

CenturyLink’s Redesigned Performance Assurance Plan (PAP)

On June 12, 2013, the Colorado Public Utilities Commission (CPUC) approved a settlement agreement that was reached with Staff of the CPUC and participating CLECs¹ (together, “Settling Parties”) for the purpose of redesigning CenturyLink’s PAP. As an integral part of the settlement, participating CLECs and CenturyLink agreed that this redesigned PAP should be proposed for adoption in the 13 other CenturyLink QC RBOC states.

Given that the redesigned PAP was built on the document structure of the Colorado PAP, most of which is different from that of other states’ PAPs, a redlined version of the other states’ PAPs would not meaningfully communicate the changes represented by the redesigned PAP. Accordingly, the following describes the changes to the PAP (Exhibit K to interconnection agreements or ICAs) and the Performance Indicator Definitions (PIDs, Exhibit B to ICAs).

Descriptions of Changes

Payment Structure – The Redesigned PAP...

- Institutes a **three-tiered, severity-level payment structure** to replace the current month-by-month definitions of non-conformance and payment triggers [section 6.0]:
 - Level 3 Non-Conformance (for the most significant deviations from the standard): Triggers a payment in **each month** for which this level of non-conformance occurs
 - Level 2 Non-Conformance (for moderately-significant deviations from the standard): Triggers a payment in any month for which there is not a Level 3 non-conformance, and the standard has been missed for **two consecutive months**, each to the extent defined for Level 2
 - Level 1 Non-Conformance (for least-significant deviations from the standard): Triggers a payment in any month for which a Level 2 or 3 non-conformance does not exist, and the standard has been missed for **three or more consecutive months** at any level
 - These levels are defined according to Table 2 in section 6.3, as follows:

TABLE 2

PARITY STANDARDS	
Performance Level	Non-Conformance Level
$0 < D_P < 0.5$	Level 1
$0.5 \leq D_P < 2$	Level 2
$ D_P \geq 2$	Level 3
BENCHMARKS as PROPORTIONS	
Performance Level	Non-Conformance Level
$0 < D_B < 5$	Level 1
$5 \leq D_B < 15$	Level 2
$D_B \geq 15$	Level 3
BENCHMARKS as MEANS or AVERAGES	
Performance Level	Non-Conformance Level
$0 < D_B < 25$	Level 1
$25 \leq D_B < 50$	Level 2
$D_B \geq 50$	Level 3

- The differences, D_P (for parity standards) and D_B (for benchmark standards) are defined in section 6.3.1 and are conceptually a representation of the numerical difference between the

¹ Comcast Phone of Colorado, LLC (“Comcast”), MegaPath Corporation fka DIECA Communications, Inc. dba Covad Communications Company (“MegaPath”), tw telecom of Colorado llc (“tw telecom”), and Eschelon Telecom of Colorado, Inc., dba Integra Telecom (“Integra”).

performance level and the established standard, expressed in terms of the number of standard deviations (for parity) or the number of benchmark increments (for benchmarks)

- In Colorado and Minnesota only, this three-level payment structure also replaces section 6.0 Table 2 variance factors and the associated six-month averaging of retail comparative results
- In connection with the new severity levels, replaces current payment increment amounts with three levels of amounts [as set forth in Table 3 in section 7.3], as follows:

TABLE 3: BASE PER OCCURRENCE PAYMENT INCREMENTS

Non-Conformance Level	Per-Occurrence Payment Increments	
	Colorado & Minnesota	Other States
Level 1	\$225.00	\$150.00
Level 2	\$337.50	\$225.00
Level 3	\$450.00	\$300.00

