as against Verizon's most recent 3-year average performance and performance ranges as approved in the Commission's order in docket 2180-TI-133, dated June 29, 2000, (2180-TI-133

June Order). The performance ranges for all components represent a 10-percent range above and below the 3-year averages.

Overall Network Quality. The Commission's orders in dockets 05-TI-157 and 05-TI-248 established a two-part industry-wide standard for overall network quality. If a company fails to achieve either part of this standard, it fails to meet the industry-wide standard for this component. The first standard is that total company customer trouble reports for the calendar year may not exceed 20 troubles per 100 lines. This is equivalent to a monthly average of approximately 1.7 troubles per 100 lines. Verizon's 2000 performance met this standard.

The other industry-wide standard for overall network quality is based on trouble reports in each of Verizon's exchanges. No exchange may have more than five troubles per 100 lines in any three or more months during the calendar year. Eight of Verizon's exchanges each had unadjusted trouble report ratios of more than five troubles per 100 lines in three or more months of 2000. Since Verizon did not meet this part of the standard, it has failed to meet the industry-wide standard for this component. Based on this, and the fact that Verizon's overall network quality performance improved upon its 3-year average, according to Wis. Admin. Code § PSC 163.04(2)(c)7.a., an adjustment equal to 50 percent of 0.06 percent, or 0.03 percent, would be assessed for this component, increasing the productivity offset.

Wis. Admin. Code § PSC 163.04(2)(c)9. allows the Commission to waive all or a portion of any quality of service disincentive in the event of extraordinary circumstances which disrupt service, making it impossible for a company to achieve its benchmarks. Verizon requests that the disincentive for this component be waived, due to such extraordinary circumstances.

Verizon contends that none of its exchanges would have exceeded the exchange-specific trouble

standard, had it not been for trouble conditions occurring that were out of the Verizon's control. Exacerbating this situation is the relatively small number of customers in each of the eight exchanges. The causes of the troubles were primarily lightning hits and the actions of non-Verizon parties. Verizon proposes that, for purposes of determining whether this standard has been met, its trouble reports be adjusted to eliminate troubles out of its control caused by the customers themselves, weather (except moisture/wet), foreign workers (except Verizon contractors), vandalism, and certain miscellaneous causes. If these causes were excluded, Verizon would satisfy the standards for network quality in each of its exchanges.

The Commission denied a similar request by Verizon last year, finding that the exclusion of all weather-related troubles, or even all lightning-related troubles does not fit the Commission's interpretation of extraordinary circumstances. The Commission further found that Verizon could have prevented some troubles by replacing air core cable and analog carrier, and that there was a pattern of troubles at the same exchanges in a number of years.

To support its waiver request this year, Verizon has supplied more information. This information shows that the presence of air core cable and analog carrier did not substantially contribute to troubles in these exchanges.

In response to staff's request Verizon supplied information which aggregated the trouble report data for each of these eight exchanges with the other exchanges served by the same host-remote central office cluster. This aggregated data showed that, if troubles caused by vandalism, customers, or foreign workers are excluded, no Verizon host-remote clusters would exceed the five troubles per 100 threshold for three or more months. This calculation does not exclude any troubles caused by weather.

The Commission grants Verizon's request for a waiver. A combination of various factors during 2000, such as troubles caused by vandalism, customers, or foreign (non-Verizon) workers made it impossible for Verizon to achieve the benchmarks. This, combined with the fact that aggregated data showed that if troubles such as these are included or excluded, no Verizon host-remote clusters would fail to meet the standard, leads the Commission to find that no adjustment for the productivity offset should be made for this component.

Speed of Repair. This component has a dual industry-wide standard. One of those dual standards is that 95 percent of all routine out-of-service troubles be cleared within 24 hours for at least 10 months in any calendar-year period. Verizon has not met this standard, since it only exceeded 95 percent in nine months. The other standard is average time out of service. Verizon met this standard. However, since Verizon did not meet one of the dual standards, it has failed to meet the industry-wide standard for this component. Based on this fact, and the fact that Verizon's performance improved upon its 3-year average, according to Wis. Admin. Code § PSC 163.04(2)(c)7.a., an adjustment equal to 50 percent of 0.06 percent, or 0.03 percent, would be assessed for this component, increasing the productivity offset.

Verizon requests that this disincentive also be waived, pursuant to Wis. Admin. Code § PSC 163.04(2)(c)9. This request is based on Verizon's interpretation that troubles caused by factors not under its control should be excluded as nonroutine. If troubles caused by the customers themselves, weather (except moisture/wet), foreign workers (except Verizon contractors), vandalism, and certain miscellaneous causes are excluded, Verizon would have exceeded the 95 percent standard in 11 months. Verizon's calculation includes only troubles

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reported by the customer, and excludes troubles automatically detected by its switching equipment, which would likely inflate the percentage cleared within 24 hours.

