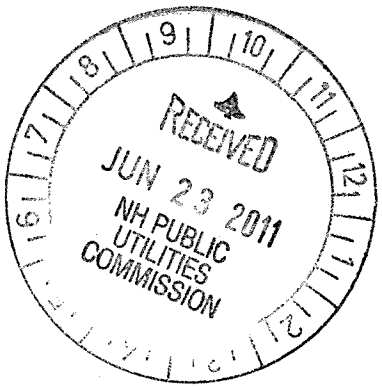

June 22, 2011

Via E-Mail and Federal Express
Debra Howland, Executive Director
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: DT 11-061; DT 09-059; DT 09-113; Audit of FairPoint Metrics, Proposed Metrics for Audit

Dear Ms. Howland:

On May 6, 2011, the Commission issued Order No. 25,221 ("FairPoint Audit Order") requiring that an audit of FairPoint's Performance Assurance Plan ("PAP") and the relevant Carrier-to-Carrier ("C2C") metrics be conducted. The Commission specifically stated that the audit "...will include each of the metrics proposed in the WPP as well as additional metrics that are important to competition as may be identified by the CLECs." (FairPoint Audit Order at 23). On May 19, 2011, Staff requested written recommendations from CLECs regarding the most critical metrics reported in the current PAP, as well as identification of those metrics currently reported which are no longer relevant or necessary.

The attached recommendations are being submitted jointly by the following CLECs: Freedom Ring Communications, LLC, d/b/a Bayring Communications ("Bayring"); CRC Communications of Maine, Inc. d/b/a OTT Communications ("OTT"); Biddeford Internet Corp., d/b/a Great Works Internet ("GWI"); National Mobile Communications Corp. d/b/a Sovernet Communications ("Sovernet"); Otel Telekom, Inc. ("Otel"); CTC Communications Corp., Lightship Telecom LLC, Choice One of New Hampshire Inc., and Conversent Communications of New Hampshire LLC (all d/b/a "One Communications Solutions of New Hampshire"[1]) (collectively, the "CANNE CLECs"[2]).

The CANNE CLECs commend the Commission and its Staff for moving forward with this important audit and hereby submit their proposed metrics for the audit (Attachment 1), a list of the current PAP metrics that the CLECs propose be deleted (Attachment 2), and an updated listing of continuing wholesale operations problems faced by CLECs (Attachment 3).

The audit will provide the Commission, FairPoint, and the CLECs with important insights into why FairPoint cannot provide adequate wholesale services. Given the importance

[1] One Communications is now an operating subsidiary of EarthLink, Inc. and is in the process of changing its name to EarthLink Business.

[2] The CANNE CLECs are all members of the CLEC Association of Northern New England ("CANNE") and intend to participate jointly in these proceedings.

of the audit, the parameters of the task must be carefully defined. The Commission noted that the audit "...is a necessary foundation for informed decisions about reasonable and appropriate wholesale business interactions between FairPoint and the CLECs following FairPoint's emergence from Chapter 11 bankruptcy" (FairPoint Audit Order at 13) and that "...an audit of the current PAP [as] a necessary step in determining the scope and nature of any future PAP." (Id. at 18) The Commission has refused to limit the scope of the audit as suggested by FairPoint and instead has recognized the importance of understanding whether FairPoint has applied the current PAP properly or if there are other weaknesses in the PAP that they must be identified and remedied as part of the development of any new or revised PAP. (Id. at 17)

As the Commission correctly noted, there are questions as to whether FairPoint's reported data is accurate or reliable. FairPoint continues to provide sub-standard service to CLECs in many critical areas that impact the ability of CLECs to compete. Indeed, FairPoint has yet to provide the level of wholesale service and quality that Verizon provided prior to cutover. This ongoing problem is evidenced by the unaudited PAP results since cutover and by other operational problems that are not currently measured or reflected in the PAP results. Attachment 3 to this letter provides an updated listing of continuing operations problems faced by CLECs in the areas of Pre-order, Ordering/Provisioning, Billing, Maintenance and Repair and Other. This attachment is an update to the report developed by the CLECs and Liberty Consulting in conjunction with the New Hampshire Public Utilities Commission during the spring of 2010. We present this update because we believe it will provide both the Commission and its auditors with additional insight to help shape the scope of the audit.

The audit design should allow the auditor complete flexibility to select metrics, data and other necessary information that might be relevant to understanding the current PAP, the proposed WPP and why FairPoint continues to fail to reach the pre-cutover levels of service and functionality in the vast majority of wholesale provisioning. In other words, although the CANNE CLECs are proposing a list of metrics to begin the audit, all of the metrics (PAP and C2C) are critical to the efficient operation of the market and should be subject to some form of review, if not full audit treatment. It is also important to note that even metrics that are not considered operationally critical or which continually fail (and thus generate penalties) may be deemed worthy of measurement because they assist the Commission, FairPoint, and the CLECs in monitoring specific areas of performance. The auditors must be allowed the flexibility to expand the scope of the audit as necessary to "drill down" and investigate any and all metrics and underlying systems and processes, if the audit is to be meaningful.

While we understand that the audit is focused on metrics, the Commission and/or the auditors should also scrutinize FairPoint's rationale for deletion of close to 80%[3] of the PAP and C2C

[3] *Id.* Note that the number of metrics proposed by FairPoint is not the same in all related documents. But it appears that they are proposing to delete more than 80 percent of the total metrics reported. See, also, FairPoint Testimony of Julie Canny and David Sargent in Vermont Docket No. 7506, dated May 9, 2011at page six (6).

metrics. The proposed elimination of hundreds of metrics is remarkable both with respect to the sheer number of deletions and with respect to the impact on the quality and effectiveness of the PAP. As noted in a PowerPoint presentation provided by FairPoint during the May 26, 2011 Vermont workshop, FairPoint proposes to delete the following categories of metrics:

- UNE Platform, Line Sharing & Line Splitting reported in C2C (97 metrics)
- Industry consensus deletion (NY) (103 metrics)
- FairPoint System/Process does not exist (32 metrics)
- Metrics for products with little or no long term activity (116 metrics)
- Redundant Metrics (39 metrics)
- Metrics without standards or not measuring FairPoint (25 metrics)
- Simplification (30 metrics)

Given the decrease in the quality of wholesale services since the transition to FairPoint, it is difficult to understand how reducing the number of metrics by 80% would help FairPoint provide better service. Such a proposal is counter-intuitive and provides further support for scrutinizing FairPoint's support for deletions. The CANNE CLECs have found that FairPoint's rationales for deletions are flawed in many respects and thus we encourage the Commission and/or the auditors to verify whether FairPoint's rationales for deletions are supported.

The audit should also determine whether FairPoint is in compliance with the definition of any and all metrics being audited. In other words, instead of just investigating the metric, the underlying data and whether it is being calculated and reported properly, the auditors should also express an opinion as to FairPoint's compliance with the definition in the C2C Guidelines for the existing metric.

Finally, at page 23 of the FairPoint Audit Order the Commission encourages "...the parties to identify metrics that are obsolete or no longer relevant or useful..." The CANNE CLECs have identified more than 100 metrics that can be deleted because those metrics are related to UNE-Platform and Line Splitting or are metrics that do not measure FairPoint performance. (See Attachment 2)

Once again, the CANNE CLECs commend the Commission and its Staff for moving forward with an audit of the PAP. We stand ready to work with the Commission, its Staff, and FairPoint to develop a thoughtful, thorough, and effective audit plan. We look forward to meeting with Staff and the parties next Wednesday.

