

Commonwealth of Pennsylvania  
Public Utility Commission

Pennsylvania Commercial Availability Review

Final Report – Metrics  
Version 1.1

Submitted by:



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## I. INTRODUCTION

KPMG Consulting, Inc. (KPMG Consulting) was retained by the Commonwealth of Pennsylvania Public Utility Commission (Pa. PUC) to assist in the Verizon Pennsylvania Commercial Availability Review. As directed by the Pa. PUC, KPMG Consulting performed the following two tasks: (1) an examination of metrics reports produced both by Verizon Pennsylvania and participating CLECs (“Metrics Study”) and (2) limited reviews and observations of selected provisioning processes (“Provisioning Study”). The Provisioning Study is provided under a separate file.

The following report provides a summary of the results of the Metrics Study. This Study is delivered to the Commissioners and Staff of the Pa. PUC as a work product of the Pennsylvania Commercial Availability Review, and is intended only for their informational needs. No reproduction or publication of this report is allowed without the consent of the Commonwealth of Pennsylvania Public Utility Commission.

## II. EXECUTIVE SUMMARY

The Metrics Study was performed using Carrier-to-Carrier (C2C) data supplied by Verizon Pennsylvania to KPMG Consulting, the participating CLECs, and the Pa. PUC Staff for the purpose of testing the commercial availability of Verizon Pennsylvania’s Operational Support Systems (OSS) and wholesale products. The study period covered the months of January, February, and March 2001. For each month of the study, the CLECs were asked to provide KPMG Consulting with issues related to the C2C reports. In collaboration with the Pa. PUC Staff, KPMG Consulting examined the issues raised by the CLECs and attempted to determine the causes of any identified discrepancies in results reported. The key points discovered during the study indicate: (1) we found no instances where CLEC-identified discrepancies with the Verizon Pennsylvania reported values could be fully substantiated; and (2) many differences between Verizon Pennsylvania and CLEC calculations appear to result from different interpretations of metric business rules and data inclusions and exclusions.

### III. APPROACH

The primary purpose of the Metrics Study was to compare information and data provided by the CLECs to the corresponding information and data supplied by Verizon Pennsylvania. To do this, KPMG Consulting planned to do the following:

- Assist the Pa PUC in developing ground rules that each party to the evaluation (Verizon Pennsylvania and CLECs) must follow in providing input during the Commercial Availability Period, which was designated as January 1, 2001, through March 31, 2001.
- Examine, with the assistance of the Pa. PUC staff, Carrier-to-Carrier (C2C) Metrics Reports provided by Verizon Pennsylvania to the Pa. PUC for the Commercial Availability Period.
- Examine, with the assistance of the Pa. PUC staff, corresponding CLEC reports provided for the same reporting months.
- Identify and confirm discrepancies, with the assistance of Pa. PUC staff, between the Verizon Pennsylvania C2C Reports and the corresponding CLEC reports, as alleged by the CLECs based upon submitted supporting data. KPMG Consulting was not responsible for the resolution of any issues identified as a result of this examination.
- Investigate with the assistance of the Pa. PUC Staff the causes of any identified discrepancies.

A key assumption of this study was that the CLECs were to provide their metrics report data to KPMG Consulting in the same format as the Verizon Pennsylvania C2C reports. However, the participating CLECs reported they could not provide data in the same format as Verizon Pennsylvania, creating a situation where automated replication was not possible within the time frame of our review. As a result, the Pa. PUC Staff together with KPMG Consulting met with the participating CLECs to develop a list of 25 Key Metrics for the study (see Attachment A) for which the CLECs agreed to provide data in templates developed by KPMG Consulting at the direction of the Pa. PUC Staff.