In response to staff's request Verizon supplied information which excluded troubles caused by vandalism, customers, or foreign workers, but included troubles caused by weather. This calculation showed that Verizon would only meet the 95 percent standard in nine months.

The Commission denies Verizon's request for a waiver. The exclusion of all weather-related troubles, or even all lightning-related troubles does not fit the Commission's interpretation of nonroutine circumstances.

Average Employee Answer Time for Repair and Business Office Calls. Verizon's performance for average employee answer time for repair and business office calls met the industry-wide standard, and improved upon the company-specific performance range. Therefore, no adjustment to the productivity offset shall be imposed for these components.

Verizon points out that, because of such improvements, it will be held to a higher standard next year, due to the use of a 3-year average standard. Verizon requests that the Commission eliminate the 3-year average performance criteria as it related to average speed of answer for the business office and repair service.

While the Commission is sympathetic to this concern, Verizon's request is denied. The Commission is required by Wis. Admin. Code § PSC 163.04(2)(c)5. to evaluate service quality disincentives based on a combination of past company performance and industry-wide standards. The past company performance is to be based on a 3-year average. Changes to this provision are being considered in docket 1-AC-189. In the meantime, if Verizon misses these benchmarks, it has the opportunity to request a waiver under Wis. Admin. Code §§ PSC 163.04(2)(c)7.b., or 9.

Other Components. For average time interval for installation, and trunk blockage, Verizon's most recent performance meets the industry-wide standard and meets the company-specific 3-year average performance. Therefore, according to Wis. Admin. Code § PSC 163.04(2)(c)6.a., no adjustment to the productivity offset shall be assessed for these components.

Verizon's performance for percent repeat trouble reports fails to meet the industry-wide standard, and fails to meet the company-specific three-year average performance. Therefore, according to Wis. Admin. Code § PSC 163.04(2)(c)8.a., an adjustment equal to 100 percent of 0.06 percent shall be assessed for this component, increasing the productivity offset.

Adjustment to Productivity Offset for Infrastructure Investment

The calculation of the adjustment to the productivity offset for infrastructure investment applicable to Verizon's sixth year of price regulation is set forth in Appendix C. The calculation is based on comparing actual performance against thresholds approved in the 2180-TI-133 June Order.

Verizon met these thresholds. Based on Verizon's actual deployment of Asynchronous Digital Subscriber Line, interoffice fiber, a self-healing fiber interoffice fiber ring, and replacement of VIDAR switches during 2000, a total adjustment equal to 0.80 percent shall be granted, decreasing the productivity offset.

Wisconsin Advanced Telecommunications Foundation (WATF)

During 2000, Verizon met its WATF obligation by contributing \$432,907. Therefore, the Commission determines that no adjustment to the productivity offset shall be assessed for this

component. Verizon has completed its WATF obligation as established in its original price-reg filing.

Discretionary Adjustment to the Productivity Offset

According to Wis. Admin. Code § PSC 163.04(2)(f), in addition to the adjustments to the productivity offset for infrastructure investment, quality of service, and WATF as discussed previously, the Commission may also, at its discretion, increase or decrease the productivity offset by up to 0.1 percent for utilities with less than 500,000 access lines. To determine this discretionary adjustment, Wis. Admin. Code § PSC 163.04(2)(f) sets forth the factors the Commission may consider to the extent they relate to the utility's infrastructure investment and quality of service.

The Commission determines that Verizon should be assigned a discretionary decrease to the productivity offset of 0.10 percent. The Commission's determination is based on the extent to which the utility has reasonably complied with its annual commitment defined in its infrastructure investment plan, the extent to which the utility has established customer assistance programs and the effectiveness of those programs, and the level of customer satisfaction.

Verizon invested \$95.1 million in its infrastructure during 2000. This represents a 23 percent increase over the most recent 5-year average. Of this amount, \$22.2 million was invested in enhancements and technology advancement, such as interoffice fiber, digital carrier, and Internet. Since electing price regulation in 1995, Verizon has invested \$481 million in its infrastructure. This exceeded the high end of the range included in its commitment plan by \$191 million.

Verizon has taken positive steps to combat the cramming issue by continued enforcement of a tough anti-cramming policy to implement the best practices endorsed by the industry's anti-cramming task force. By doing this, Verizon continues to forgo revenues from unscrupulous billing and collection clients to protect its customers.