Respectfully submitted,

Trina M. Bragdon, Esq.
Director of Legal Affairs
OTT Communications
900 D Hammond St.
Bangor, ME 04401
Office: (207) 992-9920
Fax: (207) 992-9992
Trina.Bragdon@ottcommunications.com

Lawrence F. Lackey
Director, Regulatory Affairs
Sovernet Communications
276 East Allen Street
Winoski, VT 05404
Tel 820-460-9133
llackey@sover.net

Paula Foley, Esq.
Regulatory Affairs Counsel
One Communications, an EarthLink Business company
5 Wall Street
Burlington, MA 01803
Tel 781-362-5713
pfoley@corp.earthlink.com

Frederick S. Samp, Esq.
General Counsel
Great Works Internet
8 Pomerleau Street
Biddeford, Maine 04005
(207) 602-1136
esamp@gwi.net

Benjamin P. Thayer
President
Bayring Communications
359 Corporate Drive
Portsmouth, NH 03801
(603) 766-3299
bthayer@bayring.com

Gent Cav
President
Otel Telekom, Inc
One Sundial Avenue
Manchester, NH 03103
gent@otel.us

Certificate of Service

I hereby certify that a copy of the foregoing has on this 22nd day of June, 2011 been sent by electronic mail to the persons listed on the Electronic Service Lists.

Trina M. Bragdon

Attachment 1 -- Metrics to be Audited

COLOR KEYS:	Not in current NH C2C but in FPs revised SMP	Not in C2C list but in current PAP			FP'S PROPOSAL	
METRIC ID	**METRIC DESCRIPTION**	**PRODUCT DESCRIPTION**	**In C2C**	**In Current PAP**	**In SMP**	**In WPP**
PO-1-01-6050	Average Response Time - Customer Service Record (CSR)	WEB GUI/LSI/W	YES	YES	YES	NO
PO-1-06-6050	Average Response Time - Mechanized Loop Qualification - xDSL	WEB GUI/LSI/W	YES	YES	YES	NO
PO-1-08-6050	% Timeouts	WEB GUI/LSI/W	YES	NO	NO	NO
PO-2-02-6020	OSS Interface Availability - Prime Time	EDI	YES	YES	YES	YES
PO-2-02-6050	OSS Interface Availability - Prime Time	WEB GUI	NO	NO	YES	YES
PO-2-03-6080	OSS Interface Availability - Non-Prime Time	Maintenance Web GUI (RETAS) / Pre-ordering/Ordering Web GUI combined	YES	NO	NO	NO
PO-4-03-6600	Change Management Notice Delay 8 plus Days (type 1-5)	Change Notification & Confirmation Combined	NO	YES	NO	NO
PO-6-01-6000	Software Validation	Systems Metrics	YES	YES	NO	NO
PO-7-01-6000	% Software Problem Resolution Timeliness	Systems Metrics	YES	NO	NO	NO
PO-8-01-6000	% On Time - Manual Loop Qualification	Systems Metrics	YES	YES	NO	NO
OR-1-02-2100	% On Time LSRC - Flow Through	Resale POTS	NO	NO	YES	YES
OR-1-02-3331	% On Time LSRC - Flow Through	UNE Loop/Pre-qualified Complex/LNP	YES	YES	YES	YES
OR-1-04-2100	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	Resale POTS	NO	NO	YES	YES
OR-1-04-3331	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	UNE Loop/Pre-qualified Complex/LNP	YES	YES	YES	YES
OR-1-04-3342	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	UNE 2-Wire xDSL Loops	YES	YES	YES	YES
OR-1-06-2100	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	Resale POTS	NO	NO	YES	YES

Attachment 1 -- Metrics to be Audited

COLOR KEYS:	Not in current NH C2C but in FPs revised SMP	Not in C2C list but in current PAP			FP'S PROPOSAL	
METRIC ID	**METRIC DESCRIPTION**	**PRODUCT DESCRIPTION**	**In C2C**	**In Current PAP**	**In SMP**	**In WPP**
OR-1-06-3200	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE Specials	NO	NO	YES	YES
OR-1-06-3331	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE Loop/Pre-qualified Complex/LNP	YES	YES	YES	YES
OR-1-06-3342	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE 2-Wire xDSL Loops	YES	YES	YES	YES
OR-1-12-5020	% On Time FOC	Interconnection Trunks (CLEC) (<= 192 Forecasted Trunks)	YES	YES	YES	YES
OR-1-13-5000	% On Time Design Layout Record (DLR)	Interconnection Trunks (CLEC)	YES	YES	YES	YES
OR-2-02-2100	% On Time LSR Reject (Flow-Through)	Resale POTS	NO	NO	YES	YES
OR-2-02-3331	% On Time LSR Reject (Flow-Through)	UNE Loop/Pre-qualified Complex/LNP	YES	YES	YES	YES
OR-2-04-2100	% On Time LSR/ASR Reject - No Facility Check (Electronic - No Flow-through)	Resale POTS	NO	NO	YES	YES
OR-2-04-3331	% On Time LSR/ASR Reject - No Facility Check (Electronic - No Flow-through)	UNE Loop/Pre-qualified Complex/LNP	YES	YES	YES	YES
OR-2-04-3342	% On Time LSR/ASR Reject - No Facility Check (Electronic - No Flow-through)	UNE 2-Wire xDSL Loops	YES	YES	YES	YES
OR-2-06-2100	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	Resale POTS	NO	NO	YES	YES
OR-2-06-3200	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	UNE Specials	NO	NO	YES	YES
OR-2-06-3331	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	UNE Loop/Pre-qualified Complex/LNP	YES	YES	YES	YES

Attachment 1 -- Metrics to be Audited

COLOR KEYS:	Not in current NH C2C but in FPs revised SMP	Not in C2C list but in current PAP			FP'S PROPOSAL	
METRIC ID	**METRIC DESCRIPTION**	**PRODUCT DESCRIPTION**	**In C2C**	**In Current PAP**	**In SMP**	**In WPP**
OR-2-12-5020	% On Time Trunk ASR Reject	Interconnection Trunks (CLEC) (<= 192 Forecasted Trunks)	YES	YES	YES	YES
OR-4-16-1000	% Provisioning Completion Notifiers sent within one (1) Business Day	Resale & UNE combined (EDI)	YES	YES	YES	YES
OR-5-03-3121	% Flow Through Achieved	UNE POTS - Other	YES	YES	YES	NO
OR-6-03-3331	% Accuracy - LSRC	UNE Loop/Complex/LNP	YES	YES	NO	NO
OR-6-04-1040	% Accuracy - Directory Listing	All Directory Listings (combined Stand-alone and other)	YES	NO	NO	NO
PR-4-01-3211	% Missed Appointment - FairPoint - Total	UNE Specials DS1	YES	NO	YES	YES
PR-4-01-3213	% Missed Appointment - FairPoint - Total	UNE Specials DS3	YES	NO	YES	YES
PR-4-02-3342	Average Delay Days - Total	UNE 2-Wire xDSL Loops	YES	YES	NO	NO
PR-4-04-2100	% Missed Appointment - FairPoint - Dispatch	Resale POTS	YES	YES	YES	YES
PR-4-04-3113	% Missed Appointment - FairPoint - Dispatch	UNE POTS Loop New	YES	YES	YES	YES
PR-4-05-2100	% Missed Appointment - FairPoint - No Dispatch	Resale POTS	YES	YES	YES	YES
PR-4-05-3113	% Missed Appointment - FairPoint - No Dispatch	UNE POTS Loop New	YES	NO	YES	YES
PR-4-07-3540	% On Time Performance - LNP Only	UNE LNP	YES	YES	YES	NO
PR-4-14-3342	% Completed On Time - 2-Wire xDSL	UNE 2-Wire xDSL Loops	YES	YES	YES	YES
PR-4-15-5000	% On Time Provisioning - Trunks	Interconnection Trunks (CLEC)	YES	YES	YES	YES
PR-5-01-3112	% Missed Appointment - FairPoint - Facilities	UNE POTS Loop	YES	YES	NO	NO
PR-5-02-3112	% Orders Held for Facilities > 15 Days	UNE POTS Loop	YES	YES	NO	NO
PR-5-02-5000	% Orders Held for Facilities > 15 Days	Interconnection Trunks (CLEC)	YES	YES	NO	NO
PR-6-01-2100	% Installation Troubles reported within 30 Days	Resale POTS	YES	YES	YES	YES
PR-6-01-3113	% Installation Troubles reported within 30 Days	UNE POTS - Loop - New	YES	YES	YES	YES
PR-6-01-3200	% Installation Troubles reported within 30 Days	UNE Specials	YES	NO	YES	YES

