

# **Post Entry Performance Plan Final Collaborative Summary**

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# Project Process Overview

## Introduction

This report summarizes the progress of the Qwest Post Entry Performance Plan collaboration (PEPP or collaboration). Part 1 provides a summary of the processes used by the PEPP. Part 2 contains a summary of those areas in which the parties reached agreement. Part 3 contains a summary of those areas in which the parties were not able to agree at the conclusion of the collaboration. The revised Qwest PAP will also be released as a part of the final collaborative documentation.

## Part 1: Procedural Summary of the PEPP

### A. Creation of the Collaboration

The Qwest Regional Oversight Committee (ROC) announced the creation of a collaborative to discuss a post entry performance plan for Qwest on August 9, 2000.<sup>1</sup> Initially, eleven states agreed to participate<sup>2</sup>; subsequently, Colorado withdrew from the collaboration and New Mexico joined.

After the announcement of the collaboration, the ROC solicited parties to participate in the effort. Interested parties were directed to register through a web site maintained by the Montana commission. A mailing list of state commission staff and another mailing list of all parties that registered were maintained for the duration of the project. A list of participants registered to the collaboration mailing list is attached as Appendix B.

The states and Qwest also agreed to contract for assistance in directing the collaboration. Maxim Telecommunications Consulting Group (MTG) and the National Regulatory Research Institute (NRRI) served as consultants to the collaboration under this agreement. The states directed the activities of the contractors through a staff committee; Qwest provided funding and other resources for the consultants and the collaboration.

### B. Collaborative Process

The collaboration was set up to serve as a structured negotiation process. The process of creating a plan was broken down into three steps to acquaint parties with the issues and form increasingly detailed levels of consensus. The first phase consisted of the creation of a set of principles and a framework for a plan. The second phase included the presentation of various plan proposals and negotiation of common features. The last phase was the treatment of implementation.<sup>3</sup>

The process through which the parties communicated was four-fold. First, the parties met in face-to-face workshops. Second, the parties met by conference call on several occasions. Third, the parties communicated through the email list service created through the registration process. Fourth, the parties had access to a common repository of documents in a web site maintained by NRRI for the project.

The original plan called for three workshops and contained contingency plans for additional conference calls. In practice, face-to-face workshops proved more efficient and conference calls were dropped after December 2000. Likewise, the negotiation process proved to be complex and extended.

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<sup>1</sup> [http://www.nrri.ohio-state.edu/oss/Post271/Post271/roc\\_release\\_aug\\_2000.pdf](http://www.nrri.ohio-state.edu/oss/Post271/Post271/roc_release_aug_2000.pdf)

<sup>2</sup> The states that initially participated were Colorado, Idaho, Iowa, Nebraska, North Dakota, Montana, Oregon, South Dakota, Utah, Washington, and Wyoming. New Mexico initially monitored the process, then formally joined. Minnesota and Arizona declined the invitation to be involved at this time.

<sup>3</sup> See [http://www.nrri.ohio-state.edu/oss/Post271/Post271/mtg\\_initial\\_plan\\_8-21-00.pdf](http://www.nrri.ohio-state.edu/oss/Post271/Post271/mtg_initial_plan_8-21-00.pdf).

Additional workshops were added to the process. The content of the conference calls and workshops are discussed more fully below.

To assist the parties in this process, the consultants prepared several documents that were refined by the parties. These documents are archived in the PEPP web site.<sup>4</sup> The key documents found there and used by the collaboration were agendas for each meeting and call, the draft of principles and framework for the plan, a decomposition of the various plans submitted by the parties that was regularly updated for each of the 2001 meeting through April, and various documents that summarized agreements on issues as they arose. Additionally, the web site archives the various proposals and comments the parties provided for each session.

As noted more fully below in the discussion of the content of the meetings, the parties completed much of the first two phases in the original design of the project. There is agreement on much of the structure of a performance plan's performance measurements, statistical structure, and basic remedy structure. Other details remain in dispute. The parties did not reach a detailed recommendation on the manner of bringing a particular plan to a state (the implementation phase), but it is expected that Qwest will make individual filings with each state to initiate that process.

### C. Collaborative Meetings

The collaboration was conducted through a series of workshops and conference calls. The sessions are summarized below.

