

1 of Verizon's long-term service quality strategy – and demonstrate its
2 extraordinary efforts to provide high quality service.

3

4 Q. AT PAGE 12 OF HIS DIRECT TESTIMONY, STAFF WITNESS MOSES
5 CLAIMS THAT BECAUSE VERIZON HAS SHIFTED TECHNICIANS
6 FROM ITS COPPER CORE TO ITS FTTP NETWORK, VERIZON
7 LACKS THE RESOURCES TO MEET THE SERVICE OBJECTIVES
8 FOR ITS CORE CUSTOMERS. IS THAT TRUE?

9 A. No. In the first place, Mr. Moses leaves out some important information.
10 He is correct that the number of core technicians [BEGIN
11 CONFIDENTIAL] XX
12 XX
13 XX
14 XX
15 XX
16 XX
17 XXXXXXXXXXXXXXXXXXXXXXX. [END CONFIDENTIAL]

18

19 Mr. Moses also fails to note that approximately half of Verizon's FiOS
20 technicians have been trained to work on the copper network and that
21 Verizon draws on these technicians when necessary to make repairs to
22 the copper network.

COM _____
ECR _____
GCL _____
OPC _____
RCP 1
SSC _____
SGA _____
ADM _____
CLK _____

23

24 Q. DOES VERIZON CONTINUE TO PROVIDE HIGH-QUALITY SERVICE
25 TO THE CUSTOMERS ON ITS CORE NETWORK?

1 Q. HAVE YOU DONE ANY FURTHER ANALYSIS TO ASSESS
2 WHETHER VERIZON ENDEAVORS TO MEET THE OOS AND NOOS
3 SERVICE OBJECTIVES?

4 A. Yes. I have analyzed Verizon's performance by exchange during the
5 period in question for OOS using intervals of 24, 30, 36, 42 and 48
6 hours, and for NOOS using intervals of 72, 96 and 120 hours. The
7 tables attached in Exhibit DBK-3 show the number of times Verizon met
8 the interval for an exchange 90-94.9%, 85-89.9%, 80-84.9% and below
9 80% of the time. The bottom row of each table shows the total number
10 of "misses" for each interval, and thus the sum of the OOS and NOOS
11 "misses" for the 24-hour interval is 456, the number cited in the show-
12 cause order.

13
14 Q. WHAT DOES YOUR ANALYSIS SHOW?

15 A. My analysis demonstrates that Verizon is striving to meet the
16 Commission's service objectives based on the number of times Verizon
17 meets them or comes very close. [BEGIN CONFIDENTIAL] XXX
18 XXX
19 XXX
20 XXX
21 XXX
22 XXX
23 XXX
24 XXX
25 XXXXXXXXXX. [END CONFIDENTIAL]

REDACTED

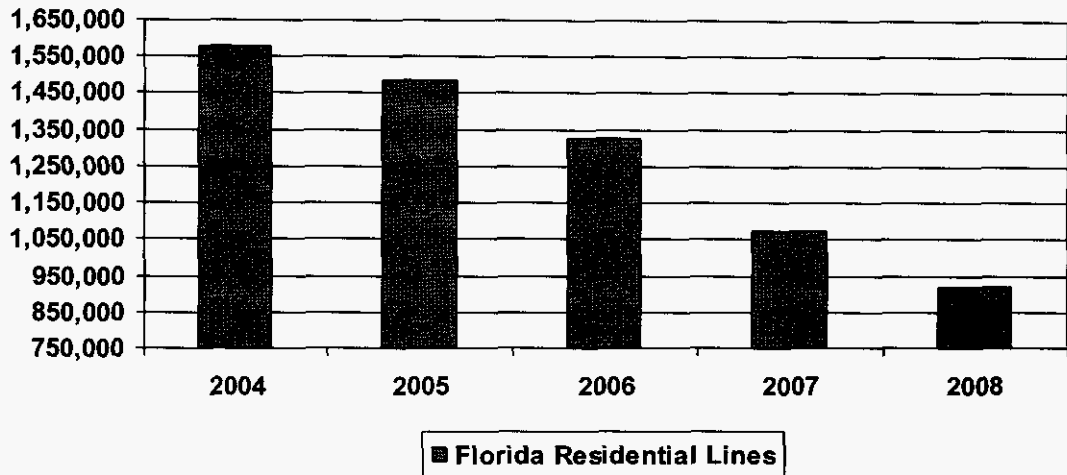
OOS: Exchange "Misses" for Stated Intervals

Percent range	24 hours	30 hours	36 hours	42 hours	48 hours
90-94.9%	85				
85-89.9%	49				
80-84.9%	42				
Below 80%	43				
Total "misses"	219				

NOOS: Exchange "Misses" for Stated Intervals

Percent range	72 hours	96 hours	120 hours
90-94.9%	59		
85-89.9%%	56		
80-84.9%	49		
Below 80%	73		
Total "misses"	237		

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Over the four-year period ending July 2008 (the most recent period for which census data is available), the number of households in the Tampa Bay area increased by almost 8%, which means these line-loss figures understate the impact of competition in the region.