Subsequently, the participating CLECs provided additional metrics and data beyond the originally agreed upon list of 25. KPMG Consulting agreed to expand the scope of the study to include these additional metrics and a modified approach was designed. The modified approach of the Metrics Study was to compare information and/or data provided by the CLECs to the corresponding C2C Reports and the processed<sup>1</sup> data supplied by Verizon Pennsylvania. To accomplish this, KPMG Consulting planned to do the following:

- Receive the C2C reports and the processed data from Verizon Pennsylvania.
- Receive the data and/or information supplied by the CLECs.
- Identify discrepancies and/or differences, between the Verizon Pennsylvania information and the corresponding CLEC information.
- Investigate the cause(s) of any identified discrepancies(s) or difference(s).
- Document the finding(s) of our investigation.

As part of this study, KPMG Consulting has included in our analysis all the data provided by the participating CLECs. The purpose of the Metrics Study was to determine whether reported discrepancies between data provided by the CLECs and Verizon Pennsylvania could be confirmed. KPMG Consulting relied, in part, on the Metric business rules and definitions provided in the December 2000 *Pennsylvania Carrier-to-Carrier Guidelines Performance Standards and Reports* (C2C Guidelines) as a basis for a number of evaluations and findings.

#### **IV. RESPONSES FROM CLECS**

As indicated above, CLEC participation was required to perform the Metrics Study. Four CLECs responded with associated data and details asserting CLEC-calculated results that did not match Verizon Pennsylvania's calculated results for the same metric or sub-metric. Not all CLECs responded for each of the three months of the study. All participating CLECs provided from additional metrics not found on the List of 25 Key Metrics.

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<sup>1</sup> Processed data is data that has moved through Verizon Pennsylvania systems and is at the point where it is usable in metric calculations.

***1. Respondents with data results not equaling Verizon Pennsylvania's Carrier-to-Carrier (C2C) results for the first test month (January, 2001)***

**AT&T**

AT&T responded to Verizon Pennsylvania's January C2C Report indicating a difference in results for six sub-metrics. Those sub-metrics are:

- OR-1-04: Percent On-Time LSRC, Less Than 10 lines (No Flow through) – UNE-POTS and Platform
- PR-1-01: Average Interval Offered (No Dispatch) – INP, Hot Cuts, Platform, 2-wire xDSL Line Sharing
- PR-3-03: Percent Completed in 3 Days, 1-5 Lines (No Dispatch)
- PR-4-02: Average Delay Days (Total)
- PR-4-05: Percent Missed Appointment - Verizon Pennsylvania (No Dispatch) – Platform
- NP-1-01: Percent Final Trunk Group Blockage

**WorldCom**

WorldCom responded to Verizon Pennsylvania's January C2C Report indicating a difference in results of two metrics/sub-metrics. Those metrics/sub-metrics are:

- PO-2-02: OSS Interface Availability – Prime Time – Web-GUI Pre-ordering and Maintenance
- BI-4-01: Percent Usage Accuracy

**2. Respondents with data results not equaling Verizon Pennsylvania's Carrier-to-Carrier (C2C) results for the second test month (February, 2001)**

**AT&T**

AT&T responded to Verizon Pennsylvania's February C2C Report indicating a difference in results of five sub-metrics. Those sub-metrics are:

- OR-6-01: Percentage Accuracy – Orders
- PR-1-01: Average Interval Offered (No Dispatch) – INP, Hot Cuts, Platform, 2-wire xDSL Line Sharing
- PR-2-01: Average Interval Completed (No Dispatch) – INP, Hot Cuts, Platform, 2-wire xDSL Line Sharing
- PR-9-01: Percent on Time Performance – Hot Cuts
- BI-4-01: Percent Usage Accuracy

**WorldCom**

WorldCom responded to Verizon Pennsylvania's February C2C Report indicating a difference in results of three metrics/sub-metrics. Those metrics/sub-metrics are:

- PO-2-02: OSS Interface Availability – Prime Time – Web-GUI Pre-ordering and Maintenance
- BI-2-01: Timeliness of Carrier Bill
- BI-4-01: Percent Usage Accuracy

WorldCom also submitted one additional sub-metric (OR-3-01) not found on the List of 25 Key Metrics, plus data relative to issues with Billing Completion Notification (BCN). KPMG Consulting reviewed the additional sub-metric and BCN issues. In part because of the lack of a BCN metric in the December 2000 C2C Guidelines, KPMG Consulting was not able to draw any conclusions about the BCN issues raised.

