

REPORT ON TELECOMMUNICATIONS SERVICE QUALITY

For

VERIZON FLORIDA, LLC.

Frostproof, Haines City, Indian Lake, Lakeland, Lake Wales, and Winter Haven Exchanges March 10 – April 25, 2008

> Division of Service, Safety & Consumer Assistance September 2, 2009

Verizon Florida, LLC. Telecommunications Service Quality Report

Summary

Staff performed a service evaluation on Verizon Florida, Inc. (Verizon), during the period of March 10 – April 25, 2008. The exchanges reviewed were Frostproof, Haines City, Indian Lake, Lakeland, Lake Wales, and Winter Haven. A broad range of tests were conducted that included measurements of the subscriber's line and it included a series of automated test calls. Several other categories were evaluated and they are as follows:

- Answer Time, which includes Voice and TDD calls to both the Business and Repair Service Offices
- Adequacy of Directory Services, which includes a Directory Review and New Numbers in Directory Assistance
- Availability of Service (Installation)
- Subscriber Loops, Transmission
- Repair Service, which includes Out-of-Service (OOS) Restored within 24 Hours, Service Affecting (SA) Restored within 72 Hours, and Rebates Required by Rule
- Periodic Report Review
- Safety, which includes Ground Deficiencies
- Timing and Billing Accuracy, which includes Intra-LATA 1+, and Directory Assistance Billing
- 9-1-1 Emergency Service, which includes Voice and TDD call completions

The service evaluation objectives are (1) to evaluate a company's performance based on service quality rules and standards; (2) to verify the service results the company reported to the Commission on a periodic basis; and (3) to determine if the company has corrected, or is in the process of correcting, all deficiencies found in previous evaluations.

Staff notes that a considerable amount of time has elapsed from when the service evaluation (SE) field work (March 10 – April 25, 2008) was completed to the date the service quality report was published. We attribute the length of time to changes in the manner the SE was accomplished. Previously, SEs were scheduled for eight to ten weeks incurring the relative travel expenses for personnel assigned to the SE. In order to reduce the Service Quality Section's travel expense, only answer time testing, subscriber loops, electrical ground safety checks and automated test calls are conducted during the field visit. The remaining items are reviewed in Tallahassee. The review in Tallahassee reduced the capability of the incumbent local exchange company (ILEC) to immediately respond and investigate any discrepancy related to the review. The draft report was issued on May 19, 2009 to the company.

Findings

In the periodic report review, staff examined the period from March 2007 through March 2008 for the exchanges being evaluated and found that the reports required by rule were in agreement with the records that were examined except for one instance. The Repair Service – SA restored within 72 hours evaluation results in the Lakeland exchange for December 2007 did not agree with Verizon's periodic report. Verizon indicated 94.0% of the SA trouble tickets were cleared within 72 hours, which is failing the standard of 95%. The evaluation determined the percentage to be 96.8%.

Answer Time:

Business Office TDD:

Staff made fifty calls to Verizon's business office using the Telecommunications Device for the Deaf (TDD) through the Florida Relay System (FRS). One call was busy, 49 calls were answered; however, only 32 calls were answered within the standard.

Corrective Action:

Verizon stated, "staff was provided the instructions from the customer information pages on how to reach the Verizon Business office through the Florida Relay System (FRS). Staff should have been given the number to the Verizon Center for Customer with Disabilities (VCCD) for the Business Office TDD answer time test calls." This center "takes voice and TDD calls and handles residential fulfillment and billing issues such as installation, moves, changes, and billing inquiry." "In addition to taking orders and handling billing inquiries, the VCCD helps customers [who identifies him/herself as having a disability, such as being visually impaired or blind, hard of hearing or deaf, cognitively impaired, speech impaired, or mobility impaired] determine telecommunications solutions most suited to their individual need. Consultants can also help with specialized phone equipment, high-speed Internet services, Braille and Large Print Bills and many other services." Verizon did state that the number for the VCCD is listed on the customer information pages of the Verizon telephone directories and the number is printed on Florida telephone bills under "How to reach us" section. During the next service evaluation, Verizon requests that staff retest the Business Office TDD Answer Time. "At that time the staff will be given the number to the Verizon center for Customers with Disabilities (VCCD) for the Business Office TDD answer time test calls."