Q. HAS VERIZON EXPERIENCED LINE LOSSES THROUGHOUT ITS REGION?

A. Yes. This vigorous competition effect is not confined to select areas within Verizon's service territory. Like all large ILECs in Florida, Verizon faces substantial competition from intermodal providers. As a consequence, Verizon has endured profound residential line losses over recent years. As shown on proprietary Exhibit MAR-1, **[BEGIN CONFIDENTIAL]** XXX
XX
XX
XXXX. **[END CONFIDENTIAL]**

1 Q. OPC WITNESS POUCHER CONTENDS (AT PAGES 7 AND 8) THAT
2 VERIZON WILFULLY VIOLATED RULE 25-4.070 BY NOT USING
3 ENOUGH RESOURCES TO ACHIEVE THE OBJECTIVES. IS THAT
4 CORRECT?

5 A. No. This opinion is based on the misconception that the rule imposes
6 absolute standards that must be met no matter the cost or the
7 circumstances. To the contrary, the rule requires companies to use
8 reasonable efforts to achieve 95% service levels, which means that
9 operational challenges and competitive forces must be taken into
10 account. Moreover, as Mr. Diamond points out, [BEGIN
11 CONFIDENTIAL] XXX
12 XXX
13 XXXX. [END CONFIDENTIAL] Mr. Poucher therefore is incorrect when
14 he suggests that Verizon has used insufficient resources for OOS and
15 NOOS troubles on its copper network.

16
17 Q. SHOULD VERIZON BE PENALIZED FOR ITS REPORTED OOS AND
18 NOOS PERFORMANCE?

19 A. No, for a number of reasons. First, Verizon should not be penalized at
20 all because it has not violated the Commission's service objectives,
21 willfully or otherwise, and as a price-regulated company it is not even
22 subject to them. Second, Verizon should not be penalized because its
23 network performance has been strong, very few customers have
24 complained about Verizon's repair service and customers surveyed
25 about Verizon's repair service have consistently given Verizon good

VERIZON - FLORIDA
 DATA AS OF DECEMBER
 EXCLUDES COMPANY OFFICIAL LINES

REDACTED

Exchange	Dec 2004		Dec 2005		Dec 2006		Dec 2007		Dec 2008		Growth % Total Res Lines 12/04 to 12/08
	Res Primary +BRI	Retail Res 2nd Line	Res Primary +BRI	Retail Res 2nd Line	Res Primary +BRI	Retail Res 2nd Line	Res Primary +BRI	Retail Res 2nd Line	Res Primary +BRI	Retail Res 2nd Line	
BARTOW	7,993	806	7,682	665	7,568	534	7,089	445	6,443	360	
BRADENTON	86,111	7,422	79,633	6,045	70,941	4,740	62,226	3,947	54,063	3,104	
CLEARWATER	172,877	16,271	151,901	12,785	130,512	9,965	110,244	7,964	92,267	6,195	
ENGLEWOOD	16,910	1,308	16,379	1,124	15,101	921	13,478	734	11,890	595	
FROSTPROOF	4,159	273	3,989	218	3,905	184	3,812	170	3,550	133	
HAINES CITY	34,689	2,100	34,280	1,697	31,756	1,333	28,635	1,165	24,213	907	
HUDSON	36,416	2,639	33,156	1,941	29,259	1,510	24,685	1,182	21,011	900	
INDIAN LAKE	1,003	92	1,006	87	979	78	972	70	911	49	
LAKE WALES	12,663	1,238	12,111	991	11,724	812	11,034	747	10,016	595	
LAKELAND	79,328	7,213	73,450	5,732	65,994	4,475	55,422	3,498	45,025	2,628	
MULBERRY	4,832	454	4,571	348	4,119	274	3,564	223	2,901	162	
MYAKKA	2,675	837	2,703	762	2,602	664	2,460	553	2,252	421	
NEW PORT RICHEY	50,985	3,708	46,555	3,020	40,642	2,311	34,886	1,831	30,027	1,479	
NORTH PORT	19,267	1,414	20,194	1,204	19,450	976	17,502	778	15,231	607	
PALMETTO	22,657	1,918	21,544	1,638	19,893	1,334	17,211	1,064	14,619	810	
PLANT CITY	23,139	2,893	21,703	2,386	19,263	1,893	16,455	1,517	13,922	1,146	
POLK CITY	3,967	422	3,740	331	3,535	286	3,120	243	2,599	180	
SARASOTA	113,825	16,866	109,202	14,710	99,114	12,196	89,351	10,218	80,916	8,475	
ST. PETERSBURG	186,461	15,682	165,069	12,501	140,991	9,753	118,637	7,770	97,834	5,719	
TAMPA	375,454	47,519	341,690	38,518	297,434	30,466	264,394	25,458	232,107	20,486	
TARPON SPRINGS	30,090	3,144	26,654	2,546	22,826	2,044	19,517	1,613	16,786	1,294	
VENICE	50,020	4,689	49,184	4,125	45,360	3,362	41,096	2,726	37,297	2,241	
WINTER HAVEN	43,280	3,455	40,159	2,809	36,738	2,147	31,028	1,731	25,246	1,284	
ZEPHYRHILLS	25,074	1,356	23,514	1,048	21,568	835	19,357	678	16,595	523	
Grand Total	1,403,875	143,719	1,290,069	117,231	1,141,274	93,093	996,175	76,325	857,721	60,293	

PROPRIETARY - NOT FOR USE OR DISCLOSURE OUTSIDE VERIZON.