Attachment 1 -- Metrics to be Audited

COLOR KEYS:	Not in current NH C2C but in FPs revised SMP	Not in C2C list but in current PAP			FP'S PROPOSAL	
METRIC ID	**METRIC DESCRIPTION**	**PRODUCT DESCRIPTION**	**In C2C**	**In Current PAP**	**In SMP**	**In WPP**
PR-6-01-3342	% Installation Troubles reported within 30 Days	UNE 2-Wire xDSL Loops	YES	YES	YES	YES
PR-6-01-5000	% Installation Troubles reported within 30 Days	Interconnection Trunks (CLEC)	YES	YES	YES	YES
PR-6-02-3520	% Installation Troubles reported within seven (7) Days	UNE Loop Basic Hot Cut (all line size)	YES	YES	YES	YES
PR-8-01-3342	Percent Open Orders in a Hold Status > 30 Days	UNE 2-Wire xDSL Loops	YES	YES	YES	NO
PR-9-01-3520	% On Time Performance - Hot Cut	UNE Loop - Basic Hot Cut (all line size)	YES	YES	YES	YES
PR-9-08-3533	Average Duration of Hot Cut Installation Troubles	UNE POTS - Loop - Hot Cut Total	YES	YES	YES	YES
MR-2-03-3342	Network Trouble Report Rate - Central Office	UNE 2-Wire xDSL Loops	YES	NO	YES	NO
MR-3-01-1341	% Missed Repair Appt - Loop -2W Digital - UNE/Resale	Resale & UNE Combined 2- Wire Digital Services	NO	YES	NO	NO
MR-3-01-2110	% Missed Repair Appointment - Loop	Resale POTS Business	YES	YES	YES	YES
MR-3-01-2120	% Missed Repair Appointment - Loop	Resale POTS Residence	YES	YES	YES	YES
MR-3-01-3112	% Missed Repair Appointment - Loop	UNE POTS Loop	YES	YES	YES	YES
MR-3-01-3342	% Missed Repair Appointment - Loop	UNE 2-Wire xDSL Loops	YES	YES	YES	YES
MR-3-02-2110	% Missed Repair Appointment - Central Office	Resale POTS Business	YES	YES	YES	YES
MR-3-02-2120	% Missed Repair Appointment - Central Office	Resale POTS Residence	YES	YES	YES	YES
MR-3-02-3112	% Missed Repair Appointment - Central Office	UNE POTS Loop	YES	YES	YES	YES
MR-3-02-3342	% Missed Repair Appointment - Central Office	UNE 2-Wire xDSL Loops	YES	YES	YES	YES
MR-4-01-3217	Mean Time To Repair - Total	UNE Specials (DS1 & DS3)	YES	NO	YES	NO
MR-4-02-2110	Mean Time To Repair - Loop Trouble	Resale POTS Business	YES	YES	YES	NO
MR-4-03-3112	Mean Time To Repair - Central Office Trouble	UNE POTS Loop	YES	YES	YES	NO

Attachment 1 -- Metrics to be Audited

COLOR KEYS:	Not in current NH C2C but in FPs revised SMP	Not in C2C list but in current PAP			FP'S PROPOSAL	
METRIC ID	**METRIC DESCRIPTION**	**PRODUCT DESCRIPTION**	**In C2C**	**In Current PAP**	**In SMP**	**In WPP**
MR-4-04-3340	% Cleared (all troubles) w/in 24 Hours -Line Share/Split	Line Sharing & Line Splitting (combined)	NO	YES	NO	NO
MR-4-06-3217	% Out of Service > 4 Hours	UNE Specials (DS1 & DS3)	YES	NO	NO	NO
MR-4-07-3112	% Out of Service > 12 Hours	UNE POTS Loop	YES	YES	NO	NO
MR-4-07-3342	% Out of Service > 12 Hours	UNE 2-Wire xDSL Loops	YES	YES	NO	NO
MR-4-08-2110	% Out of Service > 24 Hours	Resale POTS Business	YES	YES	YES	YES
MR-4-08-2120	% Out of Service > 24 Hours	Resale POTS Residence	YES	YES	YES	YES
MR-4-08-3112	% Out of Service > 24 Hours	UNE POTS Loop	YES	YES	YES	YES
MR-4-08-3217	% Out of Service > 24 Hours	UNE Specials (DS1 & DS3)	YES	NO	YES	YES
MR-4-08-3342	% Out of Service > 24 Hours	UNE 2-Wire xDSL Loops	YES	NO	YES	YES
MR-5-01-2100	% Repeat Reports within 30 Days	Resale POTS	YES	YES	YES	YES
MR-5-01-3112	% Repeat Reports within 30 Days	UNE POTS Loop	YES	YES	YES	YES
MR-5-01-3200	% Repeat Reports within 30 Days	UNE Specials	YES	NO	YES	YES
MR-5-01-3342	% Repeat Reports within 30 Days	UNE 2-Wire xDSL Loops	YES	YES	YES	YES
NP-2-05/6	% On Time - Physical Collocation - Total	Collocation - Physical & Virtual combined	NO	YES	NO	NO

Attachment 2 -- CLECs' Proposed List of Metrics to Delete

					FAIRPOINT'S PROPOSAL				CLECS' INITIAL PROPOSAL	
METRIC ID	METRIC DESCRIPTION	PRODUCT DESCRIPTION	In C2C	In Current PAP	In SMP	In WPP	SMP PROPOSAL	RATIONALE	RECOMMENDATION	RATIONALE
PO-1-01-6030	Average Response Time - Customer Service Record (CSR)	CORBA	YES	YES	NO	NO	Delete	NA @ Fpt.	Delete	CORBA Not Used
PO-1-02-6020	Average Response Time - Due Date Availability	EDI	YES	NO	NO	NO	Delete	Activity	Delete	Specific Function Not Used
PO-1-02-6030	Average Response Time - Due Date Availability	CORBA	YES	NO	NO	NO	Delete	NA @ Fpt.	Delete	CORBA Not Used
PO-1-02-6050	Average Response Time - Due Date Availability	WEB GUI/LSI/W	YES	NO	NO	NO	Delete	Activity	Delete	Specific Function Not Used
PO-1-03-6030	Average Response Time - Address Validation	CORBA	YES	YES	NO	NO	Delete	NA @ Fpt.	Delete	CORBA Not Used
PO-1-04-6020	Average Response Time - Product & Service Availability	EDI	YES	NO	NO	NO	Delete	Activity	Delete	Specific Function Not Used
PO-1-04-6050	Average Response Time - Product & Service Availability	WEB GUI/LSI/W	YES	NO	NO	NO	Delete	Activity	Delete	Specific Function Not Used
PO-1-05-6030	Average Response Time - Telephone Number Availability & Reservation	CORBA	YES	NO	NO	NO	Delete	NA @ Fpt.	Delete	CORBA Not Used
PO-1-06-6030	Average Response Time - Mechanized Loop Qualification - xDSL	CORBA	YES	YES	NO	NO	Delete	NA @ Fpt.	Delete	CORBA Not Used
PO-1-07-6030	Average Response Time - Rejected Query+	CORBA	YES	NO	NO	NO	Delete	Industry Del.	Delete	CORBA Not Used
PO-1-08-6030	% Timeouts	CORBA	YES	NO	NO	NO	Delete	NA @ Fpt.	Delete	CORBA Not Used
PO-1-09-6030	Parsed CSR	CORBA	YES	NO	NO	NO	Delete	NA @ Fpt.	Delete	CORBA Not Used
PO-2-02-6030	OSS Interface Availability - Prime Time	CORBA	YES	YES	NO	NO	Delete	NA @ Fpt.	Delete	CORBA Not Used
PO-2-03-6030	OSS Interface Availability - Non-Prime Time	CORBA	YES	NO	NO	NO	Delete	NA @ Fpt.	Delete	CORBA Not Used
OR-1-02-3140	% On Time LSRC - Flow Through	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P