- As shown in the table, these start on the foundation of the highest base payment increments defined in the current PAPs (\$225 in CO and MN [Tier 1A], and \$150 for other states [Tier 1 High]) for Level 1 and then increase the payment increment to 1.5 times the base payment increment for Level 2 and to 2 times the base payment increment for Level 3
- In Washington, the new severity levels and their escalated base payment increments also replace the escalated payment increments for DS1-capable loops and EEL-DS1s (Enhanced Extended Loops-DS1 level) currently in the Washington PAP
- Revises payment escalations for consecutive months of non-conformance so that they also apply to the two new levels² of severity [section 8.0, per Table 4 in section 8.2.1]

TABLE 4: PER-OCCURRENCE PAYMENTS TO CLEC--WITH ESCALATION

Per Occurrence Measurement Group	Consecutive Months of Non Conforming Performance at Any Level				
	Month 1	Month 2	Month 3	Month 4	Each following month after Month 4 add
Colorado and Minnesota					
Level 1	\$225.00	\$250.00	\$500.00	\$600.00	\$100.00
Level 2	\$337.50	\$362.50	\$612.50	\$712.50	\$100.00
Level 3	\$450.00	\$475.00	\$725.00	\$825.00	\$100.00
Other States					
Level 1	\$150.00	\$175.00	\$350.00	\$450.00	\$100.00
Level 2	\$225.00	\$250.00	\$500.00	\$600.00	\$100.00
Level 3	\$300.00	\$325.00	\$650.00	\$750.00	\$100.00

- The number of consecutive, non-conforming months determines the table **column** that applies
- The current month’s non-conformance level determines the table **row** that applies
- Escalations will be capped at month 12 [section 8.2]
- Specifies that all payments are to be made to individual CLECs affected by non-conforming performance levels and thus removes the concept of separate “tiers” of payments (i.e., Tier 1 and Tier 2) [in section 2.1 and throughout the document where tiers are currently mentioned]

² The other, currently existing level (Level 1) consisting of the current base payment increments.

- Identifies 9 payment-eligible and 18 Diagnostic (i.e., non-payment-eligible) PIDs, and also 10 payment-eligible products [section 3.0], as described below under PID changes
 - Thus removing 25 PIDs entirely, and
 - Eliminating the “reinstatement/removal” process
- Removes the annual Minimum Payments and Low Volume, Developing Markets provisions
- Standardizes the statistical methods and parameters across all states in which CenturyLink QC has PAPs, based on the original Colorado PAP [sections 4.0 and 5.0]
 - With a few exceptions, this represents no change to the way in which statistical methods function in the PAPs
 - Those exceptions that do constitute differences with other states’ PAPs are:
 - Arizona Only: Replaces the table of statistical critical values with the critical values used in all other states [section 5.0, Table 1: Critical Z-Value]
 - Colorado and Minnesota Only: Replaces section 6.0, along with its Table 2 variance factors and six-month averaging of retail comparative results, with the three-tiered severity level payment structure (as also mentioned above in the description of the three-tiered severity-level payment structure)
 - All States Except Colorado: For submeasurements that report for Zones 1 and 2, adds to the section 4.0 statistical methodology the procedure of combining volumes from both zones for purposes of statistical testing (*Note: Colorado currently already has this*)
 - In addition, while not constituting a difference with any state’s current PAP, this standardization also clarifies existing and continuing procedures for submeasurements that have data points of 30 or fewer, describing the types of permutation testing that apply [section 4.5], namely:
 - For submeasurements reported as intervals, a standard type of permutation test applies, as defined and described in the PAP
 - For submeasurements reported as percentages, another type of permutation test that is called the “exact proportions test” applies, which is also described in the PAP
- For Colorado, Iowa, and Wyoming only, revises provisions governing the Special Funds (*which were originally created from the former Tier 2 payments [and, in Wyoming, from a portion of former Tier 1 payments], in recognition of the elimination of payment tiers from the PAP*) to address the disposition of amounts remaining in the fund accounts) [section 9.0] (*Note: no other states have special funds*)
- Sets the annual payment caps at levels specified for each state [section 10.1]
- For all states except Colorado: Modifies the timing required for making payments [section 11.1.1] and payment reporting [section 11.3.1] for DS1-Capable Loops and EELs-DS1 in order to accommodate a provision calling for CenturyLink to pay the larger of the MR-8 Trouble Rate amount and the sum of the OP-5 New Service Installation Quality and MR-7 Repair Repeat Reports amounts (the latter two of which are reported one month later than other performance results, since they cover current and next-month data) (*Note: these provisions are already in place in Colorado*)
- For Colorado, Minnesota, Washington, and Nebraska, changes the form of PAP payments to credits on CLEC bills, whereas these states currently call for payments by check (*Note: other states already call for payments via bill credits*) [section 11.2]
- Sets the interest rate applicable to late payments and underpayments at the U.S. Treasury rate in place at the beginning of the current calendar year, unless the Commission has established a different, up-to-date rate for customer deposits, in which case that rate will be used [section 11.4 specifies which states are considered in the latter category]

