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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition for show cause proceedings) Docket No. 080278-TL
against Verizon Florida LLC for apparent violation of)
Rule 25-4.070, F.A.C., service availability, and)
impose fines, by the Office of the Attorney General,)
Citizens of the State of Florida, and AARP)
_____)

REBUTTAL TESTIMONY OF DEBORAH B. KAMPERT

ON BEHALF OF

VERIZON FLORIDA LLC

PUBLIC VERSION

August 20, 2009

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1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Deborah B. Kampert. My business address is 201 N.
3 Franklin Street, Tampa, Florida 33602.

4

5 Q. WHAT IS YOUR PROFESSIONAL EXPERIENCE AND
6 EDUCATIONAL BACKGROUND?

7 A. I have been employed with Verizon for 32 years. Currently I am a
8 manager in Verizon's State Government Affairs group, a position I have
9 held since 1998. My responsibilities include serving as liaison to the
10 Florida Public Service Commission ("Commission") Staff; providing
11 regulatory support to Verizon's operations and support teams; managing
12 customer complaints received from the Commission and other external
13 agencies; and assisting the company in its compliance with Commission
14 rules, orders and tariffs. Before 1998 I held a number of positions with
15 increasing levels of responsibility. I attended Hillsborough Community
16 College and the University of Tampa, but did not complete the
17 coursework for a degree.

18

19 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

20 A. The purpose of my rebuttal testimony is to respond to the direct
21 testimony of Office of Public Counsel witness Earl Poucher and Staff
22 witness Rick Moses. I will describe the overall quality of service Verizon
23 provides to its customers, the low level of complaints Verizon receives,
24 the data reflecting Verizon's efforts to achieve 95% service levels when
25 making out-of-service ("OOS") and not-out-of-service ("NOOS") repairs,

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1 and the impact of operational challenges on Verizon's performance
2 reports. My testimony concerns Verizon's repair service performance
3 during 2007 and the first three quarters of 2008, which is the period at
4 issue in this case.

5

6 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

7 A. The information I provide below demonstrates that Verizon provides
8 good, reliable service that gives rise to few customer complaints.
9 Verizon consistently delivers 98% network reliability, which means that
10 customers seldom experience service outages. When customers do
11 have an OOS or NOOS trouble, Verizon normally fixes the problem
12 within 24 or 72 hours, respectively. The percentage of Verizon's
13 customer base that receives a longer repair interval in a given month is
14 quite low – 0.30% or less for OOS and 0.13% or less for NOOS. Few
15 customers complain about Verizon's network service in general and
16 even fewer (8 total in an average month) complain when they receive
17 OOS repairs in more than 24 hours or NOOS repairs in more than 72
18 hours.

19

20 I also will present performance data showing that Verizon strives to
21 meet the Commission's OOS and NOOS service objectives, but is often
22 prevented from doing so by operational challenges outside its control.
23 Verizon's efforts to meet the objectives are reflected in Verizon's
24 average time to clear OOS and NOOS troubles, which is well below the
25 Commission's objectives. Moreover, when Verizon does not meet the

1 OOS objective of 95% in 24 hours or the NOOS objective of 95% in 72
2 hours, it often comes close to doing so, which can be seen in Exhibit
3 DBK-3 showing OOS and NOOS exchange results for percentage
4 ranges below 95%, both for the 24 hour and 72 hour intervals and
5 longer intervals. Finally, I will explain that 212 instances where Verizon
6 did not achieve a 95% service level at an exchange level may be
7 attributed operational challenges including severe weather and cable
8 cuts.

9
10 **OVERALL QUALITY OF SERVICE PROVIDED TO VERIZON'S**
11 **CUSTOMERS**

12 **Q. PLEASE DESCRIBE THE OVERALL LEVEL OF SERVICE THAT**
13 **VERIZON PROVIDED TO ITS CUSTOMERS.**

14 A. Verizon consistently delivers 98% network reliability. As shown in
15 Exhibits DBK-1 and DBK-2, the average number of monthly OOS and
16 NOOS trouble reports Verizon received in 2007 and the first three
17 quarters of 2008 was a small fraction of Verizon's average number of
18 residential access lines. During 2007, only 2% of Verizon's customers
19 experienced a service outage (and therefore 98% did not) and less than
20 1% had a service-affecting trouble in an average month. Similarly, in
21 2008, less than 2% of Verizon's customers experienced a service
22 outage (so again, 98% did not) and less than 1% had a service-affecting
23 trouble in an average month. Because of Verizon's network reliability,
24 the overwhelming majority of Verizon's customers remain in service
25 each month and do not require service restoration or service-affecting

1 trouble clearance.

