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November 16, 2001

VIA HAND DELIVERY

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Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No.: 000121-TP

Dear Ms. Bayo:

On behalf of the Joint ALECs, enclosed for filing and distribution are the original and 15 copies of the following:

- Joint ALECS' Supplemental Comments.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Joe McGlothlin

Joseph A. McGlothlin

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment Of Operations Support Systems Permanent Performance Measures for incumbent Local Exchange Telecommunications Companies	)))))	**Docket No.: 000121-TP** **Filed: November 16, 2001**

JOINT ALECS' SUPPLEMENTAL COMMENTS

AT&T Communications of the Southern States, Inc., WorldCom, Inc., DIECA Communications, Inc., d/b/a Covad Communications Company and Z-Tel Communications, Inc. hereinafter "Joint ALECs" supplement the comments dated November 5, 2001 as follows:

APPROPRIATENESS OF BELLSOUTH'S PROPOSED RETAIL ANALOGS FOR LINE SPLITTING AND ENHANCED EXTENDED LINKS

ALECs propose that the appropriate retail analog for wholesale line splitting is retail line sharing. The comparison should be to a product that similarly does not require the provision of full DSL loop, only a service that provides the higher bandwidth portion of the loop when BellSouth provides the voice portion.

The ALECs prefer a benchmark for EELs, such as Special Access or at least DS1/DS3 retail services. To compare the provisioning of EELs to the provisioning of DS1/DS3 interoffice facilities as proposed by BellSouth is inappropriate. This comparison ignores the fact that new transport capacity often is not required to fulfill EELs orders. In fact, the problem area raised in the PSC's permanent metric proceeding by e.spire and the ALEC Coalition related to the timeliness of migration of special access to EELs service. Here clearly the interoffice facilities as well as the channel to the end

user already are installed. Thus the process is more of a billing change than a provisioning activity.

Special access performance is the most analogous service to EELS (the combination of transport, multiplexer and loop). While the provisioning intervals for special access are purported to be premium, the provisioning processes ALECs have found are generally the same for most ILECs' UNE high-capacity loops. This would make special access an appropriate retail analog for Missed Appointments, particularly if special access provided to carriers is excluded from the retail analog. ALECs are concerned about using two products provided to the same competitor's group in determining parity, however, and propose that only special access provided to non-carriers be used. If such non-carrier volumes are too small to use, ALECs propose that a set benchmark of no more than 5% due dates missed be used for Missed Appointments. ALECs also propose that the Average Completion Interval metric benchmark be set at 30% in 5 and 70% in 8 business days. This would be analogous to special access standard intervals when facilities are available in BellSouth's FAS database (5 days) and when they are not (8 days). These ALEC-proposed benchmarks are what the Georgia staff is currently proposing in the pending six-month review for the Average Completion Interval metrics. The Georgia staff is tentatively proposing use of the DS1/DS3 loop as the retail analog for Missed Appointments. This is not what the ALECs would prefer but it is better than using interoffice facilities as proposed by BellSouth.

APPROPRIATENESS OF EXCLUDING FOUND/OK, TEST/OK, AND NO TROUBLE FOUND CODED TROUBLES FROM MAINTENANCE METRICS

ALEC oppose such exclusions in the maintenance metrics because such exclusions are problematic. Moreover, BellSouth has not shown how an erroneously coded trouble is reinstated for the trouble rate and repeat trouble metric if ALECs have to resubmit a trouble report when the first report was concluded to be no trouble found. BellSouth's recent submission in the Georgia six-month review showed for the ALEC aggregate report similar and even higher numbers of such reports so that the exclusion would appear to not help BellSouth achieve parity performance. The attached report from the Communications Workers of America on how another ILEC's management often gamed a similar trouble report exclusion (CPE), which BellSouth already excludes, shows that allowing such exclusions can lead to false reporting of parity maintenance performance. Worker salary and bonus incentives based on reducing troubles and clearing troubles more quickly can also lead to false reporting even if BellSouth's management would not be involved in such gaming. If BellSouth believes an ALEC is gaming the system by reporting false troubles to gain remedies, it has the data to report that individual ALEC to the PSC for punitive action. At the very least, if the PSC allows BellSouth to add this exclusion to all maintenance metrics, it should require BellSouth to demonstrate how incorrectly determined "no trouble found" situations would get back into the metrics for repeat troubles and accurate calculation of trouble duration from the original end user report. BellSouth should also report the number of trouble reports excluded from the metric each month, as do other ILECs. If the number is high, it would trigger the ALEC to review the raw data in PMAP rather than review all trouble report raw data every month for exclusion errors. The attached excerpt of WorldCom's experience in trying to gain root cause information on "troubles after install" for UNE-P,

shows that the data may not provide enough information and may be burdensome to research.

MODIFYING BELLSOUTH'S BILLING METRICS TO BECOME COMPLIANT WITH THE ORDER

BellSouth, WorldCom and AT&T held a conference call on 11/13 to discuss the invoice adjustment metric that was missing and problems with the DUF/ADUF error metric submitted to the PSC. The subject matter experts reached agreement on the Invoice Errors Corrected in 45 Days metric and are close to agreement regarding the DUF/ADUF Error Corrections in 5 Days metric. The main problem is the means by which the ALECs would start the clock on receiving corrections. The form proposed by BellSouth would be burdensome to use and would supply all the information required by BellSouth for each record. ALECs would prefer a more automated process called "out collect" where the actual records with errors would be returned. ALECs have proposed use of BellSouth's form with reduced information requirements (no requirement to supply date of file, pack sequence number, volser number or dataset of each call record) with an expectation to move to the automated process within a specified time limit. (See Attachments). ALECs also want data pack and content errors measured separately to avoid the skewing of data. At the same time these comments are being filed, ALECs and BellSouth are continuing to discuss this issue and are making progress toward compromise on the DUF error measurement.

CAPTURING SERIOUS DEGRADATIONS AS WELL AS FULL OUTAGES IN SYSTEM AVAILABILITY REPORTING

Even if the PSC does not use the language proposed by ALECs for capturing degraded service in placing orders or queries that result in frequent error messages and time outs, it should come up with another way to capture this problem in the OSS-2 metric. Such degraded service can cause delays that lose customer sales when the customer online loses patience while queries are being made and orders are being filed. The frequency and duration of such problems are not picked up in OSS-1; only slow response time to the extent BellSouth cuts off the measurement for timeouts. BellSouth's cutoff point for ALECs' queries is not known at this time. If the cutoff is 60 seconds, queries that take a longer time due to system slowdowns will never get into the reporting. Frequent error messages in placing order on LENS was the subject of a KPMG exception report. The OSS Availability metric needs to capture the whole story on whether systems are fully available and functional for ALECs to place orders and obtain preorder information in a reasonable amount of time.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Joint ALECS' Supplemental Comments has been furnished by hand delivery(*) or U.S. mail on this 16th day of November, 2001 to:

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Joseph A. McGlothlin

Office of the Vice President
November 1, 2000
Janet Hand Deixier, Secretary
New York Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350
Re:Case 92-C-0665, op. 95-12 (issued and effective August 16, 1995) "Performance Regulation Plan for New York Telephone Company," at Section III (K)

Dear Secretary Deixier:

Enclosed please find five (5) copies of a report "Service Quality and Service Quality Reporting at Verizon-NY" produced by CWA's Customer Service/Service Quality Program. The CS/SQ program was mandated by Section III K of the Performance Regulation Plan for New York Telephone.

The report identifies a number of serious and widespread service quality and service quality reporting problems at Verizon-NY. These problems have been verified through 2,000 surveys of Verizon-NY workers, 2,000 Hotline reports and a number of documented case studies.

The report serves two purposes. First, the report assists the PSC in its efforts to improve service quality by identifying and documenting specific problems at Verizon-NY. This is consistent with the purpose of the program as established by the PRP.

"The purpose of the CS/SQ program is to assist the Public Service Commission and New York Telephone in its efforts to improve customer service and service quality, to provide consistent and accurate service quality data reports, to meet the service quality targets provided by the Plan... "
Second, the report illustrates the importance of the CS/SQ program. It also supplements CWA's petition requesting that the PSC grant an extension of time, not any additional money, to continue to implement the CS/SQ program.

The report includes a number of recommendations to establish a process to rectify the service quality problems identified in the report. The CWA would like to participate in the formulation and implementation of any effort that the PSC establishes to correct service quality and service quality-reporting problems at Verizon-NY.

Please contact the District One Research Director, Kenneth Peres, in my office if you have any comments or questions about the report.

Sincerely,

Lawrence Mancino

CWA Vice President, District One

OFFICE OF THE VICE PRESIDENT
DATE: NOV 1
TO: Verizon-New York Local Presidents
FROM:Larry Mancino, Vice President
SUBJECT:Release of Service Quality Report to the PSC
The enclosed service quality report was formally presented to the PSC at a meeting yesterday in Albany. As you will see, the report identifies a wide range of service quality and service qualityreporting problems. The findings of the report are based on the results of 2,000 surveys, 2,000Hotline reports and many individual case studies.