- Refines the dispute resolution process [section 16.0] and change provisions [section 17.2] to be more consistent across all states, including reducing unnecessary burdens on state commissions by continuing to require attempts to settle and allowing uncontested changes to be adopted in a streamlined fashion

Effective Date for Changes

The Settling Parties propose that the effective date for all changes in all states should be January 1, 2014 (*except in Colorado, where all but the three-tiered severity-level payment structure will take effect on July 1, 2013, with the remainder on January 1, 2014*)

PIDs – Categories and Descriptions of Changes

A. PIDs that will be PAYMENT ELIGIBLE – 9 PIDs remain payment eligible in the redesigned PAP:³

- PO-5 FOCs on Time
- OP-3 Install Commitments
- OP-4 Install Interval
- OP-5 New Svc Install Quality⁴
- OP-8 LNP Timeliness
- MR-5 Troubles Cleared Timely
- MR-6 Mean Time to Restore
- MR-7 Repair Repeat Report Rate
- MR-8 Trouble Rate

B. PIDs that will be DIAGNOSTIC – 18 PIDs will be retained for reporting only (i.e., not payment eligible):³

- GA-1 Gateway Availability-LSR
- GA-3 Gateway Availability-Repair
- GA-4 Gateway Availability-ASR
- GA-7 Timely Outage Restoral
- PO-1 Pre-Ord./Ord. Response⁶
- PO-2 Flow Through^{5,6}
- PO-3 Reject Interval⁶
- PO-9 Jeopardy Notices⁶
- OP-15 Delay Intervals
- MR-11 LNP Troubles
- MR-9 Repair Appt Met
- BI-2 Invoice Times⁶
- BI-3 Billing Accuracy⁶
- BI-4 Billing Completeness⁶
- DB-1b Database Time-LIDB
- DB-1c Database Time-Listings
- NI-1 Trunk Blocking
- CP-2 Collocations Completed

C. PRODUCTS that will be REPORTABLE – 11 products will continue to be reported and 10 will be payment eligible if the related sub-measurement is not Diagnostic:⁷

- EEL-DS1
- LIS Trunks
- 2-Wire Non-Loaded Loops
- Analog Loops
- DS1-Capable Loops
- Sub-Loops
- xDSL-I Capable Loops
- ADSL-Compatible Loops
- LNP
- Resale Residence
- Resale Business (MR-5 only, Diagnostic)

D. SYSTEM-AGNOSTIC LANGUAGE CHANGES – Make PID language invulnerable to replacements of systems being measured by PIDs, to the extent possible:

- a. Permits future system replacements, if any, to be measured in the PIDs without triggering PID changes
- b. As also noted in footnote 3 below, this permits combining GA-1 with GA-8, and GA-3 with GA-6, which originally differed only by system names