2

3 **Q. WHEN CUSTOMERS DO EXPERIENCE OOS AND NOOS**
4 **CONDITIONS, HOW DOES VERIZON RESPOND?**

5 A. When a customer experiences an outage or service-affecting trouble,
6 Verizon normally meets the 24 hour or 72 hour objective. In 2007,
7 Verizon on average restored service within 24 hours 88% of the time.
8 During the first nine months of 2008 at issue in this case, the percentage
9 dipped to 84%, but this decline was due to performance levels in March
10 and April that were not in keeping with the high level of service that
11 Verizon seeks to provide. Verizon promptly addressed the situation, as
12 evidenced by the 90% OOS service level it achieved on average for the
13 other seven months of that period. For NOOS, Verizon cleared service-
14 affecting troubles 84% of the time on average in 2007, and then
15 improved that performance to 88% for the first three quarters of 2008.
16 When March and April 2008 data are excluded, the 2008 NOOS figure
17 increases to 92%.

18

19 **Q. HOW OFTEN DO VERIZON CUSTOMERS RECEIVE OOS REPAIRS**
20 **IN MORE THAN 24 HOURS AND NOOS REPAIRS IN MORE THAN 72**
21 **HOURS?**

22 A. Because Verizon's customers seldom have an outage or service-
23 affecting trouble in the first place, the percentage of Verizon's customer
24 base that receives OOS repairs in more than 24 hours and NOOS
25 repairs in more than 72 hours in a given month is extremely low. As

1 shown in Exhibit DBK-1, the percentage of Verizon's customer base
2 receiving a longer OOS interval per month in 2007 was 0.24% and a
3 longer NOOS interval per month was 0.13%. As shown in Exhibit DBK-
4 2, in 2008 only 0.30% of Verizon's customers per month received a
5 longer OOS interval and less than 0.1% received a longer NOOS
6 interval.

7

8 **VERIZON'S COMPLAINT LEVELS WERE LOW IN 2007 AND 2008**

9 **Q. PLEASE DESCRIBE THE VERIZON'S CUSTOMER COMPLAINT**
10 **LEVELS IN 2007.**

11 A. The Commission logged 354 customer complaints concerning Verizon
12 during 2007, which at the end of 2007 had 1,543,608 access lines in its
13 Florida service territory. Verizon's complaint rate per thousand lines
14 was 0.2293, the lowest rate of all ILECs for which complaints were
15 logged. Of the 354 complaints, only about 165 concerned network
16 performance (the others concerned billing), which means that during
17 2007 the Commission logged about one customer complaint concerning
18 Verizon's network performance for every 10,000 Verizon access lines.

19

20 **Q. PLEASE DESCRIBE THE VERIZON'S CUSTOMER COMPLAINT**
21 **LEVELS IN 2008.**

22 A. Verizon's complaint rate continued to be low in 2008. During the year,
23 the Commission logged 425 complaints relating to Verizon, 196 of which
24 concerned network performance. Verizon's complaint rate remained
25 below 0.3 complaints per thousand lines. The number of complaints

1 concerning network performance continued to be approximately 1 in
2 10,000.

3

4 **Q. HOW MANY COMPLAINTS DOES VERIZON RECEIVE**
5 **CONCERNING OOS INTERVALS LONGER THAN 24 HOURS AND**
6 **NOOS INTERVALS LONGER THAN 72 HOURS?**

7 A. Verizon receives few complaints about OOS intervals longer than 24
8 hours and NOOS intervals longer than 72 hours. During 2007, Verizon
9 received just 66 complaints from customers who experienced a longer
10 OOS interval and 26 complaints from customers who experienced a
11 longer NOOS interval. These figures represent complaints from all
12 sources, including the Attorney General's Office, the Better Business
13 Bureau, the FCC, other government agencies and the Commission
14 (whether logged or transfer connected), as well as complaints received
15 by Verizon's Customer Advocacy Office and Verizon executives.

16

17 The relationship between Verizon's average monthly customer base,
18 trouble reports, "misses" and OOS and NOOS complaints during 2007 is
19 shown in Exhibit DBK-1. (Verizon has not done such an analysis for
20 2008 complaints.)

21

22 **PERFORMANCE DATA SHOWS VERIZON'S EFFORTS TO ACHIEVE 95%**

23

SERVICE LEVELS

24

25

1 **Q. DOES VERIZON'S PERFORMANCE DATA SHOW THAT IT SEEKS**
2 **TO ACHIEVE 95% OOS AND NOOS SERVICE LEVELS?**

3 A. Yes. The data reflecting Verizon's overall performance that I already
4 have discussed demonstrates Verizon's efforts to achieve these levels.
5 Below I will discuss average OOS and NOOS response times; data
6 showing the number of times Verizon reached or nearly reached the
7 95% service level for the OOS and NOOS objectives; and the number of
8 times Verizon nearly achieved the 95% for slightly longer intervals.