Repair Service TDD:

Staff conducted 50 calls to Verizon's repair service using the TDD and the FRS. One call was busy, 49 calls were answered; however, only 42 calls were answered within standards.

Corrective Action:

Verizon reported that it "is reviewing the manner in which TDD calls to the repair center are processed, including evaluating the possibility of having calls from the Florida Relay System (FRS) be routed directly to the automatic call distributor (ACD) and/or be given priority within the queues." It also mentioned that "... the proposed amendments in docket No. 080641-TP, should have a positive affect on these answer time results. The new rules apply to basic local telecommunications service only and the answer time objective changed from 90% within 55 seconds to 90% within 90 seconds."

Adequacy of Directory Services:

New Numbers in Directory Assistance:

Out of the 193 requests for numbers to Directory Assistance (DA), the DA operators found 166 of the numbers correctly. The DA operators would state that a number was not published when the number should have been published, the number was not found at all, or a different number was provided rather than the number that was listed on the service order.

Corrective Action:

Verizon stated the search results for numbers to DA "are based upon what the caller asks for and how it is asked including how the name is enunciated. The search results are also based on what the operator hears and how the operator performs the initial and expanded search. Given the dependence of human interaction in the directory assistance process, 99% is a difficult objective to achieve."

After Verizon's review of each failed call, it stated the following actions were taken: "(1) We [Verizon] will continue to reinforce the importance of verifying the information with the customer and performing a complete search. (2) Directory Assistance Operators have been coached on asking for a spelling when names are unique or no listing is found. (3) As of the second quarter 2009, Verizon eliminated the partition between the Verizon database and the out of franchise/fringe vendor listings; eliminating delays and ensuring accuracy of the listing."

When a TDD customer calls DA, Verizon contracts with AT&T's Operator Services for the Deaf, who serve as a relay center. The AT&T operators will call directory assistance on behalf of the TDD customer. Verizon stated, "[a]n important item to note is that the relay operator can only relay information between the caller and directory assistance. The relay operator cannot initiate conversation or add to the conversation with the directory assistance operator such as offering a spelling." Verizon restated that 99% was a difficult objective to achieve because of the human interaction in the DA process.

Verizon reported that the following actions were taken after review of each failed TDD call. "(1) Directory Assistance operators were coached on asking for a spelling when names are unique or no listing is found. (2) Directory Assistance operators were coached to perform an expanded search when no listing is found."

Availability of Service (Installation):

Staff reviewed the fourth quarter of 2007 for the Indian Lakes exchange. This exchange failed to meet the standard.

Corrective Action:

Verizon stated that the Indian Lakes exchange missed the standards for Availability of Service due to rain/lightning, lack of good facilities, a cable that needed to be repaired, and lack of manpower. One service order was missed because Verizon failed to provide service during the appointment window (time). Verizon stated, "[a]lthough the appointment window was missed, service was provided on that day, the customer's due date."

Subscriber Loops:

Transmission:

For the exchanges that were reviewed, 591 loops were tested for transmission requirements. Fifty-one loops were deemed unsatisfactory. The problems observed were high power influence, high noise, high loss, low balance readings, and one loop had a loop current reading that was below the circuit minimum. The readings caused the loops to be classified as unsatisfactory.

Repair Service:

Out-of-Service Reports restored within 24 Hours:

Staff reviewed the OOS reports for the Frostproof, Haines City, Indian Lakes, Lake Wales, and Winter Haven exchanges. These exchanges, for the fourth quarter of 2007, failed to meet the standards.

Corrective Action:

Verizon reported that it "focuses intently on keeping customers in service, delivering high network reliability month after month and substantially cutting trouble reports over the last three years." Verizon also stated that it "provides this superior service despite intense competitive pressures and significant operational challenges, including a lengthy rainy season and frequently severe weather."

Verizon explained that its "serving area experienced severe rain storms, during the month of October, which had a direct affect on the October results. These storms cause an increased number of trouble reports as well as they interfere with our ability to dispatch repair personnel." Verizon's "employees are not dispatched during dangerous condition."

Verizon stated that the main reasons that the objectives were missed for the Out-of-Service Reports restored within 24 hours were several outages, inclement weather and manpower that was diverted to other areas to clear the troubles.