The collaboration commenced with an organizational call on August 21, 2001. During the call, the consultants outlined the process they intended to use for directing the collaborative efforts and discussed a governance model and scheduling.<sup>5</sup>

On October 2, 2000, the consultants distributed an initial set of documents containing a discussion of FCC's treatment of performance plans, a side-by-side analysis of the New York and Texas plans, and a draft set of principles and framework for a performance plan with a request for comments.<sup>6</sup>

On October 5, 2000, the parties met by conference call to discuss the initial distribution of materials.<sup>7</sup>

In response to the October 2, 2000 request for comments, Qwest, Comptel, McLeod, Worldcom, ALTS, ASCENT, COVAD, ICG, Montana Consumers' Counsel, Z-Tel, ATT, Allegiance, and Sprint filed comments.<sup>8</sup>

The first workshop was held in Denver on October 24 and 25, 2000 to discuss the framework and principles document and governance of the collaboration. Those discussions lead to high-level agreements on many of the principles. That agreement was captured in a revised principles and framework document. In addition, the parties proceeded on several other issues including a review of

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<sup>4</sup> <http://www.nrri.ohio-state.edu/oss/Post271/index.htm>.

<sup>5</sup> <http://www.nrri.ohio-state.edu/oss/Post271/Minutes/minutes8-21-00.htm>

<sup>6</sup> [http://www.nrri.ohio-state.edu/oss/Post271/first\\_workshop\\_mats.htm](http://www.nrri.ohio-state.edu/oss/Post271/first_workshop_mats.htm)

<sup>7</sup> <http://www.nrri.ohio-state.edu/oss/Post271/Minutes/minutes10-5-00.htm>

<sup>8</sup> [http://www.nrri.ohio-state.edu/oss/Post271/first\\_workshop\\_mats.htm](http://www.nrri.ohio-state.edu/oss/Post271/first_workshop_mats.htm)

state enforcement authority and a collaborative governance process. Further the parties set a conference call for December 5 and 6, 2000.<sup>9</sup>

During the December 5 and 6, 2000 conference call, the parties addressed two major areas. First, there was an extended discussion on the governance of the collaboration. When it became apparent that agreement on governance was not going to emerge, Qwest offered to submit a new proposal. (Qwest subsequently withdrew that offer and indicated that it intended to proceed without a formal governance structure.<sup>10</sup>) Second, the parties generally completed discussion of the principles. Further discussion of the framework of the performance plan was suspended as the parties had already distributed proposed plans to the collaborative members. The consultants, therefore, agreed to roll the framework discussion into the discussion of the plans. At the end of the conference call, the parties agreed to an agenda for the next workshop scheduled for January 3 to 5, 2001 in Seattle.<sup>11</sup>

As noted previously, several parties submitted proposed plans between the first and second workshops. Qwest provided drafts of its variation of the Texas plan. In addition, ATT, Worldcom, and Z-Tel also submitted plans. A statement of principles was submitted by ASCENT through a letter addressed to Commissioner Rowe of Montana.<sup>12</sup>

These proposals and position papers became the grist for a decomposition of the various plan elements that structured the discussion for the next three workshops. The decomposition sought to identify the basic elements of the various plans and aggregate the proposals from the various parties concerning those elements. The decomposition then was used as an outline for discussion in the collaborative sessions.<sup>13</sup>

The parties then met in workshops on January 3 to 5 in Seattle,<sup>14</sup> February 13 to 15 in Denver,<sup>15</sup> and March 13 to 15 in Denver<sup>16</sup> to discuss items on the decomposition. In addition, parties made presentations to the collaboration at each of these sessions to detail generally the nature of their proposals (overviews of the various plans in Seattle) and the particular elements of their proposal (statistical approaches were discussed in the February Denver meeting and remedies were discussed in the March Denver meeting). Importantly, the performance measures to be included in the plan were largely agreed to at the March Denver meeting.

Following the discussion of remedies at the March Denver meeting, the states requested “price outs” of the various proposals for the discussion at the next workshop scheduled in Portland on April 24-26, 2001. Pursuant to various agreements concerning the confidentiality of the data, Qwest performed calculations for three states of the effects of its and the modified ATT plan of the remedy provisions. These calculations were presented to the collaboration on April 24 in Portland. Following extended discussion the parties at the Portland meeting agreed to use the Qwest plan as the basis for further negotiation and largely agreed to a statistical approach based on the Qwest plan model. (Z-Tel did not participate in the April meeting and subsequently registered objections to the proposal.)<sup>17</sup> At the conclusion of the April workshop, the parties agreed to a May meeting in Seattle.