Customer satisfaction is based on the 458 complaints received by the Commission for the year 2000. Complaints received from Verizon customers decreased approximately 12 percent from 1999 to 2000.

Calculation of Price Cap Index

The calculation of the annual PCI based on the above determinations and Wis. Admin. Code § PSC 163.04 is shown in Appendix D. A summary of PCI and actual price index (API) values is shown in Appendix E.

It is reasonable, based on the calculations shown in Appendices D and E, that Verizon be allowed to increase its rates for price-regulated services an average of 1.40 percent as a result of the order in this docket, so that its three-year maximum API, presently equal to 100.00, is no more than the authorized three-year maximum PCI of 101.40. This index, when applied to current rates, determines the level of rates that is reasonable on a prospective basis, pursuant to Wis. Stat. § 196.196(1)(c) and Wis. Admin. Code § PSC 163.04.

Service Quality Benchmarks for Anniversary Date in the Year 2002

Pursuant to Wis. Adm. Code § PSC 163.04(2)(c)10., on each anniversary date, the Commission, following an opportunity for hearing, shall compute new industry-wide standards and company-specific benchmarks for service quality. These updated benchmarks shall be used

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in calculating the adjustment to the productivity offset for service quality on the next anniversary date.

Appendix F contains company-specific quality of service benchmarks and performance ranges for the five service quality components specified in Wis. Adm. Code § 163.04(2)(c)2. These benchmark ranges are to be used in calculating the adjustment to the productivity offset on Verizon's anniversary date in the year 2002. The benchmarks were computed using a 3-year average of data from 1998-2000. According to Wis. Admin. Code § PSC 163.04(2)(c)10.:

For purposes of computing the updated company-specific benchmarks and subject to a showing to the contrary, past performance for the most recent 3-year average shall meet or exceed past performance for the initial 3-year average.

For average time interval for installation, initial trouble reports, employee answer time for repair calls and business office calls, and average time out of service, the most recent 3-year average exceeded the initial 3-year average. For percent repeat troubles, the most recent 3-year average did not meet or exceed the initial 3-year average. No showing was made as to why these lower levels of quality of service should be reflected in the updated benchmarks. The benchmark for this component, therefore, was set at the initial 3-year average.

The performance ranges for all components represent a range 10-percent above and below the 3-year averages. The Commission finds the benchmarks and performance ranges set forth on Appendix F to be reasonable for use in calculating the adjustment to the productivity offset on Verizon's anniversary date in the year 2002.

Industry-wide standards to be used in calculating the adjustment to the productivity offset on Verizon's anniversary date in the year 2002 were established by the Commission in docket 05-TI-348.

Order

1. This order shall be effective on July 1, 2001.
2. Verizon may file tariffs that increase its rates by an average of 1.40 percent for price-regulated services so that its 3-year maximum actual price index is no more than the authorized 3-year maximum price cap index of 101.40.
3. The service quality benchmarks and performance ranges set forth in Appendix F shall be used in calculating the adjustment to the productivity offset on Verizon's anniversary date in the year 2002.

Dated at Madison, Wisconsin, _____

By the Commission:

Lynda L. Dorr
Secretary to the Commission

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See attached Notice of Appeal Rights

Notice of Appeal Rights

Notice is hereby given that a person aggrieved by the foregoing decision has the right to file a petition for judicial review as provided in Wis. Stat. § 227.53. The petition must be filed within 30 days after the date of mailing of this decision. That date is shown on the first page. If there is no date on the first page, the date of mailing is shown immediately above the signature line. The Public Service Commission of Wisconsin must be named as respondent in the petition for judicial review.

Notice is further given that, if the foregoing decision is an order following a proceeding which is a contested case as defined in Wis. Stat. § 227.01(3), a person aggrieved by the order has the further right to file one petition for rehearing as provided in Wis. Stat. § 227.49. The petition must be filed within 20 days of the date of mailing of this decision.

If this decision is an order after rehearing, a person aggrieved who wishes to appeal must seek judicial review rather than rehearing. A second petition for rehearing is not an option.

This general notice is for the purpose of ensuring compliance with Wis. Stat. § 227.48(2), and does not constitute a conclusion or admission that any particular party or person is necessarily aggrieved or that any particular decision or order is final or judicially reviewable.

Revised 9/28/98

APPENDIX A

This proceeding is not a contested case under Wis. Stat. ch. 227. Therefore there are no parties to be listed or certified under Wis. Stat. § 227.47. However, an investigation was conducted, and the persons listed below participated.

