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**Keefe B. Clemons**  
General Counsel – Northeast Region

May 18, 2017

**By Electronic and Overnight Mail**

Irene K. Asbury, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 3<sup>rd</sup> Floor, Suite 314  
P.O. Box 350  
Trenton, NJ 08625-0350

***Re: In the Matter of Verizon New Jersey Discontinuance of Landline  
Telecommunications Maintenance, Facilities and Infrastructure –  
BPU Docket No. TO15121325***

Dear Secretary Asbury:

Enclosed for filing with the Board are ten (10) copies of the Stipulation of Settlement entered into by Verizon New Jersey Inc., the New Jersey Division of Rate Counsel, and the Petitioners in this proceeding.

The parties respectfully request that the Board consider and approve the Stipulation at its May 31, 2017 Board meeting.

Respectfully submitted,

A handwritten signature in black ink that reads "Keefe B. Clemons".

Keefe B. Clemons

cc: Service List (By Electronic Mail)

STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

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IN THE MATTER OF VERIZON NEW	)	<b>STIPULATION OF SETTLEMENT</b>
JERSEY DISCONTINUANCE OF	)	
LANDLINE TELECOMMUNICATIONS	)	
MAINTENANCE, FACILITIES, AND	)	<b>BPU DOCKET NO.: T015121325</b>
INFRASTRUCTURE	)	

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WHEREAS, the following entities, through counsel, filed a Verified Petition ("Petition") with the New Jersey Board of Public Utilities ("Board") on November 24, 2015: City of Estell Manor and Weymouth Township in Atlantic County; Alloway Township, Lower Alloways Creek Township, Mannington Township, Township of Pilesgrove, and Upper Pittsgrove Township in Salem County; South Harrison Township in Gloucester County; Commercial Township, Downe Township, Hopewell Township, Lawrence Township, Maurice River Township, City of Millville, Upper Deerfield Township, and Fairfield Township in Cumberland County; Washington Township in Burlington County; and the County of Cumberland (hereinafter, collectively referred to as "Petitioners" or the "17 Towns");

WHEREAS, the Petitioners alleged in the Petition that Verizon New Jersey Inc. ("Verizon") has failed and refused to provide adequate and proper service pursuant to N.J.S.A. 48:3-3,

and that there were numerous and widespread deficiencies impacting the provision of safe and adequate service by Verizon to residents and customers in Petitioners' communities and sought an investigation by the Board;

WHEREAS, on December 22, 2015 and September 30, 2016, the New Jersey Division of Rate Counsel ("Rate Counsel") filed letters with the Board requesting that it investigate the issues raised in the Petition;

WHEREAS, on January 19, 2016, Verizon filed an opposition to the Petition, and asserted therein that it has and continues to provide safe and adequate service throughout the Petitioners' communities and that the requested investigation is unwarranted;

WHEREAS, on August 4, 2016, two public hearings related to this Petition were held in Estell Manor, New Jersey. Citizens and public officials testified regarding their experience with inadequate telephone and broadband service, as well as insufficient customer service;

WHEREAS, on September 19, 2016, Verizon filed a proposed plan with the Board to address service issues raised in the Petition, at the public hearing, and in customer service complaints provided by Petitioners to Verizon;

WHEREAS, on December 12, 2016, the Board appointed Board President, Richard S. Mroz, to serve as presiding officer in the investigation of Verizon's service quality in the 17 Towns; and

WHEREAS, Petitioners, Verizon, and Rate Counsel (collectively referred to herein as the ("Parties")) desire to resolve this action without the need for further litigation;

NOW, THEREFORE, the Parties hereto, intending to be legally bound thereby, DO HEREBY AGREE as follows:

**SETTLEMENT TERMS AND CONDITIONS**

**1. Conclusion of Proceeding.**

The Parties hereby stipulate that this Stipulation represents a fair conclusion with respect to the issues to be resolved in this proceeding.

**2. Verizon Plan.**

Verizon agrees to implement the plan it submitted to the Board on September 19, 2016, a copy of which is attached as Exhibit A.

**3. Copper Maintenance.**

- (a) To ensure reliable telephone service for Verizon's customers residing within the 17 Towns, Verizon will use its Proactive Preventative Maintenance Tool ("PPMT") to identify defective outside copper cables and create work packages to either repair or replace the copper cables. Verizon will utilize three types of work packages - Preventive, Proactive, and Manual -

to investigate and resolve outside plant conditions in the 17 Towns.

