

REDACTED

08 0278-TL

information protected by the privacy protections of the Florida or United States Constitutions, or any other law, statute, or doctrine.

5. Verizon objects to the Discovery Requests to the extent they seek documents or information equally available to Staff as to Verizon through public sources or records or which are already in the possession, custody or control of Staff.

6. To the extent Verizon responds to the Discovery Requests, Verizon reserves the right to amend, replace, supersede, or supplement its responses as may become appropriate in the future, but it undertakes no continuing or ongoing obligation to update its responses.

7. Verizon objects to the Discovery Requests to the extent that they seek to impose an obligation on Verizon to respond on behalf of subsidiaries, affiliates, or other persons that are not subject to the jurisdiction of the Commission.

8. Verizon objects to the Discovery Requests to the extent they seek information that is not reasonably calculated to lead to the discovery of admissible evidence and not relevant to the subject matter of this proceeding.

INTERROGATORIES

- 1. Please identify how many retail residential telephone numbers Verizon had in service as of September 30, 2008.
 - a) For copper-based service?
 - b) For FIOS-based service?

COM _____
 ECR _____
 GCL _____
 OPC _____
 RCP J
 SSC _____
 SGA _____
 ADM _____
 CLK _____

RESPONSE: Subject to and without waiving the General Objections, Verizon responds as follows:

a) As of September 30, 2008, Verizon had **[BEGIN PROPRIETARY] ***,**** **[END PROPRIETARY]** copper-based retail residential telephone numbers in service.

b) As of September 30, 2008, Verizon had **[BEGIN PROPRIETARY] ***,****

unsatisfactory plant conditions

Verizon has implemented a system identifier that identifies customers with chronic copper facility based repair problems. This initiative sets the guidelines to replace such copper facilities with fiber facilities.

23. For the period January 1, 2005 through September 30, 2008, did Verizon use an objective for clearing out-of-service trouble reports other than the objective set forth in Rule 254.070, F.A.C., when scheduling repairs for residential services provided over FIOS? If so, please identify and explain each objective used and the priority order in which each objective was considered.

RESPONSE: Subject to and without waiving the General Objections, Verizon states that its policy for the period from January 1, 2005 through September 30, 2008 was to seek to meet the service objectives set forth in Rule 25-4.070.

24. For the period January 1, 2005 through September 30, 2008, did Verizon use an objective for clearing service-affecting trouble reports other than the objective set forth in Rule 254.070, F.A.C., when scheduling repairs for residential services provided over FIOS? If so, please identify and explain each objective used and the priority order in which each objective was considered.

RESPONSE: Subject to and without waiving the General Objections, see response to Interrogatory No. 23.

25. For the period January 1, 2005 through September 30, 2008, did Verizon use an objective for clearing out-of-service trouble reports other than the objective set forth in Rule 254.070, F.A.C., when scheduling repairs for residential services provided over copper facilities? If so, please identify and explain each objective used and the priority order in which each objective was considered.

RESPONSE: Subject to and without waiving the General Objections, Verizon states that its policy for the period from January 1, 2005 through September 30, 2008 was to seek to meet the service objectives set forth in Rule 25-4.070.

[BEGIN PROPRIETARY] *****

***** **[END PROPRIETARY]**

and Verizon's OOS performance in August and September 2008 was 92% and 93%, respectively, while its NOOS performance for those months was 91% and 92%, respectively.

26. For the period January 1, 2005 through September 30, 2008, did Verizon use an objective for clearing service-affecting trouble reports other than

	12/31/04	12/31/05	12/31/06	12/31/07	09/30/08
FIOS Repair technicians					
Copper Repair technicians			REDACTED		
Subtotal					
Contractors					
Total					

Dispatch Resource Center	12/31/2004	12/31/2005	12/31/2006	12/31/2007	09/30/08
Associates - Copper					
Management - Copper					
Associates - FiOS			REDACTED		
Management - FiOS					
Total					

**FLORIDA REGION SCORECARD
RESULTS BY DISTRICT**

VZ 211 – VZ 242

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CONFIDENTIAL CD –
RESPONSE TO POD NO. 5

VZ 243

CUSTOMER SATISFACTION - Monthly Results

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	EOY
2005	Satisfaction 3 Month MA													
2006	Satisfaction 3 Month MA													
2007	Satisfaction 3 Month MA													
2008	Satisfaction 3 Month MA													

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VERIZON
V-14 CONSUMER REPAIR
QUESTIONNAIRE

VZ 245 – VZ 248

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VERIZON CUSTOMER MEASUREMENT
SERVICES (CMS) CUSTOMER CARE INDEX (CCI)
MEASUREMENT PROCESS OVERVIEW FOR
CONSUMER REPAIR CUSTOMERS

VZ 249 – VZ 253

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**FLORIDA LEADERSHIP MEETING
SLIDE PRESENTATION**

VZ 254 – VZ 277

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