

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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IN THE MATTER OF THE PETITION)
OF MCIMETRO ACCESS) DOCKET NO. UT-060502
TRANSMISSION SERVICES LLC)
D/B/A VERIZON ACCESS) SUPPLEMENT TO PETITION FOR
TRANSMISSION SERVICES FOR) ALTERNATIVE MEASUREMENT
APPROVAL OF AN ALTERNATIVE) AND REPORTING UNDER WAC 480-
MEASUREMENT OF SERVICE) 120-439(12)
QUALITY REPORTING PURSUANT)
TO WAC 480-120-439(12))

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

MCImetro Access Transmission Services LLC d/b/a Verizon Access

Transmission Services (“Verizon Business”) submits this supplement to its Petition for Alternative Measurement and Reporting under WAC 480-120-439 (“Petition”) filed with the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) on March 31, 2006. In this supplement, Verizon Business clarifies its Petition to address questions raised by the WUTC staff reviewing the Petition.

CLARIFICATIONS TO PETITION AND REPORTS

1. In its Petition, Verizon Business stated that it is a competitive local exchange carrier (“CLEC”) in Washington providing retail local exchange service using its own facilities for enterprise (large business and government) customers and using unbundled network elements (“UNEs”) and network elements provided under commercial agreements with other local exchange carriers (“LECs”) to serve mass market (residential and small business) customers. Verizon Business does not use its own facilities to serve mass market customers in Washington.

2. In its Petition, Verizon Business requested that the Commission order that WAC 480-120-439(3), (4), (6) through (9) not apply to service provided by Verizon

Business to enterprise customers. Thus, if this request is granted, Verizon Business will submit retail service quality reports for its mass market customers only.

A. WAC 480-120-439(3) – Missed Appointment Report.

3. In its Petition, Verizon Business stated that it had been its experience that the repair reporting data that is provided to it by underlying LECs is usually not available until at least 5-6 weeks after the close of any month. Therefore, Verizon Business proposed to identify and report data under this metric for the month for which it has the most current data. This limitation – and thus the proposal of Verizon Business – applies only to reporting of repair appointments, not to the reporting of installation appointments.

4. In addition, the reference in the 2nd column of the Missed Appointment Report to “Total Number of Installation or Repair Appointments Made” for both the installation appointments and repair appointments means the total number of appointments *scheduled*. Verizon Business is reporting the volume of orders received where an appointment is, in fact, scheduled. However, if the order is for a transfer, migration-of-service or move-of-service, Verizon Business may not need to schedule an appointment (as service may be activated without a customer appointment). Thus, if the order is for a transfer, migration-of-service or move of service, an appointment is generally not made, scheduled or missed and such an order is not included as an installation appointment for the Missed Appointment Report for such installations.

5. Finally, Verizon Business stated that it does not track the number of excluded orders described in Rule WAC 480-120-439(4)(c). That statement applies not just to the monthly reports, but to the 90-day and 180-day reports as well.

B. WAC 480-120-439(4) – Installation or Activation of Basic Service Report.

6. In its Petition, Verizon Business stated that it does not track the number of exclusions described in Rule WAC 480-120-439(4)(c). That statement applies not just to the monthly reports, but to the 90-day and 180-day reports as well.

7. Verizon Business will continue to provide 90-day reports, as it did for January, February and March 2006, as well as 180-day reports (including the 180-day report for the time period from January through June 2006). Technically, the reports provided by Verizon Business reflect time periods of 3 and 6 calendar months, as opposed to 90 and 180 actual days. If such reporting does not comply technically with the 90-day and 180-day report requirements, Verizon Business seeks an exemption allowing it file 3 and 6 calendar month reports, respectively.

8. In its Petition, Verizon Business stated that it also is not in a position to comply with the requirement in WAC 480-120-439(4) to distinguish between orders placed for five or fewer access lines and proposes to report (in the monthly, as well as 90-day and 180-day reports) on all mass market customer orders regardless of the number of access lines requested. Also this will only affect a very small percentage of mass market customers with more than 5 lines.

9. Finally, Verizon Business understands that although it is required to file the data specified under this subsection, it is not bound by the performance standard associated with this metric under WAC 480-120-105 because it is a CLEC relying on the services of underlying LECs.

C. WAC 480-120-439(6) – Troubles Report.

10. In its reports filed for February and March 2006, Verizon Business reported all troubles, including repeat troubles. Verizon Business does not track whether a trouble is a repeat trouble rather than a new trouble and, as a result, a trouble and a repeat trouble are counted separately on Verizon Business' reports for this metric.

D. WAC 480-120-439(7) – Switching Report.

11. As indicated in Paragraph 1, Verizon Business does not use its own network (including its two switches in Washington) to provide service to mass market customers. Accordingly, Verizon Business is seeking a complete exemption from reporting on this metric under this subsection 7.

E. WAC 480-120-439(8) – Trunk Blocking Report.

12. As described in Paragraph 1, Verizon Business does not use its own network (including its own trunks) to provide service to mass market customers. Thus, Verizon Business is requesting a complete exemption from reporting on this metric under this subsection 8.

F. WAC 480-120-439(9) – Repair Report.

13. In its Petition, Verizon Business proposed to report interruptions and impairments on a statewide basis using the 48-hour standard for interruptions rather than the 72-hour impairment standard. In the Repair Report required under WAC 480-120-439(9), Verizon Business reported the number “0” under the 72-hour standard (found under the column entitled “Total Number of Service Impairments Exempt from 72-Hour Interval Rule”). Going forward, and provided the Commission approves Verizon’s

proposal, it will report “N/A” in this column since that more accurately describes the situation.

G. WAC 480-120-439(5) – Major Outage Reports.

14. Verizon Business did not seek an exemption for this report. Verizon Business will provide the Commission with any notices it receives from its underlying carriers concerning major outages as required by this report. For example, the information on Qwest’s processes related to abnormal events and major outage notifications can be found at: <http://www.qwest.com/wholesale/clecs/maintenance.html>. Staff or others may be able to subscribe to the mailing list by contacting Qwest and asking Qwest to include them on their major outage notifications.

IV. CONCLUSION

15. For the reasons stated in the Petition for Alternative Reporting as supplemented here, Verizon Business respectfully requests that the Commission accept the proposed alternative measurements applicable to Verizon Business under WAC 480-120-439, namely:

A. That reporting obligations under WAC 480-120-439 subsections (3), (4) and (6) through (9) apply only to mass market customers, thus excluding reports on service provided to enterprise customers on Verizon Business’s own network;

B. That Verizon Business be permitted to report performance for mass market customers on a statewide, rather than central office, basis;

C. That the report to be submitted by Verizon Business for mass market customers served through underlying wholesale carriers include only such

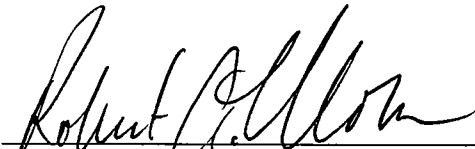
information provided to Verizon Business by the underlying carriers providing the underlying service;

D. That Verizon Business be permitted to submit monthly reports using the format and type of content found in the report filed for February 2006 and for the 90-day report and the 180-day report using the format and type of content found in the quarterly report filed for March 2006 and as more specifically discussed throughout the Petition as supplemented.

E. That Verizon Business be permitted to designate the information it has identified as valuable commercial information as "Confidential Information per WAC 480-07-160".

Respectfully submitted this 18th day of May, 2006.

MCImetro ACCESS TRANSMISSION SERVICES
LLC d/b/a VERIZON ACCESS TRANSMISSION
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