The Secretary of the PSC, the head of the Communications Division, two senior communications staff members and a senior lawyer represented the PSC at the meeting. Ken Peres, Patrick Welsh and Larry DeAngelis represented CWA. We described the history of the program and our unsuccessful efforts to get the company to cooperate in an effort to identify, verify and rectify the problems identified in the report. Most of the meeting involved a fairly detailed explanation of each of the service quality abuses identified in the report. The PSC representatives asked many questions.

The PSC representatives asked what actions CWA would like the PSC to take. Our report specifically recommends that the PSC:

• extend the CWA service quality program for the remainder of the PRP in order to continue to monitor Company performance and educate and train members;
• institute a remedial program - developed with the participation of CWA - to insure that proper procedures are followed to guarantee the future validity of service quality data;
• conduct a comprehensive reevaluation of New York Tel's performance in relation to service quality targets; and
• recalculate the penalties levied against the Company as part of the PRP.

Obviously, the proverbial ball is in the PSC's court. The PSC representatives stated that they would study the report and ask the company for its response. At that point, the PSC staff will determine the validity and extent of the problems and what recommendations to make to the PSC commissioners.

CWA Service Quality Program
TABLE OF CONTENTS

Executive Summary

CWA was directed by the Public Service Commission to institute a service quality program as part of the Performance Regulation Plan for New York Telephone. As part of this program CWA was to "examine and assess the delivery of service by the Company...and...and shall educate...employees regarding the importance of following proper procedures necessary for consistently accurate service quality data reporting."

CWA implemented this mandate by conducting workshops, distributing surveys, creating a Hotline and investigating cases of inaccurate service quality data reporting. Over 2,000 members attended workshops, over 2,000 surveys were returned, and 2,000 Hotline reports were received.

Based on the data gathered through surveys, interviews, and Hotline reports, CWA has identified-and documented-a number of management practices that result in the reporting of inconsistent and inaccurate data to the Department of Public Service.

CWA believes that the existence of widespread, inaccurate service quality data calls into question all service quality reports previously sumbitted by the Company to the PSC. Consequently, CWA recommends the following actions:
• extension of the CWA service quality program for the remainder of the PRP in order to continue to monitor Company performance and educate and train members.
• a remedial program-developed with the participation of CWA-to insure that proper procedures are followed to guarantee the future validity of service quality data;
• a comprehensive reevaluation of New York Tel's performance in relation to service quality targets; and
• the recalculation of the penalties levied against the Company as part of the PRP.

The CWA study identified three broad areas of service quality abuses by New York Tel management.

INACCURATE REPORTING OF SERVICE QUALITY DATA TO THE PSC

The CWA Service Quality Program has identified a number of management practices that result in the inaccurate reporting of service quality data to the PSC. Specifically, survey results, Hotline reports and case studies verify inaccurate reporting of data for Customer Trouble Reports, Out of Service over 24 hours, Missed Repair and Installation Appointments, Installations within 5 days, and Answer Time Performance. The misreporting of this data allows the Company to artifically improve its service quality performance and reduce its exposure to PRP penalties and PSC sanctions.
• The Direct Falsificiation of Company Service Quality Data By Management. Over 30% of those surveyed have directly seen management change the status of trouble reports. Representative examples from Hotline reports document these practices.
• Management Directing Workers To Close Out Troubles Before They Are Really Completed. Over 60% of those surveyed have been directed by management to code a trouble as completed before it is really cleared of the trouble. Representative examples from Hotline reports document these practices.
• Management Directing Workers To Backtime. Over 54% of those surveyed have been asked by management to backtime; that is, alter records identifying the date and time a trouble was completed. Representative examples from Hotline reports document these practices.
• Management Directing Workers To Change Commitments Without A Customer Request To Do So. 68% of Maintenance/dispatch Center workers surveyed were directed to change commitments without customer notification. Representative examples from Hotline reports document these practices.
• Management Directing Workers To Inappropriately Code Troubles To CPE. 40% of Maintenance/Dispatch Center workers surveyed were directed to code troubles to CPE without customer request or notification. One hundred and seventy eight Hotline reports

concerned the coding of a trouble as CPE even though the line test showed an obvious plant trouble. Representative examples from Hotline reports document these practices.
• Passing Installations Before Completion. 91% of field technicians surveyed reported that they were dispatched on repairs of recent installations only to find that dial tone had never been provided. Representative examples from Hotline reports document these practices.
• Inaccurate Computer Tests. 15% of surveyed Central Office Technicians were able to identify troubles that the computer reported as Test OKs but which, in fact, were not adequately cleared. Representative examples from Hotline reports document these practices.
• Bypassing the PSC Reporting System. 29% of Field Technicians surveyed were directed by management not to give the regular repair number but other numbers to customers such as the manager's number. Consequently, any subsequent trouble reports would not be included in data reported to the PSC. Representative examples from Hotline reports document these practices.
• Adjusting Answer Time Performance. An astounding 100% of surveyed operators and 93% of representatives receive customer complaints about the Automated Answering System. These systems actually lengthen the time a customer spends waiting on the phone.

POSSIBLE CONSUMER FRAUD - CPE AND INSIDE WIRE MAINTENANCE PLANS

Inside wire maintenance plans insure that the Company - not the customers - will be responsible for checking and fixing any inside wire or CPE problems in a timely manner. However, customers with inside wire maintenance plans are not receiving the services for which they are paying. For example:
• customers with plans are directed to check their own CPE rather than dispatching a technician - even after repeated calls;
• customers with plans are directed to check their CPE even when line tests reveal that there is a high probability that the trouble is located on the Company's system.

MANAGEMENT POLICIES WHICH HINDER THE ABILITY OF WORKERS TO DELIVER QUALITY SERVICES

Many of the Company's efforts to cut costs and boost productivity have interfered with the ability of workers to provide quality services.
• Deteriorating Plant Equipment. Due to a lack of investment in plant and equipment, workers do not have the plant or material needed to complete their jobs adequately and timely. Instead, the Company directs workers to fix problems with such "band aid" approaches as AMLs.
• Productivity Programs Hurt Customer Service. The Company's continuous push for more productivity produces company rules and regulations that not only put undue pressure on the worker but, in most cases, prevents the worker from spending the time needed to give customers the quality service they deserve and for which they have paid. For example, discipline related to performance, adherence, monitoring, poor training and

technological changes in both customer services and operator services adds more stress and does little to serve the customer.

- Pressures on MAs and CSAs Adversely Affect Service Quality. Backtiming, Lack of Training and Customer Call Outs also prevent workers from delivering quality services. For example, Customer Call Outs allow the Company the opportunity to close jobs that are still in trouble.
- Lack of Experienced Managers. New York Tel eliminated thousands of experienced managers and lowered the benefits of those remaining. Consequently, few skilled workers apply for management positions. The new managers have few if any technical skills and, therefore, are unable to properly respond to technical problems, coordinate the work force or train new workers.

INTRODUCTION

Since the first year of the Performance Regulation Plan (PRP) the New York Telephone Company has apparently improved the level of service quality delivered to customers as measured by reports submitted to the New York Public Service Commission. Based on these reports, staff of the Department of Public Service have publicly expressed their general satisfaction with the progress the Company has exhibited in meeting the service quality targets specified in the PRP for New York Telephone and improving service throughout the state.

On an overall basis, after the third year of the Performance Regulation Plan, we are satisfied with the Company's overall service quality performance... Over the past two years, the Company has improved service quality and focused on meeting the targets of the 7-year incentive plan. (State of New York, Department of Public Service, "New York Telephone Company Third Plan Year Service Quality Report" issued November 6, 1998) Reflecting this reported improvement, New York Telephone's PRP penalties have dropped from $72 million in Plan Year One to a range of $3 to $5 million in the following plan years.

However, this improvement in service performance is more apparent than real because it rests on a foundation of inaccurate and inconsistent service quality data reporting by New York Telephone. This conclusion is based on an analysis of a widely distributed survey of the New York Telephone workforce. Hotline reports and investigations of specific cases of service quality misreporting. This analysis by CWA is part of a service quality program mandated by the PSC as written in the Performance Regulation Plan for New York Telephone.

The presence of inconsistent and inaccurate service quality data allowed New York Tel to artificially improve the Company's service quality performance and, thus, minimize its exposure to the multi-million dollar penalties built into the PRP.

The following report briefly describes the PSC mandate for the service quality program and then examines three broad areas of management service quality abuse.

Inaccurate Reporting of Service Quality Data to the PSC. New York Tel management has engaged in a series of schemes which have resulted in the inaccurate reporting of performance data for Customer Trouble Reports, Out of Service Over 24 hours, Missed Repair Appointments, Missed Installation Appointments, Installations within 5 days, and Answer Time Performance.