³ The following PIDs will be discontinued completely: GA-6 (Gateway Availability-GUI Repair) and GA-8 (Gateway Availability-IMA XML) (via combining the reporting of GA-6 into GA-3 and GA-8 into GA-1), PO-4 (LSRs Rejected), PO-6 (Work Completion Notice Timeliness), PO-7 (Billing Completion Notice Timeliness), PO-8 (Jeopardy Notice Interval), PO-15 (Due Date Changes), PO-16 (Release Notice Time), PO-19 (SATE Accuracy), PO-20 (Svc Order Accuracy), OP-2 (Call Center Answer Time-Provisioning), MR-2 (Call Center Answer Time-Repair), OP-5B/T/R (New Service Quality)⁴, OP-6 (Delayed Days), OP-7 (Hot Cut Interval), OP-13 (Coordinated Cuts Timeliness), OP-17 (LNP Disconnect Timeliness), MR-3 (OOS Cleared < 24 hours), MR-4 (Troubles Cleared < 48 hours), MR-10 (Customer-caused Troubles), BI-1 (Usage Timeliness), DB-1A (Time to Update Databases-E911), DB-2 (Database Accuracy), DA-1 (Directory Asst. Answer Time), OS-1 (Operator Answer Time), NP-1 (NXX Activation), CP-1 (Collocation Interval), CP-3 (Collocation Feasibility Study Interval), and CP-4 (Collocation Feasibility Study Commitments Met).

⁴ The continuing OP-5 PID will be renamed from the current, “New Service Quality,” to become, “New Service Installation Quality,” which is currently the OP-5A title. Thus, the new OP-5 is the same as the current OP-5A.

⁵ PO-2 was already Diagnostic via “reinstatement/removal” provisions (which provisions the redesigned PAP removes).

⁶ In New Mexico, all Pre-Order (“PO-n”) metrics, BI-2, BI-3, and BI-4 are already Diagnostic.

⁷ The following products will cease being reported: Resale products (except Res and Bus as listed above), UNE-P (all types), Line Splitting, Loop Splitting, Line Sharing, Unbundled Dedicated Interoffice Transport (UDIT), 4-wire Non-loaded Loops, ISDN-capable Loops, DS3 and higher Loops, Dark Fiber, Loops with Conditioning, E911/911 Trunks, Enhanced Extended Loops (EELs, at DS0 and DS3 levels, with DS1 remaining reportable and, as applicable, payment eligible).

E. STANDARDS and PID PROVISIONS – Modifies/Updates specified standards and provisions

- a. Updates the volume threshold for LNP in PO-5 (FOC Timeliness) to reflect current standard intervals
- b. Adjusts benchmark standards affected by making Sub-Loops payment eligible

F. MODIFY MR-5 – Changes title of MR-5 (“All Troubles Cleared in 4 Hours”) to “Troubles Cleared in Specified Intervals.”

- a. This makes possible the negotiated additions of products to MR-5, which were previously measured in MR-3 (which is proposed to be eliminated in favor of having MR-5 and MR-6 remain)
- b. Thus, the products being added to MR-5 from MR-3 will continue to have MR-3-like visibility through MR-5 on a Diagnostic basis, with the digital loop types being measured against 4 hours, rather than 24 hours as in the current MR-3

