JOINT PROPOSAL

1. Voluntary Number Pooling

(a) FTR shall abide by any Commission order regarding voluntary or mandatory number pooling (e.g., Case 98-C-0689).

(b) FTR will, by the Approval period, begin Best efforts to implement voluntary 1,000 telephone number block pooling with all interested carriers to the maximum extent possible, consistent with national and New York State telephone number pooling guidelines.

(c) FTR will, no later than July 1, 2000, establish voluntary 1,000 telephone number block telephone number pooling in FTR's operating territory for the general sharing of telephone numbers among qualified carriers in assigned central office exchange codes in the 7 16 Numbering Plan Area (i.e., area code). This will include any central office exchange codes that may be assigned in any relief area code(s) in the current 716 area code.

(d) By the Approval period, FTR will convene and participate in a committee of interested carriers to initiate telephone number pooling among carriers.

(e) Voluntary number pooling shall be subject to oversight by the Commission.

2. Number Portability

(a) FTR has committed to and will continue to allow customers who wish to change local telephone carriers to retain their telephone numbers, without additional charge, when moving within a rate center.

(b) By December 3 1, 2000, FTR will permit FTR customers to retain their telephone numbers, without additional charge, when moving within a rate center.

3. Lifeline Services

(a) FTR will, by the Approval period, encourage the increase of Lifeline subscribership throughout its service territory as follows:

1. FTR will, by the Approval period, file tariff modifications to provide for an increase in the existing flat rate discount of Lifeline Service from $1.75 per month to $4.11 per month until the deferral is fully amortized; thereafter the discount will be $3.50 per month unless modified by the Commission or the FCC. (See, Case 94-C-0095 and Case 28425, <u>Order Directing Local Exchange Companies to Apply Deferred Accounting to Certain Intrastate Revenues,</u> issued December 24, 1997).

2. For each county in FTR's operating territory, FTR will, by the Approval period, begin working with counties in its service territory to establish a routine automatic verification program using a tape-to-tape match process with a county's Department of Social Services (or a corresponding state agency if the county so desires). The purpose of the program is to verify eligibility of Lifeline customers, identify additional eligible individuals, and connect or convert these individuals to Lifeline service. Within ninety (90) days following receipt of a suitable tape from the respective county or state agency, FTR will identify and begin converting those individuals that reside in its operating territory.

3. FTR will, twice a year, inform its residential customers in a monthly bill message of the existence of Lifeline service along with a telephone number to call for additional information.

4. FTR will track and record in a separate operating expense sub-account any monies used to administer and/or promote subscribership of Lifeline services and related actions thereto.

4. <u>Gross Revenue Surcharge</u>

(a) FTR may, by the Approval period, file any necessary tariff revisions to its local exchange tariffs in order to recoup, on a prospective basis, the appropriate Gross Revenue Taxes applicable to FTR's customer charges. Customer bills reflecting any revised Gross Revenue Surcharges shall contain an explanation for the revisions, which shall be subject to staff approval.

(b) Subsequent to the Approval period, FTR's Gross Revenue Surcharges ("GRS") shall reflect changes in state tax rates and state tax law as follows:

1. If the Gross Receipts Tax ("GRT") rate is increased or decreased during the OMP, the GRS will be adjusted to flow through the increase or the decrease.

2. If the GRT is replaced by a state income tax, FTR will flow the impact back to customers through the GRS, and if appropriate, rename the GRS as an income tax surcharge. If there is a transition from the GRT to a state income tax, FTR will use the GRS to flow through the transition, year by year, until it is completed (or until the OMP expires, whichever is later).

   (i) If the (hypothetical) income tax rate is subsequently raised, surcharged or lowered in a manner that specifically applies to utilities, FTR will again flow through the change using the GRS.

   (ii) If the (hypothetical) income tax rate is subsequently raised, surcharged, or lowered across the board for all companies subject to the income tax, the impact (positive or negative) will be absorbed by FTR's owners/shareholders and not reflected in rates or the GRS.

5. Left-In Dial Tone

(a) FTR will, by December 3 1, 2000, provide left-in dial tone ("Soft dial tone") on all residential access lines in the following situations:

1. All lines terminated for non-payment of charges;
2. All lines on seasonal disconnect; and
3. All lines disconnected at a customer's request.

(b) Soft dial tone will remain on each access line in the situations defined above for a period of six (6) months from the initial date of FTR action defined in paragraph (a), above. However, FTR may remove Soft dial tone from a given access line sooner than the end of the six-month (6-month) period, if the facilities are required to serve a customer (either FTR's or a CLEC's). FTR will use its Best efforts to add facilities to generally avoid shortening the six-month (6-month) period.

6. Route Diversity

(a) FTR shall configure its network such that by December 3 1, 2003 (regardless of whether or not the OMP is modified or terminated by the Commission before that date) all of FTR's central offices will have alternate access for switched traffic to the interoffice network using either of the following two methods:

1. Two cables with geographically diverse routes. Fixed cellular backup for access to emergency services will also be provided where radio coverage is or becomes available, if diverse routing will not be provided within one year of when radio coverage becomes available.

2. Two cables with geographically diverse routes and automatic protection switching. Fixed cellular backup for access to emergency service will also be provided where radio coverage is or becomes available, if diverse routing will not be provided within one year of when radio coverage becomes available.

7. Retail Service Quality

(a) The Retail Service Quality plan (service/floor levels, penalties, etc.) in the OMP will remain in full force and effect until December 31, 2004. The plan continues to include FTR's retail "Count on Us" program and other modifications thereto (e.g., Case 93-C-0103, et al, Order Approving Proposed Modifications to the Open Market Plan, issued October 16, 1998). The retail service quality requirements, and modifications thereto, will remain in full force and effect whether or not the OMP is modified or terminated by the Commission before December 3 1, 2004.

(b) Service levels or floor levels under the Retail Service Quality plan will remain at the service level of eighty-nine percent (89%) from January 1, 2001 until December 31, 2004, whether or not the OMP is modified or terminated by the Commission before December 3 1, 2004.

(c) All penalties pursuant to Retail Service Quality plan and modifications thereto currently in place when the Joint Proposal is approved will remain in effect, except as follows:

1. The annual penalty associated with a failure to achieve a service level or floor level of eighty-eight percent (88%) in year 2000 and a level of eighty-nine percent (89%) in 2001 (and thereafter) will increase upon the Approval date from seven million dollars ($7,000,000) to nine million dollars ($9,000,000) during the term of the OMP;

2. If the OMP is terminated prior to December 3 1, 2004, then the nine million-dollar ($9,000,000) penalty will revert back to the current seven million-dollar ($7,000,000) amount through December 3 1, 2004, as noted above.

8. Depreciation

(a) Effective January 1, 2000, FTR will reduce depreciation expense by $8.4 million annually by stopping the depreciation reserve deficiency amortization that the company has been recording since 1992 on the books it maintains for reporting to the Commission.

(b) FTR shall file a completed, full depreciation reserve requirement study by August 3 1, 2004.

(c) If a notice or other process is issued to examine whether or not the Commission should modify or terminate the OMP pursuant to the terms stated herein, FTR shall file a completed, full depreciation reserve requirement study within four (4) months of the issuance of such notice or process. At the same time, staff will conduct its own study.

(d) Staff and FTR agree to conduct meetings to discuss the results of both studies, and to determine if FTR is depreciating its telephone plant at the proper levels and what adjustments to depreciation rates, if any, might be warranted on the books FTR maintains for reporting to the Commission.

(e) In the year 2000, FTR will perform depreciation reserve requirement studies, utilizing year-end 1999 data, for Frontier Communications of Ausable Valley, Inc., Frontier Communications of New York, Inc., and Frontier Communications of Sylvan Lake, Inc. At the same time, staff will perform its own studies of these companies.

(f) Staff and FTR agree to conduct meetings during the year 2000, to determine if the companies defined in (e), above, are depreciating their telephone plant at the proper levels, and to determine what adjustments to depreciation rates, if any, might be warranted.

9. Total Element Long Run Incremental Cost (TELRIC) Rates

(a) By the Approval period, FTR shall revise its tariffs to reflect TELRIC-based rates for those items included in Opinion No. 99-8 (or as subsequently modified by the Commission), including, without limitation, reciprocal compensation, links and ports.

(b) By the Approval period, FTR shall withdraw, with prejudice, its Petition for Rehearing of Opinion No. 99-8.

(c) FTR shall file tariff revisions and associated TELRIC-based cost studies to reflect rates for recurring and non-recurring charges for network elements currently not in FTR's tariffs, or without TELRIC-based charges in FTR's tariffs, to include the following:

1. Two-wire analog and digital loops;

2. Four-wire analog and digital loops;

3. Cross-connections in the central office;

4. Digital Subscriber Line cooperative testing. FTR shall not charge a CLEC for cooperative testing if such testing does not require:

   (i) a separate dispatch;
   (ii) personnel with highly specialized skills and testing equipment; or
   (iii)substantial additional time above that required for the customary installation;

5. Disaggregated loop conditioning (i.e., charges per bridge tap and load coil removed from a-line, rather than a single non-recurring charge per line conditioned). FTR will have temporary TELRIC-based rates by the Approval period;

6. Collocation (including cage, cageless, cage sharing, conditioned space, security, and other similar needs). As various forms of collocation (e.g., virtual) become more common, charges for such forms of collocation shall be filed as a general tariff with TELRIC-based recurring and nonrecurring rates rather than on an Individual Case Basis ("ICB");

7. Interoffice transport (including SONET);

8. Service order;

9. Line Sharing. For Line Sharing, subject to the FCC's and the Commission's line sharing implementation requirements and time frames, FTR will provide, by the Approval period, TELRIC-based, temporary rates, subject to true-up;

10. Engineering records look-up. FTR will provide TELRIC-based rates for manual record look-ups.

(d) FTR will convene and participate in a fast track technical conference, within sixty (60) days of the Approval date, to examine and establish TELRIC-based rates for the elements of items in (c), above.

