

Public reports. If requested by a CLEC, FairPoint creates and uses a CLEC combination identifier (CLEC combo ID) to aggregate results across multiple identifiers used by the same carrier before creating the C2C and PAP reports. [REDACTED]

Although Liberty is not familiar with the terms and conditions of FairPoint's Wholesale Package, such agreements to purchase wholesale services outside of the Resale and UNE services mandated by the FCC often contain special provisions on service performance.

FairPoint does not create a CLEC-Specific PAP report if there is no payment due to the CLEC that month. The CLEC-Specific PAP reports contain aggregate CLEC results in the first several tabs. These reports contain CLEC-Specific results in the last tab ("CLEC Spec. Adj."). These reports only include results (*e.g.*, numerators, denominators, *etc.*) when there is a payment due.

The FairPoint Operations Performance Metrics organization sends a CLEC-specific bill credit file around the 28<sup>th</sup> of the month to the company's accounting organization, which applies the credits to specific CLEC bills. This credit file explicitly states whether the team should or should not apply a credit for a CLEC; [REDACTED]

[REDACTED] Because the PAP bill credits must be calculated in the month after the transactions triggering them and PAP payments are made through bill credits rather than as a direct payment to the CLEC, the relationship between the bill cycle date and the completion of the bill credit file determines when the CLEC receives a credit. As is typical in such a PAP payment mechanism, there can be up to a three-month delay between a transaction that contributed to a bill credit and the receipt of the credit. For example, an August report will not trigger a credit file until around September 28<sup>th</sup>, and the CLEC would receive bill credits in the first bill cycle after the creation of this credit file, which may not occur until late October.

Liberty independently calculated the metrics for all of 2011 using the data in the tracking spreadsheets and compared the values to the C2C and PAP reports for these months. Liberty verified the reported CLEC-aggregated values for all months except June. FairPoint acknowledged the June discrepancy, stating that it “erred when copying the June data over to the DUF template. The file was truncated and as a result the June reported results did not include the total monthly volumes.”<sup>453</sup> Liberty also verified the reported CLEC-specific values for 19 of the 43 CLECs identified on the tracking spreadsheets. Of the remaining 24 CLECs, [REDACTED] were CLECs that did not request to receive CLEC-specific results.<sup>455</sup>

Liberty identified the following defects related to the BI-1-02 metric:

- The aggregate volume of DUF records reported in December 2011 was only 55 percent of the average volumes reported for the other 11 months of the year. FairPoint indicated that this was the result of a configuration change deployed on December 6. The change was not implemented successfully, causing DUF records to fall out and not be sent to the CLECs.<sup>456</sup> FairPoint did not investigate why these volumes were so low, stating that such an investigation was not necessary “because reported results were within the performance standard.”<sup>457</sup> FairPoint has not explained why it conducts such investigations only when the metric calculations produce a value outside the performance standards, regardless of whether the numbers underlying the calculation are anomalous, as in this case. FairPoint indicated that it corrected this problem in the source systems beginning with the January 2012 data month.<sup>458</sup> **(Defect #104)**
- FairPoint does not include in the BI-1-02 denominator DUF records created but not transmitted.<sup>459</sup> **(Defect #105)**
- FairPoint made an error when copying the June 2011 data to the manual BI-1 calculation template. The source file was truncated, causing the total monthly volumes not to be included in the June reports.<sup>460</sup> FairPoint indicated that it corrected its manual process in July 2011.<sup>461</sup> **(Defect #106)**

---

<sup>452</sup> Response to Data request #249. Liberty did not audit the process used by Kansys to develop these reports or the source data included in the report because of the volume of records involved (typically in excess of 120 million per month).

<sup>453</sup> Response to Data Request #249.

<sup>454</sup> Responses to Data Requests #54 and #111.

<sup>455</sup> Response to Data Request #315.

<sup>456</sup> Response to Data Request #359.

<sup>457</sup> Response to Data Request #303.

<sup>458</sup> December 7, 2012 response to Liberty’s Draft Audit Report.

<sup>459</sup> Response to Data Request #359.

<sup>460</sup> Response to Data Request #249.

<sup>461</sup> December 7, 2012 response to Liberty’s Draft Audit Report.