Changes to Continuing PIDs as Triggered by Above Change Categories

Performance Indicator Definitions and Changes	Change Categories				
	Changes to Payment-Eligible & Diagnostic	Reportable Products	System Agnostic	Changed Standards	MR-5 Modifications
	A, B	C	D	E	F
GA-1 – Gateway Availability – IMA-GUI					
• Changes the name to “GA-1 – Gateway Availability – LSR”			X		
• Replaces system- and gateway-specific words with generic terms			X		
• Modifies the disaggregation names and descriptions of GA-1A and GA-1D to instead allow the sub-measures to be named in reported results according to the gateway or associated system, such as “GA-1-IMA-GUI” and “GA-1-SIA,” respectively, which thus can change if such systems are replaced in the future			X		
• Integrates the former GA-8 Gateway Availability – IMA-XML measure into GA-1 and reports it as GA-1-XML, which thus can change if such system is replaced in the future (<i>GA-8 currently exists only in Arizona, Colorado, Idaho, Montana, Utah, and Washington, and so other states do not have a GA-8 predecessor for the new GA-1-XML</i>)			X		
• Adds “Availability” language stating, “Prior to turn-up of new systems that replace those addressed in this measurement, parties will work together to establish a time frame for reporting and review of the new measure.”			X		
• Changes the standards to Diagnostic	X				
GA-3 – Gateway Availability – EB-TA					
• Changes the name to “GA-3 – Gateway Availability – Repair”			X		
• Replaces system- and gateway-specific words with generic terms			X		
• Integrates reporting for GA-6 Gateway Availability – GUI – Repair into GA-3 and calls for it to be reported it as GA-3-Repair GUI, which can change if such system is replaced in the future			X		
• Correspondingly modifies the disaggregation name of GA-3 to report the current GA-3 as a sub-measure that reflects the system for which availability is being measured, such as “GA-3-EB-TA,” which can change if such system is replaced in the future			X		
• Adds “Availability” language stating, “Prior to turn-up of new systems that replace those addressed in this measurement, parties will work together to establish a time frame for reporting and review of the new measure.”			X		
• Changes the standards to Diagnostic	X				
GA-4 – System Availability – EXACT					
• Changes the name to “GA-4 – Gateway Availability – ASR”			X		
• Replaces system- and gateway-specific words with generic terms			X		
• Reports results in a manner that reflects availability for systems being measured, such as “GA-			X		

Performance Indicator Definitions and Changes	Change Categories				
	Changes to Payment-Eligible & Diagnostic	Reportable Products	System Agnostic	Changed Standards	MR-5 Modifications
	A, B	C	D	E	F
4 – EXACT,” which can change if the system for processing ASRs is replaced in the future					
<ul style="list-style-type: none"> Adds “Availability” language stating, “Prior to turn-up of new systems that replace those addressed in this measurement, parties will work together to establish a time frame for reporting and review of the new measure.” 			X		
<ul style="list-style-type: none"> Changes the standards to Diagnostic 	X				
GA-7 – Timely Resolution following Software Releases					
<ul style="list-style-type: none"> Replaces system- and gateway-specific words with generic terms (<i>in Iowa, Minnesota, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, and Wyoming, this includes the replacement of the EDI gateway with XML, as previously had been done in the other states</i>) 			X		
<ul style="list-style-type: none"> Changes the standards to Diagnostic 	X				
PO-1 – Pre-Order/Order Response Times					
<ul style="list-style-type: none"> For Arizona, Colorado, Idaho, Montana, Utah, and Washington, changes the sub-measure names from PO-1A to PO-1-IMA GUI and from PO-1X to PO-1-XML to reflect the systems being measured, which can change if the systems are replaced (in other states, PO-1-XML replaces the previous measurement of the EDI gateway) 			X		
<ul style="list-style-type: none"> Changes the standards to Diagnostic 	X				
PO-2 – Electronic Flow-through					
<ul style="list-style-type: none"> Replaces the system-specific reference to “Service Order Processor,” which refers to a system bearing that name, with the lower-case, generic term, “service order processor.” 			X		
<ul style="list-style-type: none"> For Iowa, Minnesota, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, and Wyoming, the system-agnostic changes also reflect the replacement of the EDI gateway with the XML gateway and combining the reporting for both IMA-GUI and XML into one PO-2 measurement result (which previously had been completed in other states) 			X		
<ul style="list-style-type: none"> Reported results will include only Residence Resale, Unbundled Loops (with or without LNP), and LNP, consistent with the proposed product list 		X			
<ul style="list-style-type: none"> Changes the standards to Diagnostic 	X				
<ul style="list-style-type: none"> Eliminates Note 2 that addresses Line Sharing that no longer will be reported 		X			
PO-3 – LSR Rejection Notice Interval					
<ul style="list-style-type: none"> For Iowa, Minnesota, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, and Wyoming, the system-agnostic changes reflect the replacement of the EDI gateway with the XML gateway and combining the reporting of both IMA-GUI and XML into one PO-3X measurement result for local service requests (LSRs) received electronically and rejected manually (which previously had been completed in other states) 			X		
<ul style="list-style-type: none"> Eliminates an outdated, system-specific parenthetical phrase in the Exclusion section and, in AZ, CO, ID, MT, UT, and WA, removes an outdated Availability exception addressing PO-3X 			X		
<ul style="list-style-type: none"> Changes the standards to Diagnostic 	X				
PO-5 – Firm Order Confirmations (FOCs) On Time					
<ul style="list-style-type: none"> Replaces gateway-specific words with generic terms (<i>and in Iowa, Minnesota, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, and Wyoming, this includes the replacement of the EDI gateway with XML, which previously had been completed in the other states</i>) 			X		
<ul style="list-style-type: none"> Eliminates UNE-P from product categories under Disaggregation Reporting 		X			
<ul style="list-style-type: none"> Eliminates an outdated, system-specific parenthetical phrase in the Exclusion section and, in 			X		