Possible Consumer Fraud With Inside Wire Maintenance Plans. Customers with inside wire maintenance plans are not receiving the services for which they are paying.

Management Policies Which Hinder The Ability of Workers To Deliver Quality Services To Customers. A number of New York Telephone policies prevent workers from delivering the level of quality service that customers should obtain.

The final section contains specific recommendations to improve the accuracy of service quality reporting.

CWA's PSC MANDATED SERVICE QUALITY PROGRAM

Several years ago the New York Telephone Company successfully petitioned the New York Public Service Commission to deregulate its profits. Previously, both prices and a fair rate of return were set through a public hearing process between the PSC, the Telephone Company, and other interested parties including the CWA. Now the prices are set through a Performance Regulation Plan. The Company is now free to make as much profit as it can by increasing productivity, reengineering and other cost cutting techniques.

To help protect customers and workers from the negative impacts of cost cutting, the CWA and other parties successfully argued that the PSC also include a tough set of service quality targets and penalties in the Performance Regulation Plan.

As part of the PRP (Section K) the CWA received $1 million for an independent multiyear membership education program.

The purpose of the.. .Program is to assist the Public Service Commission and New York Telephone in its efforts to improve customer service and service quality, to provide consistent and accurate service quality data reports, to meet the service quality targets provided by the Plan and to carry out the LifeLine, privacy and marketing programs provided by the Plan.
The PSC mandated that the program include various activities including

Program staff shall.. .examine and assess the delivery of service by the Company... shall educate. . . employees regarding the importance of following proper procedures necessary for consistently accurate service quality data reporting.
CWA implemented this program at three different levels.

Workshops. Two separate series of workshops were developed by a group of CWA members and staff representing the major crafts in the Company in consultation with Les Leopold of the Labor Institute. The small group activity method was utilized to stimulate worker participation in discussions. A three-day train the trainer session was conducted for 21 stewards from a number of our locals. More than 2,000 stewards and other members participated in a number of workshops held across the state in 1998, 1999 and2000.

The Survey. A detailed survey was developed to allow us to obtain a statewide picture of Company service quality and data reporting practices. More than 2,000 surveys were returned and analyzed.

The CWA Hotline. CWA established a Hotline as mandated by the PRP. Over 2,000 Hotline reports have been received to date from workers reporting service quality data inaccuracies and inconsistencies. Investigations were conducted into a number of the reported instances of service quality data abuse.

THE INACCURATE REPORTING OF SERVICE QUALITY DATA

CWA conducted surveys and investigations in order to "examine and assess the delivery of service by the Company" and the provision of "consistently accurate service quality data" (PRP, Section K). A 38-question survey was developed and distributed throughout the state to field technicians, central office technicians, workers in dispatch and maintenance centers, service representatives and operators. The questions focused on service quality reporting abuses by the Company. Each question identified a potential service quality abuse, asked if the respondent had direct knowledge of such abuse and the frequency of the abuse. More than 2,000 surveys were filled out, returned and analyzed.

Examples of specific abuses were collected through the Service Quality Hotline and interviews with workers. Investigations were conducted into a number of specific cases.

An analysis of the information gathered from the surveys, Hotline calls, interviews and investigations has resulted in the identification and documentation of broad patterns of inaccurate reporting by the Company in a number of areas.

The Direct Falsification of Company Service Quality Data By Management

When customers call to report a problem the customer service attendant (CSA) enters a description of the problem into the computer system. As part of this process, the CSAs own pre-assigned Employee Code number is also entered. At each step in the life of this trouble, workers enter their Employee Codes to identify their actions.

However, management is able to enter the system at any point in time and override an individual employee's code and report. This can be done by entering the manager's own code, a generic management code, another worker's code or a fictitious code. Such

manipulation of data can enable managers to "improve" their clearance time for trouble reports or missed commitments.

We have found that, in some cases, managers have directly falsified trouble reports. This conclusion is based on survey results, Hotline reports, and direct investigation.

Survey Results. Field technicians, central office technicians and Maintenance/Dispatch Center workers were asked whether they had directly seen - as opposed to hearing about or suspecting -- management change the status of a job. The following chart states the results of the survey.

HAVE YOU EVER SEEN A FOREMAN OR SUPERVISOR CLOSING OUT OR CHANGING THE STATUS OF A JOB? TITLE TOTAL RESPONSES NO NOT SURE YES
Field Techs 1,047 67% 9% 24%
COTs 191 43% 10% 47%
Maintenance 122 39% 9% 52%

Overall, 30% of those surveyed have directly seen management change the status of a trouble report. And they have seen this happen with a high level of regularity. The apparent disparity in the YES column between field technicians and inside technicians can be attributed to the fact that field technicians work outside and thus have fewer opportunities to view managers at their computers.

Investigation and Hotline. The survey results have been corroborated with documentation supplied through the Hotline and investigations. The following cases were chosen as representative examples.

Example 1. A customer ordered an installation on 6/25/98. The Company has five business days to meet its installation commitment; in this case, July 2. The Company was not able to meet this commitment because of an engineering problem. A supervisor asked a service representative to falsely change the installation due date and code the reason as "customer other" rather then miss the commitment due to a lack of company facilities.

When the representative refused to falsify Company records an acting manager entered the computer system and changed the due date to 7/9/98 using the representative's EC code without her knowledge. In fact, the supervisor waited for the representative to go off duty before entering false information into the Company reporting records. The Company was able to meet the 5-day standard.

Example 2. On 2/12/98 a repair supervisor falsified Company records by changing the completion time on 26 jobs so the Company would not miss the PSC commitment time.

Most of these jobs were still testing a trouble on the line and none were dispatched unless the customer called back. At that time new trouble reports were issued.

Example 3. An IMC supervisor closed out thirteen troubles on 12/22/98 without dispatching the work. This was done so that the 24-hour commitment times established by the PSC would be met. Not one of the troubles was actually cleared. All 13 jobs reappeared as troubles at a later date.

Example 4. A manager told the technicians in his group that he needed to boost his production numbers. He directed the technicians to go to a cross box and black box (ID) telephone numbers and give them to the manager. The manager then falsely reported that these numbers had troubles. These troubles were then immediately closed out and their associated commitment times were met.

Example 5. COTs in a particular bureau dispatched technicians to service troubles on over 90 "No Premise Visit Installations." However, on 8/17/99 a bureau manager closed out the installation orders as completed even though the troubles still existed and were not yet cleared.

Example 6. On March 3, 2000 a job was closed out as a Test OK with an employee code of 383. Upon investigation, it was found that there is no employee with a 383-emloyee code in the downstate district in question.

Example 7. On or around April 13, 2000, Manhattan management, at the request ofNassau bureau management, closed out seventy customer complaints as "customer miss-dials" due to changes in the area code when in fact, the troubles were due to theCompany's ANNC switching problems.

Example 8. On July 7, 2000 a supervisor tested and closed out a job with a narrative of "(supervisor spoke to sub TOK [TEST OK])." However, the trouble was not cleared. The customer called back the next day and insisted the trouble be dispatched. However, the job was not dispatched and cleared until July 1 5th.

Example 9. A technician returned ajob "not complete" on Friday, July 9, 2000. The customer was told that the technician would be back on Monday to finish work. However, a supervisor closed out the job on Saturday, July 10th. The customer called back on Monday to complain that no technician ever showed up to finish job. The job was dispatched as a new trouble on July 13the.

Management Directing Workers To Close Out Troubles Before They Are Really Completed

When a customer's trouble is resolved, an entry is made in the reporting system identifying the date and time that the trouble was "cleared." The Company then compares this clearing time to the time the trouble was received to determine whether it met its repair appointment or repaired an out-of-service trouble within 24 hours.

However, in some cases the trouble is not repaired within 24 hours or a repair appointment is not made in time. In a number of these cases, management has directed

workers to report that a trouble is closed before it is actually cleared. This allows the Company to submit data to the PSC that shows it has met its commitments even though this is not what really happened.

These management directives place workers in a very difficult position. If they do not follow management's directions they can be disciplined or, at least, earn the enmity of their supervisor. If they do follow management's directions they are placed in jeopardy for falsifying records. However, management still continues to direct workers to falsify records on a wide-ranging basis throughout New York and across job titles.

Survey Results A. Field technicians, central office technicians, Maintenance/Dispatch Center workers and service representatives were asked whether they had been directed by management to status a job as complete before it was really completed. The following chart states the results of the survey.

DOES YOUR FOREMAN OR SUPERVISOR ASK YOU TO STATUS A JOB AS COMPLETE BEFORE IT'S REALLY COMPLETE?