(e) Within sixty (60) days of the Approval date, FTR will establish TELRIC-based, temporary rates for new installations (including new customers or additional services to existing customers) subject to true-up, for the elements listed in item (c), above, where FTR does not have, at that time, TELRIC-based rates in place. FTR will file, no later than September 29, 2000, tariff revisions and associated TELRIC-based cost studies for permanent rates for the elements of in paragraphs (c)l, (c)2, (c)5, (c)9, above. FTR will file, no later than December 29, 2000, such tariff TELRIC-based revisions for the remainder of the elements in (c), above.

(f) FTR will convene and participate in a fast track technical conference within thirty (30) days of a Commission decision in Module 3 of Case 98-C-1357 (which is re-examining New York Telephone Company's unbundled network element rates) to determine if FTR's element rates need to be reexamined or modified.

(g) Within forty-five (45) calendar days of a CLEC's initial request for rates and/or services (absent extenuating circumstances), FTR will respond and provide, a TELRIC-based rate for any governmentally recognized network element. FTR will use Best efforts to provide a TELRIC-based rate or an appropriate response (consistent with any existing contractual requirements) for any non-governmentally recognized network element that is requested.

10. <u>Operational Support Systems ("OSS")</u>

(a) The Commission decision concerning the nature and extent of the OSS to be developed by FTR in Case 99-C-0936 ("OSS Order") is preemptive and supreme and is in no way, either express or implied, modified or limited by this Joint Proposal.

(b) If the OSS Order is rescinded or modified, then the following dates outlined below or the dates in the revised Order, whichever dates are earlier, will be supreme and controlling. The penalties outlined in paragraph (i), below, will only apply as of the dates outlined below, regardless of whether or not the OSS Order is in effect.

(c) FTR will absorb the costs outlined below -- (f) l-4; (g); (h) -- for OSS development, production and operations for the term of the OMP and allow CLECs to use the elements of FTR's OSS, listed below, at no charge during the term of the OMP. Normal service order charges will continue to apply. These OSS costs, defined in this item, will be expensed, not capitalized, on the books FTR maintains for reporting to the Commission.

(d) FTR will monitor, track, and make available to staff and CPB (upon request) the costs and expenses for development and production of FTR's OSS system as set forth herein.

(e) FTR's OSS obligations will apply to both Plain Old Telephone Service ("POTS") and advanced services. FTR will provide a firm date, by the Approval period, for releasing the Request for Proposal ("RFP") that will permit CLECs' comments and staff's review. FTR will ensure that the RFP is issued within sixty (60) days after the Approval period.

(f) FTR commits to the following:

1. By August 1, 2000, FTR will enhance its Customer Service Records ("CSRs") to include wire or cable makeup designation (e.g., Subscriber Line Carrier ["SLC"], Digital Line Carrier ["DLC"], pair saver, or copper). FTR will provide its Wholesale Management Systems ("WMS") reports and CSRs in File Transfer Protocol ("FTP") format, and FTR will also continue to provide them via autofax, at a CLEC's option. These will be in full working order by the above date.

2. By December 1, 2000, FTR will provide pre-ordering functions in real time via WMS, including telephone number assignment (except vanity numbers), due date availability for service orders, Purchase Order Number ("PON") status inquiry, Order status inquiry, and Line Number inquiry. This will be in full working order by the above date.

3. By December 3 1, 2000, FTR will have in place a test bed for the two-way exchange of orders in ED1 format, but without full flow-through (defined in the OSS proceeding referred to in (a), above). The system will provide CLECs with an ED1 interface for orders. FTR may continue to manually process transactions.

4. By January 31, 2001, FTR will have the order exchange (order EDI) system (described immediately above) in commercial production. This will be in full working order by the above date.

5. When the RFP and Request for Information ("RFI") are completed, FTR will, within ninety (90) days of the RFP contract award, conduct and complete an economic analysis of providing full order and pre-order flow-through with EDI.

(g) For each wire center, FTR will provide loop make-up information (e.g., SLC, DLC, pair saver, and load coil), and loop length estimates based on V & H coordinates, via a loop qualification tool. FTR will, by the Approval date, enable access to this database, via the Internet, available in real time, without charge for the term of the OMP.

(h) By August 1, 2000, when FTR enhances its CSR as defined in the previous paragraphs, FTR will include access to the loop qualification tool through WMS, at no charge during the term of the OMP. FTR will continue to maintain its Internet access as described pursuant to the terms and conditions in (g), above.

(i) Notwithstanding the OSS Order in (a) above, FTR will be subject to the following penalties if it fails to meet the dates and actions as described in this item:

1. Five hundred thousand dollars ($500,000) for missing the August 1, 2000 dates (stated above), and an additional five hundred thousand dollars ($500,000) for missing the December 1, 2000 date (stated above);

2. Two million dollars ($2,000,000) for missing the January 31, 2001 date (stated above).

(j) The Commission, in its discretion, will decide the disposition of any penalties incurred under paragraph (i), above. Penalties incurred under paragraph (i) will not limit or influence in any way, either express or implied, the Commission's authority for any other penalty action pursuant to the New York Public Service Law for any other orders or regulations (including the OSS Order, referenced above).

11. <u>Carrier-to-Carrier Service Quality Performance Incentive</u>

(a) The metrics of the Carrier-to-Carrier performance standards proceeding (Case 97-C-0139) will be used as a basis for the wholesale Carrier-to-Carrier Service Quality Performance Incentive in the OMP.

(b) The objective of the Carrier-to-Carrier Service Quality Performance Incentive ("Incentive") in the Joint Proposal is to maintain high quality wholesale service, and provide tangible rebates to those harmed by service that is not meeting the standards outlined herein and in Case 97-C-0139 (or its progeny).

(c) Five wholesale performance metric categories exist under the Incentive: Pre-order, order, provisioning, maintenance & repair, and network performance. The Joint Proposal is intended to address each metric category for performance and penalties. Going forward, particular metrics and metric characteristics will be incorporated into the OMP from other proceedings (e.g. carrier-to-carrier).

(d) Three different rebate and penalty provisions exist under the Incentive: Ordinary miss, Extreme miss, and Overall Standard Level Performance ("OS,").

(e) <u>Ordinary miss</u>. An ordinary miss of a metric will result in FTR remitting a one hundred percent 100% rebate to each individual affected CLEC (in the next billing cycle) whenever FTR misses any one of the following metrics with the applicable rebates (based on approved tariffs, where applicable; per individual line or item) shown immediately after each item. Such rebates will be adjusted accordingly whenever associated charges change (R = Residential service, B = Business service, U = Urban, X = Rural):

Percent Missed Installation Annointments
1. Interconnection trunks ($550)
2. Collocation ($7,500)
3. Basic link - Hot cut l-24 lines (R$26.79 or B$40.92)
4. Basic link - 2 wire analog l-9 lines (R$26.79 or B$40.92)
5. Basic link - 2 wire digital l-9 lines (R$26.79 or B$40.92)
6. Hi-cap link - 1.544 (DS1) ($1,100)

Percent Missed Reuair Annointments
7. Basic link - 2 wire analog (U$9.99 or X$21.92)
8. Basic link - 2 wire digital (U$9.99 or X$21.92)

Mean time to Repair- Interconnection Trunks
9. DS1/DS3 - No cable cut ($175)
10. DS1/DS3 - Cable Cut ($245.81)

Ordering
11. Order confirmation with facilities ($20)
12. Order confirmation without facilities ($20)
13. Completion notification ($20)

These metrics have specified actions, such as installation dates and appointments, associated with CLEC installation and repair service requests. Under an ordinary miss, specific rebates for each metric of one hundred percent (100%) will apply if FTR misses the initial commitment in the first instance for a particular service action or request (i.e., the first request by a CLEC for the service action to be performed by FTR). Ordinary miss rebates will be applicable starting by the Approval period. If the Commission approves new metrics or modifies current metrics so that such metrics now have installation dates and/or appointments where those metrics did not previously, then such metrics will automatically be included in this aspect of the Incentive.

(f) Extreme miss. Extreme miss rebates are added to the ordinary miss rebates defined above. An extreme miss will cover all metrics where the ordinary miss applies. Extreme miss rebates will be applicable by the Approval period, and will be in addition to, and added to, any ordinary miss rebates. An extreme miss is applicable when FTR misses a specified action for a particular service request in the second or third instance.

1. If the missed action is the second miss on the same service request, (i.e., the second instance - defined similarly to the "first instance" stated above) the rebate for that miss will be an additional two and-a-half times (2.5 times) the one hundred percent (100%) ordinary miss rebate (described above), in addition to the initial paid ordinary miss rebate, described above.

2. If the missed action is the third miss or greater on the same service request, then an aggrieved party may petition the Commission for appropriate action. However, during the calendar year 2000 (see, 1 1(g)1(i), below), FTR will pay a one hundred percent (100%) rebate for any third miss where the third miss is identified by the aggrieved CLEC and verified by FTR. This rebate will be in addition to the initial paid ordinary miss and extreme miss rebates, described above.