Performance Indicator Definitions and Changes	Change Categories					
	Changes to Payment-Eligible & Diagnostic	Reportable Products	System Agnostic	Changed Standards	MR-5 Modifications	
	A, B	C	D	E	F	
AZ, CO, ID, MT, UT, and WA, removes an outdated Availability exception						
<ul style="list-style-type: none"> Revises product groupings to include only those proposed to continue in PIDs 		X				
<ul style="list-style-type: none"> Updates the volume range for LNP within the 24-hour FOC interval category from 1-24 to 1-50 				X		
PO-9 – Timely Jeopardy Notices						
<ul style="list-style-type: none"> Measures in PO-9A (Non-Designed Services) and PO-9B (Unbundled Loops) only those products proposed to continue in PIDs 		X				
<ul style="list-style-type: none"> Eliminates reporting for PO-9D, UNE-P (POTS), consistent with the proposed product list 		X				
<ul style="list-style-type: none"> Changes the standards to Diagnostic and continues to report retail comparative results 	X					
OP-3 Installation Commitments Met						
<ul style="list-style-type: none"> Revises the product list to include only those proposed to continue in PIDs 		X				
<ul style="list-style-type: none"> Applies a 90% standard for Sub-Loop Unbundling across all states 				X		
OP-4 Installation Interval						
<ul style="list-style-type: none"> Revises the product list to include only those proposed to continue in PIDs 		X				
<ul style="list-style-type: none"> Applies a 6-Day standard for Sub-Loop Unbundling across all states (<i>Note: this standard currently applies only in Colorado, but on a Diagnostic basis</i>) 				X		
<ul style="list-style-type: none"> Applies a 5.5-Day standard for Unbundled DS1-Capable Loops across all states (<i>Note: this standard already applies in Arizona, Colorado, Minnesota, New Mexico, South Dakota, Utah, and Washington</i>) 				X		
OP-5 – New Service Quality						
<ul style="list-style-type: none"> Changes name to “OP-5–New Service Installation Quality,” which is currently the title of OP-5A 	X					
<ul style="list-style-type: none"> Eliminates sub-measures OP-5B (New Service Provisioning Quality), OP-5T (New Service Installation Quality Total), and OP-5R (New Service Quality Multiple Report Rate) and related references 	X					
<ul style="list-style-type: none"> Changed system-specific exclusion language into an “e.g.” phrase, preceded by a generic, conceptual description of what is to be excluded and removes language rendered unnecessary by the above elimination of sub-measures 			X			
<ul style="list-style-type: none"> Revises the product list to include only those proposed to continue in PIDs 		X				
<ul style="list-style-type: none"> Changes Sub-Loop standard from Diagnostic to Parity with Retail DS1 Private Line 				X		
<ul style="list-style-type: none"> Removes system-specific words, where remaining generic terms are sufficient 			X			
OP-8 – Number Portability Timeliness						
<ul style="list-style-type: none"> Eliminates a parenthetical phrase in the Exclusion section dealing with products no longer in the PIDs 		X				
OP-15 – Interval for Pending Orders Delayed Past Due Date						
<ul style="list-style-type: none"> Maintains Diagnostic standard and continues to report retail comparative results for OP-15A, while also adding retail information for OP-15B (for the purpose of counting the number of pending orders that were delayed for CenturyLink QC facility reasons, out of the total pending orders counted in the numerator of OP-15A) 				X		
<ul style="list-style-type: none"> Revises the product list to include only those proposed to continue in PIDs 		X				
<ul style="list-style-type: none"> Adds xDSL-I Capable Loop as a Diagnostic product without retail comparative reported 		X				
<ul style="list-style-type: none"> Removes references in the Notes section that no longer relate to products in the PID 		X				