TITLE	TOTAL RESPONSES	NO	NOT SURE	YES
Field Techs	1,034	37%	3%	60%
COTs	205	36%	2%	62%
Maintenance	74	58%	2%	39%
Representatives	107	32%	3%	65%

Overall, 60% of those surveyed have been directed by management to code a trouble as completed before it is really cleared. And this happens with a high level of regularity. Field Techs and COTs are asked to do this more frequently because most of the work of closing out jobs has gone to field technicians since the introduction of the Craft Access Terminal. Maintenance technicians have concentrated on checking the jobs in jeopardy (no access, held for cable, etc.) and dispatching work.

It is noteworthy that 65% of the Service Representatives who were surveyed have been asked to close out commitments or change follow-up dates without doing the work or speaking to the customer. The surveyed Representatives reported that these management directives occur very often.

Investigation and Hotline. The survey results have been corroborated with documentation supplied through the Hotline and investigations. The following cases were chosen as representative examples.

Example 1. On November 13, 1997, Central Office Technicians (COTs) were told by their supervisor to close out 67 jobs on a work status list (WSL) to meet the commitment times and go back to finish the job at a later time.

We have found that it is common management practice to direct frame personnel to do mass close-outs when the Company is close to missing their numbers for out-of-service over 24 hours. Thus, the Company appears to have made its PSC numbers even though the telephone troubles reported by customers have not been cleared.

Example 2. A job was due on 3/11/98. However, it appeared that the Company would miss its service quality commitment time. At this point, the Company's management directed the technician assigned to the job to close it out as complete to make the commitment. He was then told to issue a non-timing report to complete the job later. The technician's non-timing report was a "routine ticket" which is not regulated by the PSC.

Example 3. On 12/22/98 a technician was dispatched on a cable trouble. He was not able to fix the trouble and by proper procedure should have been allowed to issue a cable ticket so that a splicer would have been sent to clear the line. Instead, a supervisor directed the technician to close out the trouble even though it was not cleared. The technician was also directed to not write up the trouble but to verbally tell another supervisor so his group could clear the trouble on a pro-active ticket. Pro-active tickets are not reported to the PSC.

Example 4. On 2/9/99, a technician on desk duty was directed to retest and close out troubles without a dispatch - even if the jobs were still testing as service affecting troubles. When the technician refused the manager closed out the troubles.

Survey Results B. Management has also directed Central Office Technicians and Maintenance/dispatch workers to not only close out a trouble before it was cleared but to issue new trouble tickets on the same job.

ARE YOU EVER ASKED TO CLOSE OUT TROUBLES AND CREATE NEW TROUBLE TICKETS ON THE SAME JOB?

TITLE	TOTAL RESPONSES	NO	NOT SURE	YES
COTs	195	43%	6%	52%
Maintenance	166	50%	4%	46%

Overall, 49% of those surveyed have been directed by management to code a trouble as completed before it is really cleared of the trouble and to issue new trouble tickets. And they have seen this happen with a high level of regularity.

Investigation and Hotline. The survey results have been corroborated with documentation supplied through the Hotline and investigations. The following cases were chosen as representative examples.

Example 1. A manager told central office technicians to pre-test all the morning jobs then close them out so the commitment times would be meet. The manager then told the technicians to issue frame tickets on the reported troubles to clear them. The frame tickets do not have commitment times and are not covered under the PSC service quality standards.

Example 2. A repair job due on 3/11/98 for a New York City Department was going to be missed. The technician was directed by his supervisor to close the service order as a "found ok" and create a non-timing report to clear the trouble so the Company would make the commitment.

Example 3. On 2/1/99 and again on 2/2/99 an IMC supervisor directed technicians to close out installations before dial tone was established at the premises and finish the jobs as repairs.

Example 4. In June, 2000, employees reported that on many occasions IMC supervisors have instructed them to code many troubles in WAFA as pending when the Company was close to missing their out-of-service numbers for a month. These jobs would then be dispatched the next month. We have found that this practice happens quite regularly across the entire state. WAFA is a company computer system that is not watched by the PSC. By placing current jobs as pending dispatch in WAFA the Company is free to change the due date to a time when they will not be in jeopardy of missing their out of service percentage reported to the PSC.

Management Directing Workers To Backtime

One widespread scheme that management uses to alter records is to direct workers to record that a trouble was cleared at an earlier date and time than the actual resolution of the trouble. Management also directs workers to record that appointments were met even though the technicians were not dispatched until much later. This practice is known as "backtiming." Backtiming allows the Company to submit data to the PSC that shows it has met its commitments even though this is not what really happened.

Survey Results. Field technicians, central office technicians and Maintenance/Dispatch Center workers were asked whether they had been directed by management to backtime. The following chart states the results of the survey.

DOES YOUR FOREMAN OR SUPERVISOR EVER ASK YOU TO BACKTIME -- THAT IS, PUT A COMPLETION TIME JUST TO MAKE A COMMITMENT? TITLE TOTAL RESPONSES NO NOT SURE YES
Field Techs 1,035 42% 3% 55%
COTs 196 47% 7% 46%
Maintenance 134 31% 9% 60%

Overall, 54% of those surveyed have been asked by management to backtime. And they have been asked to do this with a high level of regularity, Backtiming provides an especially illustrative example of the lengths to which management will go - violating the Company's Codes of Conduct and directing others to change data -just to improve their service quality performance results.

Investigation and Hotline. The survey results have been corroborated with documentation supplied through the Hotline and investigations. The following cases were chosen as representative examples.

Example 1. A job was dispatched to a technician in the morning with a 12:00 PM commitment time. The technician completed the job at 1:00 PM. When the technician tried to close out the job in his C.A.T. (craft access terminal) the job was gone. We found that the dispatch center closed the job at 11:59 AM to meet the commitment - before the job was completed and without the technician's knowledge.

Example 2. A manager directed a technician to back-time the job he was dispatched on to make the commitment time. On the advice of the supervisor the technician closed out the job at 1:00 PM even though he did not finish the job until 1:20 PM. The technician back-timed the job to avoid a problem with the manager.

Example 3. When the Company's central office was in jeopardy of missing commitment times the technicians were told to check the computer every two hours and back time jobs that were missed then create frame tickets to cover the work.

Example 4. On 12/21/98 a technician was closing out a trouble at 4:00 PM when a supervisor directed him to backtime the closeout to 2:45 PM so the 3:00 PM commitment would be met.

Example 5. On 1/12/99 a technician was closing out ajob at 2:30 PM when he was directed by his supervisor to backtime the closeout to 12:45 PM to make the 1:00 PM commitment.

Example 6. On 5/3/99 a manager directed a technician to backtime ajob from 4/21/99 to 4/20/99 to make the commitment. The technician refused but later found out that the job was backtimed anyway.

Example 7. In January 2000, a technician uncovered 30 jobs in which data had been falsified. The technician did not want to be part of falsifying data and notified his first level manager. The first level manager stated that if such falsification is happening "I don't want to be part of it either." The first level manager then took the data to the second level manager. The technician then found another 22 jobs with falsified data and gave all the data to company security. The next day the technician was transferred to another location.

Management Driecting Workers To Change Commitments Without A Customer Request To Do So

Missed commitments are not charged against the company if they result from customer action or interaction. For example, the Company does not record a missed repair or installation appointment if the customer requests a change in time or date. Moreover, the Company counts an appointment as "met" if the technician cannot gain access to equipment on the customre's property. However, a "miss" should be ascribed to the Company if there is a company "fault" such as a lack of facilities or the technicians are late.

Management often inapprorpirately directs workers to ascribe changes in company service commitments to customer requests rather than Company Fault. In this way, the Company avoids missing commitments reported to the PSC.

Survey Results Central office technicians and Maintenance/Dispatch Center workers were asked whether they had been directed by management to change a commitment to customer request rather than Company load or fault -- without notifying the customer. The following chart states the results of the survey.

ARE YOU EVER ASKED TO CHANGE SERVICE COMMITMENTS WITHOUT A CUSTOMER REQUEST TO DO SO?

TITLE	TOTAL RESPONSES	NO	NOT SURE	YES
COTs	98	58%	20%	21%
Maintenance	127	30%	2%	68%

A whopping 68% of the Maintenance/Dispatch Center workers surveyed were asked to change commitments without notifying the customer. And they have been asked to do this with a high level of regularity. Twenty-one percent of the COTs surveyed were also asked to miscode these commitments without notifying the customer - even though most COTs have little customer contact.

Investigation and Hotline. The survey results have been corroborated with documentation supplied through the Hotline and investigations. The following cases were chosen as representative example.

Example 1. Between 2/25/98 and 3/10/98 a supervisor in one of the Company's repair centers changed commitment dates on 17 jobs without the knowledge of the customer so that PSC commitment times would be met.

Example 2. On 1/9/99, a technician was unable to complete a job because he could not obtain access to the Company's feeder cable that was off the customer's premises.