(g) Overall Standard Level Performance. The Overall Standard Level Performance element of the wholesale Carrier-to-Carrier Service Quality Performance Incentive ("OSLP") addresses all carrier-to-carrier metrics adopted by the Commission and applicable to FTR, including current metrics and future metrics added as part of the Commission's carrier-to-carrier service quality guidelines. This OSLP generally requires FTR to meet or exceed the standard level performance for each carrier-to-carrier metric (as defined in the Commission's Carrier-to-Carrier guidelines), or pay a penalty depending on the number of metrics missed (percentage of total), discussed below.

1. When all the carrier-to-carrier metrics are taken as a group, FTR must meet a "target level" of performance whereby it achieves the carrier-to-carrier standard level in at least eighty-six percent (86 %) of the opportunities to do so. If FTR remains at or above the eighty-six percent (86%) target level, then no OSLP penalties will be applied. If FTR's performance on the listed metrics (currently 23, outlined below) falls below eighty-six percent (86%) of the opportunities to do so, then FTR will be liable for an eight million dollar ($8,000,000) penalty for the measured calendar year where service was below the eighty-six percent (86%) level, subject to paragraph 11 (g)2, below.

    (i) During the calendar year 2000, FTR will not be liable for any penalty under the OSLP.

    (ii) During the calendar year 2001, the carrier-to-carrier target level performance for FTR will be eighty percent (80 %) of the opportunities to do so. After 2001, the target level will increase to eighty-six percent (86 %), as described above.

2. Following a six-month implementation "grace period" for any new or modified metrics, any modifications to the twenty-three (23) currently applicable OSLP metrics (listed below), or additional metrics added from other proceedings, shall automatically be incorporated into the OSLP. For modified metrics, the original metric measurement applies unchanged during the six-month "grace period." At the end of each calendar year, if FTR's performance, as calculated with the new and/or modified metrics, would result in no overall penalties (described above), no further action is required. If FTR's performance does not meet the target levels described above, the following provisions apply:

(i) FTR shall recalculate its performance on the basis of the twenty-three (23) metrics listed below, excluding new and/or changed metrics.

(ii) The "Percent New Interconnection Trunk Groups Installed Within 60 Days" metric will be considered a new and/or modified metric (for this specific metric only) if the number of days is reduced to less than a thirty-five day (35-day) interval.

(iii)If FTR's recalculation (pursuant to 1 1(g)2(i) above), verified by staff, indicates that an overall penalty would be incurred absent the new and/or modified metrics, FTR will be liable for the overall target performance penalty ($8 million) stated above;

(iv)If FTR's recalculation (pursuant to 1 1(g)2(i) above), verified by staff, indicates that no overall penalty would have been incurred absent new and/or modified metrics, FTR will be liable for a two-million dollar ($2,000,000) penalty instead of the eight million dollar ($8,000,000) penalty stated above.

3. The performance results to be used to determine if target level performance has or has not been met, and the application of penalties associated therewith, will be a calendar year of actual monthly performance results for each carrier-to-carrier metric. Any metric without activity in a given month will be counted as achievement of that metric's particular standard level performance for that month.

4. FTR will provide a monthly data file extract of all supporting data for the carrier-to-carrier metrics applicable to FTR. FTR shall also provide a data dictionary containing file names, field descriptions, field types (e.g., numeric or character), field lengths, and a description of valid values associated with the monthly data file. Notwithstanding this provision, FTR will provide data as required in the Commission's Carrier-to-Carrier proceeding (i.e., Case 97-C-0139).

5. The Commission will, at its discretion, determine on an annual basis what shall be done with penalties incurred, if any, by FTR under the OSLP. A party may petition the Commission and offer recommendations as to the disposition of any penalties assessed under the OSLP.

6. FTR may file a waiver request for below-target-level performance under the OSLP. Any waivers must meet the same general conditions for filing waivers as specified under the Retail Service Quality -plan of Appendix 5, paragraph 4 of the Joint Stipulation and Agreement of the original OMP, approved by the Commission on November 10, 1994.

7. Total Service Resale ("TSR") service quality performance is protected under the OMP pursuant to the current FTR Retail Service Quality plan. After twelve (12) months of FTR wholesale metric reporting, if an issue is raised by a CLEC as to TSR service quality, FTR shall show (by measurements and underlying data), within ninety (90) days, that parity exists or that resold service is adequately protected by the Retail Service Quality plan. If, in the opinion of the Commission, FTR is not able to make such a showing, then TSR performance may, at the Commission's discretion, be excluded from the Retail Service Quality plan and included in all three elements of the Incentive. FTR shall then develop appropriate ordinary miss and extreme miss rebates for appointment-based resale service metrics. FTR shall also include such metrics in the overall calculation of the OSLP as new or modified metrics, as defined above. The resale rebate levels will be subject to approval by the Director of the Office of Communications.

8. If FTR misses a particular metric's performance standard by one unit of measurement, that metric will be considered to have passed for that month.

9. There are currently twenty-three (23) metrics of the OSLP applicable to FTR (metrics make-up (e.g., days) are pursuant to the Carrier-to-Carrier proceeding), as follows:

I. Percent Install Within the Interval
   A. Interconnection Trunks
      1. New Trunk groups (DS 1 Systems with facilities available) – 95% installed within 60 days
      2. Additions to Trunk Groups (DS1. Systems with facilities available) – 95% installed within 7 days
   B. Physical Collocation Space
      3. Where space is available (first 3 per carrier) – 95% installed within 76 days
   C. Links
      4. Basic Link – Hot Cut (l-24 lines per request with facilities available) – 95% installed within 10 days
      5. Basic Link – 2 wire analog (1-9 lines per request with facilities available) – 95% installed within 10 days.
      6. Basic Link – 2 wire digital (l-9 lines per request with facilities available) – 95% installed within 15 days
      7. Hi-cap Link – 1.544 (DS1 with facilities available) – 95% installed within 7 days

II. Percent Missed Installation Appointments
   A. Interconnection Trunks
      8. Interconnection Trunks – 10% or less missed
   B. Physical Collocation Space
      9. Physical Collocation Space – 10% or less missed
   C. Links
      10. Basic Link – Hot Cut 1-24 lines – 10% or less missed
      11. Basic Link – 2 wire analog l-9 lines - 10% or less missed
      12. Basic Link – 2 wire digital l-9 lines – 10% or less missed
      13. Hi-cap Link – 1.544 (DS1)– 10% or less missed'

III. Percent Missed Repair Appointments
   A. Links
      14. Basic Link – 2 wire analog l-9 lines – 10% or less missed
      15. Basic Link – 2 wire digital 1-9 lines – 10% or less missed

IV. Mean Time to Repair
      16. DS 1/DS3 Interconnection trunks – no cable cut – 95% repaired within 2 hours
      17. DS1/DS3 Interconnection trunks – cable cut – 95% repaired within 24 hours

V. Pre-Ordering
      18. System Response Time – parity plus 4 seconds
      19. System Availability – 95% available during scheduled availability
      20. Port Availability - % All Ports Busy – 95% available during scheduled availability

VI. Ordering
      21. Order confirmation with facilities available within 48 hours – 95% of the time
      22. Order confirmation without facilities available within 48 hours plus 10 days – 95% of the time
      23. Order completion notification by 12PM the next business day – 95% of the time

12. Advanced Services

(a) FTR will provide pair swapping to CLECs at no charge so long as FTR is not required to provide a separate dispatch or incur additional time, beyond thirty (30) minutes, for such swapping. If FTR does charge CLECs for this service pursuant to the terms of this paragraph, a TELRIC-based rate will be established prior thereto.

(b) FTR will adopt Cooperative Testing procedures for new loops, similar to those developed by New York Telephone Company. FTR will not charge for cooperative testing so long as FTR is not required to provide the following:

1. a separate dispatch;
2. personnel with highly specialized skills and testing equipment; or,
3. substantial, additional time above that required for customary installation.

(c) FTR will, by June 15, 2000, begin a program to remove all load coils on loops of 18,000 actual feet and under and have a dedicated workforce of initially four (4) teams (with two people per team) to remove such load coils under this program, as follows:

1. FTR will remove, by June 15, 2001 and at no charge to CLECs during the term of the OMP, all load coils on loops of 18,000 actual feet and under which exist on loops in seven (7) specified FTR central offices (disclosed to FTR, Choice One, Rhythms, and staff) appended as proprietary Attachment 1.

2. FTR, staff and CLECs, will work collaboratively, by a committee, to prioritize the central offices, defined in 12(c) 1, above, where FTR will remove any load coils. FTR reserves the right to efficiently allocate and direct its dedicated personnel and related resources in order to meet the requirements in 12(c) 1, above. The committee must establish such priority no later than February 15, 2000.

3. FTR may petition the Commission after January 1, 2001 for an extension of the June 15, 2001 deadline. Such a petition, based on good cause, shall fully justify any extension with factual support of, but not limited to, the actual amount of work involved, resources necessary to comply with this deadline, and any efforts previously undertaken and resources previously used in this program. If FTR petitions the Commission for any extension under this paragraph, FTR shall continue the program (excluding paragraph (c)4, below, if the Commission does not render an extension decision by June 15,200 1) as originally required during the pendency of any petition.

4. FTR shall remove, at no charge to CLECs and on an end user service-request basis, any load coils remaining on loops 18,000 actual feet and under in these seven (7) central offices after the June 15,200 1 deadline (stated above) or after the expiration of any extension granted by the Commission pursuant to 12(c) 3, above.

5. For any other FTR central offices beyond the seven (7) central offices contained in Attachment 1, FTR, staff and CLECs, will work collaboratively, by a committee, to prioritize the order in which FTR will remove any load coils in additional or remaining central offices. The committee must establish such priority no later than January 31, 2001. In any event, FTR shall remove, by December 15, 2002, all load coils on loops 18,000 actual feet and under in the additional FTR central offices.