Public Service Commission of Wisconsin
(Not a party but must be served)
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

VERIZON NORTH INCORPORATED
Mr. Dan Matson
100 Communications Drive
P.O. Box 49
Sun Prairie, WI 53590

AMERITECH
Mr. Scott Jansen
722 North Broadway, 13th Floor
Milwaukee, WI 53202-4396

STATE OF WISCONSIN DEPARTMENT OF JUSTICE
Mr. Edwin J. Hughes
Assistant Attorney General
123 West Washington Avenue, P.O. Box 7857
Madison, WI 53707-7857

Verizon North Incorporated
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Disincentive for Inadequate Service
for Sixth Year of Price Regulation

Component	VERIZON Performance 2000	Industry- Wide Standard	3 Year Average Performance	Maximum of Performance Range	Disincentive
Average time interval for installation (days)	1.1	2.42	2.07	2.27	0.00%
Overall network quality:					
Trouble reports per 100 access lines	16.29	20.00	17.07	18.78	0.00%
Exchanges with more than 5 troubles per 100 lines for at least 3 months	8	0			
Speed of Repair:					
Average Time Out of Service (hours)	10.93	14.56	11.47	12.62	0.03%
Months with 95 or more percent of routine out-of-service troubles cleared within 24 hours	9	>=10			
Percent repeat trouble reports	15.29%	15.10%	14.82%	16.30%	0.06%
Average employee answer time for repair calls (seconds)	7.50	20.00	8.82	9.70	0.00%
Average employee answer time for business office calls (seconds)	28.60	60.00	35.65	39.21	0.00%
Percent of trunks exceeding threshold 3 consecutive months	0.000%	0.209%	0.073%	0.080%	0.00%
Total disincentive for inadequate service					0.09%

APPENDIX C

Verizon North Incorporated
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 Adjustment to Productivity Offset for Infrastructure
 Investment for Sixth Year of Price Regulation

Component	Actual 12/31/00	Productivity Offset Benchmarks						Infrastructure Investment Incentive (Disincentive)
		Disincentive	No Incentive or Disincentive	1/3 Incentive	½ Incentive	2/3 Incentive	Full Incentive	
Number of Central Offices with Availability, by Tariff Upon Customer Request of Asynchronous Digital Subscriber Line	14	<=3	4-6		7		8	0.08%
Number of Central Offices Served with Interoffice Fiber	188	<=181	182-185	186		187	188	0.28%
Self-Healing Interoffice Fiber Ring	1	0					1	0.08%
Replacement of VIDAR Switches	4	0	1-2				3	0.36%
Total Infrastructure Investment								0.80%

APPENDIX D

Verizon North Incorporated
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Calculation of Annual Price Cap Index

Annual Change in Gross Domestic Product Price Index		2.32%
Productivity Factor Offset	(2.00%)	
Adjustments to Productivity Offset:		
Service Quality (Appendix B)	(0.09%)	
Infrastructure Investment (Appendix C)	0.80%	
WATF	0.00%	
Commission Discretion	0.10%	(1.19%)
Total		1.13%
Annual Price Cap Index		101.13
+[1+▲GDPPI-PROD+INC-PEN]*100		

Verizon North Incorporated
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Summary of PCI and API Values

Annual PCI	101.13
Unadjusted Cumulative PCI	101.18
Three-Year Maximum PCI	101.40
Annual API	100.00
Unadjusted Cumulative API	99.77
Three-Year Maximum API	100.00
Allowed Rate Increase or (Required Decrease) ²	1.40%

² Since the 3-year maximum PCI is greater than the 3-year maximum API, Verizon may increase its rates for price-regulated services so that the 3-year maximum API does not exceed the 3-year maximum PCI.

APPENDIX F

Verizon North Incorporated
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Company Specific Service Quality Benchmarks
for Seventh Year of Price Regulation

Component	3-year Average Performance	Minimum of Performance Range	Maximum of Performance Range
Average Time Interval for Installation (days)	1.60	1.44	1.76
Trouble Reports per 100 Access Lines	16.85	15.17	18.53
Average Time Out of Service (hours)	11.83	10.65	13.02
Percent Repeat Trouble Reports	15.05%	13.55%	16.56%
Average Employee Answer Time for Repair Calls (seconds)	9.91	8.92	10.90
Average Employee Answer Time for Business Office Calls (seconds)	31.05	27.95	34.16
Percent of Trunks Exceeding Threshold 3 Months	0.085%	0.077%	0.094%

NOTE: In addition to the above company-specific service quality benchmarks, industry-wide standards also apply.