However, the supervisor directed the worker to close the trouble as a Customer No Access and reappoint the job for 1/11/99 without advising the customer.

Managaement Directs Workers to Inappropriately Code Torubles To CPE

When a customer reports a problem, the customer service attendant (CSA) enters a description of the trouble and attempts to test the customer's line. This test can determine whether a trouble exists and whether it appears to be caused by the Company's system or the customer's telephone equipment or inside wiring.

CSAs have been directed to tell all customers to check their CPE and call back later if the problem persists. The same routine is followed evenif the computer line test reported that the trouble was located in the Company's system. Troubles can also be coded as CPE when a technician goes to the Company's system. Troubles can also be coded as CPE when a technician goes to the premises and finds out that this is the case. Troubles ascribed to CPE do not count against the Company's service quality performance.

Management has direced workers to improperly code troubles to CPE even when the trouble is located in the Company's system. This is done without customer request or notification. In this way, the Company improperly adjusts its actual service quality performance.

Survey Results. Field technicians and Maintenance/Dispatch Center workers were asked whether they had been directed by management to status a job to CPE without customer verification. The following chart states the results of the survey.

ARE YOU EVER ASKED TO STATUS A JOB AS C.P.E. WITHOUT CUSTOMER VERIFICATION?

TITLE	TOTAL RESPONSES	NO	NOT SURE	YES
Field Techs	1,044	71%	6%	23%
Maintenance	126	54%	6%	40%

Forty percent of the Maintenance/Dispatch Centger workers surveyed were asked to code troubles to CPE without customer request or notification. Even though the 23% figure for field technicians appears low it actually represents a high percentage of the jobs with detected troubles because they have already been screened and tested twice.

In a related survey question, 21% of the Maintaenance/Dispatch Center workers were directed by management to ignore the "tech advises" codes placed by field technbicians in their efforts (e.g., Company fault, shortge of facilities, etc.). In this way, the reports going to the PSC could be coded so those problems could be ascribed to customer, not Company actions.

Investigation and Hotline. The survey results have been corroborated with documentation supplied through the Hotline and investigations. The following cases were chosen as representative examples.

Example 1. Customer called in an out of service complaint on Friday 11/7/97. The line was testing a light short circuit. The subscriber was given: a commitment date of 11/8, the Company called the customer on 11/8 to change the appointment to 11/9.

Customer advised the Company that he would not be available on 11/9 but it would be OK to send a Service Technician out on Monday 11/10. The Company agreed with that arrangement then closed out trouble on Sunday 11/9 to a CPE code and narrative (1201-230 trouble to CPE/cancel report.)

Customer then called the Company back on Friday 11/14 (still out of service) wanting to know why a technician didn't come out on Monday 11/10. The Company didn't give subscriber a reason, but re-appointed the job for Sunday 11/16.

On 11/16 a Service Tech. proved the trouble was caused by the Company's cable facilities and wrote a cable ticket.

Sub's service was restored on Wed. 11/19 twelve days after original trouble was called in.

Example 2. A customer reported a static trouble on 1/27/98 and again on 1/29/98. The job was closed out both times to a CPE code. The customer called back on 1/30/98 and insisted that a technician be dispatched. The technician was dispatched on 1/30/98 and had to give the job to construction to clear a cable pair.

Example 3. A customer reported a static trouble on 11/09/98. This trouble was closed out to 1247-698-000 - the code designating that the subscriber was to check the CPE and there was no dispatch. The customer called again on 11/23/98 still complaining about static. Once again the job was closed out to the same CPE code. The customer called a third time on 12/7/98 reporting the same problem. The job was finally dispatched on 12/8/98. The technician assigned to the job had to change an underground cable pair to provide the customer with clear service. The trouble was not fixed until a full month after the initial call.

Example 4. A customer called repair on 2/3/99 to report no dial tone. The customer told the Company that it was a medical emergency and needed the line repaired ASAP. The job was closed out without dispatch to a code of 1247-698-000 - sub to check CPE. When the customer called back on 2/4/99, the job was dispatched. The technician was not able tO fix the problem. A splicer had to be called in to clear a short circuit in the cable.

Example 5. On March 25. 2000 a customer reported a trouble and complained about static on the line. The job was closed with the customer during the call and coded as 000-0000-000. The accompanying narrative stated "(remove from hold - susp cpe)." It should

be noted that this customer was paying for a service plan (ECM-IWM). The customer called back in on April 8th still complaining about static. The job was dispatched on April 10th and cleared at the aerial terminal - on the Company's side of the demarcation point.

Passing Installations Before Completion

The PSC objective is to have installations completed within five days. According to proper procedures, the installation order is taken, sent to the correct department, and the installation is completed either in the office or out in the field. Once this is done the installation is coded as complete. However, survey and hotline reports have uncovered many installation orders that were closed out before they were actually completed. Instead, the orders were recoded as repair troubles directly or after the customer called repair complaining of no dial tone. In this way, the five-day installation commitment was met.

Survey Results. Field technicians were asked whether they had been dispatched on repairs of recent installations only to find that dial tone had never been provided. The following chart states the results of the survey.

ARE YOU DISPATCHED ON REPAIRS OF RECENT INSTALLATION ORDERS (ADDED LINES OR NON-PREMISE VISIT JOBS) THAT NEVER WORKED?

TITLE	TOTAL RESPONSES	NO	NOT SURE	YES
Field Techs	1,049	7%	2%	91%

A remarkable 91% of the field technicians surveyed answered yes to this question. Investigation and Hotline. The survey results have been corroborated with documentation supplied through the Hotline and investigations. The following cases were chosen as representative examples.

Example 1. On 10/10/99, an installation order due for completion on 10/8/99 was held for cable due to the lack of company facilities. Yet, the Company coded this installation as completed. The Company then routed the job to repair. On 10/12 a technician was dispatched and advised by the customer that the dial tone had never been provided. The technician was unable to provide the service due to the initial lack of cable facilities and turned the job over to the Company's engineering department.

Example 2. On 10/2/99, an installation order was coded as complete even though there were no spare cable facilities. One week later the customer reported that she never had service. A repair technician was dispatched and cleared a cable pair to provide dial tone. In this way, the Company made its PSC installation objective, its out of service over 24-hour objective and its missed appointment objective.

Example 3. On March 31, 2000 an installation job was improperly coded as completed even though it was not dispatched and did not test OK. In other words, the customer did not have service. On April 1st the job was sent to repair and closed out without a dispatch using a close out code of 1247-698-000 - sub to check equipment. The trouble was finally dispatched on April 8th~ The technician had to place a cross connect to provide the customer with service.

Inaccurate Computer Tests

Service quality measurement is largely dependent upon the Company's computer systems. When the Company receives a trouble report, the customer service attendant tests the customer's line. The results from these tests determine if the line appears to be functioning; if the trouble is caused by inside wiring or CPE; or if it is caused by the Company's system.

However, the computerized testing system employed by the Company does not always provide accurate results. In some instances, lines that test OK are in fact not OK. These inaccurate test OKs enable the Company to incorrectly report its performance in meeting trouble-related service quality measures.

Survey Results. Central Office Technicians were asked whether troubles reappeared even after they had been tested OK by the Company's "Auto Task Computer."

DO TROUBLES RETESED OK BY THE AUTO TASK COMPUTER COME BACK AS NEWLY REPORTED TROUBLES LATER?

TITLE	TOTAL RESPONSES	NO	NOT SURE	YES
COTs	194	35%	51%	15%

15% of the surveyed COTs were able to identify troubles which tested OK but for which the troubles were not adequately cleared.

Investigation and Hotline. The survey results have been corroborated with documentation supplied through the Hotline and investigations. The following cases were chosen as representative examples.

Example 1. A field Technician was given a morning job by his supervisor. The trouble report was for a no dial tone and a Maintenance Service Charge was explained to the customer. It was also noted in the comments that the line was for bedridden seniors with medical emergency status. When tech tried to access the job in his C.A.T. the job was auto rejected by the system as a test ok. After further investigation by the tech, it was found that the line was still in trouble and he called the Repair Service Bureau to reissue the job. He got the job back as his second job for the day even though it was a medical emergency. The tech then got to the job at about 10:00 AM and had to reattach the outside wire at the block cable to provide the customer with service.

Example 2. This case involves a high volume business customer and shows that even when confronted with a problem by their employees the Company insists on using an inaccurate system to bypass the PSC reporting system.

A morning job was given to a field technician. When the technician went to receive the job in the CAT (craft access terminal) the job was auto-rejected by the system. The technician then followed up on the job and found it still in trouble. The technician also found that the system closed the job out as "sub to check CPE" even though no one had spoken to the customer. The technician insisted on being dispatched on the trouble. He worked on the block wire to clear a riser and provided the customer with service.