9

10 **Q. WHAT WERE VERIZON'S AVERAGE OOS AND NOOS CLEARANCE**
11 **TIMES IN 2007 AND THE FIRST THREE QUARTERS OF 2008?**

12 A. Verizon's average time to clear OOS troubles was 19.5 hours and its
13 average time to clear NOOS troubles was 38.7 hours.

14

15 **Q. ON WHAT BASIS DID VERIZON REPORT ITS OOS AND NOOS**
16 **RESULTS TO THE COMMISSION IN 2007 AND 2008?**

17 A. In compliance with the Commission's rules, Verizon calculated results
18 for exchanges with at least 50,000 lines on a monthly basis (thus
19 creating one OOS and one NOOS opportunity per exchange per month),
20 while it calculated results for exchanges with fewer than 50,000 lines on
21 a quarterly basis (thus creating one OOS and one NOOS opportunity
22 per exchange per quarter). For OOS, Verizon reported the number of
23 outage reports it received for each exchange during the applicable
24 reporting period, the number of times it restored service within 24 hours,
25 and the corresponding percentage. For NOOS, Verizon reported the

1 number of service-affecting trouble reports it received for each
2 exchange during the applicable reporting period, the number of times it
3 cleared the trouble within 72 hours, and the corresponding percentage.

4

5 **Q. DOES VERIZON'S PERFORMANCE DATA FOR THE PERIOD IN**
6 **QUESTION SHOW THAT VERIZON SEEKS TO MEET THE**
7 **COMMISSION'S OOS AND NOOS SERVICE OBJECTIVES?**

8 A. Yes. Verizon's efforts to meet the objectives are shown by the number
9 of times Verizon meets or exceeds the 95% service levels and the
10 number of times it comes close to meeting those service levels. In most
11 reporting periods at issue in this case, Verizon meets the OOS and
12 NOOS objectives 80% of the time or more. For OOS restoration,
13 Verizon achieved a result in the 95-100% range 63 times, in the 90-
14 94.9% range 85 times, in the 85-89.9% range 49 times and in the 80-
15 84.9% range 42 times. In only 43 instances (out of 282 opportunities)
16 did Verizon report raw data reflecting an OOS service level below 80%.
17 For NOOS trouble clearance, Verizon reported service levels in the 95-
18 100% range 45 times, in the 90-94.9% range 59 times, in the 85-89.9%
19 range 56 times and in the 80-84.9% range 49 times. In only 73
20 instances (out of 282 opportunities) did Verizon report raw data
21 reflecting an OOS service level below 80%. The OOS and NOOS
22 results within percentage ranges below 95% are shown in Exhibit DBK-
23 3.

24

25

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

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

13
14 Q. WHAT DOES YOUR ANALYSIS SHOW?

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

1 **Q. WHEN VERIZON RESTORES AN OUTAGE WITHIN A SHORT TIME**
2 **AFTER THE 24-HOUR OBJECTIVE, WHAT IS THE CUSTOMER**
3 **IMPACT, IF ANY?**

4 A. The customer impact is minimal. As a practical matter, when service is
5 restored within 30 hours, that almost always means Verizon completed
6 the repair the business day after the customer called in the trouble.
7 Obviously, when Verizon restores service within 48 hours, the customer
8 has his or her service back within two business days. For customers
9 with cell phones – the great majority of customers – an additional
10 increment of time makes little difference. When a customer has a
11 special medical or other need for service restoration, Verizon provides
12 expedited service, as noted in the Rebuttal Testimony of Russell
13 Diamond.

14
15 **Q. HOW DID VERIZON'S REPAIR PERFORMANCE IN MARCH AND**
16 **APRIL OF 2008 AFFECT THE PERFORMANCE DATA YOU HAVE**
17 **DISCUSSED?**

18 A. It had a disproportionate impact. Of the 456 misses alleged in the
19 Commission's show-causes order, 96 related to monthly and quarterly
20 results that were affected by the repair results for those months.
21 Moreover, of the 43 instances where Verizon's OOS performance was
22 below 80% within 24 hours, more than half (26) related to the March-
23 April 2008 timeframe. Of the 13 instances where Verizon's OOS
24 performance was below 80% within 48 hours, 10 of them related to
25 those months.