6. FTR may petition the Commission after January 1, 2002 for an extension of the December 15, 2002 deadline. Such a petition, based on good cause, shall fully justify any extension with factual support of, but not limited to, the actual amount of work involved, resources necessary to comply with this deadline, and any efforts previously undertaken and resources previously used in this program. If FTR petitions the Commission for any extension under this paragraph, FTR shall continue the program (excluding paragraph (c)7, below if the Commission does not render an extension decision by December 15, 2001) as originally required during the pendency of any petition.

7. FTR shall remove, at no charge to CLECs and on an end user service-request basis, any load coils remaining on loops 18,000 actual feet and under in the additional central offices after the December 15, 2002 deadline (stated above) or after the expiration of any extension granted by the Commission pursuant to 12(c)6, above.

8. In all committee prioritization, regardless of which central offices are being worked on, FTR will provide relevant data (including, but not limited to, central office percent load coil distribution data) to all committee members. The committee shall give appropriate consideration, as part of this process, to CLEC collocations (and collocation applications), location of CLEC DSLAMs, and specific FTR feeder cable routes within FTR central offices. In all situations, committee disagreement as to the prioritization of FTR load coil removals shall be promptly directed to the Commission for expedited, binding arbitration.

9. This load coil removal program is based on an estimate of the overall number of load coils to be removed, and the number removed on a daily basis in FTR central offices. If the actual amount of load coils to be removed or the time to remove such coils is significantly less than the current estimate, FTR's dedicated workforce will continue its removal program with at least three (3) teams in order to complete the program sooner than specified herein.

10. CLEC requests for load coil removals outside the terms of this program (e.g., demand basis before June 15, 2001) will be at TELRIC-based, tariffed rates.

11. FTR shall conduct any load coil removal (and any such implementation process therewith) in a non-discriminatory and competitively neutral manner.

12. FTR shall update its database serving the loop qualification tool, as described in paragraphs 1 O(g) and 1 O(h) herein, to reflect, on a loop basis, the progress and results of this program. Such information will be available on a parity basis, but no later than seven (7) days.

13. FTR shall provide to the Director of the Office of Communications a monthly status report on the progress of, and the workforce actually dedicated to this program. This report will include, by central office, the number of load coils removed, and those remaining to be removed. This report shall also include an assessment of the progress made, an explanation of any deadlines missed, any delays incurred, and attainment (including potential attainment) of such deadlines.

14. During the load coil removal effort (from June 15, 2000 through December 15, 2002, plus authorized extensions, if any), the Customer Trouble Report Rate ("CTRR") standard level may not, in the Commission's discretion, be scored as a miss for a serving area, in the Retail Service Quality plan or Carrier-to-Carrier Service Quality Performance Incentive (if and when CTRR is added to the Incentive) if FTR's load coil removal effort satisfies the following:

    (i) FTR's load coil removal work takes place in the serving area in question during the month in question;

    (ii) customer troubles are reported by lines affected by the load coil removal work within thirty (30) days of the time of the work; and

    (iii)the number of such troubles, if deducted, would bring the area's CTRR within the standard level.

(d) Where feasible, FTR will provide to any requesting carrier sub-loop unbundling and collocation at remote terminals (or other technically feasible places) in the loop. Appropriate TELRIC-based charges will apply, where applicable.

(e) FTR will provide a pre-qualification report of an analog loop by actual inspection within seven (7) days of a CLEC's request. FTR will remove bridge taps from the line within seventeen (17) days from a CLEC's request for a pre-qualification report. TELRIC-based charges will apply to these activities.

(f) FTR will provide engineering manual record look-ups based on TELRIC-based rates.

(g) In addition to FTR's planned commercial rollout of ADSL in a number of FTR wire centers (disclosed to staff and CPB), FTR will provide ADSL service (including at least one DSLAM) in ten (10) additional wire centers by December 3 1, 2000. FTR will also provide ADSL service in an additional ten (10) wire centers by December 3 1,200 1, and an additional ten (10) wire centers by December 31, 2002. A list of FTR's thirty (30) wire centers is appended as proprietary Attachment 2. FTR's 2002 commitment will not apply to wire centers where a CLEC has already actually begun offering ADSL service to end users (this will only affect FTR's 2002 lo-wire centers offering commitment).

(h) By December 3 1, 2000, FTR will provide at least ten (10) DSL lines and services at no charge to not-for-profit organizations or charities specified by the United Way of Greater Rochester within FTR's service territory. FTR will ensure that the United Way distributes these free lines and services to entities providing services to children at risk (excluding hospitals, health care institutions, governmental agencies and entities qualifying for schools and libraries funding) within its service territory. This DSL offering will be offered to those ten (10) entities at no charge for the term of the OMP. FTR will ensure that offerings to such not-for-profit organizations or charities will be located in both urban and rural areas of its service territory.

(i) FTR shall, by the Approval period, have published methods and procedures in place and operational for provisioning CLEC advanced services requests (e.g., ADSL).

13. Voice Mail Service

(a) FTR's voice mail service will remain with FTR, and will be removed from its local retail tariff. By the Approval period, FTR will withdraw, with prejudice, its voice mail petition.

14. Outreach and Education

(a) The purpose of FTR's local phone competition outreach and education program is to educate and inform all consumers (including low-income consumers) in FTR's service territory about competition in the local telephone market.

(b) Beginning with the Approval period, and on an annual basis thereafter, FTR will spend a minimum of two hundred and fifty thousand dollars ($250,000) per year for five (5) years on a local telephone competition outreach and education program in FTR's service territory.

(c) FTR, CPB, PULP and staff will work collaboratively to develop the program. The program will be set forth in writing and will be effective sixty (60) days from the Approval period. FTR, with staffs oversight, will conduct this program in a competitively neutral and appropriate manner. FTR will submit, as part of its annual monitoring reports (see, item 17, below), a description of the program's accomplishments, goals, and areas for improvement, if any.

(d) If the program includes one or more surveys of consumers in the FTR service territory regarding the program, then at least one survey shall include separately stated survey results for low-income consumers in FTR's service territory. If an entity other than FTR is not able to fund and conduct the survey, then FTR may conduct an in-house survey, with staffs review, and shall develop, fund, and conduct the survey in a competitively neutral and appropriate manner, as part of its commitment herein. If FTR conducts an in-house survey, then FTR, CPB, PULP and staff will work collaboratively to develop the survey.

(e) FTR will track and record in a separate operating expense sub-account any monies used for this Outreach and Education program and related actions thereto.

15. Rates

(a) FTR will institute the scheduled rate reductions for access charges and Local Measured Service ("LMS") for the years 2000 and 2001 (Appendix 9 of Opinion 94-5). In addition, FTR will reduce LMS revenues, using a rate reduction, by five hundred thousand dollars ($500,000) per year, beginning on January 1, 2002, until the end of the OMP. These rate reductions will occur January 1"' of the respective years.

(b) FTR will reduce the charge for Rochester Unlimited from $19.95 to $19.45 in 2000, to $18.95 in 2001, and to $18.45 in 2002. The first rate reduction will take place by the Approval period, and on an annual basis from that date thereafter.

(c) Notwithstanding the current rate provisions in the original OMP, FTR shall freeze or maintain its retail and wholesale local coin telephone rates (including, without limitation, the $0.25 charge for the first three- (3) minute interval) during the term of the OMP.

16. <u>Term of OMP</u>

(a) The term of the OMP will be five years from January 1, 2000 to December 31, 2004, subject to the Term of OMP provisions contained herein. The Commission may, not more than once, modify or terminate the OMP or take other actions as necessary, either pursuant to 16 (b)-(g), herein, or upon the Commission's own motion pursuant to 16(a)-(g), herein, where such Commission action, pursuant to this paragraph, is effective on or after January 1, 2003.

(b) Pursuant to paragraph (a), above, it will be evaluated whether FTR:

1. has taken appropriate steps to remove barriers to local competition in its service territory;

2. has provided benefits to consumers that it has agreed to provide in the OMP, including the modifications of this Joint Proposal;

3. has met its retail and wholesale service quality commitments as set forth in the OMP, as modified by this Joint Proposal and subsequent modifications; or

4. is appropriately deploying new and emerging technologies and services in the FTR marketplace.

(c) If there is a*prima facie* showing by staff or another party regarding (b)l-4, above, the Commission will decide whether a review or a termination of the OMP is warranted. Parties will be afforded an opportunity to provide replies and/or comments. If the Commission finds that an adequate showing has been made, the Commission may initiate a rate proceeding or take other actions as necessary.

(d) If FTR makes a*prima facie* showing that the OMP, as modified by this Joint Proposal, is having a substantial negative impact on FTR's overall financial performance, then the Commission will decide whether a modification or a termination of the plan is warranted for the single provision or single group of provisions identified by FTR in its showing. Parties will be afforded an opportunity to provide replies or comments. If the Commission finds that an adequate showing has been made, the Commission may modify or terminate the single provision or single group of provisions identified in this paragraph or take other actions as necessary.

(e) If FTR's petition makes a*prima facie* showing that the OMP, as modified by this Joint Proposal, is having a substantial negative impact on FTR's ability to provide safe and adequate service to its customers, the Commission will decide whether FTR is permitted to terminate the plan. Parties will be afforded an opportunity to provide replies or comments. If the Commission finds that an adequate showing has been made, the Commission may terminate the plan as identified in this paragraph or take other actions as necessary.

