



REPORT ON TELECOMMUNICATIONS SERVICE QUALITY

For

VERIZON FLORIDA, INC.

Bradenton, Englewood, North Port, Palmetto, Sarasota, and Venice Exchanges

April 24, 2006, through May 18, 2006

Division of Competitive Markets & Enforcement

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For

Verizon Florida, Inc.

Engineering Specialists of the Florida Public Service Commission's Division of Competitive Markets and Enforcement conduct field service evaluations of the telecommunications services provided by Incumbent Local Exchange Companies (ILECs), Interexchange Companies (IXCs), and Competitive Local Exchange Companies (CLECs) operating within the state of Florida. Section 364.01(4)(c), Florida Statutes, mandates that the Commission "protect the public health, safety, and welfare by ensuring the monopoly services provided by telecommunications companies continue to be subject to effective price, rate, and service regulation."

The field service evaluation objectives are (1) to evaluate a company's performance based on service standards and rules; (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 performed a field service evaluation on Verizon Florida, Inc. (Verizon), during the period of April 24, 2006, through May 18, 2006. The exchanges reviewed were Bradenton, Englewood, North Port, Palmetto, Sarasota, and Venice. The categories staff evaluated were:

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

I. Answer Time

Rule 25-4.073 (1) (c), F.A.C, Answering Time states:

For subscribers who either select the option of transferring to a live assistant [when the company utilizes a menu driven automated, interactive answering system], or do not interact with the system for twenty seconds, the call shall be transferred by the system to a live attendant. At least 90 percent of the calls shall be answered by the live attendant prepared to give immediate assistance within 55 seconds of being transferred to the attendant.

Staff conducted 150 calls to Verizon's business office and repair service respectively. These calls were voice calls and Verizon utilized a menu driven, automated, interactive answering system or an IVRU. According to the rule above, the standard for both the business office and the repair service is 90 percent of the calls should be answered within 55 seconds. Staff made 50 calls using a Telecommunications Device for the Deaf (TDD) to both the business office and repair service. In these situations, Verizon processes TDD calls by using the Florida Relay Service (FRS). A TDD customer is directed to contact FRS, which will in turn relay the call to the appropriate Verizon operator service. The FRS operator then navigates through Verizon's IVRU system to direct the call to the appropriate office. Because the TDD calls are answered using an IVRU through FRS, staff relied on feedback from the FRS operator to verify that 90 percent of the calls are answered within 55 seconds.

During the 2005 service evaluation, Verizon answered 100 percent of the business office voice calls within standards and none of the business office TDD calls within standards. Verizon made a small improvement during the 2006 service evaluation with the TDD calls but declined in performance in answering the voice calls for the business office as Table 1 indicates.

Type of Calls	Total Calls	Number of Calls Failed	Number of Calls Answered	Number of Calls Answered within Standard	Percent Answered	Percent Answered within Standard	90% Standard Met
Voice	150	2	148	111	98.7%	75.0%	N
TDD	50	0	50	43	100.0%	86.0%	N

Verizon states its reason for not meeting the standard for business office answer time was that the planned staffing was not sufficient to handle the total amount of call volumes. Verizon stated that over the past several years, it has experienced a steady reduction in access lines. Verizon uses the number of access lines to assist in long-term forecasting and states even though the access lines have continued to decline, the call volume to the business office did not.

In addition, in October 2005, Verizon began to roll out an enhanced voice portal system. This system was to assist the customer by offering additional choices, increased flexibility and a reduction to the amount of misdirected calls. The system in turn would have reduced the amount of Verizon’s operators. Verizon explained there were various technical issues with the system, which caused delays in system processing and a longer handling time for the calls. This affected the answer time for the business office.

Verizon also introduced new procedures to safeguard customers’ information at the end of 2005. This affected the answer times as customers and Verizon employees adjusted to the new procedures.

Verizon states that in order to improve answer time for the business office, it will increase mandatory and voluntary overtime for the employees. All non-critical training classes will be postponed until answer times are restored and critical training is required to be conducted using overtime and on Saturdays. In the later part of 2005, Verizon began an aggressive hiring of new associates; however, due to the length of hiring process and initial training, the affects of the increase in employees is only now starting to be realized.

Table 2, Answer Time – Repair Service, illustrates that Verizon answered 100 percent within the allotted time exceeding the answer time standard. TDD calls directed to the repair service through the Florida Relay Service resulted in a 100 percent answer time, exceeding the rule standard.

Table 2 Answer Time – Repair Service							
<u>Type of Calls</u>	<u>Total Calls</u>	<u>Number of Calls Failed</u>	<u>Number of Calls Answered</u>	<u>Number of Calls Answered within Standard</u>	<u>Percent Answered</u>	<u>Percent Answered within Standard</u>	<u>90% Standard Met</u>
Voice	150	1	149	149	99.3%	100.0%	Y
TDD	50	2	48	48	96.0%	100.0%	Y

II. Adequacy of Directory Services

A. Directory Review

Rule 25-4.040, F.A.C., Telephone Directories; Directory Assistance and Rule 25-4.079, F.A.C., Hearing/Speech Impaired Persons are the applicable rules staff applies when evaluating the adequacy of directory services. These rules require specific actions such as publishing updated telephone directories once every twelve months. They also requires “911” instructions to be listed on the inside of the front cover and the FPSC contact information. Other specific instructions include a TDD listing of the Business Office of the incumbent telecommunications provider.

