

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

In the Matter of:) DOCKET NO. UT-990261
)
An Inquiry to Determine Whether There is a)
Need for Commission Rules on the Subject of)
Carrier to Carrier Service Standards for)

SUPPLEMENTAL COMMENTS OF U S WEST

INTRODUCTION AND SUMMARY

On September 10, 1999, the Washington Utilities and Transportation Commission (Commission) issued a Notice Of Opportunity To File Supplemental Comments (Supplemental Notice) in the above-captioned proceeding. Consistent with its position stated in its initial comments and the July 16, 1999 workshop in this proceeding, U S WEST Communications, Inc. (U S WEST), views the opening of a rulemaking to address the subject matter of this inquiry to be unnecessary.

In its Supplemental Notice, Commission Staff acknowledged its active consideration of proposing rules modeled on the New York Public Service Commission Order Establishing Permanent Rule on service quality standards (entered June 30, 1999). U S WEST is opposed to the utilization of rules regulating other ILECs as models in Washington, including, but not limited to rules regulating Bell Atlantic, Southwestern Bell or Pacific Tel, because those companies operate differently and have capabilities

which differ from those of U S WEST.

U S WEST believes that rules which are primarily intended to regulate U S WEST should reflect U S WEST's operating capabilities and performance measurements.

U S WEST also suggests that the intent of the rules should be apparent and reasonably calculated to satisfy the intent of the rules.

U S WEST presents a list of basic performance indicators for consideration in proposed rules. While other performance indicators are possible, U S WEST suggests that they should be included in contracts which are subject to the federal "pick and choose" laws and regulations and, therefore, generally available to all CLECs.

A RULEMAKING IS NOT NECESSARY TO SPUR COMPETITION

In its Supplemental Notice, Commission Staff indicates that it has preliminarily concluded that carrier to carrier service quality rules are necessary in the State of Washington. However, the necessity of such rules was not made apparent in the July 16, 1999 workshop held by the Commission because there was no compelling demonstration that competition had been impaired as a result of alleged unlawful discrimination by U S WEST.

Indeed, no CLEC could or did deny that competition in the State of Washington is increasingly robust. U S WEST presented incontrovertible evidence of the growth of competition and the potential for further competitive growth given the high capacity installations which the CLECs are making in Washington. While some CLECs complained of potential problems, in no instance did they claim that they have lost out on a competitive opportunity as a result of any alleged discrimination in U S WEST's provision of service to the CLECs.

For all of the reasons set forth in U S WEST's initial comments and those herein, U S WEST respectfully disagrees with Staff's preliminary conclusion that a carrier-to-carrier rulemaking is warranted.

U S WEST'S REACTION TO "NEW YORK" STYLE AND OTHER STATE RULES

In its Supplemental Notice, Staff indicated that it is considering proposing rules similar to the rules of the New York Public Service Commission (“New York PSC”) (attached to the Supplemental Notice). Additionally, Staff solicited opinions on using other states’ rules as models, including New York, California, Texas and Utah. Because the State of Utah’s rules are considered by that Commission, for the most part, to be guidelines which are still pending, U S WEST’s remarks herein will focus on the other aforementioned jurisdictions.

U S WEST believes that it is inappropriate and inconsistent with other actions of this Commission to utilize the rules of the aforementioned states as models for the State of Washington. Actions taken in other states were based upon regulating ILECs other than U S WEST. Additionally, this Commission has affirmatively expressed its desire to take a different approach to carrier to carrier rulemaking than that taken by other states.

In the rulemakings in New York, California and Texas, the primary ILECs, which those Commissions were regulating were Bell Atlantic, PacTel and Southwestern Bell, respectively. Each of those ILECs had operations and systems that were unique to their respective companies.

In none of those states did the Commissions attempt to adopt rules applicable to other companies. Instead, in each of those states, recognizing the unique nature of the ILECs which they regulate, the Commissions engaged in extensive and time-consuming workshops resulting in a full opportunity to consider the uniqueness of the ILEC which they regulated. In reviewing these proceedings, one of the significant differences between the ILECs was the ILECs’ differing capabilities and the varied nature of their performance measurements. The dissimilarities between the ILECs resulted in rules that are quite dissimilar. More importantly, those dissimilarities also exist with regard to U S WEST.

The rules of other states, applicable to other ILECs, should not be looked to as models for the State of Washington. The rules in other states reflect details that are unique to those ILECs; those detailed findings are inappropriate for application to U S WEST. In fact, it is noteworthy that even within the regions served by Bell Atlantic and Southwestern Bell, other state commissions have not adopted or used, the rulings of the New York and Texas commissions as models within their states, presumably because of even greater differences between the states served by the same ILECs. Certainly there are differences which U S WEST experiences in providing services within the fourteen states where U S WEST does business.

Utilization of the far too detailed rules from other states applicable to uniquely different ILECs is

contrary to the direction of this Commission. In June of this year, the Commissions in thirteen of the fourteen states served by U S WEST (“Regional Oversight Committee” or “ROC”) sent a letter to U S WEST proposing a region-wide collaborative test of U S WEST’s operational support systems (OSS). U S WEST has agreed to participate in this collaborative effort. The scope of that OSS testing is to include, among other things, performance measures. This Commission is one of thirteen states supporting such an approach. Indeed, a member of the Joint Commission Executive Committee of the ROC overseeing this collaborative test is this Commission’s Chairwoman, Ms. Marilyn Showalter.

It is very inconsistent for Staff to support the adoption of rules applicable to other companies when this Commission is supporting a “U S WEST” approach to reviewing the access that U S WEST provides to OSS, as well as the U S WEST performance measures. A further demonstration of this inconsistency is Staff’s preliminary conclusion to utilize the Bell Atlantic-New York rules as a model even though for formatting its test, the ROC had preliminarily determined that it would not utilize the New York OSS test format as its format for the ROC OSS test.