(f) If the Commission terminates the OMP, all provisions of the plan are terminated, except those specifically stated as continuing in the OMP including modifications thereto (including this Joint Proposal), and the permanent provisions associated with the holding company. Nothing in this Joint Proposal changes the legal requirements of any permanent provisions of the OMP, except as stated herein. If the OMP is terminated, then FTR shall amortize any deprecation reserve excess'over a ten-year period, subject to Commission approval.

(g) The OMP, as modified by this Joint Proposal, was made in consideration of, and in exchange for all other provisions of this Joint Proposal. When evaluating any petition to modify or terminate, the parties urge the Commission to give due consideration to the entire Joint Proposal and the bargained-for exchange associated therewith.

17. <u>Reporting</u>

FTR shall continue to provide annual monitoring reports to the Commission (and all parties). As part of the monitoring reports, FTR will provide a progress report on the satisfaction (or related actions toward satisfaction) of all OMP requirements, including those contained in this Joint Proposal. As part of this reporting, FTR will provide a description of specific monetary expenditures made, limited to where tracking is called for in this Joint Proposal and in current OMP requirements (e.g., Lifeline, OSS, and Outreach and Education). This provision does not diminish any current reporting requirements in the OMP and any modifications thereto (including, without limitation, the 1994 Joint Stipulation and Agreement, Section VII).

GENERAL PROVISIONS

18. No Prejudice To Other Litigation

This Joint Proposal has been entered into by the undersigned parties as a settlement and comprises their positions in these cases. In no event shall this Joint Proposal, or any negotiations, statements or proceedings related to it, be construed as, offered as, received as, used as or deemed to be evidence of any kind, in any other action or in any judicial, administrative or other proceeding, except in a proceeding to enforce or defend the terms of this Joint Proposal. Without limiting the foregoing, neither this Joint Proposal or any related negotiations, statements, or proceedings shall be construed as, offered as, received as, used as or deemed to be evidence of, or an admission or a concession by any person of any liability or wrongdoing whatsoever, or as a waiver by any party of any applicable defense. No party to this Joint Proposal, and no one in privity with them, may argue before any court, agency, governmental entity, or any other forum that the agreement shows or evidences in any way that any party violated any law or legal obligation.

19. Provisions Not Precedent

The terms and provisions of this Joint Proposal apply solely to, and are binding only in, the context of the purposes and results of this Joint Proposal. None of the terms and provisions of this Joint Proposal and none of the positions herein of any party may be referred to, cited or relied upon by any other party in any fashion as precedent in any other proceeding before this Commission or any other regulatory agency or before any court of law except in furtherance of the purposes and results of this Joint Proposal.

20. No Waiver of Any Rights

Except that as expressly provided herein, the undersigned parties do not release any other claims, actions, cause of action, obligations or demands whatsoever, whether vested or contingent, in law or equity, they ever had, shall, or may have against each other, or any person or entity that is not a party to this Joint Proposal. Nothing contained herein, or omitted herefrom, shall be deemed a resolution on the merits by the Commission, with preclusive or precedential effect, of any issue which could be raised or litigated by any party in any legal actions, including interconnection negotiations, or in related arbitration proceedings. Any participation in or support of this Joint Proposal, or any position taken (or not taken) before the Commission with respect thereto, by any party, shall be without waiver of, or prejudice to, any argument or position taken by any such party on any issue in any such legal action, including interconnection negotiations or arbitration proceedings.

2 1. <u>Commission Authority To Modify</u>

Unless otherwise stated in this Joint Proposal, all Commission rules, regulations and orders remain in effect. Nothing in this Joint Proposal shall be construed to affect or otherwise limit the Commission's authority under the Public Service Law or any other law or regulation applicable in the State of New York. The Parties understand that the Commission reserves the authority to modify this Joint Proposal if circumstances in the opinion of the Commission have such a substantial impact as to render this Joint Proposal unreasonable, unnecessary, or insufficient for the continued provision of safe and adequate service by FTR at just and reasonable rates or otherwise contrary to the Public Service Law or any other law in the State of New York.

22. <u>Integrated Agreement</u>

The terms and conditions of this Joint Proposal are submitted in their entirety with each provision in consideration for, in support of, and dependent upon the others. If the Commission does not approve this Joint Proposal in its entirety, without substantive modification, any signatory may withdraw its acceptance of this Joint Proposal by serving written notice on the other parties, and such party shall be free to pursue its position in this proceeding without prejudice. If the Commission approves this Joint Proposal or modifies it (as discussed above) in a manner acceptable to the parties, the parties intend that this settlement thereafter be implemented in accordance with its terms. If a material modification is thereafter authorized or required by the Commission that is unacceptable to any party to this settlement agreement adversely affected by such modification, then, in addition to any other remedies a party may have, such party may withdraw from the agreement and will not be bound thereafter to its provisions.

23. <u>Entire Agreement</u>

This Joint Proposal contains the entire agreement among the parties with respect to the subject matter hereof; is binding upon and inures to the benefit of the parties hereto and their respective predecessors and successors, agents, representatives, attorneys, affiliates and heirs, executors, administrators, and assigns of any or all of them and cannot be amended, modified, supplemented, changed or cancelled except by written agreement fully executed by all the parties hereto or their designated representatives. The parties agree and represent that no promise, inducement or agreement has been made, except that as explicitly set forth herein, and the parties further acknowledge that they have utilized, to the extent deemed necessary and appropriate, the independent advice and services of their respective legal counsel.

24. Counterparts

This Joint Proposal may be signed in counterparts, each of which shall be deemed to be an original document as of the date of the first. Facsimile copies shall be deemed originals for purposes of this Joint Proposal.

WA Staff Set 13 FRO132 Service Metrics 58 Pts.pdf

EXPLANATION OF THE 58 POINTS

CUSTOMER TROUBLE REPORT RATE (CTRR) – Total of 44 Points

The number of customer trouble reports during the month per 100 access lines. This is reported on each of the 44 central offices. Each office is given 1 point for making the objective.

Objective	-	0.0 – 4.2 troubles per 100 access lines
Weakspot	-	Over 7.0 troubles per 100 access lines

MISSED REPAIR APPOINTMENTS (Metro East, Metro West & Suburban) – Total of 3 Points

The number of trouble reports that are cleared later than the appointment time.

Objective	-	0.0% – 10.0%
Weakspot	-	Over 15.0%

PERCENT OUT OF SERVICE (OOS) OVER 24 HOURS (Metro East, Metro West & Suburban) – Total of 3 Points

The percentage of out of service trouble cleared in over 24 hours.

Objective	-	0.0% – 20.0%
Weakspot	-	Over 30.0%

PERCENT RAO & BAO CALLS ANSWERED WITHIN 20 SECONDS – Total of 1 point

The percentage of Residential Accounts Office and Business Accounts Office calls (combined) answered within 20 seconds.

Objective	-	90.0% – 100.0%
Weakspot	-	Under 85.0%

PERCENT REPAIR CALLS ANSWERED WITHIN 20 SECONDS – Total of 1 point

The percentage of repair calls answered within 20 seconds.

Objective	-	90.0% – 100.0%
Weakspot	-	Under 85.0%

DIRECTORY ASSISTANCE (411) AVERAGE ANSWER TIME – Total of 1 point

The average answer time for all Directory Assistance calls (411).

Objective	-	0.0 – 6.3 seconds
Weakspot	-	Over 6.9 seconds

TOLL (ZERO OPERATOR) AVERAGE ANSWER TIME – Total of 1 point

The average answer time of calls for operator assistance.

Objective	-	0.0 – 2.8 seconds
Weakspot	-	Over 4.1 seconds

METRO & SUBURBAN % INSTALLATIONS WITHIN 5 DAYS – Total of 2 Points

The number of basic (non-complex) orders completed within 5 days of the request (excluding Sundays and holidays). Appointments that are scheduled beyond 5 days **at the customers request** and orders that are closed to "sub access" (not at home) are not counted.

Objective	-	85.0% - 100%
Weakspot	-	Below 70.0%

METRO & SUBURBAN % INSTALLATION APPOINTMENTS NOT MET – Total of 2 Points

The percent of service orders not completed by the appointment date.

Objective	-	0.0% – 3.0%
Weakspot	-	Over 10.0%

Docket UT-090842
UTC Staff Data Request Nos. 127-139 to Verizon and Frontier
December 3, 2009

UTC STAFF DATA REQUEST NO. 133:

At page 17 of his testimony, Mr. Gregg indicates that Frontier has received quarterly commendations from the New York PSC for exceeding the required benchmarks, and as an example, submitted copies of the Company's compliance for the fourth quarters of 2006, 2007, and 2008. How did the Company perform from 2001 through 2005?

Response:

Applicants assert Objection Nos. 3, 7, 9, 10 and 12. Subject to and without waiver of the objections, Applicants respond as follows:

See attached files:
WA Staff Set13 FRO133 NY Commendations 2001.pdf
WA Staff Set13 FRO133 NY Commendations 2002.pdf
WA Staff Set 13 FRO133 NY Commendations 2003.pdf
WA Staff Set13 FRO133 NY Commendations 2004.pdf
WA Staff Set13 FRO133 NY Commendations 2005.pdf

Prepared By: Cassandra Guinness
Date: December 3, 2009
Witness: To be determined

WA Staff Set13 FRO133 NY Commendations 2001.pdf

STATE OF NEW YORK

Public Service Commission

Maureen O. Helmer, Chairman

Three Empire State Plaza, Albany, NY 12223
Further Details: (518) 474-7080
http://www.dps.state.ny.us
FOR RELEASE: IMMEDIATELY 02018/01C0491

Commission Issues Commendations to Telephone Companies for Excellent Service

Albany, NY • 2/27/02 • The New York State Public Service Commission today announced that it will issue letters of commendation to 46 local telephone companies or telephone company operating divisions throughout the state for providing excellent service to customers in 2001.