					FAIRPOINT'S PROPOSAL				CLECS' INITIAL PROPOSAL	
METRIC ID	METRIC DESCRIPTION	PRODUCT DESCRIPTION	In C2C	In Current PAP	In SMP	In WPP	SMP PROPOSAL	RATIONALE	RECOMMENDATION	RATIONALE
OR-1-04-3140	% On Time LSRC/ASRC - No Facility Check (Electronic - No Flow Through)	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
OR-1-06-3140	% On Time LSRC/ASRC - Facility Check (Electronic - No Flow-through)	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
OR-1-08-3210	% On Time ASRC - No Facility Check (Fax/Mail)	UNE Specials DS0	YES	NO	NO	NO	Delete	Industry Del.	Delete	FAX/Mail Not Used
OR-1-10-3210	% On Time ASRC - Facility Check (Fax/Mail)	UNE Specials DS0	YES	NO	NO	NO	Delete	Industry Del.	Delete	FAX/Mail Not Used
OR-1-10-3211	% On Time ASRC - Facility Check (Fax/Mail)	UNE Specials DS1	YES	NO	NO	NO	Delete	Industry Del.	Delete	FAX/Mail Not Used
OR-1-10-3213	% On Time ASRC - Facility Check (Fax/Mail)	UNE Specials DS3	YES	NO	NO	NO	Delete	Industry Del.	Delete	FAX/Mail Not Used
OR-1-10-3214	% On Time ASRC - Facility Check (Fax/Mail)	UNE Specials (Non DS0, Non DS1 & Non DS3)	YES	NO	NO	NO	Delete	Industry Del.	Delete	FAX/Mail Not Used
OR-2-02-3140	% On Time LSR Reject (Flow-Through)	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
OR-2-04-3140	% On Time LSR/ASR Reject - No Facility Check (Electronic - No Flow-through)	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
OR-2-06-3140	% On Time LSR/ASR Reject - Facility Check (Electronic - No Flow-Through)	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
OR-2-08-3200	% On Time Reject - No Facility Check (Fax)	UNE Specials	YES	NO	NO	NO	Delete	Industry Del.	Delete	FAX/Mail Not Used
OR-2-10-3200	% On Time Reject - Facility Check (Fax)	UNE Specials	YES	NO	NO	NO	Delete	Industry Del.	Delete	FAX/Mail Not Used

					FAIRPOINT'S PROPOSAL				CLECS' INITIAL PROPOSAL	
METRIC ID	METRIC DESCRIPTION	PRODUCT DESCRIPTION	In C2C	In Current PAP	In SMP	In WPP	SMP PROPOSAL	RATIONALE	RECOMMENDATION	RATIONALE
OR-3-01-2000	% Rejects	Resale	YES	NO	NO	NO	Delete	Industry Del.	Delete	Not Measuring FP Performance
OR-3-01-3000	% Rejects	UNE	YES	NO	NO	NO	Delete	Industry Del.	Delete	Not Measuring FP Performance
OR-3-02-1000	% LSR Resubmission Not Rejected	Resale & UNE combined (EDI)	YES	NO	NO	NO	Delete	Industry Del.	Delete	Not Measuring FP Performance
OR-5-01-3140	% Flow Through - Total	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
OR-5-03-3140	% Flow Through Achieved	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
OR-6-03-3140	% Accuracy - LSRC	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
OR-7-01-3140	% Order Confirmation/Rejects sent within Three (3) Business Days	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-1-01-3140	Average Interval Offered - Total No Dispatch	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-1-01-3345	Average Interval Offered - Total No Dispatch	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
PR-1-02-3345	Average Interval Offered - Total Dispatch	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
PR-1-03-3140	Average Interval Offered - Dispatch one (1) to five (5) Lines	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-1-04-3140	Average Interval Offered - Dispatch six (6) to nine (9) Lines	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-1-05-3140	Average Interval Offered - Dispatch (>= 10 Lines)	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-3-01-3140	% Completed in one (1) Day one (1) to five (5) Lines - No Dispatch	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P

					FAIRPOINT'S PROPOSAL				CLECS' INITIAL PROPOSAL	
METRIC ID	METRIC DESCRIPTION	PRODUCT DESCRIPTION	In C2C	In Current PAP	In SMP	In WPP	SMP PROPOSAL	RATIONALE	RECOMMENDATION	RATIONALE
PR-3-03-3345	% Completed in three (3) Days one (1) to five (5) Lines - No Dispatch	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
PR-3-06-3140	% Completed in three (3) Days one (1) to five (5) Lines - Dispatch	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-3-09-3140	% Completed in five (5) Days one (1) to five (5) Lines - Dispatch	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-4-02-3345	Average Delay Days - Total	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
PR-4-03-2100	% Missed Appointment - Customer	Resale POTS	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
PR-4-03-2200	% Missed Appointment - Customer	Resale Specials	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
PR-4-03-2341	% Missed Appointment - Customer	Resale 2-Wire Digital Services	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
PR-4-03-3100	% Missed Appointment - Customer	UNE POTS	YES	NO	NO	NO	Delete	Industry Del.	Delete	Not Measuring FP Performance
PR-4-03-3200	% Missed Appointment - Customer	UNE Specials	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
PR-4-03-3341	% Missed Appointment - Customer	UNE 2-Wire Digital Services	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
PR-4-03-3342	% Missed Appointment - Customer	UNE 2-Wire xDSL Loops	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
PR-4-03-3343	% Missed Appointment - Customer	UNE 2-Wire xDSL - Line Sharing	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Not Measuring FP Performance
PR-4-03-3345	% Missed Appointment - Customer	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
PR-4-03-3510	% Missed Appointment - Customer	UNE EEL	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
PR-4-03-3530	% Missed Appointment - Customer	UNE IOF	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance

					FAIRPOINT'S PROPOSAL				CLECS' INITIAL PROPOSAL	
METRIC ID	METRIC DESCRIPTION	PRODUCT DESCRIPTION	In C2C	In Current PAP	In SMP	In WPP	SMP PROPOSAL	RATIONALE	RECOMMENDATION	RATIONALE
PR-4-03-5000	% Missed Appointment - Customer	Interconnection Trunks (CLEC)	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
PR-4-04-3140	% Missed Appointment - FairPoint - Dispatch	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-4-04-3345	% Missed Appointment - FairPoint - Dispatch	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
PR-4-05-3140	% Missed Appointment - FairPoint - No Dispatch	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-4-05-3345	% Missed Appointment - FairPoint - No Dispatch	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
PR-4-08-2200	% Missed Appointment - Customer - Due to Late Order Confirmation	Resale Specials	YES	NO	NO	NO	Delete	Industry Del.	Delete	Not Measuring FP Performance
PR-4-08-2341	% Missed Appointment - Customer - Due to Late Order Confirmation	Resale 2-Wire Digital Services	YES	NO	NO	NO	Delete	Industry Del.	Delete	Not Measuring FP Performance
PR-4-08-3200	% Missed Appointment - Customer - Due to Late Order Confirmation	UNE Specials	YES	NO	NO	NO	Delete	Industry Del.	Delete	Not Measuring FP Performance
PR-4-08-3341	% Missed Appointment - Customer - Due to Late Order Confirmation	UNE 2-Wire Digital Services	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
PR-4-08-3342	% Missed Appointment - Customer - Due to Late Order Confirmation	UNE 2-Wire xDSL Loops	YES	NO	NO	NO	Delete	Industry Del.	Delete	Not Measuring FP Performance
PR-5-01-3140	% Missed Appointment - FairPoint - Facilities	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-5-01-3345	% Missed Appointment - FairPoint - Facilities	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
PR-5-02-3140	% Orders Held for Facilities > 15 Days	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-5-02-3345	% Orders Held for Facilities > 15 Days	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting

					FAIRPOINT'S PROPOSAL				CLECS' INITIAL PROPOSAL	
METRIC ID	METRIC DESCRIPTION	PRODUCT DESCRIPTION	In C2C	In Current PAP	In SMP	In WPP	SMP PROPOSAL	RATIONALE	RECOMMENDATION	RATIONALE
PR-6-01-3140	% Installation Troubles reported within 30 Days	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-6-01-3345	% Installation Troubles reported within 30 Days	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
PR-6-03-2100	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Resale POTS	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
PR-6-03-2200	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Resale Specials	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
PR-6-03-2341	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Resale 2-Wire Digital Services	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
PR-6-03-3112	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	UNE POTS Loop	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
PR-6-03-3140	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
PR-6-03-3200	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	UNE Specials	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
PR-6-03-3341	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	UNE 2-Wire Digital Services	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
PR-6-03-3342	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	UNE 2-Wire xDSL Loops	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
PR-6-03-3343	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	UNE 2-Wire xDSL - Line Sharing	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Not Measuring FP Performance
PR-6-03-3345	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting

					FAIRPOINT'S PROPOSAL				CLECS' INITIAL PROPOSAL	
METRIC ID	METRIC DESCRIPTION	PRODUCT DESCRIPTION	In C2C	In Current PAP	In SMP	In WPP	SMP PROPOSAL	RATIONALE	RECOMMENDATION	RATIONALE
PR-6-03-5000	% Installation Troubles reported within 30 Days - FOK/TOK/CPE	Interconnection Trunks (CLEC)	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
PR-8-01-3345	Percent Open Orders in a Hold Status > 30 Days	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
PR-8-02-3345	Percent Open Orders in a Hold Status > 90 Days	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	Industry Del.	Delete	Line Splitting
MR-2-02-3140	Network Trouble Report Rate - Loop	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-2-02-3345	Network Trouble Report Rate - Loop	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
MR-2-03-3140	Network Trouble Report Rate - Central Office	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-2-03-3345	Network Trouble Report Rate - Central Office	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
MR-2-04-3140	% Subsequent Reports	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-2-04-3345	% Subsequent Reports	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
MR-2-05-2100	% CPE/TOK/FOK Trouble Report Rate	Resale POTS	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
MR-2-05-2200	% CPE/TOK/FOK Trouble Report Rate	Resale Specials	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
MR-2-05-2341	% CPE/TOK/FOK Trouble Report Rate	Resale 2-Wire Digital Services	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
MR-2-05-3112	% CPE/TOK/FOK Trouble Report Rate	UNE POTS Loop	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
MR-2-05-3140	% CPE/TOK/FOK Trouble Report Rate	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-2-05-3200	% CPE/TOK/FOK Trouble Report Rate	UNE Specials	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
MR-2-05-3341	% CPE/TOK/FOK Trouble Report Rate	UNE 2-Wire Digital Loops	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance

					FAIRPOINT'S PROPOSAL				CLECS' INITIAL PROPOSAL	
METRIC ID	METRIC DESCRIPTION	PRODUCT DESCRIPTION	In C2C	In Current PAP	In SMP	In WPP	SMP PROPOSAL	RATIONALE	RECOMMENDATION	RATIONALE
MR-2-05-3342	% CPE/TOK/FOK Trouble Report Rate	UNE 2-Wire xDSL Loops	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
MR-2-05-3343	% CPE/TOK/FOK Trouble Report Rate	UNE 2-Wire xDSL - Line Sharing	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Not Measuring FP Performance
MR-2-05-3345	% CPE/TOK/FOK Trouble Report Rate	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
MR-3-01-3144	% Missed Repair Appointment - Loop	UNE Platform Business	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-3-01-3145	% Missed Repair Appointment - Loop	UNE Platform Residence	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-3-02-3144	% Missed Repair Appointment - Central Office	UNE Platform Business	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-3-02-3145	% Missed Repair Appointment - Central Office	UNE Platform Residence	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-3-02-3345	% Missed Repair Appointment - Central Office	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
MR-3-03-2100	% CPE/TOK/FOK - Missed Appointment	Resale POTS	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
MR-3-03-2341	% CPE/TOK/FOK - Missed Appointment	Resale 2-Wire Digital Services	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
MR-3-03-3112	% CPE/TOK/FOK - Missed Appointment	UNE POTS Loop	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
MR-3-03-3140	% CPE/TOK/FOK - Missed Appointment	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-3-03-3341	% CPE/TOK/FOK - Missed Appointment	UNE 2-Wire Digital Loops	YES	NO	NO	NO	Delete	Activity	Delete	Not Measuring FP Performance
MR-3-03-3342	%CPE/TOK/FOK - Missed Appointment	UNE 2-Wire xDSL Loops	YES	NO	NO	NO	Delete	No Standard	Delete	Not Measuring FP Performance
MR-3-03-3343	%CPE/TOK/FOK - Missed Appointment	UNE 2-Wire xDSL - Line Sharing	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Not Measuring FP Performance

					FAIRPOINT'S PROPOSAL				CLECS' INITIAL PROPOSAL	
METRIC ID	METRIC DESCRIPTION	PRODUCT DESCRIPTION	In C2C	In Current PAP	In SMP	In WPP	SMP PROPOSAL	RATIONALE	RECOMMENDATION	RATIONALE
MR-3-03-3345	%CPE/TOK/FOK - Missed Appointment	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
MR-4-01-3140	Mean Time To Repair - Total	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-02-3144	Mean Time To Repair - Loop Trouble	UNE Platform Business	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-02-3145	Mean Time To Repair - Loop Trouble	UNE Platform Residence	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-02-3345	Mean Time To Repair - Loop Trouble	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
MR-4-03-3144	Mean Time To Repair - Central Office Trouble	UNE Platform Business	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-03-3145	Mean Time To Repair - Central Office Trouble	UNE Platform Residence	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-03-3345	Mean Time To Repair - Central Office Trouble	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
MR-4-04-3140	% Cleared (all troubles) within 24 Hours	UNE POTS Platform	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-04-3345	% Cleared (all troubles) within 24 Hours	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting
MR-4-06-3144	% Out of Service > 4 Hours	UNE Platform Business	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-06-3145	% Out of Service > 4 Hours	UNE Platform Residence	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-07-3144	% Out of Service > 12 Hours	UNE Platform Business	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-07-3145	% Out of Service > 12 Hours	UNE Platform Residence	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-08-3144	% Out of Service > 24 Hours	UNE Platform Business	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-08-3145	% Out of Service > 24 Hours	UNE Platform Residence	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-4-08-3345	% Out of Service > 24 Hours	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting

Attachment 2 -- CLECs' Proposed List of Metrics to Delete

					FAIRPOINT'S PROPOSAL				CLECS' INITIAL PROPOSAL	
METRIC ID	METRIC DESCRIPTION	PRODUCT DESCRIPTION	In C2C	In Current PAP	In SMP	In WPP	SMP PROPOSAL	RATIONALE	RECOMMENDATION	RATIONALE
MR-5-01-3140	% Repeat Reports within 30 Days	UNE POTS Platform	YES	YES	NO	NO	Delete	UNEP/LS/LS*	Delete	UNE-P
MR-5-01-3345	% Repeat Reports within 30 Days	UNE 2-Wire xDSL - Line Splitting	YES	NO	NO	NO	Delete	UNEP/LS/LS*	Delete	Line Splitting

Attachment 3 -- Updated List of Operational Problems with FairPoint

Issue #		Topic	Issue description	2011 Update
1	**PO**	Addresses	Missing addresses in the system take FairPoint as long as two week to fix. In addition to new construction situations, these missing addresses often occur at locations where there is already working service.	Improved but still an issue
2	**PO**	CSI	For more complex accounts and for all government accounts (local, state and federal), CSI requests don't always return the information requested. CLECs are required to follow manual CSI process to obtain this information.	Still an issue
3	**PO**	CSI	The data that the CLECs receive in response to a CSI often does not agree with the CSI information FairPoint's service representatives have access to. Besides the return of faulty data, there is also a parity concern with this problem.	Still an issue
4	**PO**	CSI	There is a lack of feature detail on the customer's account (e.g., no call forwarding detail, hunting missing or unclear, no features, no listings). FairPoint fixed the hunting problem but it has resurfaced again.	Priority issue
5	**PO**	CSI	Completed order data is not reflected on the CSI. FairPoint takes too long to update CSI information as a result of service order activity. FairPoint indicates that this will be done within 10 days, but that often does not happen. (See related directory listings issue in Ordering & Provisioning.)	Priority issue
6	**PO**	CSI	Ported TNs often reflect that they are still with FairPoint.	Still an issue
7	**PO**	CSI	Resale CSIs missing key information such as listing and feature information	Still an issue
8	**PO**	CSI	ALI codes are missing from information returned.	Improved
9	**PO**	CSI	CSIs are often not available.	Still an issue
10	**PO**	CSI	Cannot pull CSIs for analog circuits with pseudo TNs.	Still an issue
11	**PO**	CSI	CSIs rarely carry any CFA. If it appears, it contains only first four digits, making it hard to reconcile bill to inventory.	Still an issue
12	**PO**	Dark Fiber	Responses to dark fiber inquires are not timely and there is not standard acceptance criteria for dark fiber.	Not enough data to evaluate
13	**PO**	Dark Fiber	Cannot input trouble tickets for dark fiber.	New Issue
14	**PO**	Data Problems	FairPoint continues to promise to clean-up its database discrepancy problems which cause many of the CLECs' issues. Progress is questionable.	Priority issue
15	**PO**	Directory Listings	Cannot verify a caption listing. Inquiries time out or only return single-listing information.	Priority issue
16	**PO**	Directory Listings	Cannot determine what LEC owns a customer's listing.	Priority issue
17	**PO**	Directory Listings	Dual name ID does not work, FairPoint's response only returns a single name.	Improved but still an issue
18	**PO**	Directory Listings	All directory responses indicate caption listing even in cases where the account has a single line listing.	Still an issue
19	**PO**	Directory Listings	Caption listings will not return packet information.	Still an issue

Attachment 3 -- Updated List of Operational Problems with FairPoint

Issue #		Topic	Issue description	2011 Update
20	**PO**	Directory Listings	DLI only returns a single listing even in cases where the customer has multiple listings. Often the returned listing is not the main listing.	Improved but still an issue
21	**PO**	Documentation	VFO documentation is poor	Improved
22	**PO**	Loop Qual	When a CLEC cannot obtain a loop qual by address, FairPoint's manual investigation process can take up to a week to return the requested information. With Verizon responses were returned within 48 hours.	Priority issue
23	**PO**	Loop Qual	Automated loop qual responses are often inaccurate (estimate about 30-35% of the time). Additionally, manual loop inquiry responses are also often inaccurate (estimate 20-25% of the time).	Priority issue
24	**PO**	Loop Qual	FairPoint had implemented a fix to return to CLECs information indicating that a remote terminal is in use. However, this functionality has been lost again within the past month.	Improved but still an issue
25	**PO**	Loop Qual	Loop lengths returned are often incorrect.	Still an issue
26	**PO**	Loss of Functionality	Verizon's systems gave the CLECs the ability to pull information on their CABS accounts, FairPoint does not offer this functionality. It takes 3-5 days to pull the information using the SPOC or help desk.	Still an issue
27	**PO**	Loss of Functionality	FairPoint does not provide the ability for the CLECs to access their own BANs for Directory Listings	Still an issue
28	**PO**	Loss of Functionality	CLECs cannot pull Design Layout Reports. They were able to do this with Verizon.	Still an issue
29	**PO**	Loss of Functionality	CSI responses no longer reflect cost information or contract lengths.	Still an issue
30	**PO**	Loss of Functionality	FairPoint does not provide any explanation why a loop does not qualify as Verizon did.	Improved but still an issue
31	**PO**	Loss of Functionality	Cannot obtain multiple TNs on a single CSI, each TN needs to be polled individually.	Improved
32	**PO**	Loss of Functionality	CLECs would like to have FairPoint develop a standard response for manual loop qualification inquires, providing all of the information the CLEC requires (e.g., loop length, PARTS RT). Currently, CLECs receive a screen shot of an email response from FairPoint's engineering department.	Still an issue
33	**PO**	Manual Requests	Responses to manual requests are not timely.	Improved but still an issue
34	**PO**	Systems	Pre-ordering inquiries frequently time out before returning a response.	Still an issue
35	**OP**	ASR	Often get errors for incorrect CCNA when the information is correct.	No longer an issue
36	**OP**	CFA Change	CFA change orders are getting worked ahead of the due date, causing service outages.	No longer an issue

Attachment 3 -- Updated List of Operational Problems with FairPoint

Issue #		Topic	Issue description	2011 Update
37	**OP**	CLEC-to-CLEC Conversions	Resale conversions involving two CLECs result in a service outage 100% of the time. This also happens with conversions from retail to resale but not as frequently.	Improved but still an issue
38	**OP**	Complex Orders	All complex orders result in a JEP, requiring manual follow-up.	No longer an issue
39	**OP**	Directory Listing Orders	Listing orders often error as "listing does not exist" even in cases where it clearly does exist.	Still an issue
40	**OP**	Directory Listing Orders	Directory listing often comes back with "no existing listing" on ported TNs. This happens with both JB-V and JB-N order types.	Still an issue
41	**OP**	Directory Listing Orders	Cannot migrate the directory listing with a hot cut order. Request results in a "no DL to migrate" error.	Improved but still an issue
42	**OP**	Directory Listing Orders	Directory listings are not updated in a timely manner after receipt of the BCN. FairPoint's manual update process also takes too long. Because of continued problems with directory listing updates, CLECs are required to manually check all their DL orders after completion to verify that the updates have been made. (See related CSI issue in Pre-order.)	Still an issue
43	**OP**	Disconnect Orders	Orders for circuit disconnects are not worked in a timely fashion by FairPoint and are not implemented on the FOC due date. CLECs continue to be billed for service beyond the disconnect due date.	Still an issue
44	**OP**	Disconnects	For resale service when the BTN of a multi-line account gets ported from the reseller, FairPoint does not use one of the remaining WTNs to establish a new BTN.	New Issue
45	**OP**	False PCN & BCN	Order is complete on FOC date and PCN/BCN are received yet no work was done. These orders seem to flow through FairPoint's systems without getting the required work accomplished. This happens an estimated 40% of the time.	Improved but still an issue
46	**OP**	False PCN & BCN	Many tag-and-locate orders are needed because FairPoint is not working the original order properly. This often results in a vendor meet to resolve issues.	Priority issue
47	**OP**	Hot Cuts	Hot cut process has improved but it is still very manual. eWPTS-based process with Verizon was much better.	Improved but still an issue
48	**OP**	Hot Cuts	FairPoint is not providing timely PCNs or BCNs on hot cut orders	No longer an issue
49	**OP**	Intervals	Some CLECs request longer intervals because they don't trust FairPoint to make the standard interval	Still an issue for some CLECs
50	**OP**	Line Loss Reports	Line loss reports to the CLECs are not always accurate or not always sent. This can cause customers to be double billed.	Still an issue
51	**OP**	Loss of Functionality	Unable to delete a BAN listing. Must ask FairPoint to do manually.	Still an issue