It is premature for Staff to enter into a rulemaking when the ROC process appears to be headed in a different direction. Staff’s direction will divert resources of Staff, U S WEST and the CLECs from the ROC’s U S WEST region-wide effort on OSS testing. Even if Staff were to focus this proceeding primarily on performance measurements, this may also be inconsistent with the ROC’s preliminary plans to include performance measurements as part of its collaborative testing efforts.

While the ROC collaborative testing effort is only at a preliminary stage, it would be counterproductive and inconsistent for Staff’s effort in this proceeding to start down a different path at this time. Instead, Staff should monitor the progress of the ROC collaborative testing effort in order to be consistent with the ROC’s policy direction. Moreover, as the subject of carrier to carrier service quality evolves through the ROC collaborative testing process, the Arizona Joint OSS test efforts (which also have a proposed performance measurement component), and interconnection agreements which will come before the Commission for approval. Those learnings will likely lead to better results in Washington compared to starting from documents from other states relating to other ILECs. Furthermore, remaining in synchronization with the ROC effort will keep this Staff consistent with this Commission.

PRINCIPLES AND OBJECTIVES FOR THIS RULEMAKING

U S WEST does not believe that Staff should propose rules without an understanding, if not an agreement, on what principles and objectives should be applied to the rules. At best, to date Staff's documentation has implied that Staff feels that there should be more local exchange telecommunications competition. In response, Staff appears to be seeking a proposed solution that it hopes will accelerate changes in the marketplace.

U S WEST does not believe that Staff's approach is sound. Nevertheless, if the objective of a carrier to carrier service quality rulemaking is to ultimately facilitate increased local exchange telecommunications competition, some principles for the rules should be apparent, if not articulated. U S WEST suggests some principles below:

First, U S WEST supports service quality rules that are limited to specifying basic performance indicators which should be reported by all participants in the marketplace, U S WEST and CLECs alike. U S WEST believes that specific operational issues are best handled in contracts and through the carriers' operational practices. U S WEST recognizes that some state commissions, such as this Commission, are authorized to resolve disputes between the CLECs and U S WEST and that any additional rules need not necessarily focus on that process.

Second, U S WEST believes that the rules should avoid a scope that, in effect, micromanages the businesses and business relationships of U S WEST and the CLECs. As is evident in the hundreds of thousands of pages generated in judicial and regulatory proceedings throughout the country, the extensive amount and level of detail placed before courts and Commissions has not necessarily encouraged additional competition.

Third, U S WEST believes that this Commission should remain consistent with the principles of the Telecommunications Act that there be no unlawful discrimination for functions that have retail comparatives or analogues. This Commission should not prescribe absolute levels of performance for these types of functions as frequently advocated by CLECs. Consistent with this belief, U S WEST supports a nondiscrimination standard for resold finished services provisioning and repair, Local Interconnection Services (LIS) trunking provisioning and repair, as well as unbundled loop repair because all of those functions have, or arguably have, comparable or analogous retail functions. The prescription of absolute performance levels potentially result in an unlawful requirement for U S WEST to provide superior service to the CLECs, contrary to the Telecommunications Act of 1996.

With regard to comparisons, U S WEST and most CLECs acknowledge that when comparisons are made, there needs to be statistical equivalency between the performance results for the ILEC's "retail" customers and the performance results for the ILEC's "wholesale" customers. While there is agreement in principle between the ILECs and CLECs with regard to statistical equivalency, there is often debate about which statistical test should be applied in given circumstances and what the level of confidence should be for the statistical findings.

Fourth, in those instances in which there is not a comparable or analogous retail function, U S WEST is supportive of the establishment of "benchmark" levels that are "reasonable and achievable," rather than arbitrarily predetermined levels frequently advocated by the CLECs. "Reasonable and achievable" benchmark levels would not be established by deferring to performance levels established by or for other ILECs, or even U S WEST's performance in other states. Instead, if rules are to be adopted by this Commission, U S WEST strongly encourages this Commission to adopt "reasonable and achievable" (by U S WEST) benchmark levels based upon U S WEST's results in Washington. If and when appropriate, U S WEST will propose such benchmark levels in a rulemaking proceeding in this State. The adoption of "reasonable and achievable" benchmarks meets the CLECs market needs for foreseeable expectation and their business needs for a meaningful opportunity to compete.

Fifth, U S WEST believes that any rules should facilitate correction of practices that result in unlawful discrimination, rather than exclusively focus on punishment. Both fines and contractual self-executing remedies are simply a form of penalty that do not assist in correction. Fines and contractual self-executing remedies divert resources that could be applied to correction. Moreover, fines and self-executing penalties are an inexact, insufficient and inappropriate substitute to the exercise of good judgment. A strict liability standard unfairly penalizes U S WEST when there may have been CLEC-caused reasons or force majeure circumstances for results not being statistically equivalent. Parties that believe that they have been injured should exercise their recourse through the courts, this Commission and through means otherwise agreed to by the parties in the CLEC's interconnection agreements with U S WEST. Accordingly, U S WEST believes that this Commission should avoid the adoption of penalties or requiring "self-executing" remedies payable to the CLECs as part of its rules.

Finally, U S WEST believes that this Commission should not attempt to establish a set of permanent rules from the onset. Instead, this Commission should try to work through the issues on a trial basis. U S WEST recommends that this Commission recognize the need to allow developmental lead time, especially if any new performance indicators are to be developed as part of a rulemaking proceeding.

U S WEST'S PROPOSALS CONCERNING RULES

U S WEST includes these comments in the event that Staff wishes to pursue its current course of action even though such action will not necessarily result in increased competition and is contrary to the policy direction of this Commission. As stated in the preceding section, U S WEST believes that carrier to carrier service quality rules should be limited to the requirement for carriers to provide each other information as reflected below. This proposal is written from the perspective of U S WEST's capability to provide the information discussed below. More detailed information concerning U S WEST's proposals is attached hereto as Appendix A.

A. Main Performance Indicators

U S WEST proposes that the Commission incorporate in its rules a limited number of performance indicators. A group of Main Performance Indicators would be focused on answering several key questions relating to the end-user's receipt of U S WEST telecommunications services or facilities through the CLECs. Those questions are:

Did the end-user customer receive service availability from U S WEST when U S WEST advised the CLEC that service availability was to be expected?