Performance Indicator Definitions and Changes	Change Categories				
	Changes to Payment-Eligible & Diagnostic	Reportable Products	System Agnostic	Changed Standards	MR-5 Modifications
	A, B	C	D	E	F
MR-5 – All Troubles Cleared within 4 Hours					
<ul style="list-style-type: none"> Changes name to “MR-5 – Troubles Cleared within Specified Intervals” in order to accommodate negotiated additions of some Diagnostic products with different intervals 		X			X
<ul style="list-style-type: none"> Changes system-specific exclusion language into an “e.g.” phrase, preceded by a generic, conceptual description of what is to be excluded and removes system-specific terms 			X		X
<ul style="list-style-type: none"> Adds the MR-5X disaggregation for reporting Resale Business Single Line and Sub-Loops 	X				X
<ul style="list-style-type: none"> Revises the product list to include only those proposed to continue in PIDs 		X			X
<ul style="list-style-type: none"> Adds the phrase, “All Troubles Cleared within 4 hours,” after the “Zone Type Disaggregation” title in the Product Reporting category 		X			X
<ul style="list-style-type: none"> Adds three products to “Zone-Type Disaggregation-All Troubles Cleared within 4 Hours”: Unbundled 2-Wire Non-loaded Loops, Unbundled xDSL-I Capable Loops, and Unbundled ADSL Compatible Loops on a Diagnostic basis (as these products were previously measured in MR-3 against a 24-hour interval) 	X	X			X
<ul style="list-style-type: none"> Adds a new Product Reporting category of “Non-disaggregated Reporting – Out of Service Cleared within 24-hours,” to accommodate adding Resale Business Single Line Service and Sub-Loops to this PID on a Diagnostic basis (including the reporting of retail comparatives for Resale Business (i.e., Business Single Line) and for Sub-Loops (i.e., RES & BUS POTS)), in light of the removal of the MR-3 (Out of Service Cleared within 24 hours) 	X	X			X
MR-6 – Mean Time to Restore					
<ul style="list-style-type: none"> Changes system-specific exclusion language into an “e.g.” phrase, preceded by a generic, conceptual description of what is to be excluded and removes system-specific references where no longer necessary 			X		
<ul style="list-style-type: none"> Revises the product list to include only those proposed to continue in PIDs 		X			
<ul style="list-style-type: none"> Changes retail comparative for Sub-Loops to be parity with RES & BUS POTS and adds a Note 1 that provides for changing the retail comparative to Retail DS1 Private Line, if the standard repair interval changes to 4 hours for Sub-Loops 		X		X	
<ul style="list-style-type: none"> Removes the current Note 1 that is outdated 		X			
MR-7 – Repair Repeat Report Rate					
<ul style="list-style-type: none"> Changes system-specific exclusion language into an “e.g.” phrase, preceded by a generic, conceptual description of what is to be excluded 			X		
<ul style="list-style-type: none"> Revises the product list to include only those proposed to continue in PIDs 		X			
<ul style="list-style-type: none"> Changes retail comparative for Sub-Loops to Retail DS1 Private Line (<i>Currently, this is Diagnostic in all states except Colorado, which applies retail ISDN-BRI as the parity standard</i>) 				X	
<ul style="list-style-type: none"> Deletes outdated Availability and Notes statements 		X			
MR-8 – Trouble Rate					
<ul style="list-style-type: none"> Changes system-specific exclusion language into an “e.g.” phrase, preceded by a generic, conceptual description of what is to be excluded 			X		
<ul style="list-style-type: none"> Revises the product list to include only those proposed to continue in PIDs 		X			
<ul style="list-style-type: none"> Changes retail comparative for Sub-Loops to Retail DS1 Private Line (<i>Currently, this is Diagnostic in all states except Colorado, which applies retail ISDN-BRI as the parity standard</i>) 				X	
<ul style="list-style-type: none"> Retains the 3-tier standard for Unbundled DS1-Capable Loops and EEL-DS1s in Colorado only (per Note 1), while retaining Retail DS1 Private Line as the parity standard in other states 				X	