The union grieved the auto-reject because the Company was knowingly closing out work without it being completed and without the knowledge of the customer. The grievance is titled "not providing good customer service." The grievance was denied at first step. The Company stated that the "lines closed out by an access machine is part of everyday business" If technician had not followed up on this trouble a large business customer's service would not have been restored.

Example 3. On 1/30/99 a trouble was auto-rejected by the Company's IFAS system while still testing as a short circuit.

Example 4. On 2/01/99 a trouble was auto-rejected by the Company's IFAS system while still testing as an open out, i.e., a definite trouble.

Example 5. On 2/2/99 a trouble was auto-rejected by the Company's IFAS system while a technician was still on the job and had not cleared the trouble on which he was working.

Example 6. On 8/27/99 four jobs were auto-rejected by the Craft Access Testing System. A technician took it upon himself to conduct a retest and found that three of the jobs were still testing metallic (shorts, grounds, crossed batteries) troubles. The fourth job tested OK but the technician requested that the job be dispatched. He later found a defective jack at the customers premise.

Bypassing The PSC Reporting System

One of the easiest ways to improve the service quality performance reported to the PSC is to bypass the reporting system altogether.

Survey Results. Field Technicians were asked whether management directed them to give customers callback numbers other than the Company's regular repair service numbers.

ARE YOU TOLD TO GIVE CUSTOMERS A FORM WITH ANY CALLBACK NUMBER OTHER THAN 890-6611 OR 890-7711?

TITLE TOTAL RESPONSES NO NOT SURE YES
Field Techs 1,049 63% 8% 29%

Twenty-nine percent of the field technicians surveyed were asked to give other than regular repair numbers to customers. Most often, they were asked to leave their garage or beeper numbers. Calling these numbers, rather than the regular repair numbers, necessarily improves the Company's customer trouble report rate.

Investigation and Hotline. The survey results have been corroborated with documentation supplied through the Hotline and investigations. The following cases were chosen as representative examples.

Examples 1 & 2. In two cases a customer reported multiple lines out of service but reports were only issued on the customer's first line. The technician was directed to issue EO reports to clear the other lines. These ED reports do not count against the Company's performance for PSC service quality purposes.

Example 3. Participants at the CWA service quality workshops reported many instances when field technicians were told to leave their beeper number or the number of their garage with the customer so that any "subsequents" will not be recorded into the computer system and go to the PSC.

Example 4. The CWA Service Quality hotline has received reports that Supervisors were advising directory assistance operators to give the Company's Presidential hotline number to customers actually requesting the PSC number. This was only done for those customers wanting to file a complaint against the Company.

Example 5. On June22 and 26, 2000 thirty-one troubles were taken out of LMOS and placed in WFC to hide the out of service reports. The only tickets that are supposed to be in WFC are designed circuits. All other ISDN reports are to be worked from LMOS. LMOS tickets are customer reported and PSC regulated. Since SARTS took over ISDN, they have closed, excluded or cancelled every LMOS ticket and put them in WFC - an unregulated database.

Adjusting Answer Time Performance

The PSC's rules and regulations establish service quality standards governing the speed with which certain types of customer calls are answered. There are standards for repair service, directory assistance and toll and assistance calls. Historically, all customers directly reached a representative or an operator. The amount of time that customers wait on the line is measured and included in the average speed of answer data reported to the PSC. However, with the introduction of automated answering systems many customers who previously would have been put on hold now pass through the automated system.

According to our surveys and interviews, the automated system actually lengthens the time a customer must wait before reaching a representative or operator. Yet, none of the time customers spend waiting in the automated system is included in speed of answer data reported to the PSC.

Survey Results. Customer dissatisfaction with the Automated Answering System is illustrated by questions posed to operators and representatives.

DO CUSTOMERS SOMETIMES COMPLAIN ABOUT THE AUTOMATED ANSWERING SYSTEM?

TITLE TOTAL RESPONSES NO NOT SURE YES
Representatives 107 6% 1% 93%
Operators 164 0% 0% 100%

An astounding 100% of surveyed operators and 93% of surveyed representatives receive customer complaints about the Automated Answering System. And these complaints occur very often.

POSSIBLE CONSUMER FRAUD - CPE AND INSIDE WIRE MAINTENANCE PLANS

Inside wire maintenance plans insure that the Company -- not the customers -- will be responsible for checking and fixing any inside wire or CPE problems in a timely manner. Yet, CWA has received almost 200 reports indicating that customers with inside wire maintenance plans are not receiving the services for which they are paying. Many reports describe how the Company directs customers with plans to check their own CPE rather than dispatching a technician to fix the problem -- even after repeated calls by the customer. Other reports indicate that the Company directs customers with plans to check their CPE even when line tests reveal that there is still a trouble on the line and that there is a high probability the trouble is located on the Company's system. These practices may be potentially fraudulent since the Company is denying subscribers the services for which they have paid.

Example 1. On 4/21/98, a customer called in a trouble for no dial tone. The line test revealed a short circuit. The trouble was coded "sub to check CPE." After checking CPE the customer called back the next day reporting the trouble still existed. The trouble was closed out again as "sub to check CPE." The customer made a third call reporting the trouble still existed. Yet again, the trouble was closed out as "sub to check CPE." The customer called a fourth time on 4/25/98 still reporting an out of service condition. The job was finally dispatched on 4/27/98 -- six days after the initial call. The technician cleared a short circuit in the network terminating wire. This trouble was in the Company's network terminating wire -- not the customer's inside wire.

In this example, the Company was able to exclude all the customer's troubles that were coded as "sub to check CPE." Only the call on 4/25 actually counted as a reportable trouble for PSC purposes. Adding insult to injury, this customer pays for a full maintenance plan.

Example 2. Customer reported trouble on 3/10/98 as no dial tone. Customer has a full wiring plan and the job was testing "open" which is a dispatchable trouble. The trouble report was closed out on the same day without a dispatch to a cleared code of 100-1247-698-000 with a narrative of "sub to check CPE" even though the customer was paying for a full wire plan.

The customer called back on 3/10/98 arid insisted that a technician be sent because she was paying for ECM/IWM and was entitled to it. The job was then dispatched on 3/11/98.

The technician that was dispatched found that the dial tone was not leaving the frame. The job was then rewired in the central office to provide service.

Example 3. A customer called the Company numerous times on 1/18/99. This trouble was closed out to CPE without dispatch. The customer called again on 2/5/99 and the trouble was again coded to CPE - even though the customer was paying for an inside wire maintenance plan (PMP/IWM). When the technician was finally dispatched on 2/7/99, he cleared the problem in the riser cable that feeds the apartments in the building. The customer told the technician that she had been out of service for two weeks and no one from The Company told her to check the CPE. If the Company had directed her to check the CPE, she would have insisted that the job be dispatched.

Example 4. Customer called in a static trouble on 4/02/98. The trouble was then closed out to a cleared code of 300-1247-698-000 with a narrative of sub to check CPE without a dispatch. The customer then called back on 4/03/98 to report the trouble again.

The trouble was then dispatched out on 4/04/98 and a technician had to clear the static in the outside wire (drop) caused by two tree limbs that had fell on the drop.

Customer is paying for Inside Wire Maintenance Plan and the Company still didn't dispatch on the job the first time.

Example 5. On February 4, 1998 a customer called in a trouble for a broken jack. The customer had a wire maintenance plan covering 3 jacks. The Company closed out the job the same day without a dispatch to a cleared code of 100-0712-600-000 with a narrative of "reached answering machine left message - TEST OK." The Company did not call the customer again nor did it dispatch a technician to check the trouble.

The customer then called back on 2/16/98 for the same trouble but a technician was not dispatched until 2/20/98. The technician had to replace the defective jack to provide the customer with service.

The customer had a maintenance plan but had to wait 16 days for the Company to dispatch a technician.

Example 6. On 3/31/98, a customer called in a trouble for no dial tone. The line test revealed a short circuit. The trouble was coded "sub to check CPE." After checking CPE the customer called back reporting the trouble still existed. The trouble was closed out again as "sub to check CPE." On the customer's third call back on 3/31/98 she demanded that a tech be dispatched because she paid for the PMP/IWM (the full service maintenance plan). The tech was dispatched and cleared a short circuit in the customer's inside wire. No maintenance service charge was assessed.

Example 7. A customer reported "No Dialtone" on 9/8/99. The job was closed out to an inside wire code 1247-698 with a narrative of "Sub to Check CPE." No 'technician was dispatched. The customer called again on 9/10 and the same thing happened. The customer called a third time demanding that a technician be dispatched. When a technician was finally dispatched on 9/12 he had to replace a cross-connect at the Company's underground feeder terminal.

MANAGEMENT POLICIES WHICH HINDER THE ABILITY OF WORKERS TO DELIVER QUALITY SERVICES

In an effort to "assess the delivery of service by the Company" we conducted a series of interviews and workshops attended by 1,050 telephone workers from various crafts. We found that many of the Company's efforts to cut costs and boost productivity interfered with the ability of workers to provide quality services. The following list contains a few examples of the roadblocks the Company has placed in workers' efforts to provide quality services.