What was the length of time that it took for U S WEST to make a service available to the end-user customer, assuming facilities were in place?

If a customer was without service on a voice line (non-designed), was service restored within twenty-four hours?

If a customer had service but was having trouble on a voice line (non-designed), was that trouble cleared within forty-eight hours?

If a customer was out of service or having any trouble with a data line (designed), was that condition or trouble cleared within four days?

U S WEST provides the bulk of its voice services through single call, non-designed two-wire copper pairs of lines. For a variety of reasons, U S WEST is unable to repair those lines within four hours. Those reasons include the inability of U S WEST technicians to get access to a customer's premises, inability to mutually arrange joint testing with another exchange carrier or interexchange carrier, safety limitations such as telephone pole climbing at night, municipality prohibitions against entering into manholes during morning or evening rush hour traffic. Therefore, the intervals for non-design repair are longer than the intervals for high traffic designed facilities.

Those Main Performance Indicators and their purpose specifically would be:

1. Installation Commitments Met

Purpose:

To evaluate the extent to which U S WEST installs services for or on behalf of CLECs by the scheduled due date.

2. Installation Interval

Purpose:

To evaluate the timeliness of U S WEST's installation of services for CLECs, focusing on the average time to install service.

3. Out of Service Cleared within 24 hours – Non-designed Repair Process

Purpose:

To evaluate timeliness of repair for non-designed services, focusing on cases where the out of service cases were resolved within the standard estimate for non-designed services (i.e., 24 hours for out-of-service conditions).

4. All Troubles cleared within 48 hours – Non-Designed Repair Process

Purpose:

To evaluate timeliness of repair for non-designed services, focusing on trouble cases of all types (both out of service and service affecting) and on the number of such cases resolved within the standard estimate for non-designed services (i.e., 48 hours for service-affecting conditions).

5. All Troubles Cleared within 4 hours – Designed Repair Process

Purpose:

To evaluate timeliness of repair for designed services, focusing on all trouble cases of all types (including out of service and service affecting troubles) and on the number of such cases resolved within the standard estimate for designed services (i.e., 4 hours).

The Main Performance Indicators would be applied to the following product group categories:

Residence POTS

Business POTS

Centrex

ISDN – Basic “POTS”

ISDN – Basic Designed

ISDN – Primary Rate

Digital Switched Service

Direct Inward Dialing

PBX Trunks

DS0

DS1

DS3

Local Interconnection Service (LIS) Trunks

Unbundled Loop

Unbundled Dedicated Interoffice Transport
Unbundled Switch
Collocation (Installation Commitment Met and Installation Interval)

As of the time of this filing, U S WEST is aware that the recent “Open Meeting” of the Federal Communications Commission in which the subject of the “UNE Remand” of the United States Supreme Court’s order was discussed. U S WEST anticipates that its product group categories list will expand.

B. Supplemental Performance Indicators

U S WEST also proposes to incorporate in Commission rules additional performance indicators that reflect certain operational aspects of the interaction between U S WEST and the CLECs. Those interactions include:

Information concerning the interaction between CLEC customer service personnel and U S WEST, either electronically or telephonically; and

Information concerning the operations of the network.

Those Supplemental Performance Indicators and their purpose would be:

Supplemental Performance Indicators: Customer Service Interactions

1. Gateway Availability – via Human-to-Computer Interface

Purpose:

To evaluate the quality of CLEC access to the specified electronic gateway, focusing on the extent to which the gateway is actually available to CLECs.

2. Gateway Availability – via Computer-to-Computer Interface

Purpose:

To evaluate the quality of CLEC access to the specified electronic gateway, focusing on the extent to which the gateway is actually available to CLECs.

3. Pre-Order / Order Response Times

Purpose:

To evaluate the timeliness of CLEC access to U S WEST's operational support systems in carrying out pre-ordering and ordering functions, focusing on specific transaction types through the specified gateway interface.

4. Electronic Flow-through of Local Service Requests (LSRs) to the Service Order Processor

Purpose:

To monitor the extent to which U S WEST's processing of CLEC LSRs is completely electronic, focusing on the degree to which electronically-transmitted LSRs flow directly to the service order processor without human intervention or without manual retyping. To make available diagnostic information to help address potential issues that might be raised by the core performance indicators of commitments met and installation intervals.

5. Firm Order Confirmation (FOC) Interval

Purpose:

To monitor the timeliness with which U S WEST returns FOCs to CLECs, to make available diagnostic information to help address potential issues that might be raised by the core performance indicators of commitments met and installation intervals.

6. LSRs Rejected

Purpose:

To monitor the extent to which electronic LSRs are rejected, as a percentage of all electronic LSRs to make available diagnostic information to help address potential issues that might be raised by the diagnostic indicator of LSR rejection notice intervals.

7. LSR Rejection Notice Interval

Purpose:

To monitor the timeliness with which U S WEST notifies CLECs that electronic LSRs have been rejected, to make available diagnostic information to help address potential issues that might be raised by the core pre-order/order performance indicators.

8. Pre-Order / Order Response Times for U S WEST Retail Transactions

Purpose:

To report the timeliness of retail service representative access to U S WEST's operational support systems in carrying out pre-ordering and ordering functions, focusing on specific transaction types.

9. Order Completion Notifications Transmitted within 24 hours (Under Development)

Purpose:

To report the timeliness of completion notifications, focusing on the percentage of notifications transmitted within 24 hours of the date and time orders are completed.

10. Speed of Answer - Interconnect Provisioning Center

Purpose:

To evaluate the timeliness of CLEC access to U S WEST's interconnection provisioning center(s), focusing on how long it takes for calls to be answered.

11. Calls Answered within twenty seconds - Interconnect Provisioning Center

Purpose:

To evaluate the timeliness of CLEC access to U S WEST's interconnection provisioning center(s), focusing on the extent to which calls are answered within twenty seconds.