Service Affecting Reports restored within 72 Hours:

In the Service Affecting reports restored within 72 hours, staff also reviewed the fourth quarter of 2007 for the Frostproof, Haines City, Indian Lakes, Lake Wales, and Winter Haven exchanges. These exchanges failed to meet standards.

Corrective Action:

Verizon reported "[t]he missed objectives were due to manpower being reallocated from service affecting trouble to out of service conditions."

Rebates Required by Rule:

During the repair ticket review, staff found 1,052 rebates were due to customers being out of service greater than 24 hours. One hundred and forty-eight rebates were not credited to the customers.

Corrective Action:

Verizon reported, "Credit has been issued to all accounts where the rebate was not previously provided." Verizon also stated, "[t]he majority of the missed rebates were related to customers who had their account on vacation service (seasonal service). The customer requested service to be restored from vacation service and a trouble report was received prior to the first bill being generated." Without a bill, the Verizon associate does not have a way to issue a credit for the trouble report and "[i]n this instance, the associate should place a 30 day follow-up on the account within the rebate tool so that the account is redistributed through the rebate tool again in 30 days. At that point in time, a bill should be available for the associate to issue the time out service credit."

Because the 30 days follow-up did not occur, Verizon issued a refresher-training course for its associates and "a service alert was sent to the associates responsible for issuing the time out of service credits, reiterating the process to follow when no bill is available."

Regarding some of the other rebates that were missed, Verizon stated that the rebates should have been credited and believed it was not "processed due to employee error. The associates responsible for issuing the time out of service credits have been coached."

Safety:

Ground Deficiencies:

For the exchanges that were reviewed, 589 loops were tested for grounding deficiencies. One hundred and thirty-five loops were new installs and 454 loops were randomly tested. Seven loops were deemed to have improper grounds for the loops that were recently installed. Thirty-five randomly tested loops were also deemed to have improper grounds. The problems observed included loops that were missing a ground or the ground wire was broken or loose.

Timing and Billing Accuracy:

Intra-LATA 1+:

Staff made 141 calls to test Verizon's Intra-LATA 1+ service. Verizon underbilled 36 of the calls to the extent it did not bill for these calls at all. These calls should have been billed as an Intra-LATA call.

Corrective Action:

Verizon reported the 36 calls that were not billed "were made from one of the test lines that had been installed for the purposes of the service evaluation." This test line was a Lakeland number and the 36 calls that were not billed was a Sarasota number. "Per the Verizon General Service Tariff, calls from Lakeland to Sarasota are IntraLATA toll calls." The test line was disconnected at the end of the evaluation fieldwork. "Since this specific line is no longer in service, we [, Verizon,] are unable to duplicate the configuration of the line and unable to isolate why a billing record was not created."

Verizon stated, "The translations in the Lakeland switch have been reviewed and it has been confirmed that calls from" Lakeland to Sarasota "are correctly treated as toll calls and are passed to the customer's presubscribed carrier; therefore we [, Verizon,] can only conclude that this was an isolated incident."

Immediately following the summary and findings is a series of charts depicting the results of the categories that were evaluated. In the instances where Verizon failed to meet the established standard, the results are highlighted in yellow.

Verizon Florida, LLC. Telecommunications Service Quality Report

Charts

Answer Time - Business Office *								
	% of Calls %							
	Total	Calls	Calls	Calls	Answered in	Answered		
	Calls	Failed	Offered	Answered	55 sec.	w/i Std.		
Voice	150	1	99.3%	148	137	92.6%		
TDD	50	0	100.0%	49	32	65.3%		

Standards: 95% of the calls shall be offered within 15 seconds after the last digit is dialed when the company uses an IVRU.

90% of the calls shall be answered within 55 seconds after being transferred to a live attendant. Rule 24-4.073 (b) and (c) F.A.C., Answering Time applies.

* One busy signal after the IVRU for the Business Office Voice calls. One busy signal to the Business Office TDD, business office hung up or disconnected by live operator.

Answer Time - Repair Service *								
% of Calls %								
	Total	Calls	Calls	Calls	Answered in	Answered		
	Calls	Failed	Offered	Answered	55 sec.	w/i Std.		
Voice	150	0	100.0%	149	149	100.0%		
TDD	50	0	100.0%	49	42	85.7%		

Standards: 95% of the calls shall be offered within 15 seconds after the last digit is dialed when the company uses an IVRU.