1 **OPERATIONAL CHALLENGES**

2 **Q. WHAT OPERATIONAL CHALLENGES DOES VERIZON FACE?**

3 A. Because Verizon's service territory on the central west coast of Florida
4 is subject to severe weather, Verizon frequently operates under
5 conditions that are anything but normal. For example, in July 2007 there
6 were more than 200,000 lightning strikes in Verizon's service territory,
7 which created an unusually high number of service outages and delayed
8 restoration because Verizon does not dispatch its employees during
9 dangerous conditions. In addition to operational issues posed by severe
10 weather, Verizon must address cable cuts and other damage to its
11 facilities and equipment that can lead to service levels below 95%
12 through no fault of Verizon. The challenges posed by these operational
13 issues and how Verizon meets them are addressed in the Rebuttal
14 Testimony of Russell Diamond.

15

16 **Q. DOES VERIZON EXCLUDE PERFORMANCE DATA WHEN SEVERE**
17 **WEATHER OR OTHER EXTERNAL CHALLENGES PREVENTED IT**
18 **FROM MEETING 95% SERVICE LEVELS?**

19 A. Generally, no. In compliance with Rule 25-4.070, Verizon does not
20 exclude trouble tickets caused by major outages unless the outage
21 affects at least 10% of the exchange. Major outages and other issues
22 that prevent Verizon from achieving a 95% service level are, however,
23 described in the narratives included in its quarterly service quality
24 reports.

25

1 **Q. HOW MANY INSTANCES HAVE YOU IDENTIFIED WHERE SEVERE**
2 **WEATHER AND OTHER CIRCUMSTANCES PREVENTED VERIZON**
3 **FROM ACHIEVING 95% SERVICE LEVELS?**

4 A. For OOS, based on my review of Verizon's quarterly service quality
5 reports, there were at least 100 instances where severe weather caused
6 or played a significant role in producing service levels below 95%, most
7 of them during the rainy season that normally takes place between June
8 and September or October. Another seven instances where Verizon
9 reported a result below 95% resulted from cable cuts and vandalism.
10 So of the 219 OOS misses alleged in the Commission's show-cause
11 order, almost half (107) can be attributed to these factors.

12
13 For obvious reasons, Verizon gives higher priority to OOS restoration
14 than to NOOS trouble clearance. As a result, when operational
15 challenges such as severe weather arise, NOOS clearance normally
16 takes a back seat to restoring customers who are out of service. In the
17 case of the 107 alleged misses just discussed, Verizon reported
18 performance below the NOOS objective for the same exchange and
19 reporting period 105 times. The alleged misses that may be attributed
20 to operational challenges therefore totals 212.

21

22 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

23 A. Yes.

24

25

Exhibit A

Verizon's 2007 Average Monthly Network Performance (January – December)

