

CHANGE CONTROL ASSURANCE PLAN

Verizon - New York Inc.

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APPENDIX A – Change Control Measures

I. INTRODUCTION

The “Order Adopting Permanent Rule” in Case 97-C-0139 added three new metrics related to the Change Control Process to the Carrier-to-Carrier Guidelines.¹ To ensure that New York Telephone Company, d/b/a Verizon - New York (“Verizon NY”), will execute the Change Control process in an expeditious and non-discriminatory manner, Verizon NY will undertake the actions set forth in this Change Control Assurance Plan (the “C.C.A.P.”) after entry into the long distance market pursuant to Section 271 of the Telecommunications Act of 1996. A total of \$25 million in bill credits will be at risk to CLECs if Verizon NY provides unsatisfactory service for the four measures in this Plan.

II. THE CHANGE CONTROL MEASURES AND BILL CREDITS

The following measures, which have been taken from the June Order, are included in this Plan:

1. PO-4-01: % Change Management Notices Sent on Time;
2. PO-4-03: Change Management Notice Delay 8 plus Days;
3. PO-6-01: % Software Validation; and
4. PO-7-04: Delay Hours - Failed/Rejected Test Transactions - No

Workaround.

¹ In addition to PO-4 Timeliness of Change Management Notice, which was included in the Guidelines adopted by the Commission in February (*see* Case 97-C-0139, *Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies*, “Order Adopting Inter-Carrier Service Quality Guidelines” (issued February 16, 1999), the Commission adopted PO-5, Average Notification of Interface Outage, PO-6 Software Validation and PO-7 Software Problem Resolution Timeliness. (*See* Case 97-C-0139, *Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies*, “Order Establishing Permanent Rule” (issued June 30, 1999) (the “June Order”), Appendix at 8-12.

Attached hereto as Appendix A is a chart that provides the standards that will be applied to each of the above measures and the total amount of bill credits associated with each standard. If a performance measure is missed according to its standards, bill credits will be paid to all CLECs purchasing Unbundled Network Elements (“UNEs”) or resold services. CLECs will receive bill credits on a prorated basis of the total credit determined using Appendix A based on their lines in service. This Plan will use the same mechanisms set forth in the Performance Assurance Plan for determining “lines in service.” (*See C.C.A.P. at 6, n.7.*)

Under this Change Control Assurance Plan, Verizon NY will retain the right to withdraw any proposed software release prior to the item being put into final production. If Verizon NY exercises this right, it will not be deemed to have violated the requirements set forth in PO-4-01, PO-4-03, PO-6-01 or PO-7-04 and will not be subject to the payment of bill credits under those measures.

The initial amount of annual bill credits for all CLECs will be \$10 million under this Plan. If, however, the bill credits due to the CLECs under this Plan exceed \$10 million in any year,² an additional amount of \$15 million will be at risk from the bill credit amounts allocated to the Mode of Entry Categories in the Performance Assurance Plan. Thus, a total of \$25 million will be available for bill credits for the Change Control measures. Bill credit payments for Change Control measures will be given priority over bill credits for the MOE categories. (*See P.A.P., Section II(B)(2).*)

The Commission will have the authority to reallocate the monthly distribution of bill credits between and among any provisions of the P.A.P. and the C.C.A.P. The Commission will

² The “year” will be measured from the first day of Verizon NY’s entry into the interLATA market.

give the Company 15 days notice prior to the beginning of the month in which the reallocation will occur. Any reallocation will be done pursuant to Commission order.

III. MONTHLY REPORTS

Each month Verizon NY will issue a report on its performance on the above measures to each CLEC providing service in New York.³ The reports will be CLEC specific and will indicate the scores on the measures, the aggregate amount of bill credits, if any, that Verizon NY must provide pursuant to the standards set forth in Appendix A, and the specific amount of bill credits that will appear on the individual CLEC's bill. All CLECs with multiple bill accounts must inform Verizon NY as to which of their accounts should receive any bill credits for the Change Control measures.

IV. REVIEWS, UPDATES AND AUDITS

Biannual reviews and updates will occur under this Plan until the Commission determines otherwise. However, Verizon NY, after consulting with Staff, may at any time recommend to the Commission modifications, additions, or deletions to the measures in this Plan or the bill credit allocations. CLECs and any other interested parties will be given an opportunity to provide comments on any recommendations. In addition, Staff will have the right from time to time, on 60-days notice to Verizon NY, to conduct an audit of data reported in the monthly reports.⁴

³ Verizon NY's performance on the other Change Control metrics will be reported in the monthly C2C reports.

⁴ Unlike the most of the measures in the P.A.P., the recording of data for each of the measures in this Plan will be done manually.

V. EXCEPTION PROCESS

Verizon NY will have the right to file a petition with the Commission seeking to have the standards contained in Appendix A waived or modified either for future or past periods. The Commission shall grant such a request if it determines that the application of one or more of the standards contained in Appendix A would not serve the public interest. The application of one or more parts of Appendix A would not serve the public interest if Verizon NY could not, through any reasonable efforts, prevent results that do not satisfy the standards. Verizon NY's petition must include all information that demonstrates how the measure was missed. It shall also include a recalculation of the measure with the challenged information excluded from the calculations. CLECs and other interested parties will be given an opportunity to respond to any Verizon NY petition for an Exception. In the event the Commission rules in Verizon NY's favor, Verizon NY will have the right to offset any paid bill credits against any future bill credits that may come due for either the Change Control measures or Performance Assurance Plan measures.

VI. TERM OF PLAN FOR THE CHANGE CONTROL PROCESS

The Change Control Assurance Plan will have the same term as the Performance Assurance Plan. It will remain in effect, as modified from time to time by the Commission, until the Commission rescinds the Performance Assurance Plan or develops a replacement mechanism.

VII. FULLY INTEGRATED DOCUMENT

The terms and provisions of this Plan are submitted in their entirety to the Commission for approval. This Plan represents a fully integrated statement of the commitments Verizon NY will undertake, including the payment of bill credits for unsatisfactory performance under the measures. It is not offered to the Commission for approval on a piecemeal basis.

Change Control Performance Assurance Plan Measures

PO-4-01	% Change Management Notices Sent on Time			
	Performance Range (Notification and Confirmation for Types 3, 4 and 5 only)	≥ 95%	90 to 94.9%	< 90%
	Performance Credit	\$0	\$250,000	\$500,000
PO-4-03	Change Management Notice Delay 8 plus Days (Notification and Confirmation for Type 1, 2, 3, 4 and 5)			
	Performance Credit	\$25,000 per day		
PO-6-01	% Software Validation (See Note 1)			
	Performance Range	≤ 5%	5.1 to 10%	> 10%
	Performance Credit	\$0	\$100,000	\$1,000,000
PO-7-04	Delay Hours – Failed/Rejected Test Transactions – No Workaround (See Note 2)			
	Performance Credit	\$50,000 per day Per Release		

Note 1: Measured against releases pursuant to Change Notice Types 3, 4 and 5.

Note 2: PO-7-04 applies to failed Test Deck items executed by Verizon NY in PO-6-01 and applies until all errors reported in PO-6-01 are fixed.