90% of the calls shall be answered within 55 seconds after being transferred to a live attendant. Rule 25-4.073 (b) and (c) F.A.C., Answering Time applies.

DID NOT MEET STANDARD

^{*} One busy signal after the IVRU for the Repair Service Voice calls. One busy signal to the Repair Service TDD, operator hung up after answering call, without conversing with the FRS operator.

Directory Reviewed							
Name / Date of Directory	Total Items Reviewed	Items in Compliance with Std.	% of Items in Compliance with Std.				
Frostproof February 2008	21	21	100.0%				
Haines City February 2008	21	21	100.0%				
Indian Lake February 2008	21	21	100.0%				
Lakeland February 2008	21	21	100.0%				
Lake Wales February 2008	21	21	100.0%				
Winter Haven, Lake Alfred, Auburndale February 2008	21	21	100.0%				
"No Sales" annual bill insert	1	1	100.0%				
Total	127	127	100.0%				

Standard: 100% of the items reviewed for the directory shall comply with Rule 25-4.040 F.A.C., Telephone Directories; Directory Assistance and Rule 25-4.079, F.A.C., Hearing/Speech Impaired Persons.

New Numbers in Directory Assistance						
Calls Made Requests for Total found % Found in						
to DA	Numbers	in DA	DA			
193	193	166	86.0%			

Standard: 99% of new service orders shall be listed in Directory Assistance (DA) within 48 hours of competition of the order. Rule 25-4.040 (5) F.A.C., Telephone Directories; Directory Assistance applies.

Availability of Service (Installation) - 4th Qtr 07								
			Orders					
	Total		Delayed		Orders	% Orders		
	Orders	Orders	for	Net	Completed	Completed		
Exchange	Reviewed	Excluded	Const.	Orders	w/i Std.	w/i Std.		
Frostproof	269	0	0	269	246	91.4%		
Haines City	1592	2	0	1590	1471	92.5%		
Indian Lakes	44	0	0	44	38	86.4%		
Lake Wales	647	0	0	647	587	90.7%		
Winter Haven	1490	0	0	1490	1358	91.1%		

Availability of Service (Installation) - December 2007							
	Orders						
	Total		Delayed		Orders	% Orders	
	Orders	Orders	for	Net	Completed	Completed	
Exchange	Reviewed	Excluded	Const.	Orders	w/i Std.	w/i Std.	
Lakeland	865	0	0	865	793	91.7%	

Standard: 90% of Services Orders shall be completed within 3 days, on the appointment day, or on the customer request if greater than 3 days. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.066 F.A.C., Availability of Service applies.

Subscriber Loops - Transmission							
	Total	Number of	Number of	% of			
	Loops	Unsatisfactory	Satisfactory	Satisfactory			
Exchange	Tested	Loops	Loops	Loops			
Frostproof	100	9	91	91.0%			
Haines City	101	4	97	96.0%			
Indian Lakes	89	7	82	92.1%			
Lakeland	101	0	101	100.0%			
Lake Wales	100	28	72	72.0%			
Winter Haven	100	3	97	97.0%			
Company Total	591	51	540	91.4%			

Standard: Rule 25-4.072 F.A.C., Transmission Requirements applies. An unsatisfactory loop describes a condition where the parameter (loss, noise, balance, loop current) being measured is not within the recommended or acceptable limits as defined within the ANSI/IEEE std. 820-1984.

Out-of-Service Reports Restored Within 24 Hours - 4th Qtr 2007							
				# of OOS	% of OOS		
				Reports	reports		
	Reports	Excluded	# of OOS	Cleared w/i	Cleared w/i		
Exchange	Reviewed	Reports	Reports	24 Hrs.	Std.		
Frostproof	493	23	380	339	89.2%		
Haines City	1392	47	996	888	89.2%		
Indian Lakes	300	3	241	200	83.0%		
Lake Wales	1805	142	1335	1152	86.3%		
Winter Haven	1804	125	1301	1182	90.8%		

Out-of-Service Reports Restored Within 24 Hours - December 2007							
	# of OOS % of OOS						
				Reports	reports		
	Reports	Excluded	# of OOS	Cleared w/i	Cleared w/i		
Exchange	Reviewed	Reports	Reports	24 Hrs.	Std.		
Lakeland	1616	134	1109	1055	95.1%		

Standards: 95% of Out-of-Service Repair Tickets shall be cleared within 24 hours or on the appointment day. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.070 F.A.C., Customer Trouble Reports applies.