12. Speed of Answer – Interconnect Repair Center

Purpose:

To evaluate timeliness of CLEC access to U S WEST's interconnection repair center(s), focusing on how long it takes for calls to be answered.

13. Calls Answered with 20 seconds – Interconnect Repair Center

Purpose:

To evaluate of CLEC access to U S WEST's interconnection repair center(s), focusing on the number of calls answered within twenty seconds.

14. Mean Time to Provide U S WEST Recorded Usage Records

Purpose:

To evaluate the timeliness with which U S WEST provides recorded usage records to CLECs.

15. Mean Time to Deliver Invoices

Purpose:

To evaluate the timeliness with which USW delivers EDI-formatted bills to CLECs.

16. Billing Accuracy – Adjustments for Errors (Under Development)

Purpose:

To evaluate the accuracy with which U S WEST bills CLECs, focusing on the percentage of billed revenue adjusted due to errors.

Supplemental Performance Indicators: Network Operations Interactions

1. Trunk Blocking – Interconnection Trunks

Purpose:

To evaluate factors affecting completion of calls from U S WEST end offices to CLEC end offices, focusing on average busy-hour blocking percentages in interconnection final trunks.

2. Trunk Blocking – Local Interoffice (“Common”) Trunks

Purpose:

To evaluate factors affecting completion of calls from U S WEST end offices to other U S WEST end offices, focusing on average busy-hour blocking percentages in local interoffice final trunks.

3. Delayed Days (average)

Purpose:

To evaluate the extent to which U S WEST is late in installing services for CLECs, focusing on the average number of days that late orders are completed beyond the committed due date.

4. CLEC or CLEC's Customer-caused Installation Misses

Purpose:

To evaluate the extent to which installation misses were caused by CLEC or CLEC's Customer, to make available diagnostic information to help address potential issues that might be raised by the core performance indicators of commitments met and installation intervals.

5. CLEC or CLEC's Customer-caused Trouble Reports

Purpose:

To evaluate the extent to which trouble reports were caused by CLEC or CLEC's Customer, to make available diagnostic information to help address potential issues that might be raised by the core maintenance and repair performance indicators.

C. Discussion of the U S WEST Proposals Concerning Rules

The local exchange telecommunications marketplace has become increasingly competitive since the passage of the Telecommunications Act of 1996. Technological innovations have resulted in increased switching capacity, and greater throughput. Even the traditional pair of copper wire can carry more traffic as bandwidth-splitting capability has improved.

In addition to the significant degree of technological change, we are experiencing a structural change in the telecommunications industry. Examples of this structural change are convergence between interLATA long distance carriers and local exchange carriers, interLATA long-distance carriers and access carriers, interLATA long-distance carriers and wireless carriers, interLATA long-distance carriers and internet service providers, interLATA long-distance carriers and cable television companies, local exchange carriers and wireless carriers, local exchange carriers and other local exchange carriers, nationally and internally.

In an environment experiencing this degree of dynamic change, traditional regulation with extended proceedings and increased complexity is ill equipped to regulate the industry players. Therefore, U S WEST's proposal is based on not over directing the telecommunications companies. Instead, in transition to a fully competitive telecommunications marketplace, U S WEST's proposal supports a focus on end-user outcomes.

The five main performance indicators that U S WEST has proposed reflect the direct experience of the end-user customers. As end user customers think of their purchase of telecommunications service, as well as any other service, they are most interested in receiving what they purchased at a fair price when they wanted it. In those instances when a repair is necessary, the end-user customer is most interested in having it fixed when they were told it would be fixed.

The needs of the end-user are relatively simple compared to the needs of a CLEC. U S WEST has proposed performance indicators that would allow the basic monitoring of the operational relationships between the CLECs and U S WEST. Because each CLEC

has differing approaches to business, their desire for additional and different performance measurement provisions vary. State regulatory rules, however, are not where those needs should be met.

In the course of negotiations, U S WEST has experienced a wide range of requests for performance measurements. Some CLECs have not requested any performance measurements. Other CLECs have requested an extensive degree of performance measurements. Over the past three years, as U S WEST's measurement capabilities have improved, U S WEST has been able and willing to offer a greater number of performance indicators.

This Commission does not need to incorporate every conceivable performance indicator into its rules. Because of the "pick and choose" provisions of the Telecommunications Act of 1996 (47 U.S.C sec. 252 (i)). CLECs may review the performance measurements that other CLECs are receiving and if they desire, receive the same type of measurements. In fact, as demonstrated in the attachment to U S WEST's Initial Comments in the proceeding, U S WEST offers CLECs a greater number of performance indicators that are proposed for these rules. However, there is greater flexibility with contracts compared to rules which allows U S WEST and the CLECs to keep pace with the dynamics of the evolving marketplace, trends in regulation, and ongoing operations.

U S WEST has focused its comments on what it believes to be the appropriate and sole core of carrier to carrier service quality regulation: performance measurement. If the Commission opens a rulemaking proceeding, in U S WEST's view, the initial, if not sole, focus of the proceeding should be in determining appropriate performance measurement indicators for inclusion in the rules.

CONCLUSION

U S WEST has been, and will continue, providing nondiscriminatory services to the CLECs in the State of Washington. Additional regulation will not necessarily further competition but instead will increase cost.

If a rulemaking is opened, it should be based upon U S WEST's operating capabilities and performance measurements, not those of other ILECs outside of the fourteen states where U S WEST Communications principally does business.

The sole focus of the rulemaking should be to identify a basic set of performance indicators that would allow the experience of Washington's end-user customers to be monitored in a carrier to carrier environment. Additionally, a basic set of performance indicators to monitor the interactions between U S WEST and the ILECs might also be considered. However, a rulemaking should not be utilized to impose new and extensive regulatory requirements in such a dynamic telecommunications environment.

APPENDIX A

Main Performance Indicators

1. Installation Commitments Met

Purpose:

To evaluate the extent to which U S WEST installs services for CLECs by the scheduled due date.