Attachment 3 -- Updated List of Operational Problems with FairPoint

Issue #		Topic	Issue description	2011 Update
52	**OP**	Loss of Functionality	Unable to determine the status of an order in the system for late or JEP orders; must rely on the SPOC or ROC.	Still an issue
53	**OP**	Loss of Functionality	Unable to get accurate DEMARC information. Verizon used to provide this data through eWPTS.	Improved but still an issue
54	**OP**	Loss of Functionality	For missing addresses Verizon would return a range of valid house numbers, FairPoint does not provide this functionality.	Still an issue
55	**OP**	Loss of Functionality	Orders reject for a partial port of an account with hunting. To get around this, the end-user customer has to open a ticket with FairPoint to remove hunting. The CLEC can only request porting after the ticket closes, delaying the porting and causing the customer to be without hunting for approximately 7 or 8 business days.	Still an issue
56	**OP**	Manual Processing	LSRs often drop out of the flow through process and nobody at FairPoint does anything about them until the CLECs bring them to FairPoint's attention.	Priority issue
57	**OP**	Manual Processing	Orders that reject for system problems will often not be addressed by FairPoint until the CLEC open a WHD ticket on the order. CLECs do not get a reject notice; the order just sits in ACK/ACPT state.	Still an issue
58	**OP**	Manual Processing	Manual orders often miss critical information such as circuit IDs.	Still an issue
59	**OP**	Missing data	TNs and addresses missing from FairPoint's systems. It takes FairPoint too long to update systems once notified of these problems.	Priority issue
60	**OP**	Multiple FOCs	CLECs receive multiple FOCs on circuit-type orders, with subsequent FOCs often changing the circuit ID or requiring a dispatch when the first FOC indicated a cut through.	Improved but still an issue
61	**OP**	NID Moves	Provisioning plan for NID moves does not include a dispatch step, causing service outages.	Still an issue
62	**OP**	Order Intervals	Intervals offered by FairPoint are much longer than those that were offered by Verizon. Intervals offered are longer than FairPoint's published standard intervals.	Priority issue
63	**OP**	Order Intervals	Published interval is not being followed for disconnect orders. The orders get a FOC with the published interval due date but the orders are generally not worked on that date.	No longer an issue
64	**OP**	Other	FairPoint's field technicians provide the CLEC's customers with inaccurate information, which typically reflects poorly on the CLECs	Improved but still an issue
65	**OP**	Performance Reporting	FairPoint's performance reports are incorrect and misleading as a result of problems such as the false PCN/BCN issue.	Still an issue
66	**OP**	Process	ROC will issue a JEP on an order for lack of facilities, yet order will continue to be worked by other FairPoint organizations, causing service outages. This happens often on CLEC-to-CLEC hot cuts.	Improved

Attachment 3 -- Updated List of Operational Problems with FairPoint

Issue #		Topic	Issue description	2011 Update
67	**OP**	Process	When orders need to be delayed due to an overload of repair problems. FairPoint cannot tell the CLECs which orders it will be delaying, preventing them from notifying their customers of the delay.	Still an issue
68	**OP**	Process	SPOCs do not provide timely responses to inquiries/problems. Many SPOCs do not have full systems access.	Improved but still an issue
69	**OP**	Process	FairPoint does not provide installation notices preventing the CLECs from giving acceptance notices.	No longer an issue
70	**OP**	Process	FairPoint will issue artificial completion notices so that a repair dispatch can be made to fix a problem with the physical provisioning of the order.	Still an issue for some CLECs
71	**OP**	Process	Number swaps - giving a number to FairPoint. The LNP group ports the number prior to the work/other steps being completed, which takes the customer out of service.	New Issue
72	**OP**	Process/Records	For SPUNE/SWUNE conversions performed before cutover, no record of the disconnected SA circuit exists in FairPoint's database, leading field techs to believe it is an out-of-service circuit. Techs have used these pairs for new services, resulting in loss of service on existing circuits.	No longer an issue
73	**OP**	Related PONS	Related PON orders are not being worked concurrently, causing service outages.	Improved but still an issue
74	**OP**	Related PONS	RPON orders need to be announced and SPOC needs to be instructed to "babysit" the orders all the way through the process.	Priority issue
75	**OP**	SUPPs	Supplemental orders receive a FOC; however, the order is worked on the original due date, often causing service outages.	Improved
76	**OP**	SUPPs	Same Day SUPPs on Directory orders return a response that the order has already been worked. The SPOCs have indicated that these orders are getting worked early, preventing the CLEC's an ability to SUPP the order.	Still an issue
77	**OP**	Systems	New Invalid reject: Starting in June 2011, CLECs see new rejects CLECs have never seen before, but CLECs were not notified of any system changes or updates.	New Issue
78	**OP**	Systems	When CLECs supplement an order, FairPoint continues to provide Firm Order Conformation, Provisioning Completeness Notifier or/and Billing Completeness Notifier for the original order.	New Issue-Priority
79	**OP**	Systems	System fixes for one problem often cause other problems.	Still an issue
80	**OP**	Systems	The manual work that the CLECs must do to "baby sit" FairPoint's systems has greatly driven up the CLECs' cost of doing business.	Priority issue
81	**OP**	Systems	Some CLECs find it necessary to expend the resources to create daily spreadsheets for their SPOC on all outstanding orders. Manual order tracking is a huge time waster for the CLECs	Priority issue

Attachment 3 -- Updated List of Operational Problems with FairPoint

Issue #		Topic	Issue description	2011 Update
82	**OP**	Systems	Systems errors occur too frequently, requiring CLECs to resubmit orders. This occurs at least once per day.	Still an issue
83	**OP**	Systems	System error messages to the CLECs don't always reflect what the problem is that would allow the CLEC to take action to fix it.	Still an issue
84	**OP**	Systems	Erroneous system error "Not able to create new customer in M6," which was fixed, has returned with FairPoint's 3/18 systems "upgrade."	Improved but still an issue
85	**OP**	Systems	CLECs often cannot order service to a location where FairPoint has previously provisioned service.	No longer an issue
86	**OP**	Systems	New loop orders are often coming through as cut through. The SPOC used to work these to make sure they were dispatched, but now CLECs are being told that they "must trust the systems," which requires the CLECs to issue a tag-and-locate order after the original order completes.	Still an issue
87	**OP**	Systems	M6 errors prevent the rescheduling of a due date because the order is "stuck."	Improved but still an issue
88	**OP**	Ports	Port orders reject for hunting when none exists.	New Issue
89	**OP**	Ports	Port orders reject for hunt group when the entire account is porting (making the hunt group a non-issue)	New Issue - Priority
90	**OP**	Ports	"Customer Not Ready" jeopardies are sent on port orders. These are often sent 1-2 days before the due date. In some cases, they are sent after the due date when the number has already been ported.	New Issue
91	**OP**	Ports	SPOCs cannot work "complex" port issues - can only be handled by Portland office.	New Issue
92	**OP**	Process	A significant number of orders still require EWOC/IT tickets. Once opened, these sit with no progress (and no updates) for at least a week, often longer. ETA's on issue resolution are never provided leading to extremely frustrated customers and sometimes loss of a sale.	New Issue
93	**MR**	Chronic Troubles	FairPoint never provides a solution to the CLECs chronic trouble reports and instead just keeps providing short term fixes.	Still an issue
94	**MR**	Chronic Troubles	FairPoint has facility quality issues that are causing chronic troubles.	Still an issue
95	**MR**	Repair Quality	About 10-15% of the trouble reports that FairPoint closes as "no trouble found" (NTF) must be reopened. This is a higher percentage than the CLECs experienced with Verizon.	Priority issue
96	**MR**	Tag & Locate	The CLECs' volume of "tag and locates" through the M&R department are significantly greater than they were with Verizon. This is resulting from installation orders not being worked properly (issue also addressed in Ordering & Provisioning).	Priority issue