**XO Pennsylvania, Inc.**

XO Pennsylvania, Inc. (XO) responded to Verizon Pennsylvania's February C2C Report indicating a difference in results of three metrics/sub-metrics from the List of 25 Key Metrics. Those metrics/sub-metrics are:

- OR-6-01: Percent Accuracy – Orders
- OR-6-03: Percent Accuracy – Local Service Request Confirmation – UNE
- PR-6-01: Percent Install Troubles Reported in 30 Days – xDSL Loop

XO also submitted two additional sub-metrics (OR-2-04 and PR-6-02) not found on the List of 25 Key Metrics. They also raised Firm Order Confirmation completeness and relevancy issues.

**Covad Communications Company**

Covad Communications Company responded to Verizon Pennsylvania's February C2C Report indicating a difference in results of seven metrics/sub-metrics from the List of 25 Key Metrics. Those metrics/sub-metrics are:

- PR-2-01: Average Interval Completed (No Dispatch) – INP, Hot Cuts, Platform, 2-wire xDSL Line Sharing
- PR-2-02: Average Interval Completed (Total Dispatch) – xDSL Loops
- PR-3-03: Percent Completed in 3 Days 1-5 Lines – No Dispatch
- PR-3-10: Percent Completed in 6 Days 1-5 Lines (Total) – xDSL Loop
- PR-4-02: Average Delay Days (Total)
- PR-4-05: Percent Missed Appointment – Verizon Pennsylvania (No Dispatch) – Platform
- PR-6-01: Percent Install Troubles Reported in 30 Days – xDSL Loop

Covad Communications Company also submitted an additional sub-metric (MR-2-02) and several metrics not found on the List of 25 Key Metrics plus completeness and relevancy issues.

### ***3. Respondents with data results not equaling Verizon Pennsylvania's Carrier-to-Carrier (C2C) results for the third test month (March, 2001)***

#### **AT&T**

AT&T responded to Verizon Pennsylvania's March C2C Report indicating no differences in results from the List of 25. However, AT&T submitted two sub-metrics (OR-5-01 & OR-5-03) not found on the List of 25 Key Metrics, and raised BCN issues.

#### **WorldCom**

WorldCom responded to Verizon Pennsylvania's March C2C Report indicating a difference in results of three metrics/sub-metrics. Those metrics/sub-metrics are:

- PO-2-02: OSS Interface Availability – Prime Time – Web-GUI Pre-ordering and Maintenance
- BI-2-01: Timeliness of Carrier Bill
- BI-4-01: Percent Usage Accuracy

WorldCom also submitted two additional sub-metrics (OR-3-01 & OR-4-02) not found on the List of 25 Key Metrics. In addition, they raised Completion Notification flow-through and completeness issues.

## **V. REVIEW OF DATA RECEIVED FROM CLECS**

For each month of the study, CLECs were asked to provide KPMG Consulting with issues related to the January, February, and March 2001 C2C Reports. In some instances, raw report data supporting the allegations were supplied. This data was reviewed by KPMG Consulting and where possible was used in the process of assessing the issues raised. The following tables list the results of our investigation for each metric examined in the study.