Deteriorating Plant Equipment Harms Customer Service

Due to the lack of investment in plant and equipment, there are not enough pairs available for new customer lines. Instead, the Company now uses AMLs that put two or more lines on one pair. This quick fix solution has consequences for the customer. For example, if a drive pair goes bad, two or more customers can go out of service instead of one. AMLs also cause poor quality dial tone. They also do not work on all C.P.E. equipment and some answering machines. In addition, AMLs reduce the speed for faxes and Internet usage. Because AMLs use 135 volts instead of 48 volts, over time, they may overheat the line causing future failures, as well as causing unsafe working conditions. MLT equipment is not capable of testing AML circuits. Notwithstanding all these problems, the use of AMLs is still widespread. For example, the West Bronx District installs approximately 500 AMLs every 3 months while Brooklyn has 11,000 AMLS.

Productivity Programs Hurt Customer Service

The continuous push for more productivity produces Company rules and regulations that not only put undue pressure on the worker but, in most cases, prevents the worker from spending the time needed to give customers the quality service they deserve and for which they have paid. We have found through our workshops that discipline related to performance, adherence, monitoring, poor training and technological changes in both customer services and operator services adds more stress and does little to serve the customer.

Discipline Related to Performance

For Reps the Company prescribed handle time for each call is 370 seconds. This includes a mandatory opening script of 20 seconds and a closing "Is there anything else I can help you with today?" If the customer responds with another request that conversation is included in the 370 seconds handle time.

Operators have to deal with a 21-second handle time besides the indignity of having a machine answer the call for them. It is very difficult to service most customer inquiries within the handle time without "hurrying" the customer.

The customer representatives and the operators are put in the position of rushing the customer off the line to meet the Company rules.

Adherence

The time a Rep must be ready to receive a call is strictly set. Only 30 minutes is allowed per tour to be out of adherence. Reps are considered out of adherence even if they are late for a break or lunch because they are on with a customer. Discipline can be taken when a Rep is 10% over adherence time. Many times there is paper work involved after a call so a Rep must go off line putting them out of adherence again. In reality, because of the way the clock is used to determine adherence, a Rep can have as little as 20 minutes a day to be out of adherence.

Monitoring

Monitoring of customer calls is used by the Company "to protect service quality." Customers, Reps and Operators do not know when a call is being monitored. For example, if Reps do make a mistake they are not usually told, and continue to make the same mistake. Secret monitoring also adds stress, which is passed onto the service given to the customer.

Poor Training

Many new product lines and price changes require formal training. Most training is given on a read and pass along technique. Also, outside contractors are used to push new

products that the Rep has not been trained on and is therefore unable to explain the product to the customer. Operators get new Company information printed on their screen or written on an easel in the office. In most cases, there is no follow-up information and no guarantee the Operator saw the new information.

Technological Changes

Both Reps and Operators are pushed by new computers that only add more stress and do not serve the customer. The new DAB computers (411) actually take longer to get the information the customer is seeking.

Pressures Put On MAs And CSAs Adversely Affect Service Quality And The Data Reported To the PSC

There are many different job functions that fall under the title of MA or CSA. Many pressures are placed on these craft people every day because of their multi-faceted jobs. These pressures affect the way MAs and CSAs deal with both employees and customers. In some cases this affects the accuracy of Company PSC reports for "out of service" commitment times. The following list provides a few examples of the types of pressures that are being placed on these crafts every day:

Back-Timing

MAs and CSAs are being told by supervisors to back-time returns called into the RSB by Field Technicians to make the out of service commitment times. This practice places not only the MAs or CSA in jeopardy of disciplinary action for falsifying Company records but also places the Field Technician unknowingly in jeopardy for the same reason.

Lack Of Training

Many MAs and CSAs are not trained in every entity of their job responsibilities. In one interview done by CWA, a long term employee who has worked in a RSB for years, was moved to dispatch a year and a half ago. As of the time this interview took place the technician still was not trained in all the aspects of the dispatch entity.

Customer Call-Outs

MAs are pressured to call out customers on a daily basis. One reason for these calls is to get customers to cancel or re-appoint their service order before it is dispatched. In one RSB these technicians are referred to as the "Call-Out Crew," and must meet customer call out quotas on a daily basis. This practice allows managers to move the workload so they can meet their commitment times. This gives the Company the opportunity to close jobs that are still in trouble.

Deregulation and the Loss of Experienced Managers Negatively Impact Service Quality

Deregulation insured that the Company could boost profits from downsizing, reengineering and reorganizing. With this incentive it eliminated thousands of experienced managers and lowered the benefits for those remaining. It also increased the productivity pressures on those that remained. Here are some of the consequences:

Because of the lower benefits and increased productivity pressures, the position has become much less desirable to senior skilled workers. As a result, the positions are increasingly filled with people hired off the street with little or no technical experience or skill.

Because these new managers have few if any technical skills, they are unable to properly train the new temporary workers or respond adequately to workers' technical problems and concerns.

For example, a CWA review of the 9 managers at a work location found that five had less than two years experience. Of those 5, three had less than one year. These managers were responsible for 240 workers.

RECOMMENDATIONS

The presence of inconsistent and inaccurate service quality data allowed New York Tel to artificially improve the Company's service quality performance and, thus, minimize its exposure to the multi-million dollar penalties built into the PRP. CWA makes the following recommendations to fix these problems.

1) Extend the CWA service quality program for the remainder of the PRP.

It is not enough to merely monitor PSC service quality data because it has already been doctored. The CWA service quality program is needed so that data reporting is monitored at the source. There is no other avenue through which workers can participate without fear of retribution. The program also benefits consumers and the PSC because it educates and trains members in terms of the importance of service quality for the Company, consumers and the workers themselves.

2) Develop a remedial program - with the participation of CWA - to insure that over the long term, proper procedures are followed to guarantee the future validity of service quality data and the delivery of high quality service.

The surveys and hotline reports prove that the service quality reporting problems are widespread and represent a pattern of abuse across the state of New York. They are not isolated to one manager, bureau or geographic area. Such problems require long term solutions. CWA recommends that a remedial program be developed -- with our full participation -- to address these problems in a systematic and comprehensive manner.

3) Conduct a comprehensive reevaluation of New York Tel's performance in relation to service quality targets and recalculate the penalties levied against the Company - part if the PRP.

The existence of documented inaccurate service quality data calls into question all the service quality reports previously submitted by the Company to the PSC.

Excerpt from WorldCom's 11/16/01 Reply Comments on BellSouth's FCC 271 applications for Georgia and Louisiana. Our metric reports in Georgia show much lower trouble after install rates for WorldCom than WorldCom actually experienced, the difference may be wrongly excluded trouble reports.

Loss of Dial Tone

1. Loss of dial tone continues to be a significant problem for MCI customers. As of November 2, the number of MCI customers who had lost dial tone within 30 days of the date on which MCI received the completion notice was 1,703.[1] As a percentage of MCI's installed base of customers in Georgia, this is 2.1% of MCI's customers – a significant increase from the 1.8% that existed when MCI last reported the data on September 23, 2001. Lichtenberg, Desrosiers, Kinard & Cabe Decl. 41. Again, we must re-emphasize that this is simply far too many customers losing dial tone within a short period of migration for the problems to be coincidental. While we do not have visibility into the cause of the lost dial tone, it is highly unlikely that anywhere near this many customers would have lost dial tone if they had not migrated from BellSouth.
2. On September 27, MCI submitted a list of 27 customers to BellSouth who had lost dial tone within 30 days of migration so that BellSouth could perform a root cause analysis. On November 9, BellSouth responded that one of these customers had lost dial tone as a result of a "service order error"; three customers had lost dial tone as a result of "switch translation problems"; four customers lost dial tone, and BellSouth identified a trouble, even though "there was no trouble found in BellSouth's facilities"; two customers had no trouble that could be identified by BellSouth;

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1 MCI has chosen 30 days as the appropriate measure as that it is how BelllSouth reports its performance data.

fourteen customers lost dial tone as a result of facility problems; one customer lost dial tone as a result of an inside wiring problem; one lost dial tone as a result of a defective network interface; and one lost dial tone as a result of a problem caused by another utility company with a buried drop.