Attachment 3 -- Updated List of Operational Problems with FairPoint

Issue #		Topic	Issue description	2011 Update
97	**BI**	CSRs	FairPoint does not provide the tie pair on loop records like Verizon did. On many new loop orders (2 & 4 wire), there is no information about the loop on the CSR except for the circuit ID and the Central Office - no end user name, no address, no facility.	New Issue
98	**BI**	Disconnects	Disconnect orders are not getting worked on time or circuits are physically disconnected but CLECs continue to get billed for them. When the orders are worked FairPoint does not prorate the credits correctly. Estimate is that this is occurring 25% of the time.	Priority issue
99	**BI**	Disconnects	Disconnects worked in January '09, prior to cutover, were not credited back to the disconnect date. FairPoint is requiring Verizon FOC from the CLECs to provide this credit. One CLEC still has 30 of these orders still in dispute with FairPoint.	Still an issue
100	**BI**	Disconnects	Resale disconnects of complex services such as ISDN, Centrex and analog circuit with pseudo TNs are physically disconnected but billing of the circuit never stops.	Still an issue
101	**BI**	Disconnects	For resale service when the BTN of a multi-line account gets ported from the reseller, FairPoint does not use one of the remaining WTNs to establish a new BTN but continues to bill the CLEC for the BTN that was ported away.	Still an issue
102	**BI**	Disconnects	CLECs receive BCNs and PCNs for disconnect orders but billing of the circuit doesn't stop unless the CLEC calls the problem to FairPoint's attention.	Still an issue
103	**BI**	Dispute Resolution	When FairPoint concurs with a dispute on a disconnect, the bill credit often does not go all the way back to the due date of the disconnect order, resulting in another dispute.	Improved but still an issue
104	**BI**	Dispute Resolution	FairPoint has no sense of urgency in resolving disputes or locating payments received but not posted.	Priority issue
105	**BI**	Dispute Resolution	FairPoint does not accept the bill dispute form posted on its website. FairPoint requires the CLECs to file disputes using the Verizon form. Once billing disputes are filed, FairPoint provides the CLECs with a separate form indicating the status of the claim. This multiple form process requires the CLECs to manually compare the forms to determine the status of each claim submitted. Automatic batch id's are assigned by FairPoint per each dispute form filed. However, if several claim forms are filed at once, no indication of which batch id belongs to which claim filed is provided. An email and/or call to our FP billing contact/specialist is required to get this information.	Priority issue; issues in first two sentences resolved.
106	**BI**	DUF	DUF volumes are significantly below (estimate 20%) what they were prior to cutover.	Still an issue
107	**BI**	Incorrect Billing	CLECs continue to get bills for accounts that belong to other CLECs.	Still an issue

Attachment 3 -- Updated List of Operational Problems with FairPoint

Issue #		Topic	Issue description	2011 Update
108	**BI**	Incorrect billing	Retail customers that ported their service to a CLEC are still getting billed by FairPoint. This goes as far back as a customer who ported away from FairPoint in August '09.	Still an issue
109	**BI**	Incorrect billing	Accounts that are not PICed to a carrier are still getting billed by FairPoint as if the account is PIC'd to that carrier.	Still an issue
110	**BI**	Incorrect Billing	FairPoint bills trouble ticket/repair charges to BANs not associated with the circuit/number. (Circuit billed on one BAN and TT/Repair billed on different BAN). If trouble ticket disputed FairPoint denies as CID not billed on BAN.	New Issue
111	**BI**	Incorrect Billing	UNE-P usage being billed on separate BAN from UNE-P lines. UNE-P usage unable to be verified by line as usage is reported in a CABS format by switch CLLI not by number.	New Issue
112	**BI**	Invoice Accuracy	Resale invoices have discrepancies between the total shown on the invoice to detail billing contained within OC&C's. Starting balances to not equal ending balance of prior month and current months charges do not tabulate to the summary numbers.	New Issue-Priority
113	**BI**	Invoice Timeliness	Electronic invoices often are not received in a timely manner. CLECs need to call FairPoint to get electronic invoices issued or get paper copies.	Still an issue
114	**BI**	Loss of Functionality	FairPoint cannot provide the directory line-by-line listing bill detail that they used to get from Verizon.	Still an issue
115	**BI**	Loss of Functionality	FairPoint continues to provide multiple DUF files rather than a single file, preventing the CLECs from being able to easily audit the files.	Still an issue
116	**BI**	Loss of Functionality	Verizon website provides the CLECs the ability to review the status of its bill disputes. FairPoint does not provide this functionality.	Priority issue
117	**BI**	New billing	FP is still having trouble getting new services into billing in a timely manner - we continue to see back billing on a variety of invoices for service added last year and in 2009.	New Issue
118	**BI**	Open claims	Disputed amounts are not being exempted from late fees.	New Issue
119	**BI**	Payments	CLEC bill payments are often either misapplied or are not applied at all. This has been a continual problem since cutover and has not gotten any better. Occurs about 50% of the time.	Still an issue
120	**BI**	Posting claim amounts	When claims are received, they are not applied to the correct invoice - they are posted to current, leaving a balance due. We are assessed late fees on that old balance, necessitating another claim for that!	New Issue
121	**BI**	Record Accuracy	Since April we have been receiving toll on our rduf and uduf files that do not belong to us. FairPoint continues to work the problem but to date is not resolved. They acknowledged they had an issue with their look up table for 7 carriers as well as numbers getting ready to port to us but have not as yet. Incident 26707 is past it's due date.	New Issue

Attachment 3 -- Updated List of Operational Problems with FairPoint

Issue #		Topic	Issue description	2011 Update
122	**BI**	Record Accuracy	FairPoint is not accurately capturing the amount of traffic that the CLECs are terminating to FairPoint.	Priority issue
123	**BI**	Resale discount	We don't receive a resellers' discount on usage on any of our resale BANs	New Issue
124	**OT**	Collocation	Central Office lockouts for employees who have only been issued new FP keys (the ones made available since November 2010).	New Issue
125	**OT**	Line Loss Reports	Line loss reports - missing and inaccurate.	New Issue-Priority
126	**OT**	LVR Reports	The LVR reports supplied by FairPoint are extremely inaccurate leaving the CLECs in the dark on how their customer accounts are going to appear in the phone books.	Priority issue
127	**OT**	PAP Reporting	Reports are always late and there is no consistency in the reporting. Reports are also inaccurate. Some CLECs don't receive reports at all.	Still an issue
128	**OT**	Poles	Days to survey, days to make ready and days to license should be measured.	New Issue
129	**OT**	Process	SPOCs and help desk personnel are unfamiliar with directory listings processes and systems.	Improved but still an issue
130	**OT**	Training	Minimal training on DL available (5 min. in a 3 hr. LNP class).	Still an issue