**Table V-1: Pre-Ordering**

<b>Metric</b>	<b>CLEC</b>	<b>CLEC Issue</b>	<b>Month</b>	<b>KPMG Consulting Findings</b>
PO-1	AT&T	AT&T states that Verizon Pennsylvania has problems with their LNP orders	January	AT&T provided negative comments in written format, but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.
PO-2	AT&T	AT&T states that Verizon Pennsylvania has problems with their OSS interface	January	AT&T provided negative comments in written format, but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
PO-2-02	WorldCom	WorldCom reviewed Verizon Pennsylvania’s reporting on PO-2-02 (OSS Interface Availability), which is only reported on a CLEC Aggregate basis. In Verizon Pennsylvania’s C2C Report, the Prime Time Web GUI (pre-order) for PA was reported available 99.89% of the time. Based on its calculations, WorldCom claims that Verizon Pennsylvania failed to meet the standard in both January and February 2001. WorldCom calculated a value of 84.54% in February for this metric and provided an attachment to support its calculation.	January, February, March	Although Verizon and WorldCom use the same high-level business rule, KPMG Consulting found a mismatch in the calculations. Verizon factors in the number of “boxes” (i.e., transaction processors) shown on the C2C Report. WorldCom did not factor in the number of boxes and therefore the value WorldCom calculated for PO-2-02 is different from the value reported by Verizon.

Table V-2: Ordering

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
OR-1-04	AT&T	AT&T states that Verizon Pennsylvania understated this metric. AT&T states the value should be 90.02 while Verizon Pennsylvania reported 90.3	January	Verizon Pennsylvania supplied considerably more orders than did AT&T. In addition, AT&T showed two orders as confirmed when Verizon Pennsylvania showed the same two orders as rejected. The reason for this mismatch in data can only be determined by performing data integrity analysis on both Verizon Pennsylvania and AT&T data sets.
OR-2-02	WorldCom	WorldCom states that Verizon Pennsylvania overstated the actual number of observations and understated the actual the number of rejects.	January, February	This is similar to AT&T's issue with the ordering metrics. KPMG Consulting found that Verizon Pennsylvania's data set did not match the data set provided by WorldCom. Data integrity analysis would need to be performed on both the WorldCom and Verizon Pennsylvania data to determine why this mismatch occurs.
OR-2-04	WorldCom	WorldCom states that Verizon Pennsylvania overstated the actual number of observations and understated the actual the number of rejects.	January, February	This is similar to AT&T's issue with the ordering metrics. KPMG Consulting found that Verizon Pennsylvania's data set did not match the data set provided by WorldCom. Data integrity analysis would need to be performed on both the WorldCom and Verizon Pennsylvania data to determine why this mismatch occurs.
OR-2-04	XO	XO points out that Verizon Pennsylvania did not meet the standard.	February	See Above

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
OR-3-01	WorldCom	WorldCom states that their data showed significantly more observations than did the data from Verizon Pennsylvania.	January, February, March	This is similar to AT&T's issue with the ordering metrics. KPMG Consulting found that Verizon Pennsylvania's data set did not match the data set provided by WorldCom. Data integrity analysis would need to be performed on both the WorldCom and Verizon Pennsylvania data to determine why this mismatch occurs.
OR-4-01	AT&T	AT&T states that Verizon Pennsylvania understated this metric. AT&T states the value should be 85% while Verizon Pennsylvania reported 100%	January	Verizon Pennsylvania supplied considerably more orders as part of its metrics data set than did AT&T. This is the same data set as used to calculate OR-1-04. In addition, AT&T showed two orders as confirmed when Verizon Pennsylvania showed the same two orders as rejected. The reason for this mismatch in data can only be determined by performing data integrity analysis on both Verizon Pennsylvania and AT&T data sets.
OR-4-02	WorldCom	WorldCom states that Verizon Pennsylvania did not capture 6500 orders.	January, February, March	This is similar to AT&T's issue with the ordering metrics. KPMG Consulting found that Verizon Pennsylvania's data set did not match the data set provided by WorldCom. Data integrity analysis would need to be performed on both the WorldCom and Verizon Pennsylvania data to determine why this mismatch occurs.
OR-5	AT&T	AT&T states that their experience is lower than the CLEC industry average.	January, March	Based on the data we've received from Verizon, KPMG Consulting believes Verizon's reported value to be correct. Data integrity analysis would need to be performed on both Verizon and AT&T data sets in order to determine why Verizon and AT&T differ in their calculation.

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
OR-6	AT&T	AT&T states that Verizon Pennsylvania failed to meet the standard.	January	AT&T provided negative comments in a written format, but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.
OR-6-01	XO	XO points out that Verizon Pennsylvania did not meet the standard.	February	XO's complaint seems to be based on the "remedies" report. This project concerns itself with the data from the C2C Report. In addition, XO did not provide data for comparison to the Verizon Pennsylvania reported results.
OR-6-03	XO	XO stated that their data showed 87% completeness and Verizon Pennsylvania showed it to be 97%.	February	Verizon Pennsylvania does use sampling with this metric. It is not the intention of this report to address the sampling methodology used by Verizon Pennsylvania in calculating this metric.

**Table V-3: Provisioning**

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
PR-1	AT&T	AT&T states that Verizon Pennsylvania understated this metric. AT&T states the value should be 2.75 days while Verizon Pennsylvania reported 1.65 days.	January	Verizon Pennsylvania uses an internal field to create the extract used to calculate the Provisioning metrics. AT&T does not have access to this data and therefore the data set used by Verizon Pennsylvania differs from that used by AT&T. This results in a difference in all provisioning metrics. This internal field used by Verizon Pennsylvania is the CRIS date. A complete description of the issue surrounding CRIS date can be found on page 608 of the PA Final Report dated December 22, 2000. In addition, it is questioned why this is a measure defined by parity requirements; Verizon Pennsylvania does not have a structurally equal product with matching data.
PR-2	Covad	Covad points out that Verizon Pennsylvania did not achieve parity with retail. In addition, Covad claims Verizon Pennsylvania must have manipulated data.	January, February	Verizon Pennsylvania uses an internal field to create the extract used to calculate this metric. Covad does not have access to this data and therefore the data set used by Verizon Pennsylvania differs from that used by Covad. This results in a difference in all provisioning metrics. This internal field used by Verizon Pennsylvania is the CRIS date. A complete description of the issue surrounding CRIS date can be found on page 608 of the PA Final Report dated December 22, 2000.

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
PR-2-01	Covad	Covad states that Verizon Pennsylvania understated the number of line sharing arrangements as well as the actual metric value	January, February	Verizon Pennsylvania uses an internal field to create the extract used to calculate this metric. Covad does not have access to this data and therefore the data set used by Verizon Pennsylvania differs from that used by Covad. This results in a difference in all provisioning metrics. This internal field used by Verizon Pennsylvania is the CRIS date. A complete description of the issue surrounding CRIS date can be found on page 608 of the PA Final Report dated December 22, 2000.
PR-3-03	AT&T	AT&T states that Verizon Pennsylvania understated this metric. AT&T states the value should be 84.23 % while Verizon Pennsylvania reported 97.87%.	January	Verizon Pennsylvania uses an internal field to create the extract used to calculate the Provisioning metrics. AT&T does not have access to this data and therefore the data set used by Verizon Pennsylvania differs from that used by AT&T. This results in a difference in all provisioning metrics. This internal field used by Verizon Pennsylvania is the CRIS date. A complete description of the issue surrounding CRIS date can be found on page 608 of the PA Final Report dated December 22, 2000.

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
PR-3-03	Covad	Covad states that Verizon Pennsylvania understated the number of line sharing arrangements as well as the actual metric value	January, February	Verizon Pennsylvania uses an internal field to create the extract used to calculate this metric. Covad does not have access to this data and therefore the data set used by Verizon Pennsylvania differs from that used by Covad. This results in a difference in all provisioning metrics. This internal field used by Verizon Pennsylvania is the CRIS date. A complete description of the issue surrounding CRIS date can be found on page 608 of the PA Final Report dated December 22, 2000.
PR-3-10	Covad	Covad points out that Verizon Pennsylvania did not achieve parity with retail. In addition, Covad claims Verizon Pennsylvania must have manipulated data.	February	Verizon Pennsylvania uses an internal field to create the extract used to calculate this metric. Covad does not have access to this data and therefore the data set used by Verizon Pennsylvania differs from that used by Covad. This results in a difference in all provisioning metrics. This internal field used by Verizon Pennsylvania is the CRIS date. A complete description of the issue surrounding CRIS date can be found on page 608 of the PA Final Report dated December 22, 2000.

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
PR-3-11	Covad	Covad states that Verizon Pennsylvania understated the number of line sharing arrangements as well as the actual metric value	January, February	Verizon Pennsylvania uses an internal field to create the extract used to calculate this metric. Covad does not have access to this data and therefore the data set used by Verizon Pennsylvania differs from that used by Covad. This results in a difference in all provisioning metrics. This internal field used by Verizon Pennsylvania is the CRIS date. A complete description of the issue surrounding CRIS date can be found on page 608 of the PA Final Report dated December 22, 2000. In addition, Covad did not supply any supporting data.
PR-4-02	AT&T	AT&T states that Verizon Pennsylvania overstated this metric. AT&T states the value should be 3.4 days while Verizon Pennsylvania reported 4 days. In addition, AT&T stated that it submitted 10 orders while Verizon Pennsylvania only reported 2.	January	Verizon Pennsylvania uses an internal field to create the extract used to calculate this metric. AT&T does not have access to this data and therefore the data set used by Verizon Pennsylvania differs from that used by AT&T. This results in a difference in all provisioning metrics. This internal field used by Verizon Pennsylvania is the CRIS date. A complete description of the issue surrounding CRIS date can be found on page 608 of the PA Final Report dated December 22, 2000.
PR-4-02	Covad	Covad states that Verizon Pennsylvania performed poorly in this metric.	January, February	Covad provided negative comments in a written format, but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
PR-4-05	AT&T	AT&T states that Verizon Pennsylvania understated this metric. AT&T states the value should be 1.8 % while Verizon Pennsylvania reported 0.27%.	January	Verizon Pennsylvania uses an internal field to create the extract used to calculate the Provisioning metrics. AT&T does not have access to this data and therefore the data set used by Verizon Pennsylvania differs from that used by AT&T. This results in a difference in all provisioning metrics. This internal field used by Verizon Pennsylvania is the CRIS date. A complete description of the issue surrounding CRIS date can be found on page 608 of the PA Final Report dated December 22, 2000.
PR-4-05	Covad	Covad states that Verizon Pennsylvania performed poorly in this metric.	January, February	Covad provided negative comments in a written format, but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.
PR-5-01	Covad	Covad states that the metric understates the actual lack of facilities problem by excluding those loops that have not been provisioned.	January	Verizon Pennsylvania uses an internal field to create the extract used to calculate this metric. Covad does not have access to this data and therefore the data set used by Verizon Pennsylvania differs from that used by Covad. This results in a difference in all provisioning metrics. This internal field used by Verizon Pennsylvania is the CRIS date. A complete description of the issue surrounding CRIS date can be found on page 608 of the PA Final Report dated December 22, 2000.

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
PR-6-01	Covad	Covad states that Verizon Pennsylvania did not achieve parity and that their metric calculation is incorrect	January, February	Verizon Pennsylvania uses an internal field to create the extract used to calculate this metric. Covad does not have access to this data and therefore the data set used by Verizon Pennsylvania differs from that used by Covad. This results in a difference in all provisioning metrics. This internal field used by Verizon Pennsylvania is the CRIS date. A complete description of the issue surrounding CRIS date can be found on page 608 of the PA Final Report dated December 22, 2000.
PR-6-01	XO	XO points out that Verizon Pennsylvania did not meet the standard.	February	XO provided negative comments in a written format, but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.
PR-6-02	XO	XO points out that Verizon Pennsylvania did not meet the standard.	February	XO provided negative comments in a written format, but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.

**Table V-4: Maintenance & Repair**

<b>Metric</b>	<b>CLEC</b>	<b>CLEC Issue</b>	<b>Month</b>	<b>KPMG Consulting Findings</b>
MR-2-02	Covad	Covad states that the metric understates the actual lack of facilities problem by excluding those loops that have not been provisioned.	January	Covad provided negative comments in written format but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.
MR-4	Covad	Covad states that Verizon Pennsylvania did not achieve parity.	January, February	Covad provided negative comments in written format but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.

**Table V-5: Network Performance**

<b>Metric</b>	<b>CLEC</b>	<b>CLEC Issue</b>	<b>Month</b>	<b>KPMG Consulting Findings</b>
NP-1-01	AT&T	AT&T states that the blockage on dedicated final trunk groups is disturbing and discriminatory.	January, February	AT&T provided negative comments in written format, but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.

Table V-6: Billing

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
BI-2	WorldCom	WorldCom states that Verizon Pennsylvania sent bills on time only 50% of the time	February, March	Data integrity analysis would need to be performed on both Verizon Pennsylvania and WorldCom data to confirm the reported discrepancy.
BI-3	WorldCom	WorldCom states that Verizon Pennsylvania's bills are not presented in an agreed-upon format. Therefore, WorldCom is unable to calculate this metric.	January, February	WorldCom provided negative comments in written format but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.
BI-4	WorldCom	WorldCom states that Verizon Pennsylvania reported 100% accuracy when their data showed it to be 93.64%.	January, March	Data integrity analysis would need to be performed on both Verizon Pennsylvania and WorldCom data to confirm the reported discrepancy.
BI-4-01	AT&T	AT&T states that only 80% of the DUF orders attributed to them are actually theirs.	January	Although AT&T says Verizon Pennsylvania's reported value does not match AT&T's experience, AT&T does not provide it's own value and therefore no comparison is possible.
BI-6	WorldCom	WorldCom states that Verizon Pennsylvania's bills are not presented in an agreed-upon format. Therefore,	January, February	WorldCom provided negative comments in written format but did not challenge the reported results and did not provide data for comparison to the Verizon Pennsylvania reported results.

Metric	CLEC	CLEC Issue	Month	KPMG Consulting Findings
		WorldCom is unable to calculate this metric.		
BI-6-02	WorldCom	WorldCom states that Verizon Pennsylvania should have been reporting this metric	January	Verizon Pennsylvania has reported this metric as Under Review (UR).
BI-7-01	WorldCom	WorldCom states that Verizon Pennsylvania should have been reporting this metric	January	Verizon Pennsylvania has reported this metric as Under Review (UR).
BI-7-02	WorldCom	WorldCom states that Verizon Pennsylvania should have been reporting this metric	January	Verizon Pennsylvania has reported this metric as Under Review (UR).
BI-8-02	WorldCom	WorldCom states that Verizon Pennsylvania should have been reporting this metric	January	Verizon Pennsylvania has reported this metric as Under Review (UR).

## VI. CONCLUSIONS

- Based on the data made available to KPMG Consulting, we found no instances where CLEC-identified discrepancies with the Verizon-Pennsylvania-reported values could be fully substantiated.
- Data and calculations vary between Verizon Pennsylvania and the CLECs. Metric business rule interpretations appear to be one root cause for apparent differences in results. Furthermore, variances in systems, processes, methods, and expectations contribute to what are, essentially, misunderstandings between the Verizon Pennsylvania and CLECs regarding how to interpret data and produce common metric values.
- Many issues identified by the CLECs were not accompanied by supporting data. KPMG Consulting could not perform any analysis of such issues.
- Some discrepancies may result from different data collection and analysis mechanisms used by Verizon Pennsylvania and the CLECs. Substantiation of these discrepancies could only be accomplished through a thorough review of the CLEC data and storage mechanisms and data integrity together with full replication of CLEC calculations. Such analysis was not possible because of the format in which data were provided by the CLECs and the time constraints of this engagement<sup>2</sup>.
- Some data that is necessary for the calculation of C2C metrics according to the metric business rules is available only to Verizon Pennsylvania; e.g., CRIS data.
- Timing of when a record completes and becomes available for reporting purposes causes discrepancies in count and completion dates between the Verizon Pennsylvania and the CLEC data.

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<sup>2</sup> KPMG Consulting estimates that it could take between six and twelve months to perform such an analysis.

## ***Attachment A***

### **CRITERIA USED FOR DEVELOPMENT OF THE LIST OF 25 METRICS**

KPMG Consulting and the Pa. PUC Staff did not intend inclusion or exclusion of a metric on the list to be interpreted as a positive or negative statement regarding any of the non-selected metrics' applicability or appropriateness. No inference of quality or content is directly or indirectly implied by inclusion/exclusion of a metric/sub-metric on the List of 25 Key Metrics for Review.

The following criteria (in order of weight) were applied to the development of the List of 25 Key Metrics:

- CLEC input regarding desired metrics for the review
- Metrics with the highest levels of activity
- Presence of a measurable standard
- Results from previous Carrier-to-Carrier (C2C) Report indicating standard not met (not in compliance)
- Metrics previously identified as problematic
- Metrics relative to products the Pa. PUC and or FCC have indicated interest in or concern with

### **FINAL LIST OF 25 KEY METRICS FOR REVIEW**

1. PO-1-01: Average Response Time Customer Service Record – Web GUI
2. PO-1-04: Average Response Time Product & Service Availability – Web GUI
3. PO-1-06: Average Response Time Facility Availability (ADSL Loop Qualification) – Web GUI

4. PO-2-02: OSS Interface Availability – Prime Time – Web-GUI Pre-ordering and Maintenance
5. OR-1-04: Percent On Time LSRC, Less Than 10 lines (No Flow through) – UNE-POTS and Platform
6. OR-6-01: Percent Accuracy – Orders
7. OR-6-03: Percent Accuracy – Local Service Request Confirmation – UNE
8. PR-1-01: Average Interval Offered (No Dispatch) – INP, Hot Cuts, Platform, 2-wire xDSL Line Sharing
9. PR-2-01: Average Interval Completed (No Dispatch) – INP, Hot Cuts, Platform, 2-wire xDSL Line Sharing
10. PR-2-02: Average Interval Completed (Total Dispatch) – xDSL Loops
11. PR-3-03: Percent Completed in 3 Days, 1-5 Lines (No Dispatch)
12. PR-3-01: Percent Completed in 6 Days, 1-5 Lines (Total) – xDSL Loop
13. PR-4-02: Average Delay Days (Total)
14. PR-4-05: Percent Missed Appointment – Verizon Pennsylvania (No Dispatch) – Platform
15. PR-5-01: Percent Missed Appointment – Verizon Pennsylvania – Facilities
16. PR-6-01: Percent Install Troubles Reported in 30 Days – xDSL Loop
17. PR-8-01: Open Orders in a Hold Status for More Than 30 Days – Platform
18. PR-9-01: Percent On Time Performance – Hot Cuts
19. MR-4-02: Mean Time to Repair – Loop trouble – Platform, UNE loops
20. MR 4-03: Percent Missed Appointment Customer – xDSL Loop and Line Sharing
21. MR 4-04: Percent Cleared Trouble Reports within 24 Hours – xDSL Loop and Line Sharing
22. MR 5-01: Percent Repeat Trouble Reports within 30 Days – xDSL Loop and Line Sharing
23. NP-1-01: Percent Final Trunk Group Blockage<sup>3</sup>

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<sup>3</sup> This metric was included in the list although no standard has been established.

- 24. BI-2-01: Timeliness of Carrier Bill
- 25. BI-4-01: Percent Usage Accuracy