Staff reviewed twenty-one items from six Verizon telephone directories. One item was missed in all six directories due to the telephone directories showing \$0.70 for the Directory Assistance (DA) charges. Verizon’s tariff states the charge is \$0.85.

During the last evaluation, Verizon’s telephone directories listed prices for the DA charges, busy verification and emergency interrupt different than what was listed its tariff. This year the busy verification and emergency interrupt prices were corrected, but the DA charges are still incorrect.

In Verizon’s response to the missed directory review standards, it stated that at the time the directories were published, the tariff price for the directory assistance was \$0.70 and that is what the directories reflected. The directory assistance rate changed after the telephone directories were published. The new telephone directories will reflect the \$0.85 charge for directory assistance.

Table 3 Directory Reviewed

Name/ Date of Directory	Total Items Reviewed	Number of Items in Compliance with Standards	Percent of Items in Compliance with Standards	100% Standards Met
Bradenton / Oct-05	21	20		
Englewood/Oct-05	21	20		
North Port/Oct-05	21	20		
Palmetto/Oct-05	21	20		
Sarasota/Oct-05	21	20		
Venice/Oct-05	21	20		
Company Total	126	120	95.2%	N

B. New Numbers in Directory Assistance

Rule 25-4.040 (5), F.A.C., Telephone Directories; Directory Assistance states:

Directory assistance operators shall maintain records of all telephone numbers (except for non-published telephone numbers) in the area for which they have the responsibility of furnishing service. . . All new or changed listings shall be provided to directory assistance operators within 48 hours after connection of service, excluding Saturdays, Sundays and holidays.

Staff reviewed 195 service orders that were more than 48 hours old, but not more than 76 hours old after connection of service. Staff called directory assistance (DA) to verify that the subscribers were in the DA database using the service orders as a guide. Some DAs allow more than one request for numbers on a single call. Staff made 134 calls to DA requesting 195 numbers indicating that staff made multiple requests per call. Verizon’s directory assistance found 177 of the requested numbers. Table 4 represents the DA test results indicating Verizon did not meet the standard.

During last year’s service evaluation, Verizon found 93.4 percent of new numbers in the directory assistance database. This year, the percentage increased to 94.7 percent of new numbers being found in the directory assistance database.

Verizon stated that since the calls are not recorded, it was not able to review the conversations between the caller and the directory assistance operator. Directory Assistance search results are based upon what the caller asks for, how the information is asked, and how the information is enunciated. The search results are also based on what the operator hears and how the operator performs the searches. In Verizon’s response, it stated, “Given the dependence of human interaction in the directory assistance process, 99% is a difficult objective to achieve.”

Verizon was able to research some of the directory assistance misses. In these cases, Verizon determined that the directory assistance operator did perform the call correctly. Corrected results are in Table 4 below.

Verizon stated that it would continue to reinforce the importance of verifying the information with the customer and performing a completed search. Directory Assistance operators have been coached on asking for a spelling when names are unique or no listings are found.

Number of Calls <u>made to DA</u>	Number of Requests for <u>Numbers</u>	Total Numbers <u>Found in DA</u>	Percent of Numbers Found in <u>DA</u>	99% <u>Standard Met</u>
134	187	177	94.7%	N

III. Availability of Service (Installation)

Rule 25-4.066 (2), F.A.C., Availability of Service states:

Where central office and outside plant facilities are readily available, at least 90 percent of all requests for primary service in any calendar month shall normally be satisfied in each exchange of at least 50,000 lines and quarterly in exchanges of less than 50,000 lines within an interval of three working days after receipt of application when all tariff requirements relating thereto have been complied with, except those instances where a later installation date is requested by the applicant or where special equipment or services are involved.

Rule 25-4.066 (3), F.A.C., Availability of Service states:

If the applicant requests an installation date beyond three working days, the requested date shall be counted as day three for measurement purposes.

Rule 25-4.066 (4), F.A.C., Availability of Service states:

When an appointment is made in order for the company to gain access to the customer's premises, the mutually agreed upon date will be day three for measurement purposes.

Six exchanges were reviewed during the evaluation: Bradenton, Englewood, North Port, Palmetto, Sarasota, and Venice. The Englewood, North Port and Palmetto exchanges at the time of the evaluation had less than 50,000 access lines therefore staff requested the service orders for January 1, 2006, through March 31, 2006. Bradenton, Sarasota, and Venice exchanges had more than 50,000 access lines so the period reviewed was March 1, 2006, through March 31, 2006.

The first quarter of 2006 was reviewed for the Englewood exchange. Four orders were excluded because the connection of the service happened the month before the order was closed. Orders are also excluded when there is a delay for construction of facilities to provide service to the end user. An example of an excluded order would be if the customer is in a brand new neighborhood and there are no facilities available. The net number of orders for the Englewood exchange was 738. Out of the net orders, 698 orders were completed either within three days, on the appointment day and time, or on the day that the customer requested, if it was greater than three days. This resulted in 94.6 percent of service orders completed within standards. The standard is 90 percent.