(i) Preventive work packages will analyze customer trouble reports from customers located in the 17 Towns to identify copper cables that have 3 or more associated trouble reports in a one-year period. Cables so identified will be repaired or replaced.

(ii) Proactive work packages will run a daily test of the copper cables in the wire centers serving the 17 Towns and will identify network issues such as foreign voltage, shorts, and improper grounds, which can adversely affect service delivery. Copper cables will be repaired or replaced based on cable test results, the presence of defective pairs, and customer trouble history associated with the cable.

(iii) Manual packages will be created based on the identification of outside plant issues by field personnel, which are considered along with defective pair history and customer trouble history to target cables for repair or replacement.

- (b) Verizon will also conduct daily inspections of the outside plant facilities to ensure that they are protected from weather and other conditions that cause service outages or other service problems. Verizon will resolve all open plant conditions within 30 days of initial discovery.
- (c) Verizon will report semi-annually to the Board, Rate Counsel, Counsel for the 17 Towns, the Director Freeholder of Cumberland County, AARP, and Senator Van Drew's Office, all of the proactive preventative maintenance activities (which include open plant, cable repair and replacement) completed and in progress in all 17 Towns for a period of three years following the final approval of this agreement.
- (d) Verizon will also meet semi-annually with the Board, Rate Counsel, Counsel for the 17 Towns, the Director Freeholder of Cumberland County, and Senator Van Drew's Office, to discuss the maintenance activity in the 17 Towns.
- (e) The maintenance plan and associated reporting agreed to and contained herein will remain in effect for a period of three years following the final approval of this agreement.

**4. DSL Congestion Relief.**

(a) Verizon has implemented or is in the process of implementing the following measures in response to the filing of the Petition in this proceeding: in three communities, Estell Manor, Weymouth (which includes Dorothy) and Maurice River, Verizon has installed additional equipment at remote terminals where very high bandwidth utilization has negatively affected DSL performance for some customers. This additional investment created additional capacity for high speed Internet access customers, bringing improved service reliability to over 450 customers in these three communities. Verizon completed the installation of the additional equipment required to ease the congestion for DSL customers in Estell Manor, Weymouth, and Maurice River in August 2016. Verizon subsequently began migrating existing DSL customers in each area onto the new equipment in order to balance the bandwidth usage provisioned over the remote terminals, resulting in more consistent DSL performance for customers. Those migrations were completed in September 2016. Verizon's efforts to ease congestion in the remote terminals serving Estell Manor, Weymouth, and Maurice River also expanded DSL

availability to 400 addresses that were previously unable to order the service. In addition, Verizon's initiative to maximize DSL performance and availability in its remote terminals resulted in the qualification of approximately 2,000 additional addresses that will now be able to order DSL in the towns of Upper Pittsgrove, Downe, Commercial, Mannington, Pilesgrove, and South Harrison.

- (b) Verizon will pursue additional congestion relief and install equipment to improve DSL service in Galloway Township, Hamilton Township, and Atlantic City in Atlantic County.
- (c) Verizon will continue monthly monitoring of the DSL congestion levels in the remote terminals serving the 17 Towns to ensure that utilization levels remain below 75%. . Any remote terminal in the 17 Towns with bandwidth utilization over 75% will be provided with congestion relief, and customers will be migrated onto new equipment within 60 days after the installation of the equipment has been completed. Installation of equipment will be completed as soon as practicable, but no later than 6 months after the finding by Verizon that a remote terminal serving the 17 Towns exceeds the 75% utilization benchmark.



**5. Fiber Deployment.**

Verizon will deploy fiber facilities to satisfy its obligation under the Bona Fide Retail Request ("BFRR") Program to provide broadband to the residents of Estell Manor, Weymouth, and Corbin City. Deployment will commence upon receipt of a signed agreement and \$100 deposit (which shall be held as pre-payment for service) from at least 35 qualified applicants. Verizon having determined that Lower Alloways Creek Township has met the requirements under the BFRR Program, Verizon will continue its deployment of fiber to Lower Alloways Creek Township in order to provide broadband to its residents and will comply with the BFRR Program's 9-month deployment timeframe.