Description:

Measures the percentage of orders for which the scheduled due date is met. Includes (inward) C (Change), N (New), and T (Transfer) order types. Original due date matched by completion date is counted as a met due date. A due date missed for standard categories of customer reasons is counted as met. All orders assigned a due date by U S WEST are measured, including orders with customer-requested due dates longer than the standard interval and orders with extended due dates assigned in conjunction with lack of facilities.

Results for non-designed services (Residence POTS and Business POTS) will be disaggregated and reported according to orders involving:

- OP-3A Dispatches within MSAs;
- OP-3B Dispatches outside MSAs; and
- OP-3C No dispatches.

By December 1999, results for designed services (DS0, DS1, DS3, LIS trunks, and Unbundled Loops) will be disaggregated according to installations:

- OP-3D In High Density areas; and
- OP-3E In Low Density areas.

Formula:

$[(\text{Total Orders completed on Original Due Date}) / (\text{Total Orders Completed})] \times 100$

Explanation: The percent commitments met is obtained by dividing the total number of service orders completed on the original due date by the total number of service orders completed during the measurement period.

Exclusions:

Orders issued pending Right of Way or customer deposit.
D, F and R order types.

2. Installation Interval

Purpose:

To evaluate the timeliness of U S WEST's installation of services for CLECs, focusing on the average time to install service.

Description:

Measures the average interval (in business days) between the application date and the completion date for service orders accepted and implemented. Includes only (inward) C (Change), N (New), and T (Transfer) orders.

Results for non-designed services (Residence POTS and Business POTS) will be disaggregated and reported according to orders involving:

- OP-4A Dispatches within MSAs;
- OP-4B Dispatches outside MSAs; and
- OP-4C No dispatches.

By December 1999, results for designed services (DS0, DS1, DS3, LIS trunks, and Unbundled Loops) will be disaggregated according to installations:

- OP-4D In High Density areas; and
- OP-4E In Low Density areas.

Formula:

$$\frac{\Sigma[(\text{Order Completion Date \& Time}) - (\text{Order Application Date \& Time})]}{\text{Total Number of Orders Completed}}$$

Explanation: The average installation interval is derived by dividing the sum of installation intervals for all orders (in business days) by total number of service orders completed in the reporting period. A fraction of a day is rounded up or down to the nearest full day. The application date is day zero (0); the day following the application date is day one (1).

Exclusions:

Orders issued pending Right of Way or customer deposit.
Orders with customer requested due dates greater than the current standard interval and intervals lengthened due to CLEC- and CLEC's customer-caused delays.
D, F and R order types.

3. Out of Service Cleared within 24 hours – Non-designed Repair Process

Purpose:

To evaluate timeliness of repair for non-designed services, focusing on cases where the out of service cases were resolved within the standard estimate for non-designed services (i.e., 24 hours for out-of-service conditions).

Description:

Measures the percent of Non-designed service trouble reports cleared within 24 hours of a call from a CLEC, or from a U S WEST end user retail customer, to U S WEST. Time measured is from date and time of receipt to date and time trouble is indicated as cleared. Includes only out of service (OOS) trouble reports, which are defined as the inability to initiate or receive calls.

Results will be disaggregated and reported according to trouble reports involving:

- MR-3A Dispatches within MSAs;
- MR-3B Dispatches outside MSAs; and
- MR-3C No dispatches.

By December 1999, results for Unbundled Loops will be disaggregated according to trouble reports:

- MR-3D In High Density areas; and
- MR-3E In Low Density areas.

Formula:

$(\text{Number of Out of Service Trouble Reports Resolved within 24 hours}) / (\text{Total Number of Out of Service Trouble Reports Received}) \times 100$

Explanation: Percentage is obtained by dividing the total number of OOS reports resolved within 24 hours by the total number of OOS reports received during the measurement period.

Exclusions:

Trouble reports found to be related to customer equipment, customer education, inside wire, and “no access.”

Subsequent trouble reports (i.e., redundant reports for the same trouble before it is resolved).

Trouble reports generated for internal U S WEST system/network monitoring purposes.

4. All Troubles cleared within 48 hours – Non-Designed Repair Process

Purpose:

To evaluate timeliness of repair for non-designed services, focusing on trouble cases of all types (both out of service and service affecting) and on the number of such cases resolved within the standard estimate for non-designed services (i.e., 48 hours for service-affecting conditions).

Description:

Measures the percent of Non-designed service trouble reports cleared within 48 hours of a call from a CLEC, or from a U S WEST end user retail customer, to U S WEST. Time measured is from date and time of receipt to date and time trouble is indicated as cleared. Includes all applicable trouble reports, including those that are out of service and those that are only service-affecting.

Results for non-designed services will be disaggregated and reported according to trouble reports involving:

- MR-4A Dispatches within MSAs;
- MR-4B Dispatches outside MSAs; and
- MR-4C No dispatches.

By December 1999, results for Unbundled Loops will be disaggregated according to trouble reports:

- MR-4D In High Density areas; and
- MR-4E In Low Density areas.

Formula:

[(Total Maintenance Reports Completed within 48 hours) / (Total Maintenance Reports Received)] x 100

Percentage is obtained by dividing the total number of reports completed in 48 hours or less by the total number of trouble reports received during the measurement period.

Exclusions:

Trouble reports found to be related to customer equipment, customer education, inside wire, and “no access.”

Subsequent trouble reports (i.e., redundant reports for the same trouble before it is resolved).

Trouble reports generated for internal U S WEST system/network monitoring purposes.

5. All Troubles Cleared within 4 hours – Designed Repair Process

Purpose:

To evaluate timeliness of repair for designed services, focusing on all trouble cases of all types (including out of service and service affecting troubles) and on the number of such cases resolved within the standard estimate for designed services (i.e., 4 hours).

Description:

Measures the percentage of trouble reports for designed services that are cleared within four hours of a call from a CLEC, or from a U S WEST end user retail customer, to U S WEST. Time measured is from date and time of receipt to date and time trouble is cleared.

By December 1999, results for designed services (DS0, DS1, DS3, and LIS trunks) will be disaggregated according to trouble reports:

- MR-5A In High Density areas; and
- MR-5B In Low Density areas.