Many companies have been commended for several years in succession, with two companies • Ogden Telephone Company and Pattersonville Telephone Company • receiving commendations for fourteen consecutive years. All three of Frontier Telephone of Rochester•s operating divisions received commendations for 2001, compared to two divisions that received such recognition last year. Verizon of New York, the largest provider of local telephone service in the state, received commendations this year for two of its ten operating divisions. Last year none of Verizon's operating divisions received commendations.

"New Yorkers, residents and business owners alike, expect and deserve high quality telephone service, and the Commission remains committed to ensuring that they receive an excellent level of service," stated Commissioner Thomas J. Dunleavy, who chaired today's meeting. "The companies receiving commendations this year for meeting and exceeding their customers' expectations in 2001 are to be applauded for their efforts."

The Commendations for excellent service are based on telephone companies' performance in relation to service quality standards established by the Commission. The criteria to measure the condition of each company's infrastructure includes an evaluation of •customer trouble report rates•

(CTRR) and the number of consumer complaints received by the Commission. Measurements are taken monthly for each operating entity, such as a local exchange operating unit or division. The measurements may be supplemented by staff inspections, if necessary. When service in a particular entity is found to be less than satisfactory, staff intervenes to achieve compliance with Commission standards. The commendations announced today also are based on a new requirement that any company operating under an incentive regulatory plan must have no incidence of service-related penalties for CTRR or complaints during the year.

The 46 companies or operating divisions on the attached list met the criteria for Commendation for Excellent Service in 2001.

--30--

Year 2001 Commendations for Telephone Companies and/or Various Operating Divisions

Company	Threshold CTRR [1]	PSC Complaint Rate [2]	Incentive Plan [3]	Consecutive Year
ALLTEL (Fulton)	100%	0.1	N/A	Tenth
ALLTEL (Jamestown)	100%	0.1	N/A	Fifth
Armstrong	100%	0.3	N/A	Ninth
Berkshire	100%	0.3	N/A	Seventh
Cassadaga	100%	0.0	N/A	Ninth
Champlain	97%	0.0	N/A	Third
Chatauqua & Erie	96%**	0.1	N/A	Eleventh
Chazy & Westport	97%	0.0	N/A	Fifth
Citizens of Hammond	100%	0.0	N/A	Sixth
Crown Point	100%	0.0	N/A	Ninth
Cablevision Lightpath	100%	0.2	N/A	Fourth
Delhi	100%	0.4	N/A	First
Deposit	100%	0.4	N/A	Tenth
Dunkirk & Fredonia	100%	0.4	N/A	Thirteenth
Edwards	100%	0.0	N/A	First
Empire	97%	0.1	N/A	Second
Fishers' Island	100%	0.0	N/A	Twelth
Frontier of New York (Highland)	100%	0.2	N/A	Fourth
Frontier of Rochester - Metro East	100%	0.2	Met	Third
Frontier of Rochester - Metro West	100%	0.2	Met	Third
Frontier of Rochester - Suburban	100%	0.4	Met	First
Frontier of Seneca-Gorham	98%	0.0	N/A	Fourth
Frontier of Sylvan Lake	100%	0.1	N/A	Fourth
Germantown	100%	0.0	N/A	Thirteenth
Hancock	100%	0.0	N/A	Thirteenth
Margaretville	100%	0.2	N/A	Thirteenth
Middleburgh	100%	0.3	N/A	Seventh
Mid-Hudson Communications	100%	0.0	N/A	First
Newport	100%	0.0	N/A	Third
Nicholville	96%	0.0	N/A	Third
Ogden	100%	0.2	N/A	Fourteenth
Oneida County	100%	0.0	N/A	Twelth
Ontario	100%	0.0	N/A	Third
Oriskany Falls	100%	0.0	N/A	Fourth
Pattersonville	100%	0.0	N/A	Fourteenth
Port Byron	100%	0.0	N/A	Second
RCN Telecom	100%	0.0	N/A	Third
State	100%	0.2	N/A	Twelth
Time Warner Communications	96%	0.1	N/A	First
Township	97%	0.3	N/A	Third
Trumansburgh	97%**	0.0	N/A	First
Verizon - Central (State)	95%	0.3	**Missed *****	First
Verizon - Midtown Manhattan (Manh.)	99%	0.3	**Missed *****	First
Vernon	100%	0.3	N/A	Eleventh
Warwick Valley	98%	0.4	N/A	First
Winstar	100%	0.0	N/A	Fourth

[1] Customer Trouble Report Rate (CTRR) is based on 95% or more of a company's monthly central offices performance results in a given year per central office being in the performance range of 0-3.3 reports per 100 lines (RPHL).

[2] PSC Complaint Rate is the number of complaints per 1,000 access lines per year; the commendation level is 0.5 or less.

[3] Incentive plan requirements for CTRR and PSC complaints are either met or missed or are not applicable (N/A). Verizon and Frontier of Rochester operate with incentive plans. Taconic's plan expired on August 31, 2001.

**Adjusted to eliminate unusual service-related problems in one month.

***For PRP purposes, Gap Closure is considered on a company-wide basis, and on this basis, the company missed the criteria. When considered on a divisional basis, these two divisions did not contribute to the over-all Gap Closure failure, and on that basis, are recommended for commendation.

WA Staff Set13 FRO133 NY Commendations 2002.pdf

STATE OF NEW YORK

Public Service Commission

William M. Flynn, Chairman

Three Empire State Plaza, Albany, NY 12223
Further Details: (518) 474-7080
http://www.dps.state.ny.us

FOR RELEASE: IMMEDIATELY 03017

Commission Issues Commendations to Telephone Companies for Excellent Service

Albany, NY – 3/18/03 – The New York State Public Service Commission today announced that it will issue letters of commendation to 47 local telephone companies or telephone company operating divisions throughout the state for providing excellent service to customers in 2002.

Many companies have been commended for several years in succession, with two companies – Ogden Telephone Company and Pattersonville Telephone Company – receiving commendations for fifteen consecutive years. Verizon of New York, the largest provider of local telephone service in the state, received commendations this year for four of its eleven operating divisions. Last year two of Verizon's operating divisions received commendations.

"The Commission commends these telephone companies cited today for meeting and exceeding their customers' service quality expectations in 2002," stated Commission Chairman William M. Flynn. "The high standards we set here in New York help ensure that our residents and businesses throughout the state benefit from being at the world's crossroads of telecommunications technology."

The Commendations for excellent service are based on telephone companies' performance in relation to service quality standards established by the Commission. The criteria to measure the condition of each company's infrastructure includes an evaluation of "customer trouble report rates" (CTRR) and the number of consumer complaints received by the Commission. Measurements are taken monthly for each of 912 central office switches in the state. The measurements may be supplemented by staff inspections, if necessary. When service in a particular office is found to be less than satisfactory, staff intervenes to achieve compliance with Commission standards. The commendations announced today also are based on a requirement that any company operating under an incentive regulatory plan must have no incidence of service-related penalties for CTRR or PSC complaints during the year.

The 47 companies or operating divisions on the attached list met the criteria for Commendation for Excellent Service in 2002.

— 30 —

Year 2002 Commendations for Telephone Companies and/or Various Operating Divisions

Company	Threshold CTRR 1	PSC Complaint Rate 2	Incentive Plan 3	Consecutive Year
Adelphia Business Solutions	100%	0.0	N/A	First
ALLTEL (Fulton)	98%	0.1	N/A	Eleventh
ALLTEL (Jamestown)	95%4	0.1	N/A	Sixth
Armstrong	100%	0.0	N/A	Tenth
AT&T - ACC Corporation	100%	0.1	N/A	First
Berkshire	97%	0.2	N/A	Eighth
Cassadaga	100%	0.0	N/A	Tenth
Champlain	100%	0.2	N/A	Fourth
Chatauqua & Erie	99%	0.0	N/A	Twelfth
Chazy & Westport	100%	0.0	N/A	Sixth
Choice One Communications	98%	0.3	N/A	First
Citizens of Hammond	100%	0.0	N/A	Seventh
Crown Point	100%	0.0	N/A	Tenth
Deposit	100%	0.0	N/A	Eleventh
Dunkirk & Fredonia	100%	0.0	N/A	Fourteenth
Edwards	100%	0.0	N/A	Second
Empire	96%	0.2	N/A	Third
Fishers' Island	100%	0.0	N/A	Thirteenth
Frontier of AuSable Valley	96%	0.0	N/A	First
Frontier of New York (Highland)	100%	0.1	N/A	Fifth
Frontier of Rochester - Metro East	96%	0.2	Met	Fourth
Frontier of Seneca-Gorham	98%	0.1	N/A	Fifth
Frontier of Sylvan Lake	100%	0.0	N/A	Fifth
Frontier Communications of America	100%	0.0	N/A	First
Germantown	100%	0.0	N/A	Fourteenth
Hancock	100%	0.0	N/A	Fourteenth
Margaretville	100%	0.0	N/A	Fourteenth
Middleburgh	100%	0.0	N/A	Eighth
Newport	100%	0.0	N/A	Fourth
Nicholville	100%	0.0	N/A	Fourth
Ogden	97%	0.0	N/A	Fifteenth
Oneida County	100%	0.0	N/A	Thirteenth
Ontario	100%	0.2	N/A	Fourth
Oriskany Falls	100%	0.0	N/A	Fifth
Pattersonville	100%	0.0	N/A	Fifteenth
Port Byron	100%	0.0	N/A	Third
RCN Telecom	100%	0.0	N/A	Fourth
State	100%	0.4	N/A	Thirteenth
Time Warner Communications	100%	0.0	N/A	Second
Township	97%	0.2	N/A	Fourth
Trumansburg	97%4	0.0	N/A	Second
Verizon - Bronx	97%	0.2	Met	First
Verizon - Long Island	95%4	0.1	Met	First

Verizon - Manhattan North	98%	0.2	Met	First
Verizon - Queens	98%	0.1	Met	First
Vernon	100%	0.3	N/A	Twelfth
Warwick Valley	98%	0.2	N/A	Second

1 Customer Trouble Report Rate (CTRR) is based on 95% or more of a company's monthly central offices performance results in a given year per central office being in the performance range of 0 - 3.3 reports per 100 lines (RPHL).

