

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of an Investigation into the)	
Quality of Wireline Telecommunications)	File No. TO-2011-0047
Services in the State of Missouri)	

**RESPONSE OF MCImetro Access Transmission Services, LLC
d/b/a Verizon Access Transmission Services and
MCI Communications Services, Inc. d/b/a Verizon Business
TO ORDER OPENING AN INVESTIGATION INTO THE QUALITY
OF WIRELINE TELECOMMUNICATIONS SERVICES IN MISSOURI**

Come now MCImetro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services and MCI Communications Services, Inc. d/b/a Verizon Business ("Verizon") and for their Response to Order Opening An Investigation into the Quality of Wireline Telecommunications Services In Missouri states as follows:

4A. Does your company own or maintain telecommunications facilities in Missouri?

Response: Yes. It should be noted that owned facilities are used for the provision of service to commercial customers only. All residential customers are served via facilities leased from ATT.

4B. Does your company track on a regular basis any of the following:

- i. Timeliness of installing service after a customers orders service
- ii. Timeliness of repairing service after a customers orders service
- iii. Amount of service trouble

Response:

- i. Yes. Tracked on a national basis.
- ii. Yes. Tracked on a national basis.
- iii. Yes. Tracked on a national basis

4C. Please provide your most recent results for any of the information tracked above.

Response: See HIGHLY CONFIDENTIAL Exhibit "NetPro OTP Report for Verizon Business" for response to 4Bi. This data is for Jan 2010 through Sep 2010 and is only available on a national basis.

See HIGHLY CONFIDENTIAL Exhibit "ETMS Per-Ticket MTTR Report for Verizon Business" response to 4Bii and 4Biii. This data is for Jan 2010 through Sep 2010 and is only available on a national basis.

Verizon considers this information to be HIGHLY CONFIDENTIAL because it is market specific information relating to services offered in competition with others (4 CSR 240-2.135).

4D. Explain your company's preventative maintenance procedures. Include in your explanation specific methods you utilize to be certain that telephone equipment and plant is kept in good working condition. State whether your preventative maintenance program is tracked by exchange area or state. Please provide results of this measurement for the past two years.

Response: There is a schedule of Preventive Maintenance tasks (PM)s that has been established which covers the telecommunications equipment deployed in the network at Verizon facilities. Verizon has a system called PM engine that generates the required PMs for the equipment. These are generated with due dates detailing when the technician must complete that specific PM. These PMs are then dispatched to the appropriate field technician who then goes to the location, completes the PM, and the updates the system with this completion. See HIGHLY CONFIDENTIAL Exhibit "Missouri PM Dispatches"

Verizon considers this information to be HIGHLY CONFIDENTIAL because it is market specific information relating to services offered in competition with others (4 CSR 240-2.135).

4E. What percentage of your company's annual budget is spend on maintaining existing telephone plant?

Response: Verizon does not track preventative maintenance dollars and budget percentages in a manner that is responsive to this data request and does not maintain books and records specific to Missouri.

4F. What percentage of your company's annual budget is spent on training its technical staff?

Response: Verizon does not track training dollars and budget percentages in a manner that is responsive to this data request and does not maintain books and records specific to Missouri.

Respectfully Submitted,

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing documents was either faxed, emailed, or mailed by U.S. Mail postage paid this 1st day of November, 2010, to the following:

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/s/ Carl J. Lumley