Formula:

$$\frac{[(\text{Number of Trouble Reports Resolved within 4 hours}) / (\text{Total Trouble Reports Received})] \times 100}{}$$

Explanation: Percentage is obtained by dividing the total number of trouble reports completed in four hours or less by the total number of trouble reports received during the measurement period.

Exclusions:

Trouble reports found to be related to customer equipment, customer education, inside wire, and “no access.”

Subsequent trouble reports (i.e., redundant reports for the same trouble before it is resolved).

Trouble reports generated for internal U S WEST system/network monitoring purposes.

Supplemental Performance Indicators: Customer Service Interactions

1. Gateway Availability – via Human-to-Computer Interface

Purpose:

To evaluate the quality of CLEC access to the specified electronic gateway, focusing on the extent to which the gateway is actually available to CLECs.

Description:

Measures the availability of the IMA (Interconnect Mediated Access) interface, reports the percentage of scheduled time the IMA Interface is available for view and/or input.

Formula:

[Number of Hours and Minutes Gateway is Available to Competing Carriers During Reporting Period / Number of Hours and Minutes Gateway was Scheduled to be Available During Reporting Period] x 100

Explanation: Percentage is derived from sum of hours and minutes that the interface is actually available for processing divided by scheduled interface availability time.

2. Gateway Availability – via Computer-to-Computer Interface

Purpose:

To evaluate the quality of CLEC access to the specified electronic gateway, focusing on the extent to which the gateway is actually available to CLECs.

Note: Currently, no CLECs are using the EDI interface. Results for this indicator will be reported beginning three months following the month in which combined CLEC activity in the state exceeds 1,000 local service requests submitted through the interface.

Description:

Measures the availability of EDI (Electronic Data Interchange) interface, reports the percentage of scheduled time the EDI Interface is available for view and/or input.

Formula:

[Number of Hours and Minutes Gateway is Available to Competing Carriers During Reporting Period/Number of Hours and Minutes Gateway was Scheduled to be Available During Reporting Period] x 100

Explanation: Percentage is derived from sum of hours and minutes that the interface is actually available for processing divided by scheduled interface availability time.

3. Pre-Order / Order Response Times

Purpose:

To evaluate the timeliness of CLEC access to U S WEST's operational support systems in carrying out pre-ordering and ordering functions, focusing on specific transaction types through the specified gateway interface.

Description:

Measures the time interval between query and response for specified pre-order/order transactions through IMA. Results will be reported as follows:

PO-1A	Pre-Order/Order Response Time for IMA (CLEC transactions)
PO-1B	Pre-Order/Order Response Time for Exact (both CLEC and retail transactions)
PO-1C	Pre-Order/Order Response Time for EDI (CLEC transactions)

Note: Currently, no CLECs are using the EDI interface. Results for this indicator will be reported beginning three months following the month in which combined CLEC activity in the state exceeds 1,000 local service requests submitted through the interface.

Results will be reported separately for the following transaction types:

Appointment Scheduling (Due Date Reservation, where appointment is required)

Feature Function and Service Availability Information

1. Facility Availability
2. Street Address Validation
3. Customer Service Records
4. Telephone Number

Formula:

$$\Sigma [(Query Response Date \& Time) - (Query Submission Date \& Time)] / (Number of Queries Submitted in Reporting Period)$$

Explanation: The average response time is calculated by dividing the sum of the individual intervals measured for each query/response transaction measured by the total number of queries measured. A query is an individual request for the specified type of data.

Exclusions:

None.

4. Electronic Flow-through of Local Service Requests (LSRs) to the Service Order Processor

Purpose:

To monitor the extent to which U S WEST's processing of CLEC LSRs is completely electronic, focusing on the degree to which electronically-transmitted LSRs flow directly to the service order processor without human intervention or without manual retyping. To make available diagnostic information to help address potential issues that might be raised by the core performance indicators of commitments met and installation intervals.

Description:

Measures the percentage of all electronic LSRs that flow from the specified electronic gateway interface to the Service Order Processor (SOP) without rejection or error and without any human intervention.

Results for this indicator will be reported according to the gateway interface used to submit the LSR:

DPO-1A	LSRs received via IMA
DPO-1B	ASR/LSRs received via Exact
DPO-1C	LSRs received via EDI

Formula:

$$\frac{[(\text{Number of Electronic LSRs that pass from the Gateway Interface to the SOP as specified}) / (\text{Total Number of Electronic LSRs pass through the Gateway Interface})] \times 100}{}$$

Exclusions:

Rejected LSRs, non-electronic LSRs (e.g., via fax or courier).

5. Firm Order Confirmation (FOC) Interval

Purpose:

To monitor the timeliness with which U S WEST returns FOCs to CLECs, to make available diagnostic information to help address potential issues that might be raised by the core performance indicators of commitments met and installation intervals.

Description:

Measures the average time for U S WEST to provide a Firm Order Confirmation (FOC) in response to a customer LSR received from the CLEC. The interval measured is the period between U S WEST's receipt of the LSR and U S WEST's response with a FOC notification. FOC notifications measured are those associated with installation orders completed in the reporting period.

Results for this indicator will be reported according to the electronic gateway interface or manual method used to submit the LSR:

DPO-4A	LSRs received via IMA
DPO-4B	LSRs received via Exact
DPO-4C	LSRs received via EDI
DPO-4D	LSRs received via Facsimile

Formula:

$\Sigma[(\text{Date and Time of FOC Notification}) - (\text{Date and Time of LSR Receipt})] / (\text{Total Number of FOC Notifications transmitted})$.

Exclusions:

None.

6. LSRs Rejected

Purpose:

To monitor the extent to which electronic LSRs are rejected, as a percentage of all electronic LSRs to make available diagnostic information to help address potential issues that might be raised by the diagnostic indicator of LSR rejection notice intervals.

Description:

Measures the percentage of electronic LSRs rejected (returned to the CLEC) for standard categories of errors/reasons. Reasons for rejection include: missing/incomplete information; duplicate ASR/LSR; no valid contract; no valid end user verification; and miscellaneous CLEC data provisioning process errors.

Results for this indicator will be reported according to the gateway interface used to submit the LSR:

DPO-3A	LSRs received via IMA
DPO-3B	ASR/LSRs received via Exact
DPO-3C	LSRs received via EDI

Formula:

$[(\text{Total number of LSRs rejected}) / (\text{Total number of LSRs received})] \times 100$

Exclusions:

Non-electronic LSRs.

7. LSR Rejection Notice Interval

Purpose:

To monitor the timeliness with which U S WEST notifies CLECs that electronic LSRs have been rejected, to make available diagnostic information to help address potential issues that might be raised by the core pre-order/order performance indicators.

Description:

Measures the interval (in business days) between the receipt of an electronic Local Service Request (LSR) and the rejection of the LSR for standard categories of errors/reasons. Standard reasons for rejection include: missing/incomplete information; duplicate LSR; no valid contract; no valid end user verification; and miscellaneous CLEC data provisioning process errors. CLEC, U S WEST, and state specific results are available. Included in the interval is time required for efforts by U S WEST to work with the CLEC to avoid the necessity of rejecting the LSR.

Results for this indicator will be reported according to the gateway interface used to submit the LSR:

DPO-2A	LSRs received via IMA
DPO-2B	ASR/LSRs received via Exact
DPO-2C	LSRs received via EDI

Formula:

$\Sigma [(Date\ and\ time\ of\ Rejection\ Notice\ transmittal) - (Date\ and\ time\ of\ LSR\ receipt)] / (Total\ number\ of\ LSR\ Rejection\ Notifications)$

Exclusions:

Non-electronic LSRs.

8. Pre-Order / Order Response Times for U S WEST Retail Transactions

Purpose:

To report the timeliness of retail service representative access to U S WEST's operational support systems in carrying out pre-ordering and ordering functions, focusing on specific transaction types.

Description:

Measures the time interval between query and response for specified pre-order/order transactions through U S WEST's retail pre-order/ordering systems. Results are reported separately for the following transaction types:

- Appointment Scheduling (Due Date Reservation, where appointment is required)
- Feature Function and Service Availability Information
- Facility Availability
- Street Address Validation
- Customer Service Records
- Telephone Number

Formula:

$\Sigma[(\text{Query Response Date \& Time}) - (\text{Query Submission Date \& Time})] / \text{Number of Queries Submitted in Reporting Period}$, where Query = Individual Request for data.

Exclusions:

None.

9. Order Completion Notifications Transmitted within 24 hours (Under Development)

Purpose:

To report the timeliness of completion notifications, focusing on the percentage of notifications transmitted within 24 hours of the date and time orders are completed.

Description:

Measures the number of completion notifications transmitted within 24 hours as a percentage of all orders completed in the reporting period:

Note: This performance indicator is under development for November 1999.

Formula:

$$\left[\frac{\text{(Total Number of Completion Notifications Transmitted within 24 hours)}}{\text{(Total Number of Orders Completed)}} \right] \times 100$$

Explanation: The percentage is calculated by dividing the number of completion notifications transmitted to CLECs within 24 hours by the total number of orders completed in the reporting period.

Exclusions:

None.

10. Speed of Answer - Interconnect Provisioning Center

Purpose:

To evaluate the timeliness of CLEC access to U S WEST's interconnection provisioning center(s), focusing on how long it takes for calls to be answered.

Description:

Measures the average time following the first ring to answer calls in the Interconnection Provisioning Center. Abandoned calls are tracked from first ring to time attempt was terminated. Results are provided at a U S WEST level of reporting; neither CLEC- nor state-specific results are available.

Formula:

$$\Sigma[(\text{Date and Time of Call Answer}) - (\text{Date and Time of First Ring})] / \text{Total Calls Answered by Center during reporting period.}$$

Explanation: Average speed of answer is obtained by dividing the sum of all answer times recorded (minutes/seconds) by the total number of calls answered at the center in the reporting period.

Exclusions:

None.

11. Calls Answered within twenty seconds - Interconnect Provisioning Center

Purpose:

To evaluate the timeliness of CLEC access to U S WEST's interconnection provisioning center(s), focusing on the extent to which calls are answered within twenty seconds.

Description:

Measures the percentage of Interconnection Provisioning Center calls that are answered within twenty seconds of the first ring. Abandoned calls are tracked from first ring to the time attempt was terminated. Results are provided at a U S WEST level of reporting; neither CLEC- nor state-specific results are available.

Formula:

$$\frac{[(\text{Total Calls Answered by Center within 20 seconds}) / (\text{Total Calls Answered by Center})] \times 100}{}$$

Explanation: Percentage is derived from total number of calls answered within 20 seconds divided by total number of calls received.

Exclusions:

None.

12. Speed of Answer – Interconnect Repair Center

Purpose:

To evaluate timeliness of CLEC access to U S WEST's interconnection repair center(s), focusing on how long it takes for calls to be answered.

Description:

Measures the average time following the first ring to answer calls in the Interconnection Repair Center, which handles Wholesale calls only. Abandoned calls are tracked from first ring to time attempt was terminated. Results are provided at a U S WEST level of reporting; neither CLEC- nor state-specific results are available.

Formula:

$\Sigma[(\text{Date and Time of Call Answer}) - (\text{Date and Time of First Ring})] / \text{Total Calls Answered by Center.}$

Explanation: Average Speed of Answer is obtained by dividing the sum of times to answer calls by the total number of calls received.

Exclusions:

None

13. Calls Answered with 20 seconds – Interconnect Repair Center

Purpose:

To evaluate of CLEC access to U S WEST's interconnection repair center(s), focusing on the number of calls answered within twenty seconds.

Description:

Measures the percentage of Interconnection Repair Center calls answered within twenty seconds of the first ring. Abandoned calls are tracked from first ring to time attempt was terminated. Results are provided at a U S WEST level of reporting; neither CLEC- nor state-specific results are available.