**6. BFRR Program.**

- (a) Verizon will extend the BFRR Program for 18 months, until June 30, 2019.
- (b) Verizon will conduct targeted outreach to mayors and residents in the 17 Towns to provide further information about the BFRR Program process and to encourage qualified residents to apply. Outreach will include semi-annual bill messages on customer bills, meetings with mayors and residents to explain the BFRR Program, placing ads in area newspapers, and working with local officials to place BFRR Program information on township and city websites.

**7. Customer trouble reports.**

- (a) Verizon will maintain its network service so that the average monthly rate of customer trouble reports, excluding customer premises equipment ("CPE") reports, does not exceed 2.3 reports per 100 customer access lines in the 17 Towns.
- (b) Verizon will maintain its network service so that the average monthly rate of repeat out-of-service trouble reports for the 17 Towns, excluding CPE reports, does not exceed 37.6% of initial out-of-service reports for residential customers and 26.9% of initial out-of-service reports for business customers.
- (c) Verizon will work with representatives of the 17 Towns to encourage Verizon customers in the 17 Towns to report out-of-service conditions and service-affecting issues directly to Verizon on a timely basis.

**8. Out-of-Service Conditions**

Verizon will strive to resolve 76.5% of out-of-service conditions reported in the 17 Towns within 48 hours. This metric will exclude customer-requested appointments greater than 48 hours when Verizon has offered a service appointment within 48 hours. Verizon will use its best efforts to schedule appointments for out-of-service reports as soon as possible for (1) emergency situations, (2) customers over the age of 65 or

with special medical needs, and (3) customers with no access to wireless services.

**9. Customer Service Calls and Service Appointments.**

Verizon agrees to improve its performance in this area and agrees to require its Customer Service Representatives to undergo refresher training to reinforce their continued understanding of Verizon's regulatory obligations, including those under the BFRR Program.

**10. Reports.**

Verizon agrees to provide semi-annual reports to the Board, Rate Counsel, Counsel for the 17 Towns, the Director Freeholder of Cumberland County, AARP, and Senator Van Drew's Office, for a period of three years following the final approval of this agreement that detail the following maintenance activities in accordance with this Agreement:

- (a) The number of outside plant conditions resolved monthly;
- (b) The number of copper cables replaced and repaired and the locations impacted by the work in the 17 Towns;
- (c) Actions taken to relieve DSL congestion in specific remote terminals serving the 17 Towns where bandwidth utilization is over 75% and the number of DSL customers migrated to new remote terminal equipment

within 60 days after the installation of the equipment has been completed;

- (d) Report showing Verizon's results for (1) the customer trouble report rate metric of 2.3 troubles per 100 access lines for the 17 Towns, and (2) the repeat out-of-service trouble report rate metrics for residential (37.6%) and business customers (26.9%) for the 17 Towns.
- (e) Report showing Verizon's results for out-of-service conditions cleared within 48 hours for the 17 Towns.
- (f) Reports provided to the parties will state and/or name the performance data compiled and/or relied upon in assessing metric results in the reports provided to the parties.

**11. Effective Date.**

The Parties agree that this Stipulation should be considered by the Board at its next available agenda meeting, which is currently scheduled for May 31, 2017, in order to allow for the implementation of the Verizon plan at the earliest possible time.

**MISCELLANEOUS**

12. Upon receipt of the reports described in paragraph 10, the parties may request further information including, but not

limited to, any metrics for performance data, or other materials in possession of Verizon that demonstrate performance levels of the copper landline system in order to assess Verizon's performance of its commitments under the Stipulation. Verizon agrees to respond on a timely basis to these requests for information. If Verizon fails to meet the performance and service metrics established herein for three consecutive quarters, it shall, within 30 days of reporting on the third quarter of non-compliance, provide a plan to the Board and the Parties setting forth how it will achieve compliance with the metrics at issue and a timeframe to achieve compliance. Additionally, if a Party believes that Verizon is not in compliance with the terms and conditions of this Stipulation, that party shall provide written notice to Verizon and other Parties setting forth the basis for its belief and the specific terms at issue. Verizon shall respond within 30 days of receipt of such notice with an explanation of why it maintains it is in compliance with the terms of the Stipulation or a plan to achieve compliance. If the Parties are unable to resolve the dispute after good-faith efforts at the next semi-annual in-person meeting, the Parties retain the right to seek enforcement of the Stipulation by filing a petition with the Board. The Parties further acknowledge and agree that in the event of Verizon's continued failure to resolve performance and service

metric issue(s) within a reasonable time period, the Parties reserve the right to take any other legal action in pursuit of their legal remedies in this matter.

13. The Parties agree that non-public information provided by Verizon under the Stipulation shall be done under the terms of a mutually satisfactory non-disclosure agreement. Non-public information provided to Rate Counsel shall be governed by the Non-Disclosure Agreement dated February 16, 2016. Non-public information provided to Counsel for the 17 Towns shall be governed by the Non-Disclosure Agreement dated April 25, 2016. Verizon will enter into separate Non-Disclosure Agreements with the Director Freeholder of Cumberland County, AARP, and the Office of Senator Van Drew.

14. This Stipulation shall be binding on the Parties upon approval by the Board. This Stipulation shall bind the Parties in this matter only and shall have no precedential value.

15. This Stipulation contains terms, each of which is interdependent with the others and essential in its own right to the signing of this Stipulation. Each term is vital to the agreement as a whole, since the Parties expressly and jointly state that they would not have signed the Stipulation had any term been modified in any way. Thus, if upon consideration of this Stipulation, the Board modifies any of the terms described above, each of the signatory Parties will have the right either

to modify its own position, to accept the proposed change(s), or to opt out of this Stipulation and resume as if no Stipulation had been reached. If a signatory Party chooses to opt out, this proceeding also will resume as if no Stipulation had been reached.

16. The Parties agree that these procedures are fair to all concerned, and therefore, they are made an integral and essential element of this Stipulation.

17. This Stipulation is being executed in counterpart originals, and shall be binding on each Party who executes such a counterpart, with the same force and effect as if all executing Parties had executed a single original document.

#### **CONCLUSION**

WHEREFORE, for the reasons set forth above, the Parties to this Stipulation respectfully request that the Board (i) approve and adopt this Stipulation in its entirety; and (ii) issue a Decision and Order determining that the resolution of the issues in this proceeding as proposed in this Stipulation are just and reasonable.

IN WITNESS THEREOF, the undersigned Parties do HEREBY AGREE to the form and execution of this Agreement.

VERIZON NEW JERSEY INC.

By: Keefe B. Clemons  
Keefe B. Clemons  
Vice President, General Counsel, and Secretary

Dated: 5/16/2017



NEW JERSEY DIVISION OF RATE COUNSEL

By: Stefanie A. Brand  
Stefanie A. Brand  
Director, Division of Rate Counsel

Dated: May 16, 2017

CITY OF ESTELL MANOR  
WEYMOUTH TOWNSHIP  
ALLOWAY TOWNSHIP  
LOWER ALLOWAYS CREEK TOWNSHIP  
MANNINGTON TOWNSHIP  
TOWNSHIP OF PILESGROVE  
UPPER PITTSBORO TOWNSHIP  
SOUTH HARRISON TOWNSHIP  
COMMERCIAL TOWNSHIP  
DOWNE TOWNSHIP  
HOPEWELL TOWNSHIP  
LAWRENCE TOWNSHIP  
MAURICE RIVER TOWNSHIP  
CITY OF MILLVILLE  
UPPER DEERFIELD TOWNSHIP  
FAIRFIELD TOWNSHIP  
WASHINGTON TOWNSHIP  
THE COUNTY OF CUMBERLAND

By: 

\_\_\_\_\_  
Theodore E. Baker  
Their Attorney

Dated: 5/18/17

EXHIBIT A

**Ava-Marie Madeam**  
Vice President - State Gov't Relations



540 Broad Street, Floor 6  
Newark, NJ 07102

Phone 973.649.3125  
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avamarie.p.madeam@verizon.com

September 19, 2016

**VIA FEDEX**

Irene Kim Asbury, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 3<sup>rd</sup> Floor, Suite 314  
Post Office Box 350  
Trenton, New Jersey 08625-0350

**Re: I/M/O Verizon New Jersey Inc.'s Discontinuance of Land Line  
Telecommunications Maintenance, Facilities and Infrastructure  
BPU Docket No. TO15121325**

Dear Secretary Asbury:

Verizon New Jersey Inc. ("Verizon") has reviewed its operations in Southern New Jersey to identify opportunities to enhance the customer experience for Verizon's customers in the 17 towns that filed the petition in the above matter. The service issues raised by some of our customers in Southern New Jersey have been and will continue to be a very high priority for Verizon because we are committed to providing quality reliable service to our customers every day. Our review focused on three areas of opportunity: (1) additional fiber investment under the BFRR program; (2) relieving congestion of the DSL (Digital Subscriber Line) network in several towns; and (3) additional improvements to the copper infrastructure, including repair and replacement of low performing copper cables and elimination of all identified open plant conditions. As discussed in more detail below, Verizon believes these initiatives will greatly improve the experience of Verizon's customers in Southern New Jersey. In summary, Verizon

plans to: (1) deploy fiber optic facilities to Lower Alloways Creek; (2) relieve DSL congestion at the remote terminals serving Estell Manor, Weymouth and Maurice River to improve the reliability of DSL service serving customers in these towns and enable additional customers in several towns to order DSL who were previously unable to get DSL because of congestion in Verizon's central offices (COs) ; and (3) reducing customer outages by making additional capital investments to repair or replace copper cables and eliminate open plant conditions that are service impacting.

### **FIBER DEPLOYMENT TO LOWER ALLOWAYS CREEK – BFRR**

Verizon plans to deploy fiber to approximately 900 households in Lower Alloways Creek provided the town satisfies all the requirements of the Bona Fide Retail Request (BFRR) program, which requires Verizon to bring broadband service (but not necessarily fiber-based service) to this community.<sup>1</sup> To date, the town has satisfied all the requirements except for the submission of one-year service commitments and \$100 deposits from 35 or more eligible customers.<sup>2</sup> Verizon's fiber deployment to Lower Alloways Creek may begin as early as this year and will be completed within nine months, barring any unforeseen delays. Verizon's decision to deploy fiber to Lower Alloways Creek will further improve the resilience and reliability of Verizon's network infrastructure in this community. Verizon is aware that customers in Estell Manor and Weymouth are actively submitting BFRR applications and we

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<sup>1</sup> Under the BFRR program, Verizon is required to provision broadband to customers located in a census tract that satisfies the BFRR requirement within 9 months of receiving a minimum of 35 applications from residential or single line business customers who meet the qualifications: (1) no access to broadband alternatives, *i.e.*, no cable, no DSL , no wireless 4G service, (2) have signed a contract agreeing to at least one year of service, and (3) pay a \$100 deposit to be credited towards the service. The initial 9 month period for broadband deployment can be extended up to 6 months for certain delays beyond Verizon's reasonable control. *See BPU Stipulation of Settlement* at pp 3-4.

<sup>2</sup> Verizon will be sending out letters on September 19 to those eligible Lower Alloways Creek residents who submitted BFRR applications, requesting that they sign the contract and pay the \$100 deposit.

Ms. Irene Asbury  
September 19, 2016

stand ready to provide broadband to additional towns in Southern New Jersey or other towns in the state that satisfy the BFRR requirements.

### **DSL PERFORMANCE AND RELIABILITY IMPROVEMENTS**

At the beginning of 2016, Verizon began efforts across multiple states to address specific central offices (COs) where DSL bandwidth utilization was extremely high. This condition resulted in slow response times for some of our DSL customers, and, in some cases, customers were unable to order DSL as a result. Verizon also reviewed every complaint from Southern New Jersey residents that cited DSL related performance and reliability issues.

In three communities – Estell Manor, Weymouth and Maurice River - Verizon has installed additional equipment at remote terminals located in wire centers where bandwidth utilization was very high and affected DSL performance for some of our customers. This additional investment creates additional capacity for high speed Internet customers, bringing improved reliability and consistent service to over 450 customers in these three communities. The installation of additional equipment to ease the congestion in the COs serving Estell Manor, Weymouth, and Maurice River was completed in mid-August. Verizon subsequently began migrating existing DSL customers in each area onto the new equipment on order to balance the bandwidth usage provisioned over the remote terminals, resulting in more consistent DSL performance for our customers. Verizon has completed 233 migrations of existing DSL customers in the three towns so far (100 in Estell Manor, 90 in Weymouth, and 43 in Maurice River) and will be working to complete additional migrations by the end of September.

Verizon's efforts to ease congestion in the COs serving Estell Manor, Weymouth, and Maurice River also enabled approximately 400 addresses that were previously unable to order DSL to now order the service. Furthermore, Verizon's overall corporate initiative to maximize

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DSL performance and availability in our COs has resulted in the qualification of approximately 2000 additional addresses that will now be able to order DSL in Upper Pittsgrove, Downe, Commercial, Mannington, Pilesgrove, and South Harrison. Verizon plans to notify these customers of the availability of DSL and how they can order the service by mailing postcards over the next few weeks.

**CONTINUED INVESTMENT IN THE COPPER NETWORK IN SOUTHERN JERSEY**

Verizon has invested approximately \$100 million dollars over the last two years in proactive preventative maintenance of the copper network in Southern New Jersey. Verizon continues to be focused on ensuring that outside plant facilities are protected from weather and other conditions that cause service outages or other service affecting problems. Since November 2015, Verizon Operations visually inspected the outside plant serving the 17 petitioning towns and corrected nearly 500 open plant conditions. At the August 4 hearing, Verizon was informed about an additional 141 plant conditions - 81% (114) of those additional conditions have been repaired; 14% (20) had no issues or were previously resolved; and 5% (7) were not Verizon facilities. Verizon will continue our efforts to identify “open plant” conditions and repair them immediately, in order to remove plant irregularities that result in loss of service and wasted dispatches.

In addition, the company is on target to spend approximately \$300,000 by the end of 2016 replacing copper cables or sections of cables, as part of our annual Infrastructure Improvement Program (“IIP”), in the Southern New Jersey towns of Estell Manor, Weymouth, Upper Pittsgrove, Pilesgrove, Upper Deerfield, Commercial, and Hammonton. Fourteen IIP projects have been completed, with one remaining project to be completed by the end of

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September. The 15 IIP projects will improve service in towns located in Cumberland, Salem, Atlantic, and Cape May Counties.

In addition to the IIP projects, Verizon has spent in excess of \$1 million on Proactive Preventative Maintenance (“PPM”) packages in Southern New Jersey through August 2016. These packages include splice rebuilds, terminal replacements, and other plant activity aimed at improving service for our customers. Recent customer complaints also helped Verizon identify additional areas of opportunity in Atlantic, Cumberland, Gloucester, and Salem counties to achieve service improvements, resulting in 74 new PPM packages which have all been completed. Verizon will continue to engage in proactive analysis of cable conditions in the Southern New Jersey towns through weekly open plant inspections and detailed review of trouble reports submitted by our customers in order to quickly pursue corrective actions to ensure reliable service for our customers in Southern New Jersey.

Verizon has always maintained a strong relationship with municipal leaders around the state. In February 2016, Verizon directly engaged each mayor, the Cumberland County Freeholder, and other local officials in order to directly address the service claims made in the petition. Verizon held in person meetings and monthly conference calls with mayors and conducted visits to Verizon work sites with mayors and other local officials to share information about ongoing maintenance occurring in the towns, to address any service issues, and to keep the lines of communication open between these communities and Verizon. These interactions between Verizon and the towns will continue.

Finally, the customer complaints aired at the August 4 hearing have all been addressed. Verizon conducted a thorough review of the 273 complaints received from various residents of Southern New Jersey communities and all complaints have been resolved, (27 of the complaints



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were not Verizon customers and 3 complainants provided inadequate information). And as previously mentioned, we created 74 new PPM packages to directly address and resolve the issues raised by our customers through their written and verbal complaints concerning their telephone and DSL service.

### **CONCLUSION**

Providing reliable service to our customers continues to be a top priority for Verizon, and we have taken the service issues raised by some of our customers in Southern New Jersey very seriously. The plan outlined above brings fiber to Lower Alloways Creek through the BFRR process, addresses slow DSL response times, makes DSL available to more customers in several towns, and accelerates our copper investment and maintenance efforts in all 17 South Jersey towns. Verizon will continue to take steps to improve plant conditions and decrease trouble reports in Southern New Jersey by utilizing all our resources to target problem areas. We know that providing the best customer experience is what we need to do in order to retain customers in a highly competitive environment.

Very truly yours,



Ava-Marie Madeam

cc: Paul Flanagan (by e-mail)  
Lawanda Gilbert (by e-mail)  
Harold Bond (by e-mail)  
Service List (by e-mail)