3. BellSouth's response provides little information beyond that which MCI already has from trouble ticket closure information. With respect to the fourteen customers who had facility problems, for example, MCI does not know what these facility problems were or why UNE-P migration customers would be experiencing such problems. With respect to the four customers for whom BellSouth identified a trouble but BellSouth then stated that "there was no trouble in BellSouth's facilities," MCI has no idea what this means. As for the five customers who lost dial tone as a result of a service order error and switch translation problems, these appear to be problems associated with migrations but BellSouth has not provided sufficient detail to know for sure.[2] BellSouth, for example, has not provided the dates the "N" and "D" service orders completed for each of the 27 customers, which would help determine whether the two service order process was responsible for the loss of dial tone.
4. Not only did BellSouth fail to provide this information in its initial note but, when MCI responded to BellSouth by asking for additional information (Att. 5), BellSouth refused to provide it. BellSouth sent back a note stating that "[t]he account team's research of the cause of the outages experienced by the 27 customers has been provided." (Att. 6) (emphasis added). Once again this emphasizes the difficulty in working with BellSouth to obtain information needed to resolve problems.

[2] The two customers for whom trouble could not be found may also have lost dial tone as a result of the N and D order process but had dial tone restored before BellSouth checked the line

5. In any event, at a minimum, BellSouth's explanations seem to support the conclusion that a significant portion of the customers that have lost dial tone within 30 days of migration are losing dial tone as a result of problems associated with migration. At a minimum, the customers who lost dial tone as a result of a service order error and switch translation problems seem to fall into this category. It remains impossible to determine the exact magnitude of the problem, however.

6. The Georgia Commission states that of 17,746 UNE-P conversions for three carriers, only 45 involved a loss of dial tone. And it cites Ms. Lichtenberg's affidavit as admitting that of 3,400 UNE-P orders MCI had submitted as of May 31, 2000 only two had lost dial tone during the conversion process. But while the Georgia Commission accurately characterizes Ms. Lichtenberg's first affidavit in the Georgia proceeding, the subsequent affidavits she submitted as MCI gained experience showed far more instances of lost dial tone. As for the Georgia Commission's claim that of 17,746 UNE-P conversions for three carriers only 45 involved a loss of dial tone, we do not know on what this claim is based. We do know, however, that as we have previously explained, thousands of customers have lost dial tone in the 30 days after migration – even when only MCI customers are considered. This is far too high.

PROCESS - B-9: Percent Daily Usage Feed Errors Corrected in 5 Business Days

1. The clock starts when BellSouth receives ~~acknowledges receipt of the~~ CLEC's ~~written requests on CLEC~~ Problem/Issue/File Retransmission form.
    - CLEC sends CLEC Problem/Issue/File Retransmission to ODUF ADUF SMEs (BST to note here email and snail mail address).

2. -EMI content errors should be attached in a separate file from the CLEC Problem/Issue/File Retransmission form For content errors, CLECs prefer to send back errored records in what is know as an "outcollect" proceess and receipt of these returned errored records would start the time clock. While the outcollect process is pending final agreement, testing and implementation, the CLECs would agree to use a the CLEC Problem/Issue/File Restransmission form for content errors if they are allowed to attach call records in error to the form without needing to provide date of file, pack sequence number volser number or dataset of each call record . This information would be burdensome to provide for the many thousands of records that often have the same problem. Use of the interim method does not imply that it is acceptable long term use beyond adoption of the outcollect method no later than xxxxx.
    i.
    ii. Separate CLEC Problem/Issue/File Retransmission form should be submitted for each error type
        a. Each error type must provide:
            1. From RAO (iBST: nstructions for filling out say this is not mandotory, which is it???)
            2. OCN

    - Within X hours, the ODUF ADUF SMEs acknowledges receipt of CLEC Problem/Issue/File Retransmission form to the CLEC
    - ODUF ADUF SMEs acknowledges that there is error (or not) (Exclude but report monthly on number of disputed/rejected records with errors.)
        i. CLEC Problem/Issue/File Retransmission forms disputed by~~submitted to~~ ODUF ADUF SMEs, but the number of such disputed or rejected records that the CLECs claim have errors are reported monthly. ~~that do not result in an error are not counted in this measure.~~
    - Error are referred to IT for resolution
        i. IT Corrects referred problem to prevent future occurances.
        ii. IT Corrects referred errors and resends records to CLEC

~~2.~~3. The clock stops when BellSouth transmits ~~or makes available~~ the corrected usage to the CLEC

~~3.~~4. -Reporting of data for measure

- Data for this measure will be accumulated for each record with an error.
- The ODUF ADUF SMEs gathers data for this measusre using a manually prepared EXCEL spreadsheet.
- At the end of the month, BellSouth ODUF ADUF SMEs will supply the total number of daily usage errors in reporting month and the total number of daily usage errors corrected in the reporting month within 5 business days for each CLEC by state.

~~4.~~5. Data will be forwarded to PMAP for processing reports.

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    - Within X hours, the ODUF ADUF SMEs acknowledges receipt of CLEC Problem/Issue/File Retransmission form to the CLEC
    - ODUF ADUF SMEs acknowledges that there is error (or not) (Exclude but report monthly on number of disputed/rejected records with errors.)
        i. CLEC Problem/Issue/File Retransmission forms disputed by~~submitted to~~ ODUF ADUF SMEs. but the number of such disputed or rejected records that the CLECs claim have errors are reported monthly. ~~that do not result in an error are not counted in this measure~~.
    - Error are referred to IT for resolution
        i. IT Corrects referred problem to prevent future occurances.
        ii. IT Corrects referred errors and resends records to CLEC
2.3. The clock stops when BellSouth transmits ~~or makes available~~ the corrected usage to the CLEC
3.4. -Reporting of data for measure
    - Data for this measure will be accumulated for each record with an error.
    - The ODUF ADUF SMEs gathers data for this measusre using a manually prepared EXCEL spreadsheet.
    - At the end of the month, BellSouth ODUF ADUF SMEs will supply the total number of daily usage errors in reporting month and the total number of daily usage errors corrected in the reporting month within 5 business days for each CLEC by state.
4.5. Data will be forwarded to PMAP for processing reports.

Section 5: Billing

B-9: Percent Daily Usage Feed Errors Corrected in 5 Business Days

Definition

Measures the timely correction of Daily Usage Feed (DUF) errors in record information and Pak formats measured separately. Errors included (1) Pack Failure errors and (2) EMI content errors in records.

Exclusions

~~Usage that cannot be corrected and resent or~~ Usage that the CLEC doesn't want Retransmitted.

CLEC Problem/Issue/File Retransmission forms disputed by~~submitted to~~ ODUF ADUF SMEs. ~~that do not result in an error~~.

Business Rules

This measure will provide the % of errors corrected in 5 Business days.

Pack Failure errors are defined as a DUF header/trailor error containing one or more of the ~~fo~~following conditions: Grand total records not equal to records in pack or seqcuence/invoice numbers for a from RAO is not secquencial

EMI content errors are defined as those records with errors contained in the EMI detail records that would cause errors or omissions in CLEC customer billings.~~cause a message to be unbillable by the CLEC~~

~~Only~~For Pak errors only -notification received via the CLEC Problem/Issue/File Retransmission form (BST please provide website location that brings you directly to the form, information on required fields, and information on who to send it to via email or mail) will be included in this measure. For content errors, CLECs prefer to send back errored records in what is know as an "outcollect" proceess and receipt of these returned errored records would start the time clock. While the outcollect process is pending final agreement, testing and implementation, the CLECs would agree to use a the CLEC Problem/Issue/File Restransmission form for content errors if they are allowed to attach call records in error to the form without needing to provide date of file, pack sequence number volser number or dataset of each call record . This would be burdensome to implement for the many thousands of records that have the same problem. Use of the interim method does not imply that it is acceptable for use beyond adoption of the outcollect method no later than xxxxx.

For each type error condition, a new CLEC Problem/Issue/File Retransmission form should be submitted.

EMI content errors should be attached in a separate file from the CLEC Problem/Issue/File Retransmission form

Elapsed time is measured in business days.

The clock starts when BellSouth receives ~~acknowledges receipt of the~~ CLEC's ~~written requests on CLEC~~ Problem/Issue/File Retransmission form. Including completion of all relevant fields per BellSouth's web instructions.~~,~~

The clock stops when BellSouth transmits ~~or makes available~~ the corrected usage to the CLEC or fixes the problem so no further errors occur. All records with errors sent on a Problem/Issue/File Retrainsmission form must be corrected within the 5 days for the interval to be met.

This measure applies only to CLECs that are ODUF and ADUF participants

Calculation

Timeliness of Daily Usage Content Errors Corrected = (a ÷ b) X 100

- a = Total number of Daily Usage Records with Content Errors Corrected in the reporting month within 5 Business Days.
- b = Total number of Daily Usage Records with Content Errors corrected in reporting month

Timeliness of Daily Usage Pak Format Errors Corrected = (a – b) X 100

- a = Total number of Daily Usage Paks with Format Errors Corrected in the reporting month within 5 Business Days.

• b = Total number of Daily Usage Paks with Format Errors corrected in reporting month

Number of disputed record errors excluded to be reported separately.

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month - BellSouth Recorded - Non-BellSouth Recorded	• None

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable