

Significantly, the FCC has determined that there is a retail analogue to repair functions.⁹⁹

Accordingly, the repair and maintenance PIDs for UNEs require Qwest to provide repair functions to CLECs in parity with analogous retail services. Thus, all of the maintenance and repair PIDs require Qwest to provide repair services in parity with retail and the Commission will be able to verify Qwest's performance through the reported results. This commitment is also reiterated in SGAT § 12.3.1.1.¹⁰⁰ With these commitments, the Commission can be assured that Qwest will provide repair services in a manner that does not discriminate against CLECs or prevent them from meeting their retail service quality objectives.

The ROC PIDs are precisely the type of negotiated performance measures upon which the Commission should rely to determine whether Qwest meets its performance obligations to CLECs. For those UNEs that are compared to Qwest's retail performance, the Commission can be assured that Qwest will provision service that is at parity with retail. For those UNEs for which performance benchmarks have been set, CLECs have determined by agreeing to these benchmarks that the benchmarks provide them a meaningful opportunity to compete. For UDIT, UNE-P, and unbundled loops, the PIDs provide that Qwest will repair those UNEs in parity with analogous retail services. To ensure that the SGAT properly aligns with Qwest's obligations under the PIDs, Section 20.0 of the SGAT will incorporate the final version of the PIDs.

⁹⁹ Memorandum Opinion and Order, *Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Michigan*, CC Docket No. 97-137, 12 FCC Rcd 20543 ¶ 140 (1997) ("*Ameritech Michigan Order*").

¹⁰⁰ SGAT § 12.3.1.1 ("Qwest will provide repair and maintenance for all services covered by this Agreement in substantially the same time and manner as that which Qwest provides for itself, its End User Customers, its Affiliates, or any other party. Qwest shall provide CLEC repair status information in substantially the same time and manner Qwest provides for its retail services.") and SGAT § 12.3.1.3 ("Qwest will perform repair service that is substantially the same in timeliness and quality to that which it provides to itself, its end user customers, its Affiliates, or any other party. Trouble calls from CLEC shall receive response time priority that is