2 PSC Complaint Rate is the number of complaints per 1,000 access lines per year; the commendation level is 0.5 complaints per 1,000 or fewer.

3 Incentive plan requirements for CTRR and PSC complaints are either met or missed or are not applicable (N/A).

Verizon and Frontier of Rochester operate under incentive plans. Taconic's plan expired on August 31, 2001.

4 Adjusted to eliminate an unusual event in one month for one office.

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Filed Session of March 16, 2004

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

February 23, 2004

TO: THE COMMISSION

FROM: OFFICE OF TELECOMMUNICATIONS

SUBJECT: Case 01-C-0491 - In the Matter of the Quality of Telephone Service Provided by Local Exchange Companies in New York State During Calendar Year 2003.

Commendations of Local Telephone Companies for Excellent Service Quality During 2003, and Annual Service Quality Report for Local Telephone Companies Serving 500,000 or Fewer Lines.

SUMMARY

It is recommended that the Commission commend 36 local telephone companies and/or their operating divisions, out of a possible 71, for providing excellent telephone service during the year 2003. Most small incumbent local exchange carriers qualify for a commendation, as do several competitive local exchange carriers. One of eleven operating divisions of Verizon New York Inc. is included in this group as is one of three divisions of Frontier Telephone of Rochester.

BACKGROUND

In 1988, the Commission established a process for recognizing those local exchange carriers that provided exemplary service quality. Staff believes that Commission commendations continue to serve as an incentive for all local exchange companies to provide high quality service. Commendations are based on two metrics, Customer Trouble Report Rate (CTRR) and PSC Complaint Rate, and achievement of incentive plan target on these two measures, where applicable. This will be the sixteenth consecutive year the Commission will have awarded commendations.

The three criteria for granting commendations for excellent service are detailed below:

1. 95% or more of all CTRR measurement opportunities for the central offices of a company or its operating divisions/subsidiaries during a calendar year be in the range of 0-3.3 reports per 100 lines (RPHL),[1]

2. A PSC Complaint Rate of 0.07 complaints or less per 1,000 access lines during that year,[2] and

3. Achievement of all applicable incentive plan targets relating to CTRR and PSC complaints.

Overall, Staff reviewed the performance of 58 local exchange companies in preparing its recommendations, of which 40 are incumbents and 18 are competitive carriers. The 11 operating divisions of Verizon are considered individually for commendation.[3] Similarly, two operating divisions of ALLTEL New York, Inc. (ALLTEL),[4] three operating divisions of Frontier Telephone of Rochester, Inc. (FTR),[5] and three subsidiaries of AT&T Corporation[6] are also considered separately for commendation. This permits consideration of smaller operating units within larger companies on a more equal footing with smaller companies.

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1 The Telephone Service Standards, 16 NYCRR 603, only require that each central office perform at a CTRR of 5.5 or less. Companies with seven or more offices must have 85% of their offices performing at a level of 3.3 or less. Thus, the commendation criteria exceed the Commission standards.

2 A slight modification from 0.070 to 0.075 is actually used as explained later in this memorandum.

3 The 11 divisions are: Bronx, Brooklyn West, Brooklyn East, Central, Long Island, Midstate, Manhattan North, Northeast, Queens, Manhattan South and Western.

4 Jamestown, Fulton

5 Suburban, Metro East, Metro West

6 AT&T Communications, AT&T Local Services (formerly Teleport), and ACC.

DISCUSSION

1. PSC Commendations

Attachment 1 to this memorandum lists the qualifying companies and operating divisions/subsidiaries and their associated performance justifying issuance of a commendation. Attachment 2 lists those that failed to qualify. Entries in boldface on Attachment 2 indicate performance results that fall short of the commendation criteria. In making this year's commendation recommendation, Staff adjusted some CTRR results to remove the impact of the April 2003 ice storm that caused substantial damage to telephone plant throughout much of upstate New York. Attachment 3 shows a history of the percent of companies commended compared to the number of companies eligible for commendation.

This year a lower percentage of commendations are recommended than in previous years for three reasons. First, CTRR performance, particularly for Verizon, was not quite as good as last year. Second, there are more Competitive Local Exchange Carriers (CLECs) and less than 50% of them meet the commendation criteria. Third, Staff no longer adjusts any company's PSC complaint counts because the Quick Resolution System implemented by the Office of Consumer Services already provides each company with more opportunity than under the previous process to avoid complaints. A few companies miss a commendation for 2003 solely because they had one or two more complaints than allowed under the PSC complaint rate criterion that was adopted last year.[7]

Discussed below are the specific results for Verizon, FTR, other Citizens Communications companies, the remaining incumbent carriers, and the Competitive Local Exchange Carriers.

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7 See Item 501 of the Commission's March 2003 session modifying the commendation criteria to reflect the impact of QRS on complaint counting. Also see: http://www.dps.state.ny.us/fileroom/doc13226.pdf

Verizon

One operating division, Manhattan South, is being recommended for commendation in 2003. While as many as four divisions had earned commendations during the period 1997 through 1999, none qualified in 2000, two qualified (Midtown Manhattan and Central) in 2001, and four qualified in 2002. The reason more divisions have not qualified in past years is primarily due to incentive plan failures on either CTRR or PSC complaints. For 2003, Verizon's CTRR performance generally declined across ten of its eleven divisions, and PSC complaint rates in some of these divisions also did not meet the new criteria.

Citizens Communications

Citizens Communications consists of Frontier Telephone of Rochester (FTR), Citizens Telecommunications Company of New York, Inc. (Citizens), Ogden and Frontier Communications of New York, Ausable Valley, Seneca-Gorham and Sylvan Lake. The Metro West operating division of FTR, Ogden and Seneca-Gorham are recommended for commendation. The other two FTR divisions do not qualify primarily because of CTRR performance even after adjusting for the April ice storm.[8] Citizens missed a commendation for 2003 for the third consecutive year, based on both CTRR and complaint rate performance. It had received a commendation in each of the nine years previous to 2001. The remaining three subsidiaries do not meet the requirements.

Other Incumbent Carriers

Most of the remaining 32 incumbent carriers are recommended to be commended for their 2003 service quality performance. Pattersonville will be receiving a commendation for the 16th consecutive year. Dunkirk & Fredonia, Germantown, Hancock and Margaretville will be receiving commendations for the 15th consecutive year, and nine others will be doing so for ten to 14 consecutive years. The following

8 In 1999, two of FTR's three operating divisions received commendations. This was repeated in 2000, and all three divisions earned a commendation in 2001. In 2002, one division, Metro East, received a commendation.

incumbent carriers did not meet the criteria: the two operating divisions of ALLTEL, Delhi, Empire, Ontario, Taconic, Township, Trumansburg, Vernon and Warwick Valley.

Competitive Local Exchange Carriers

In order to be considered for a commendation, a competitive carrier had to be in business and report service quality data for the entire calendar year. Out of 18 such carriers, the following nine should be commended for their performance during 2003: Adelphia Business Solutions, AT&T – ACC Corporation, AT&T Local Services, Cablevision Lightpath, DFT Local Service, Frontier Communications of America, Global Crossing Local Services, RCN Telecom and Time Warner Communications.

Cablevision Lightpath has also requested reconsideration of a commendation for the year 2002.[9] The company explains that its 2002 service data improperly aggregated six central offices into three, and that certain excludable trouble reports in January and June 2002 were mistakenly included. Staff has reviewed the revised data provided by the company and is satisfied that the company's actual performance in 2002 warrants commendation for excellent service.

2. Commendation Criteria Modification

Last March, Staff proposed a modification of the PSC complaint rate portion of the commendation criteria, moving it for purposes of commendations in 2003 from 0.5 to 0.070 complaints per 1,000 lines per year. This change was designed to recognize the significant impact of the Office of Consumer Services' Quick Resolution System (QRS) in lowering the number of PSC complaints. The modification was based on data under QRS from June 2002 to December 2002. However, Staff believes June and July 2002 should have been excluded because the QRS process took time to implement and these two months do not fully reflect its impact. When these months are excluded, the PSC complaint rate target changes from 0.070 to 0.075 complaints per

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9 This was done by letter to Staff dated October 21, 2003.

1,000 lines per year.[10] Staff has used this less stringent 0.075 target for its proposed commendations for 2003 in this memorandum.

3. Annual Service Quality Report

The service quality performance during 2003 provided by those local exchange companies that are not otherwise reported on a quarterly basis (i.e., Verizon and Citizens Communications) to the Commission is described below.

Incumbent Local Companies

The service quality performance of 38 incumbent local exchange carriers is reported annually to the Commission. These carriers serve a total of 1.2 million lines in 319 central offices, and represent 10.6% of the incumbent local exchange market in the state. Approximately 93% of these offices provided service quality in the range of 0 to 3.3 RPHL throughout the year. This is considered excellent performance in relationship to the Commission's CTRR standards. Individual CTRR performance for each company may be found in the attachments.