Performance Indicator Definitions and Changes	Change Categories				
	Changes to Payment-Eligible & Diagnostic	Reportable Products	System Agnostic	Changed Standards	MR-5 Modifications
	A, B	C	D	E	F
MR-9 – Repair Appointments Met					
<ul style="list-style-type: none"> Changes system-specific exclusion language into an “e.g.” phrase, preceded by a generic, conceptual description of what is to be excluded 			X		
<ul style="list-style-type: none"> Revises the product list to include only those proposed to continue in PIDs 		X			
<ul style="list-style-type: none"> Changes the standards to Diagnostic and retains reporting of retail comparative results 	X				
MR-11 – LNP Trouble Reports Cleared within Specified Timeframes					
<ul style="list-style-type: none"> Removes reference to “business,” consistent with proposed product list 		X			
<ul style="list-style-type: none"> Changes the standards to Diagnostic 	X				
BI-2 – Invoices Delivered within 10 Days					
<ul style="list-style-type: none"> Revises the products listed to include only those proposed to continue in PIDs 		X			
<ul style="list-style-type: none"> Changes the standards to “Diagnostic (Parity by Design)” 	X				
BI-3 – Billing Accuracy – Adjustments for Errors					
<ul style="list-style-type: none"> Revises the products listed to include only those proposed to continue in PIDs 		X			
<ul style="list-style-type: none"> Changes the standards to Diagnostic 	X				
BI-4 – Billing Completeness					
<ul style="list-style-type: none"> Revises the products listed to include only those proposed to continue in PIDs 		X			
<ul style="list-style-type: none"> Changes the standards to Diagnostic but continues to provide retail comparative results for BI-4A 	X				
DB-1 – Time to Update Databases					
<ul style="list-style-type: none"> Replaces system-specific words, where applicable, with generic terms 			X		
<ul style="list-style-type: none"> Revises the products referenced to include only those proposed to continue in PIDs 		X			
<ul style="list-style-type: none"> Changes the standards to Diagnostic 	X				
NI-1 – Trunk Blocking					
<ul style="list-style-type: none"> Changes the standards to Diagnostic but also continues to report retail comparative results for NI-1A and NI-1B 	X				
<ul style="list-style-type: none"> Adds “or equivalent” concept to references made to “TGSRs” 			X		
<ul style="list-style-type: none"> Deletes outdated Note 5 and other outdated note language 				X	
CP-2 – Collocations Completed within Scheduled Intervals					
<ul style="list-style-type: none"> Changes the standards to Diagnostic 	X				