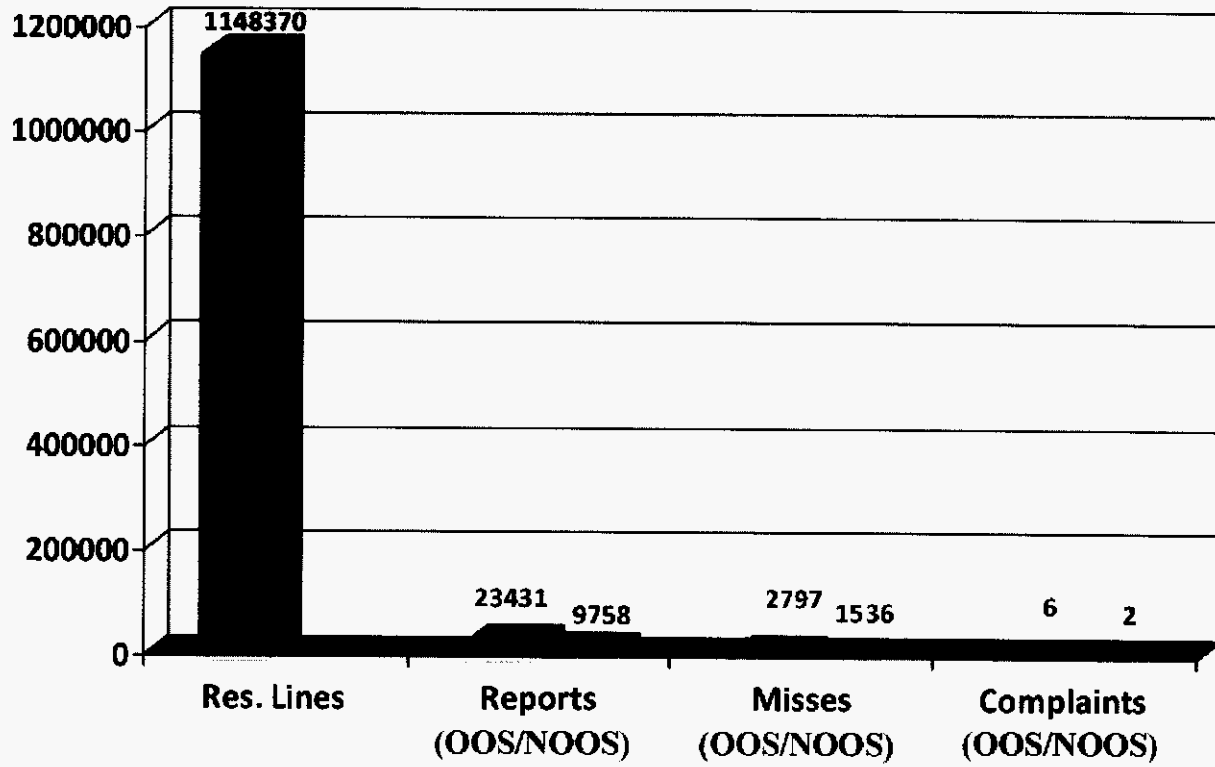
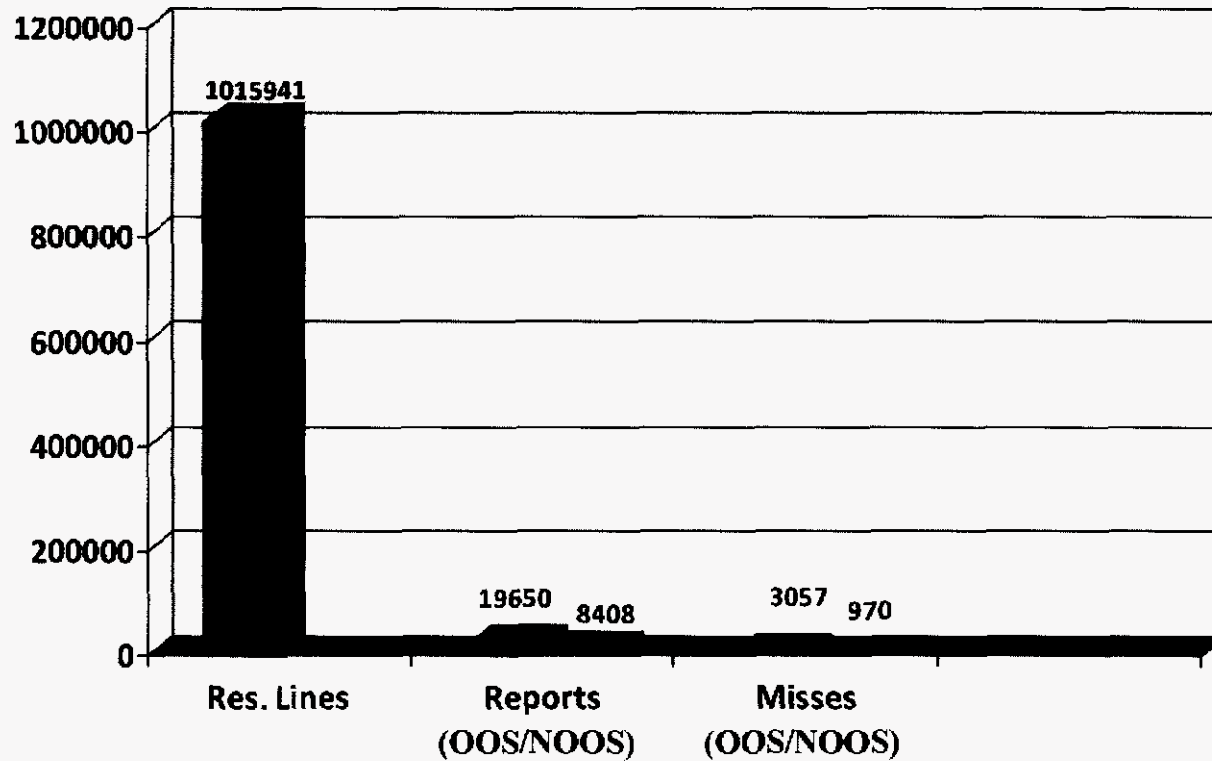


Exhibit B

Verizon's 2008 Average Monthly Network Performance (January - September)*



*Verizon has not yet calculated the number of complaints by customers in 2008 who experienced an OOS or NOOS "miss."

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OOS: Exchange "Misses" for Stated Intervals

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

NOOS: Exchange "Misses" for Stated Intervals

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