Staff reviewed 1,351 orders for the North Port exchange with 11 orders being excluded. 1,114 out of 1,340 net orders were completed within standards. This is 83.1 percent, which is below standards. Staff reviewed 1,265 orders for the Palmetto exchange and six orders were excluded. Out of 1,259 net orders, 1,164 orders were completed within standards resulting in a 92.5 percent.

For those exchanges reporting monthly, staff reviewed March 2006 orders for Bradenton, Sarasota, and Venice. The total number of orders reviewed for Bradenton was 1,307 and four orders were excluded. Out of 1,303 net orders, 1,189 orders were completed within standards. The result is 91.3 percent, which is above standards. In the Sarasota exchange, 1,525 orders were reviewed and 36 orders excluded. Out of 1,489 net orders, 1,395 orders completed within standards. This also resulted in a percentage above standards, which is 93.7 percent. For Venice, 525 orders were reviewed and five of those orders were excluded. Out of 520 net orders, 477 orders were completed within standards, which is 91.7 percent.

In comparing results for 2005, three exchanges were also evaluated. Those results indicated two exchanges met standards and one exchange did not. The 2006 results for the three exchanges containing more than 50,000 lines exceeded the 90 percent standard. Table 5 contains the breakdown for each exchange.

The only exchange that failed to meet the standard for 2006 was North Port. In its response, Verizon stated that North Port missed the service installation standard because of a higher than forecasted volume of new service installations. This exchange experienced an unanticipated 40 percent increase in service order volumes.

Table 5 Availability of Service (Installation)

<u>Exchange</u>	<u>Month</u>	<u>Total Orders Reviewed</u>	<u>Number of Orders Excluded</u>	<u>Number of Orders Delayed for Const.</u>	<u>Number of Net Orders</u>	<u>Number of Orders Completed within Standards</u>	<u>Percent of Orders Completed Within Standards</u>	<u>90 % Standard Met</u>
Englewood	Jan - 06	361	4	0	357	328	91.9%	
	Feb - 06	202	0	0	202	196	97.0%	
	Mar - 06	179	0	0	179	174	97.2%	
	1 st Qtr Total	742	4	0	738	698	94.6%	Y
North Port	Jan - 06	510	9	0	501	395	78.8%	
	Feb - 06	408	0	0	408	342	83.8%	
	Mar - 06	433	2	0	431	377	87.5%	
	1 st Qtr Total	1351	11	0	1340	1114	83.1%	N
Palmetto	Jan - 06	595	6	0	589	546	92.7%	
	Feb - 06	350	0	0	350	325	92.9%	
	Mar - 06	320	0	0	320	293	91.6%	
	1 st Qtr Total	1265	6	0	1259	1164	92.5%	Y
Bradenton	Mar - 06	1307	4	0	1303	1189	91.3%	Y
Sarasota	Mar - 06	1525	36	0	1489	1395	93.7%	Y
Venice	Mar - 06	525	5	0	520	477	91.7%	Y

IV. Subscriber Loops – Transmission

Rule 25-4.072(1), F.A.C., Transmission Requirements states:

Telecommunications companies shall furnish and maintain the necessary plant, equipment, and facilities to provide modern, adequate, sufficient, and efficient transmission of communications between customers in their service areas. Transmission parameters shall conform to ANSI/IEEE Standard 820 Telephone Loop Performance Characteristics (Adopted 1984) incorporated herein by reference.

Staff performs transmission tests as recommended by the ANSI/IEEE Standard 820-1984. The tests measure Loop Current, Decibel Loss, Power Influence, Metallic Noise, and Balance. The loop is the facility that runs from the customer’s house to the telecommunications company’s office and equipment. The measurements recommended by the ANSI/IEEE Standard 820-1984 are transmission characteristics of the loop that indicate acceptable performance criteria. Staff

performs subscriber loop measurements during service evaluations to verify that industry standards are being met. In addition, if two or more measurements fall within the marginal range for Loop Current, Decibel Loss, or Metallic Noise, the loop is considered to be unsatisfactory and should be referred to maintenance for repair.

Staff tested 589 customer loops in the Bradenton, Englewood, North Port, Palmetto, Sarasota, and Venice exchanges. Staff results indicated that five loops were unsatisfactory, 110 loops were marginal, where only one area of measurement was in the marginal range, and 474 loops were satisfactory. The result for the overall subscriber loop evaluation is 99.2 percent. Table 6 contains the results for each exchange for the 2006 test year.

During the 2005 service evaluation, Verizon had 99 percent of the 300 loops that were tested meet standards. This year, Verizon improved the loop transmission results by 0.2 percent.

