

BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

In the Matter of the Investigation Into)	DOCKET NO. UT-003022
)	
U S WEST COMMUNICATIONS, INC.'s)	
)	
Compliance With Section 271 of the)	
Telecommunications Act of 1996)	DOCKET NO. UT-003040
.....)	
)	
In the Matter of)	
)	43 RD SUPPLEMENTAL ORDER;
U S WEST COMMUNICATIONS, INC.'s)	APPROVING QWEST'S
)	REQUEST FOR ACCEPTANCE
Statement of Generally Available Terms)	OF PERFORMANCE MEASURE
Pursuant to Section 252(f) of the)	PO-20, WITH CONDITIONS
Telecommunications Act of 1996)	
)	
.....)	

I. SYNOPSIS

1 *In this Order, the Washington Utilities and Transportation Commission approves Qwest Corporation's request for acceptance of a performance measure, PO-20, for inclusion in the Qwest Performance Assurance Plan, to become effective upon the effective date of the plan. Because the measure has not been developed in the same collaborative manner as all other performance measures, measure PO-20 will be subject to intensive review and possible changes during any collaborative multi-state review of performance measures and the six-month review process, if necessary.*

II. MEMORANDUM

2 **Procedural Background.** On August 20, 2002, Qwest Corporation (Qwest) filed a pleading with the Washington Utilities and Transportation Commission (Commission), requesting that the Commission approve a new performance measurement, PO-20, and payment schedule for inclusion in the Qwest Performance Assurance Plan (QPAP). Performance Measurement PO-20 measures Qwest's performance in accurately processing manual service orders, and is designed as a 95

percent benchmark measure, with payments for non-compliance made to the states. On August 22, 2002, AT&T filed with the Commission Comments on Qwest's Proposed PO-20 Measurement. On August 28, 2002, AT&T and WorldCom filed with the Commission Comments on Qwest's Proposed PO-20 Measurement, requesting that the comments dated August 28, 2002, replace AT&T's comments dated August 22, 2002. On September 16, 2002, Qwest filed with the Commission its Response to AT&T and WorldCom's Comments on PO-20.

3 **Qwest's Request.** Qwest asks the Commission to approve the new performance measure for inclusion in the QPAP upon the effective date of the QPAP. Qwest agreed in *ex parte* comments filed with the Federal Communications Commission (FCC) to ask each state to include the proposed measure in the QPAP. Qwest states that it began reporting results for the new measure PO-20 in July 2002. Qwest states that the filing does not preclude the opportunity for parties and states to consider changes to the measure during a multi-state collaborative effort known as the long-term performance indicator definition, or PID, forum, or during a six-month review.

4 **AT&T and WorldCom Comments.** AT&T and WorldCom object to Qwest unilaterally developing a performance measure for manual service order accuracy. AT&T and WorldCom assert that the performance measure should be developed in a collaborative forum, as were other PIDs used in the QPAP for measuring Qwest's performance.

5 AT&T and WorldCom also object to various aspects of Qwest's proposed performance measure: 1) The order entries should be compared to the post-provisioning Customer Service Record (CSR), not the resulting service order; (2) The scope of products and services addressed by the measure is too limited; (3) The scope of service order fields to be examined is too limited; and (4) The proposed Tier 2, i.e., state, payment amounts are too low. AT&T and WorldCom also state that Qwest's methods and procedures for collecting data for the PO-20 measure are not clear. Finally, AT&T and WorldCom assert that the measure should be a Tier 1 measure for which payments are made to individual competitive local exchange carriers (CLECs), rather than the states.

6 **Qwest's Response.** In response, Qwest asserts that PO-20 was developed to address issues raised by KPMG during the course of the Regional Oversight Committee's (ROC) Operations Support Systems (OSS) test. Qwest agrees that the proposed

measure does not include all of the products and fields measured in similar performance measures developed by Verizon and Southwestern Bell, but asserts that measure PO-20 allows for additional phases of development that may include expansion of products and fields. Qwest asserts that PO-20 should be implemented now, despite the omission of certain products and fields.

7 Qwest asserts that the comparison of local service requests to resulting service orders is appropriate, as the measure is intended to determine whether Qwest has accurately processed the service order. Qwest explains some of the methods and procedures for collecting and compiling data on the new measure. Finally, Qwest asserts that the payment levels for the new measure are consistent with those in other states, and that that the payments would be made to fourteen states as PO-20 is a region-wide measure. Qwest requests that the Commission approve the measure “in light of the positive benefits to CLECs and the states and the ability of CLECs to seek further modification through a collaborative process or at the six-month review.”

8 **Discussion and Decision.** We are concerned that Qwest has requested approval of measure PO-20 for inclusion in the QPAP without the benefit of collaborative discussions with interested CLECs and members of the former ROC Technical Advisory Group (TAG). All other performance measures were discussed and developed in a collaborative fashion. The issue of manual service order accuracy, and Qwest’s failure to address that issue during the OSS test, were serious enough to cause this Commission to request that the FCC give lesser weight to performance data for measure OP-4. *See 39th Supplemental Order*, ¶ 58. In their comments filed on August 28, 2002, AT&T and WorldCom identify a number of concerns, and significant omissions, in the design of the measure. Qwest recognizes in its response that the measure will need to be modified to address the concerns over Qwest’s accuracy of manually handling service orders.

9 Because Qwest agrees that the measure will be subject to review and modification during the six-month reviews and any multi-state collaborative discussions that may occur prior to a six month review, we approve Qwest’s proposed performance measure, PO-20, as an interim measure for inclusion in the QPAP to become effective on the effective date of the QPAP. Including the measure in the QPAP on an interim basis will allow some measure of Qwest’s performance in manually handling service orders. Any resulting payments should create an incentive for Qwest to improve its performance in this area. We approve measure PO-20 on condition, however, that

Qwest work collaboratively with interested CLECs and other members of the ROC TAG to extensively refine and modify the measure prior to any six-month review at this Commission and that the measure be subject to extensive review and modification during the six-month review.

II. ORDER

10 IT IS ORDERED That Qwest's request to include a new performance measure, PO-20, in Section 7.4 of the QPAP is approved on an interim basis, on the condition that Qwest work collaboratively with CLECs and other members of the ROC TAG to refine and modify the measure prior to any six-month review before this Commission. Further, the measure is subject to review and modification at the six-month review and any multi-state collaborative review of performance measures to address, at a minimum, the concerns raised by WorldCom and AT&T.

DATED at Olympia, Washington and effective this ____ day of September, 2002.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

MARILYN SHOWALTER, Chairwoman

PATRICK J. OSHIE, Commissioner

NOTICE TO PARTIES: This is a final order of the Commission. In addition to judicial review, administrative relief may be available through a petition for reconsideration, filed within 10 days of the service of this order pursuant to RCW 34.05.470 and WAC 480-09-810, or a petition for rehearing pursuant to RCW 80.04.200 or RCW 81.04.200 and WAC 480-09-820(1)