

Portions of Verizon's exhibits subject to the People's Motion to Strike

People's Verizon Cross 00-0596
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Rebuttal Testimony of Karen H. Boswell, Verizon Exhibit 2.0 1-16-02

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P. 3. Lines 43-48

No. ~~The contents of carriers' quarterly reports have been a topic of conversation at all of the workshops that have taken place since the passage of HB 2900. The participants in the workshops did not believe percentage reporting was a viable measurement. In fact, no proposal offered in this process suggested that appointments should be expressed as a percentage. Doing so now seems too late in the process since the opportunity has past for a full discussion. More importantly, ... Those proposals run afoul of the consensus that was reached by the parties during the workshop process.~~

P. 3 Lines 57-59

~~First, much work went into the workshop process to develop a rule that contained as much consensus among the parties as possible, thus reducing the issues that would be litigated. Along that line, ...~~

P. 4 Lines 61-63

~~compromise. (Boswell Dir., p. 10, ln 247). To propose additional standards at this phase of the proceeding jeopardizes the consensus that was reached during the workshop and could render the time spent developing a draft rule meaningless.~~

P. 14 Lines 308-315

~~Yes. This issue was discussed at length during the workshop process and the Calculation A and Calculation B methods were both added to Staff's draft rule as a result of the workshop discussion. The thought was that Calculation A (as proposed by Staff) would be the "Official Calculation Methodology." Calculation B would be reported so that Staff could measure the impact of subtracting emergency exclusions from both the numerator and from the denominator in determining the out-of-service ("OOS") results. Staff's intent was to compare the two calculation methods over time to determine if one method was superior to the other. Now, CUB/AG is introducing...~~

P. 18 Lines 404-05

~~No. Once again, these proposals are inconsistent with the consensus that was reached by the parties during the workshop process on these issues.~~

P. 18 Lines 410-418

~~Yes. Verizon strongly opposes the creation of new or more stringent more stringent standards. First, much work went into the workshop process to develop a rule that contained, as much as~~

consensus among the parties as possible, thus reducing the issues that would need to be litigated. Along that line, Verizon did not oppose the creation of new service standards for “repeat trouble” and “repeat installation trouble” at 20% levels in order to reach consensus in the workshops. (Boswell Dir., p.10, ln. 247). ~~To propose additional or more stringent standards at this phase of the proceeding jeopardizes the consensus that was reached during the workshops, and renders the time spent developing a draft rule meaningless.~~ If such a proposal were adopted, Verizon would oppose the new repeat measures.

P. 20, line 441-444

To adopt the standards proposed by CUB/AG for trouble reports, repeat trouble reports and installation trouble reports without any analysis, or supporting documentation, jeopardizes the consensus that was reached during the workshops.