Table 6 Subscriber Loops – Transmission									
<u>Area</u>	<u>Total Number of Loops Tested</u>	<u>Unsatisfactory</u>		<u>Marginal</u>		<u>Satisfactory</u>		<u>Evaluation Results</u>	<u>98% Standard Met</u>
		<u>Number</u>	<u>Percentage</u>	<u>Number</u>	<u>Percentage</u>	<u>Number</u>	<u>Percentage</u>		
Bradenton	98	2	2.0%	14	14.3%	82	83.7%		
Englewood	100	0	0.0%	3	3.0%	97	97.0%		
North Port	99	0	0.0%	12	12.1%	87	87.9%		
Palmetto	100	2	2.0%	37	37.0%	61	61.0%		
Sarasota	102	1	1.0%	23	22.5%	78	76.5%		
Venice	90	0	0.0%	21	23.3%	69	76.7%		
Company Total	589	5	0.85%	110	18.7%	474	80.5%		
Marginal + Satisfactory								99.2%	Y

V. Repair Service Summary

Rule 25-4.070(1), F.A.C., Customer Trouble Reports states:

Each telecommunications company shall make all reasonable efforts to minimize the extent and duration of trouble conditions that disrupt or affect customer telephone service. Trouble reports will be classified as to their severity on a service interruption (synonymous with out-of-service or OOS) or service affecting (synonymous with Non-Out-Of-Service or non-OOS) basis. Service interruption reports shall not be downgraded to a service affecting report; however, a service affecting report shall be upgraded to a service interruption if changing trouble conditions so indicate.

Service interruptions include conditions such as no dial tone or not being able to originate a phone call. Service affecting troubles include conditions such as noise on the line or the telephone rings when no one is on the line.

Staff reviewed 7,627 trouble reports in the Bradenton, Englewood, North Port, Palmetto, Sarasota, and Venice exchanges. 1,424 reports were excluded from the calculations. Staff excluded reports if they concerned unregulated features such as voice mail, or if the customer canceled the trouble call. Of the remaining 6,203 reports reviewed, 4,645 reports were out-of-service reports and 1,558 reports were service affecting reports. As stated in the Availability of Service section of this report, Englewood, North Port, and Palmetto had less than 50,000 access lines therefore, the first quarter of 2006 was reviewed. Bradenton, Sarasota, and Venice exchanges had greater than 50,000 access lines so only the month of March 2006, was reviewed. Table 7 below, contains the repair summary by exchange.

Table 7 Repair Service Summary					
<u>Area</u>	<u>Month</u>	<u>Number of Reports Reviewed</u>	<u>Number of Excluded Reports</u>	<u>Number of Out of Service Reports</u>	<u>Number of Service Affecting Reports</u>
Englewood	Jan - 06	638	109	389	140
	Feb - 06	525	73	336	116
	Mar - 06	514	80	362	72
	1 st Qtr Total	1677	262	1087	328
North Port	Jan - 06	379	76	235	68
	Feb - 06	302	72	183	47
	Mar - 06	427	58	309	60
	1 st Qtr Total	1108	206	727	175
Palmetto	Jan - 06	582	79	356	147
	Feb - 06	344	63	195	86
	Mar - 06	332	53	197	82
	1 st Qtr Total	1258	195	748	315
Bradenton	Mar - 06	1130	235	658	237
Sarasota	Mar - 06	1214	231	732	251
Venice	Mar - 06	1240	295	693	252
Company Total		7627	1424	4645	1558

A. Out of Service Restored Within 24 Hours

Rule 25-4.070(3)(a), F.A.C., Customer Trouble Reports states:

Service Interruption: Restoration of interrupted service shall be scheduled to insure at least 95 percent shall be cleared within 24 hours of the report in each exchange that contains at least 50,000 lines and will be measured on a monthly basis. For exchanges that contain less than 50,000 lines, the results can be aggregated on a quarterly basis. For any exchange failing to meet this objective, the company shall provide an explanation with its periodic report to the Commission.

Staff reviewed 1,087 out of service reports for the Englewood exchange for the first quarter of 2006. Of the reports reviewed, 1,011 reports were cleared within 24 hours. This is 93.0 percent, which is below the 95 percent standard. For the first quarter of 2006, in the North Port exchange, 727 out of service reports were reviewed and 679 reports were cleared within 24 hours. This is 93.4 percent which is also below the standard. For the Palmetto exchange, 748 out of service reports were reviewed with 702 reports clearing within 24 hours resulting in a 93.9 percentage which is also below the standard.

For the month of March 2006, in the Bradenton exchange, 658 out of service reports were reviewed. Staff notes that Bradenton was the only exchange that had a percentage higher than the standard. The Bradenton exchange cleared 646 reports within 24 hours resulting in a 98.2 percentage. In the Sarasota exchange, staff reviewed 732 out of service reports with 655 reports clearing within 24 hours. This is 89.5 percent. 693 out of service reports were reviewed for the Venice exchange. 651 reports cleared within 24 hours. This is 93.9 percent. All of these exchanges were below the standard.

During the 2005 service evaluation, staff reviewed 1,602 out of service repair reports for three exchanges for one month. All exchanges failed to meet standards. The percentages for the three exchanges reviewed were 85.6 percent, 91.4 percent, and 88 percent respectively. During this year's service evaluation, Verizon failed all exchanges, except for one exchange. All the percentages did improve from the previous evaluation. Table 8 is a listing reflecting the exchanges containing less than 50,000 access lines, reported quarterly and the number of reports cleared within 24 hours. All three exchanges for the 1st quarter of 2006 did not meet the 95 percent standard. Additionally, the three remaining exchanges contained more than 50,000 access lines and for the month of March 2006, only one exchange met the standard.

Verizon stated that system issues affected all exchanges where missed reports were being counted as met. This issue was not corrected until late January 2006. Another system error affected all exchanges. Because of the system error, some reports were cleared with incorrect

dates and times that were later than the actual clear date and time and other reports were double dispatched. This error occurred between February 17 and February 19, 2006.

Verizon stated it will continue to utilize a fluid work force and an aggressive clock management strategy in order to respond to out of service conditions. The issues with old and new systems have been identified and corrected.

Table 8 Out of Service (OOS) Reports Restored Within 24 Hours

<u>Exchange</u>	<u>Month</u>	<u>Total Number of OOS Reports</u>	<u>Number of OOS Reports Cleared within 24 Hrs.</u>	<u>Percent of Reports Cleared Within 24 Hrs</u>	<u>95% Standard Met</u>
Englewood	Jan - 06	389	336	86.4%	
	Feb - 06	336	321	95.5%	
	Mar - 06	362	354	97.8%	
	1 st Qtr Total	1087	1011	93.0%	N
North Port	Jan - 06	235	206	87.7%	
	Feb - 06	183	174	95.1%	
	Mar - 06	309	299	96.8%	
	1 st Qtr Total	727	679	93.4%	N
Palmetto	Jan - 06	356	332	93.3%	
	Feb - 06	195	179	91.8%	
	Mar - 06	197	191	97.0%	
	1 st Qtr Total	748	702	93.9%	N
Bradenton	Mar - 06	658	646	98.2%	Y
Sarasota	Mar - 06	732	655	89.5%	N
Venice	Mar - 06	693	651	93.9%	N
Company Total		4645	4344	93.5%	

B. Service Affecting Restored Within 72 Hours

Rule 25-4.070(3)(b), F.A.C., Customer Trouble Reports states:

Service Affecting: Clearing of service affecting trouble reports shall be scheduled to insure at least 95 percent of such reports are cleared within 72 hours of the report in each exchange, which contains at least 50,000 lines and will be measured on a monthly basis. For exchanges, which contain less than 50,000 lines, the results can be aggregated on a quarterly basis.

Staff reviewed 328 service affecting reports for the Englewood exchange for the first quarter of 2006. 303 reports were cleared within 72 hours. This results in a 92.4 percentage, which is below the 95 percent standard. For the North Port exchange, 175 service affecting reports were reviewed and 156 reports were cleared within 72 hours. This is 89.1 percent, which is also below the standard. For the Palmetto exchange, 315 service affecting reports were reviewed with 307 reports clearing within 72 hours. This is 97.5 percent, which exceeds the 95 percent standard.

For the month of March 2006, in the Bradenton exchange, 237 service affecting reports were reviewed and 233 reports cleared within 72 hours. This is 98.3 percent. For the Sarasota exchange, staff reviewed 251 service affecting reports and 238 reports cleared within 72 hours. This is 94.8 percent. For the Venice exchange, 252 service affecting reports were reviewed and 248 reports cleared within 72 hours. This is 98.4 percent. The results indicate two out of the three exchanges exceeded the 95 percent standard

During the 2005 service evaluation, Verizon passed one exchange out of three exchanges in the service affecting repair category. This year, Verizon met the standard in three exchanges and missed in the other three exchanges. The percentages for the 2005 service evaluation were 92.9 percent, 97.7 percent, and 84.1 percent. This year, the percentages are 92.4 percent, 89.1 percent, 97.5 percent, 98.3 percent, 94.8 percent, and 98.4 percent, respectively. Table 9 details staff's results by exchange.

Verizon stated, "Repair priority is given to the out of service reports over service affecting report[s]. The objective was missed due to all available manpower being allocated to out-of-service customers." Verizon also stated that the systems problems that affected the out-of-service reports also affected the service affecting reports. The same actions and action plan will be utilized for the service affecting reports as for the out-of-service reports.

Table 9 Service Affecting (SA) Reports Restored Within 72 Hours

<u>Exchange</u>	<u>Month</u>	<u>Total Number of SA Reports</u>	<u>Number of SA Reports Cleared within 72 Hrs.</u>	<u>Percent of Reports Cleared Within 72 Hrs</u>	<u>95% Standard Met</u>
Englewood	Jan – 06	140	115	82.1%	
	Feb – 06	116	116	100.0%	
	Mar – 06	72	72	100.0%	
	1 st Qtr Total	328	303	92.4%	N
North Port	Jan – 06	68	51	75.0%	
	Feb – 06	47	47	100.0%	
	Mar – 06	60	58	96.7%	
	1 st Qtr Total	175	156	89.1%	N
Palmetto	Jan – 06	147	142	96.6%	
	Feb – 06	86	83	96.5%	
	Mar – 06	82	82	100.0%	
	1 st Qtr Total	315	307	97.5%	Y
Bradenton	Mar – 06	237	233	98.3%	Y
Sarasota	Mar – 06	251	238	94.8%	N
Venice	Mar – 06	252	248	98.4%	Y
Company Total		1558	1485	95.3%	

C. Rebates

Rule 25-4.070(1)(b), F.A.C., Customer Trouble Reports states:

In the event a subscriber's service is interrupted other than by a negligent or willful act of the subscriber and it remains out of service in the excess of 24 hours after being reported to the company, an appropriate adjustment or refund shall be made to the subscriber automatically, pursuant to Rule 25-4.110, F.A.C., (Customer Billing). Service interruption time will be computed on a continuous basis, Sundays and holidays included. Also, if the company finds that it is the customer's responsibility to correct the trouble, it must notify or attempt to notify the customer within 24 hours after the trouble was reported.

In reviewing the out of service reports for the month of January 2006, staff determined that 168 rebates were owed to customers for their service being interrupted for longer than 24 hours. Staff investigated and found that Verizon provided 118 of the rebates, which resulted in 70.2 percent of the rebates given.

For the month of February 2006, staff found 96 rebates were due and 75 rebates were given. This is 78.1 percent. In the month of March 2006, staff found 235 rebates were due to customers. Verizon provided 169 rebates, which is 71.9 percent.

During the investigation of the rebates, Verizon gave credits to customers' accounts that did not automatically receive a rebate. Accounts that did not receive an automatic rebate are counted as a miss. All accounts have been given the appropriate credits as of the date of this report.

Verizon stated in the response to the missed rebates that there were three different issues causing the rebates to not automatically be issued to the customer. The first issue is a data records issue. Verizon states that "everyday a query is run pulling the trouble reports that were closed the previous day and were out of service in excess of 24 hours." This data is imported to a database called MPH. Associates in Verizon's Support and Resource Center (SRC) issue the appropriate credit to the customer's account based on the tickets that are imported to MPH.

Verizon stated that two different systems are involved with importing data to MPH, VRepair Core system and VRepair Reports system. Verizon realized a problem between the two systems during the 2006 service evaluation and stated an interim fix was put into place. It ran a second query concerning the evaluation results with the interim fix in place and did find that additional repair tickets required a credit to be issued. A permanent fix is now in place and is being tested. Verizon will perform a test using the January 2007, trouble reports and will report to the Commission their findings by March 1, 2007.

The second issue concerning the rebates is employees' errors. Verizon states that these misses were the result of human error. The repair tickets were in the correct data system but the rebate was not processed due to employee error. Verizon stated that the employees have been coached on issuing the rebates.

The third issue concerning rebates occurred when an out of service condition repair ticket was created as a not out of service repair ticket. Verizon, in its response, attributed the problem to the following circumstances:

- 1) Employees incorrectly created service affecting or non out of service tickets or failed to close the tickets to an out of service condition.
- 2) Tickets initially created as non out of service and the customer called back stating the service condition had changed to out of service.
- 3) Verizon's Voice Portal that automatically generates repair tickets depending upon the responses provided by the customer to certain voice prompts.

Verizon stated that in order to correct item one above it provided additional coaching on the proper procedures relating to repair tickets and the necessity of properly coding service conditions. Regarding item two, staff agrees that when a customer calls back to change the service condition, the 24 hour clock should begin at the time the customer calls back. In all of those situations that were counted as requiring rebates, staff agrees with Verizon that no rebates were due.

Concerning the Voice Portal, Verizon stated repair tickets were generated based on the customer's responses to specific questions. Based upon those responses, tickets were either coded as out of service or non out of service. Verizon provided additional detail concerning the Voice Portal tickets and staff agreed some were correctly coded and others were not and required a rebate. The report was updated to reflect this change.

During the 2005 service evaluation, Verizon did not provide 100 percent of the required rebates for the one month reviewed. For 2006, Verizon's percentages for the automatic rebates during the months reviewed were 68.2 percent, 72.8 percent, and 70.7 percent respectively. Table 10 details the percentages by month.

Table 10 Rebates				
<u>Month</u>	<u>Number of Rebates Due</u>	<u>Number of Rebates Given</u>	<u>Percent of Rebates Given</u>	<u>100% Standard Met</u>
Jan - 06	168	118	70.2%	N
Feb - 06	96	75	78.1%	N
Mar - 06	235	169	71.9%	N

VI. Periodic Report Review

Rule 25-4.0185, F.A.C., Periodic Reports states:

Each local exchange telecommunications company shall file with the Commission's Division of Competitive Markets and Enforcement the information required by Communications Form PSC/CMP 28 (4/05), which is incorporated into this rule by reference.

During an evaluation, staff compares the periodic report filed by the company to the results of the service evaluation. Staff looks at schedules 2, 11, 15, and 16 of the periodic report. Schedule 2 is Availability of Service, schedule 11 is Repair Service, schedule 15 is Repair Service Answer Time, and schedule 16 is Business Office Answer Time. Staff reconciled the schedules and the evaluation data. For example, if answer time calls were made in April, staff will look at the schedules 15 and 16 for April.

Table 11 shows the results of staff's reconciliation of the evaluation results and Verizon's filed reports. There was a difference of three items. Staff also reviews if the periodic report was forwarded in a timely manner. Verizon did file its periodic report on time.

Verizon stated in its response, it believes the difference in the reconciliation was due to staff's review that is based on a sample, whereas the periodic report includes all tickets. Verizon also believes that part of the variance is the result of some trouble tickets being issued by the customer through the voice portal. The reports were created as non out of service based on the customer responses to the voice portal prompts. Further, Verizon stated that staff engineers may have considered some of the tickets to be an out of service condition based on the initial trouble type reported by the customer. Staff does recognize that it has the advantage of a complete trouble ticket and does reclassify some conditions and this will cause a difference to occur within the evaluation. Staff weighs the importance of rebates to the customer higher and will reclassify tickets to out of service in those situation that are appropriate.