For each of these companies, PSC complaints generally number only a few per year. As a group, they experienced a complaint rate of 0.07 complaints per 1,000 lines during the past year. Comparable rates for Verizon and FTR were 0.10 and 0.07, respectively.

Competing Local Exchange Carriers

There are 18 competing local exchange carriers that reported 2003 CTRR results. These carriers serve a total of about 2.7 million access lines[11] using 54 CLEC-owned central offices as well as numerous facilities of incumbents. Approximately 97% of the CLEC central offices in this group provided service quality within the range of 0 to 3.3 RPHL, considered excellent performance. Individual CTRR performance for each

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10 This adjustment was mentioned in a Public Notice issued December 22, 2003 in Case 00-C-1945 – Proceeding on Motion of the Commission to Consider Cost recovery by Verizon and to Investigate the Future Regulatory Framework, Appendix B, pg. 5.

11 The vast majority of these lines CLECs obtain from incumbent carriers on either a resale or Unbundled Network Element – Platform (UNE-P) basis.

company may be found in the attachments. As a group, the PSC complaint rate for all of the competing carriers during 2003 was 0.89.

RECOMMENDATION

It is recommended that the Secretary to the Commission issue a letter to each of the 36 companies or operating divisions listed on Attachment 1, commending them for excellent telephone service quality provided during 2003. Cablevision Lightpath should also receive a commendation for the previous year, 2002.

Respectfully submitted,

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Attachments

Attachment 1

Year 2003 Commendations for Telephone Companies and/or Various Operating Divisions

Company	Threshold CTRR [1]	PSC Complaint Rate [2]	Incentive Plan [3]	Consecutive Year
Adelphia Business Solutions	100%	0.03	N/A	Second
Armstrong	100%	0.00	N/A	Eleventh
AT&T - ACC Corporation	100%	0.00	N/A	Second
AT&T- AT&T Local Services	97%	0.01	N/A	First
Berkshire	97%	0.00	N/A	Ninth
Cablevision Lightpath	100%	0.02	N/A	First
Cassadaga	100%	0.00	N/A	Eleventh
Champlain	100%	0.00	N/A	Fifth
Chatauqua & Erie	96%	0.00	N/A	Thirteenth
Chazy & Westport	100%	0.00	N/A	Seventh
Citizens of Hammond	100%	0.00	N/A	Eighth
Crown Point	100%	0.00	N/A	Eleventh
Deposit	98%	0.00	N/A	Twelfth
DFT Local Service	100%	0.00	N/A	First
Dunkirk & Fredonia	100%	0.00	N/A	Fifteenth
Edwards	100%	0.00	N/A	Third
Fishers' Island	100%	0.00	N/A	Fourteenth
Frontier Communications of America	100%	0.00	N/A	Second
Frontier of Rochester - Metro West	97%	0.04	Met	First
Frontier of Seneca-Gorham	96%	0.00	N/A	Sixth
Germantown	100%	0.00	N/A	Fifteenth
Global Crossing Local Services	100%	0.00	N/A	First
Hancock	100%	0.00	N/A	Fifteenth
Margaretville	100%	0.00	N/A	Fifteenth
Middleburgh	100%	0.00	N/A	Ninth
Newport	100%	0.00	N/A	Fifth
Nicholville	100%	0.00	N/A	Fifth
Ogden	100%	0.04	N/A	Thirteenth — Shd be 16th
Oneida County	100%	0.00	N/A	Fourteenth
Oriskany Falls	100%	0.00	N/A	Sixth
Pattersonville	100%	0.00	N/A	Sixteenth
Port Byron	100%	0.00	N/A	Fourth
RCN Telecom	100%	0.00	N/A	Fifth
State	100%	0.00	N/A	Fourteenth
Time Warner Communications	100%	0.03	N/A	Third
Verizon - Manhattan South	96%	0.07	Met	First

[1] Customer Trouble Report Rate (CTRR) is based on 95% or more of a company's monthly central offices performance results in a given year per central office being in the performance range of 0-3.3 reports per 100 lines (RPHL). This data has been adjusted where necessary, to remove the impact of the April 2003 ice storm.

[2] PSC Complaint Rate is the number of complaints per 1,000 access lines per year; the commendation level is 0.075 or less.

[3] Incentive plan requirements for CTRR and PSC complaints are either met or missed or are not applicable (N/A). Verizon and Frontier of Rochester operate with incentive plans.

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Attachment 2

Year 2003
Companies and/or Various Operating Divisions Failing to Receive a Commendation

Company	Threshold CTRR [1]	PSC Complaint Rate [2]	Incentive Plan [3]	Consecutive Year
Allegiance Telecom	100%	**0.36**	N/A	Fourth
ALLTEL (Fulton)	96%	**0.08**	N/A	First
ALLTEL (Jamestown)	**93%**	0.04	N/A	First
AT&T- AT&T Communications	100%	**0.66**	N/A	Fifth
Broadview Networks	100%	**0.28**	N/A	Third
Choice One Communications	100%	**0.09**	N/A	First
Citizens Communications	**93%**	**0.09**	N/A	Third
Delhi	**83%**	0.00	N/A	Second
Empire	96%	**0.12**	N/A	First
Frontier of AuSable Valley	98%	**0.15**	N/A	First
Frontier of New York (Highland)	100%	**0.09**	N/A	First
Frontier of Rochester - Metro East	97%	**0.09**	Met	First
Frontier of Rochester - Suburban	**79%**	0.07	Met	Second
Frontier of Sylvan Lake	100%	**0.10**	N/A	First
MCI Metro Access	100%	**0.52**	N/A	Sixth
Ontario	**92%**	**0.19**	N/A	First
SBC Telecom	**92%**	**12.82**	N/A	First
Taconic	**91%**	0.04	N/A	Third
Tech Valley Communications [4]	**67%**	0.00	N/A	Second
Township	100%	**0.33**	N/A	First
Trumansburg	**92%**	0.00	N/A	First
Verizon - Bronx	**80%**	**0.15**	Met	First
Verizon - Brooklyn East	**79%**	**0.08**	Met	First
Verizon - Brooklyn West	**66%**	**0.17**	Met	First
Verizon - Central	**88%**	0.07	Met	First
Verizon - Long Island	**90%**	**0.10**	Met	First
Verizon - Manhattan North	**94%**	**0.13**	Met	First
Verizon - Midstate	**78%**	**0.09**	Met	Eleventh
Verizon - Northeast	**80%**	**0.09**	Met	Sixteenth
Verizon - Queens	**92%**	0.07	Met	First
Verizon - Western	**84%**	0.06	Met	Sixteenth
Vernon	100%	**0.35**	N/A	First
Warwick Valley	100%	**0.20**	N/A	First
Westelcom Networks	**92%**	0.00	N/A	First
Winstar	**17%**	0.00	N/A	Second

Numbers in bold indicate where the performance fell short.

[1,2,3] See previous page for explanation.

[4] Tech Valley Communications was formerly known as Mid-Hudson Communications.

Case 01-C-0491

Attachment 3

SERVICE COMMENDATIONS
1991 to 2003

YEAR	TOTAL COMPANIES*	COMPANIES COMMENDED	PERCENT COMMENDED
2003	71	36	50.7%
2002	68	47	69.1%
2001	66	46	69.7%
2000	65	45	69.2%
1999	63	48	76.2%
1998	59	40	67.8%
1997	53	35	66.0%
1996	52	32	61.5%
1995	52	33	63.5%
1994	52	29	55.8%
1993	52	35	67.3%
1992	52	32	61.5%
1991	52	30	57.7%

* Companies and/or divisions or subsidiaries

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STATE OF NEW YORK

Public Service Commission

William M. Flynn, Chairman

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FOR RELEASE: IMMEDIATELY 05020

Commission Issues Commendations to Telephone Companies for Excellent Service

New York, NY – 3/16/05 – The New York State Public Service Commission today announced that it will issue letters of commendation to 43 local telephone companies or telephone company operating divisions throughout the state for providing excellent service to customers in 2004.

Many companies have been commended for several years in succession, with one company, Pattersonville Telephone Company receiving commendations for seventeen consecutive years. Verizon New York Inc., the largest provider of local telephone service in the state, received commendations this year for two of its eleven operating divisions. Additionally, one of three divisions of Frontier Telephone of Rochester qualified for a commendation. Last year, 36 local telephone companies or telephone company operating divisions received commendations.

"The Commission commends these telephone companies cited today for meeting and exceeding their customers' service quality expectations in 2004," stated Commission Chairman William M. Flynn. "The high standards we set here in New York help ensure our residents and businesses throughout the state benefit from having access to an exceedingly high level of telecommunications technology. Telephone service quality has been, and will continue to be, a priority for the Commission."

The Commendations for excellent service are based on telephone companies' performance in relation to service quality standards established by the Commission. The criteria to measure the condition of each company's infrastructure includes an evaluation of "customer trouble report rates" (CTRR) and the number of consumer complaints received by the Commission. Measurements are taken monthly for each of 912 central office switches in the state. The measurements may be supplemented by staff inspections, if necessary. When service in a particular office is found to be less than satisfactory, staff intervenes to achieve compliance with Commission standards. The commendations announced today also are based on a requirement that any company operating under an incentive regulatory plan must have no incidence of service-related penalties for CTRR or PSC complaints during the year.

The 43 companies or operating divisions on the attached list met the criteria for Commendation for Excellent Service in 2004.