Service Affecting Reports Restored Within 72 Hours - 4th Qtr 2007						
Exchange	# of SA Reports	# of SA Reports Cleared w/i 72 Hrs.	% of SA Reports Cleared w/i Std.			
Frostproof	90	67	74.4%			
Haines City	349	315	90.3%			
Indian Lakes	56	36	64.3%			
Lake Wales	328	281	85.7%			
Winter Haven	378	313	82.8%			

Service Affecting Reports Restored Within 72 Hours - December 2007						
# of SA # of SA Reports % of SA Reports						
Exchange	Reports	Cleared w/i 72 Hrs.	Cleared w/i Std.			
Lakeland	373	361	96.8%			

Standards: 95% of Service Affecting Repair Tickets shall be cleared within 72 hours or on the appointment day. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.070 F.A.C., Customer Trouble Reports applies.

Repair Service Rebates Required by Rule						
Rebates Rebates % of Rebates						
Month	Due	Given	Given			
October-2007	463	392	84.7%			
November-2007	288	255	88.5%			
December-2007	301	257	85.4%			

Standard: 100% of the rebate shall be automatically credited to the customer if the service remains out-of-service in excess of 24 hours computed on a continuous basis, Sundays and holidays included. Rule 25-4.070 (1)(b), F.A.C. Customer Trouble Reports applies.

Safety - Ground Deficiencies										
Exchange	Loops Tested	Poor Grounds	% of Adequate Grounds							
New Installs										
Frostproof	20	1	95.0%							
Haines City	22	0	100.0%							
Indian Lakes	15	1	93.3%							
Lakeland	37	5	86.5%							
Lake Wales	21	0	100.0%							
Winter Haven	20	0	100.0%							
Company Total	135	7	94.8%							
Ra	andom Loops	5								
Frostproof	80	12	85.0%							
Haines City	79	1	98.7%							
Indian Lakes	74	4	94.6%							
Lakeland	64	4	93.8%							
Lake Wales	79	5	93.7%							
Winter Haven	78	9	88.5%							
Company Total	454	35	92.3%							

Standards: Rule 25-4.038, F.A.C. Safety applies.

Timing and Billing - Intra-LATA									
	Number of	Calls	Calls	% Correctly					
	Calls	Undertimed	Overtimed	Timed					
Timing Accuracy									
1+	141	36	0	74.47%					
	Number of	Calls	Calls	% Correctly					
	Calls	Underbilled	Overbilled	Billed					
Billing Accuracy									
1+	141	36	0	74.47%					

Billing Per Tariff	Yes or No
1+	Yes

Standard: Timing and billing accuracy for intra-LATA calls shall not be less than 97%. Rule 25-4.077 Metering and Recording Equipment applies. The test was conducted prior to the repeal of the rule.

Timing and Billing - Directory Assistance									
							%	Billed	
Central	Telephone	Calls		Billable	Calls		Correctly	per	
Office	Number	Made	Allowance	Calls	Billed	Variance	Billed	Tariff	
	863-686-								
Lakeland	9094	157	0	157	158	-1	99.4%	Y	
Lakeland -	863-686-								
TDD Line	9178	52	52	0	0	0	100.0%	Y	

Standard: 97% of calls to DA shall be billed correctly and in accordance with the company's tariff on file with the Commission. Rule 25-4.077 Metering and Recording Equipment, and Rule 25-4.115, F.A.C., Directory Assistance applies. The test was conducted prior to the repeal of Rule 25-4.077.

9-1-1 Emergency Service										
		Calls Busy Failed Calls				% of Calls				
Area	NXX	Made	Calls	Calls	Completed	Completed				
	Voice Calls									
Lakeland	686	150	3	0	150	100.0%				
TDD Calls										
Lakeland	686	50	0	0	50	100.0%				

Standard: 100% of calls to 911 Emergency Service shall be completed by the company. Rule 25-4.081, F.A.C. Emergency 911 Access applies.

^{*} Three calls received a fast busy signal for the 9-1-1 TDD

Quality of Service Complaints Reported to the Commission												
	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07
Number of Customer Complaints	72	63	44	63	56	77	64	67	43	68	52	34