Table 11 Periodic Report Review

<u>Item Reviewed</u>	<u>Exchange</u>	<u>Month</u>	<u>Standard Met per Periodic Report</u>	<u>Standard Met per Service Evaluation</u>
Answer Time				
Business Office		April 2006	N	N
Repair Service		April 2006	Y	Y
Availability of Service				
	Englewood	1 st Qtr 2006	Y	Y
	North Port	1 st Qtr 2006	N	N
	Palmetto	1 st Qtr 2006	Y	Y
	Bradenton	March 2006	Y	Y
	Sarasota	March 2006	Y	Y
	Venice	March 2006	Y	Y
Repair Service – OOS 24 Hours				
	Englewood	1 st Qtr 2006	N	N
	North Port	1 st Qtr 2006	N	N
	Palmetto	1 st Qtr 2006	Y	N
	Bradenton	March 2006	Y	Y
	Sarasota	March 2006	N	N
	Venice	March 2006	Y	N
Repair Service – SA 72 Hours				
	Englewood	1 st Qtr 2006	N	N
	North Port	1 st Qtr 2006	N	N
	Palmetto	1 st Qtr 2006	Y	Y
	Bradenton	March 2006	Y	Y
	Sarasota	March 2006	Y	N
	Venice	March 2006	Y	Y
Comparison between Periodic Report & Service Evaluation	Number of Items Reviewed	Number of Items that are the Same	Number of Different Items	Percent of Same Items
	20	17	3	85.0%

VII. Safety – Ground Deficiencies

Rule 25-4.038, F.A.C., Safety states:

Each utility shall at all times use reasonable efforts to properly warn and protect the public from danger, and shall exercise due care to reduce the hazards to which employees, customers, and the public may be subjected by reason of its equipment and facilities. All subscriber loops shall be properly installed to prevent harm to the public as referenced in Article 800.30 and 800.31 of the National Electric Code (NEC), incorporated herein by reference.

The National Electric Codes gives specific guidance about grounding telephone systems. Proper grounding of the subscriber loop helps protect the subscribers and their property.

Staff tested 589 loops in the six exchanges during the 2006 service evaluation. Eighty-six loops were new installations for service and 503 loops were randomly tested. Thirty-six of the loops were found to have poor grounds. Of the loops found to have poor grounds, eight loops were new installation for service and twenty-eight loops were of the randomly tested category. Of the newly installed loops, the standard is 100 percent of the loops must have proper grounding. In the randomly tested category, the grounding standard is 92 percent. Verizon has corrected all of the ground deficiencies identified during the 2006 evaluation.

During the 2005 service evaluation, staff tested 72 loops for new installation for service. Two loops had poor grounds. This was 97.2 percent for new installs compared to this year's 90.6 percent for new installs. Staff also tested 228 random loops for Verizon's customers in 2005. Four loops had poor grounds, which is 98.2 percent of loops with proper grounds. This year, the 505 random loops that staff tested, only 27 loops had poor grounds. This is 94.7 percent, which exceeds the 92 percent standard.

In investigating the inadequate grounding, Verizon found that one was due to a modification caused by the customer. For the other grounding issues, Verizon found that the recent installs were grounded but failed to meet the company's standards. Each technician that worked on the orders has been counseled and retrained in accordance with Verizon's grounding standards. Table 12 lists the loops that were either a new installation or a random loop test by exchange. The new installs did not meet the standard.

Table 12 Safety – Ground Deficiencies

<u>Exchange</u>	<u>Number of Loops Tested</u>	<u>Number of Loops with Poor Grounds</u>	<u>Percent of Loops with Adequate Grounds</u>	<u>Standard Met</u>
New Installs				Standard = 100.0%
Bradenton	24	3	87.5%	
Englewood	3	0	100.0%	
North Port	22	1	95.5%	
Palmetto	6	2	66.7%	
Sarasota	19	2	89.5%	
Venice	12	0	100.0%	
Company Total	86	8	90.7%	N
Random Loops				Standard = 92.0%
Bradenton	76	5	93.4%	
Englewood	97	6	93.8%	
North Port	78	3	96.2%	
Palmetto	94	7	92.6%	
Sarasota	81	6	92.6%	
Venice	77	1	98.7%	
Company Total	503	28	94.4%	Y

VIII. Timing and Billing Accuracy

A. Intra-LATA 1+ and Calling Card

Rule 25-4.077 (3), F.A.C., Metering and Recording Equipment states:

Metering and timing equipment shall be maintained so that the accuracy of the company billing operations enjoys a high confidence level from their customers. After allowance for a one-second variation, timing accuracy shall be not less than 97 percent.

A series of test calls were generated to measure the timing of local toll calls or Intra-LATA calls for billing purposes. These tests were precisely timed to ensure that the elapsed times were the same for each series of calls. To evaluate the accuracy of Verizon's network, all test calls were completed using our computerized timing tester. Normally, calls are completed at each of the following intervals: 183, 182, 181, 180, 179, 178, 123, 122, 121, 120, 119, 118, 63, 62, 61, 60, 59, and 58 second intervals.