Formula:

$$\left[\frac{\text{(Total Calls Answered by Center within 20 seconds)}}{\text{(Total Calls Answered by Center)}} \right] \times 100$$

Explanation: Percentage is derived from total number of calls answered within 20 seconds divided by total number of calls received.

Exclusions:

None

14. Mean Time to Provide U S WEST Recorded Usage Records

Purpose:

To evaluate the timeliness with which U S WEST provides recorded usage records to CLECs.

Description:

Measures the average time interval from date of recorded usage to date usage records are transmitted to CLECs.

Formula:

$\sum(\text{Date Record Transmitted} - \text{Date Usage Recorded})/(\text{Total number of records})$

Exclusions:

None.

15. Mean Time to Deliver Invoices

Purpose:

To evaluate the timeliness with which USW delivers EDI-formatted bills to CLECs.

Description:

Measures the average number of days between the bill date and bill delivery.

Formula:

$\sum(\text{Bill Transmission Date} - \text{Bill Close Date}) / (\text{Total Number of Bills})$

Exclusions:

None.

16. Billing Accuracy – Adjustments for Errors (Under Development)

Purpose:

To evaluate the accuracy with which U S WEST bills CLECs, focusing on the percentage of billed revenue adjusted due to errors.

Description:

Measures the billed revenue adjusted off bills due to errors, as a percentage of total billed revenue.

Formula:

$\sum(\text{Billed Amounts Adjusted for Errors})/(\text{Total Related Billed Amounts in Reporting Period})$

Exclusions:

None.

Supplemental Performance Indicators: Network Operations Interactions

1. Trunk Blocking – Interconnection Trunks

Purpose:

To evaluate factors affecting completion of calls from U S WEST end offices to CLEC end offices, focusing on average busy-hour blocking percentages in interconnection final trunks.

Description:

Measures the percentage of trunks blocking in interconnection final trunks, reported by:

NI-1A Interconnection (LIS) trunks to U S WEST tandem offices;

NI-1B Interconnection (LIS) trunks to U S WEST end offices.

Formula:

$$\sum[(\text{Blockage in Final Trunk Group of Specified Type})(\text{Number of Circuits in Trunk Group})] / (\text{Total Number of Final Trunk Circuits in all Final Trunk Groups})$$

Explanation: Actual average percentage of trunk blockage is calculated by dividing the equivalent average number of trunk circuits blocking by the total number of trunk circuits in final trunks of the type being measured. Final trunks are those that do not overflow calls to other trunk types when blocking.

Exclusions:

Toll trunks, non-final trunks, and trunks that are not connected to the public switched network.

2. Trunk Blocking – Local Interoffice (“Common”) Trunks

Purpose:

To evaluate factors affecting completion of calls from U S WEST end offices to other U S WEST end offices, focusing on average busy-hour blocking percentages in local interoffice final trunks.

Description:

Measures the percentage of trunks blocking in local interoffice final trunks, reported by:
NI-2A Trunks connecting U S WEST end offices to U S WEST tandem offices;
NI-2B Trunks connecting U S WEST end offices to other U S WEST end offices.

Formula:

$$\frac{\sum[(\text{Blockage in Final Trunk Group of Specified Type})(\text{Number of Circuits in Trunk Group})]}{(\text{Total Number of Final Trunk Circuits in all Final Trunk Groups})}$$

Explanation: Actual average percentage of trunk blockage is calculated by dividing the equivalent average number of trunk circuits blocking by the total number of trunk circuits in final trunks of the type being measured. Final trunks are those that do not overflow calls to other trunk types when blocking.

Exclusions:

Toll trunks, non-final trunks, and trunks that are not connected to the public switched network.

3. Delayed Days (average)

Purpose:

To evaluate the extent to which U S WEST is late in installing services for CLECs, focusing on the average number of days that late orders are completed beyond the committed due date.

Description:

Measures the average number of days service is delayed beyond the original due date for reasons attributed to U S WEST.

Results for non-designed services (Residence POTS and Business POTS) will be disaggregated and reported according to orders involving:

- OP-6A Dispatches within MSAs;
- OP-6B Dispatches outside MSAs; and
- OP-6C No dispatches.

By December 1999, results for designed services (DS0, DS1, DS3, LIS trunks, and Unbundled Loops) will be disaggregated according to installations:

- OP-6D In High Density areas; and
- OP-6E In Low Density areas.

Formula:

$$\frac{\sum[(\text{Actual Completion Date of late order}) - (\text{Original Due Date of late order})]}{(\text{Total Number of Late Orders})}$$

Explanation: Average delayed days is derived by dividing the sum of all delayed days (associated with late orders) by the total number of orders with missed original due dates. Result is expressed in business days.

Exclusions:

Orders delayed due to Customer reasons are excluded.

4. CLEC or CLEC's Customer-caused Installation Misses

Purpose:

To evaluate the extent to which installation misses were caused by CLEC or CLEC's Customer, to make available diagnostic information to help address potential issues that might be raised by the core performance indicators of commitments met and installation intervals.

Description:

Measures the percentage of installation commitments missed for CLEC or CLEC's customer's reasons. State-specific results will be reported for individual CLEC, aggregate CLECs, and U S WEST retail customers.

Formula:

(Orders where installation commitment is missed due to CLEC or CLEC's customer's reasons) / (Total number of orders completed during the period)

Exclusions:

U S WEST-caused misses (which are reflected in commitments met indicators), orders issued pending: Right of Way; facilities; or customer deposit are excluded.

5. CLEC or CLEC's Customer-caused Trouble Reports

Purpose:

To evaluate the extent to which trouble reports were caused by CLEC or CLEC's Customer, to make available diagnostic information to help address potential issues that might be raised by the core maintenance and repair performance indicators.

Description:

Measures the percentage of all trouble reports that occur due to CLEC or CLEC end user customer action. State-specific results will be reported for individual CLECs, aggregate CLECs, U S WEST retail customers.

Formula:

(Number of Trouble Reports caused by CLEC or CLEC's customer) / (Total Number of Trouble Reports)

Exclusions:

Third party reports and reports assigned to outside causes (e.g., non-U S WEST pole damage).