Bills for these calls were analyzed and compared to the records generated by the tests for origination and duration time to develop the timing and billing accuracy summary. While the accuracy of our tests can be measured in hundredths of a second, we allow the company a tolerance of plus or minus one second.

Staff made 139 1+ Intra-LATA test calls over Verizon’s network. There were no timing or billing discrepancies found. This is 100 percent for both the timing and billing accuracy. Verizon did not offer an Intra-LATA calling card, so this test was not performed. Staff also verifies that Verizon is billing per its tariff, which means does the price and timing of calls on the bill match what is listed in the tariff. During the 2006 evaluation, Verizon was billing per tariff.

Last year, during Verizon’s service evaluation, staff made 140 1+ Intra-LATA test calls over Verizon’s network. The results for the tests were 100 percent for timing accuracy, 100 percent for billing accuracy, and Verizon did bill per tariff. The results for this year’s tests are the same. Table 13 details staff’s timing and billing analysis.

Table 13 Timing and Billing – Intra-LATA					
	Total Number of Calls	Number of Calls Under Timed	Number of Calls Over Timed	Percent of Call Correctly Timed	97% Standard Met
Timing Accuracy					
1+	139	0	0	100.0%	Y

	Total Number of Calls	Number of Calls Under Billed	Number of Calls Over Billed	Percent of Call Correctly Billed	97% Standard Met
Billing Accuracy					
1+	139	0	0	100.0%	Y

Billing Per Tariff		Yes or No
1+		Y

B. Directory Assistance

Rule 25-4.115, F.A.C., Directory Assistance states:

(1) Directory assistance service provided by any telephone company shall be subject to the following:

(a) Charges for directory assistance shall be reflected in tariffs filed with the Commission and shall apply to the end user.

(b) The tariff shall state the number of telephone numbers that may be requested by a customer per directory assistance call.

(2) Charges for calls within a local calling area or within a customer's Home Numbering Plan Area (HNPA) shall be at rates prescribed in the general service tariff of the local exchange company originating the call and shall be subject to the following:

(a) There shall be no charge for directory assistance calls from lines or trunks serving individuals with disabilities. . .

(b) The same charge shall apply for calls within a local calling area and calls within an HNPA.

(c) The tariff shall state the number of calls per billing month per individual line or trunk to the number designated for local directory assistance (i.e., 411, 311, or 611) for which no charge will apply. The local exchange company shall charge for each local directory assistance call in excess of this allowance. . .

Staff conducted directory assistance (DA) testing on two lines. One line was designated as a TDD line or a line for an individual with disabilities. Verizon did not charge for the calls made on the TDD line, which is correct. On the other line, staff made 88 calls. According to Verizon's tariff, the allowance is three free calls for one line for one billing cycle. The billable calls are 85 calls. Verizon billed for 91 calls. The percent is 92.9 percent, which is below the standard of 97 percent.

In Verizon's response to the DA billing, it states that the billing records indicate 94 calls were made with the three call allowance, yielding 91 calls being billed at the \$0.85 rate, which is the rate in the tariff. Staff's worksheet showed only 88 calls were made. Verizon cannot find any billing system problems or errors and believes the bill rendered is correct. Verizon believes that no further action is required. Staff notes that for the 2005 evaluation, Verizon's result was 99.3 percent for correctly billed calls. Staff will review this item again during the next evaluation and

will pay closer attention to the calls that are made. Table 14 indicates the timing and billing analysis for telephone number (941) 955-4925.

Table 14 Timing and Billing – Directory Assistance									
Central Office	Telephone Number Used	Total Calls Made	Allowance	Billable Calls	Calls Billed	Variance	Percent Correctly Billed	97 % Standard Met	Billed per Tariff
Sarasota	941-955-4925	88	3	85	91	6			
Company Total		88	3	85	91	6	92.9%	N	Y

IX. 9-1-1 Emergency Service

Rule 25-4.081(1), F.A.C., Emergency 911 Access states:

Access to emergency 911 services shall be provided by the local exchange company to basic local exchange company subscribers.

From the Sarasota exchange, staff made 149 voice calls and 50 TDD calls to 911 emergency services. There was one busy call for the TDD calls. This is counted as a completed call but not answered. For Verizon’s review, this is 100 percent completed calls to 911 emergency services for both voice calls and TDD calls.

During the 2005 service evaluation, there were 100 percent of completed voice calls to 911 over Verizon’s network. There was one call that failed to complete to 911 for TDD calls, which is 98 percent. Verizon improved the TDD completion calls to 911 with 100 percent during this year’s service evaluation.

Table 15 911 Emergency Service							
Area	NXX	Total Calls Made	Number of Busy Calls	Number of Failed Calls	Total Calls Completed to 911	Percent of Calls Completed to 911	100 % Standard Met
Voice Calls							
Sarasota	955	149	0	0	149	100.0%	
Company Total		149	0	0	149	100.0%	Y
TDD Calls							
Sarasota	955	50	1	0	50	100.0%	
Company Total		50	1	0	50	100.0%	Y