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<sup>9</sup> [http://www.nrri.ohio-state.edu/oss/Post271/first\\_workshop\\_mats.htm](http://www.nrri.ohio-state.edu/oss/Post271/first_workshop_mats.htm)

<sup>10</sup> <http://www.nrri.ohio-state.edu/oss/Post271/Post271/stevedavisltrp.pdf>

<sup>11</sup> [http://www.nrri.ohio-state.edu/oss/Post271/Minutes/dec\\_5&6\\_minutes.htm](http://www.nrri.ohio-state.edu/oss/Post271/Minutes/dec_5&6_minutes.htm)

<sup>12</sup> [http://www.nrri.ohio-state.edu/oss/Post271/position\\_papers.htm](http://www.nrri.ohio-state.edu/oss/Post271/position_papers.htm)

<sup>13</sup> For an early version of the decomposition, see [http://www.nrri.ohio-state.edu/oss/Post271/Post271/Decomposition\\_ver2.pdf](http://www.nrri.ohio-state.edu/oss/Post271/Post271/Decomposition_ver2.pdf)

<sup>14</sup> [http://www.nrri.ohio-state.edu/oss/Post271/third\\_workshop\\_materials.htm](http://www.nrri.ohio-state.edu/oss/Post271/third_workshop_materials.htm)

<sup>15</sup> [http://www.nrri.ohio-state.edu/oss/Post271/fourth\\_workshop\\_materials.htm](http://www.nrri.ohio-state.edu/oss/Post271/fourth_workshop_materials.htm)

<sup>16</sup> [http://www.nrri.ohio-state.edu/oss/Post271/fifth\\_workshop\\_materials.htm](http://www.nrri.ohio-state.edu/oss/Post271/fifth_workshop_materials.htm)

<sup>17</sup> [http://www.nrri.ohio-state.edu/oss/Post271/sixth\\_workshop\\_materials.htm](http://www.nrri.ohio-state.edu/oss/Post271/sixth_workshop_materials.htm)

The Seattle workshop took place on May 15 to 17, 2001.<sup>18</sup> At the beginning of this workshop several issues that remained open from the prior session were discussed and resolved. Qwest then presented a proposal on remedies to the parties. In response, the CLECs identified the major areas of concern they had with the Qwest proposal and the redline draft of the Qwest PAP they received on May 14, 2001. Qwest declined to discuss further the areas raised by the CLECs except for several areas of clarification on items that had been tentatively agreed to in prior discussions. It also left open the possibility of further discussions concerning higher remedies for high value services. At that point, Qwest indicated that further workshops would be unwarranted and that it would prepare a draft of the performance plan incorporating the areas of agreement previously reached and highlighting those areas that remain unresolved. These items (the Qwest revised performance plan, areas of agreement, and areas of disagreement) form the remainder of this report.

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<sup>18</sup> [http://www.nrri.ohio-state.edu/oss/Post271/seventh\\_workshop\\_materials.html](http://www.nrri.ohio-state.edu/oss/Post271/seventh_workshop_materials.html)

# List of Agreements

## **Part 2: List of Agreements**

The following issues were discussed and agreed to by the collaborative.

### **A. Principles and Framework Items**

1. The collaborative agreed on wording for Principles 4.1 through 4.5 at the October 24, 2000 workshop. This agreed upon wording is contained in the Revised Principles and Framework document posted on the collaborative web site.

### **B. PEPP Governance**

1. The collaborative agreed to work without a defined governance structure.

### **C. Performance Measurements**

1. The collaborative agreed that the PIDs would be used to define whether a measure was a parity or benchmark measure. The PIDs would also define how these measurements were to be evaluated.
2. A matrix of the PIDs that were discussed for inclusion in the plan appears as Appendix A of this document. The matrix outlines areas of agreement and areas of no agreement for the PIDs. This matrix contains an agreed upon structure of families for some of the PIDs. When a measurement family is defined, the collaborative agreed that the remedy would be calculated based upon the measurement resulting in the highest dollar value within the family.

### **D. Classification of Performance Measurements**

1. Qwest proposed to increase the level of Tier 1 payments to CLECs by classifying Tier 1 measurements OP-8, OP-13a, MR-3, MR-5, and MR-6a, 6b, 6c as "high. (See attachment 1 of the Qwest PAP.) This agreement is captured in Appendix A of this document.
2. The collaborative agreed that Tier I remedies would be payable to the individual CLECs, while Tier II remedies will be payable to the states. Tier II remedies will be measured on an aggregate basis.

### **E. Statistical Methods**

1. The collaborative agreed to evaluate benchmark measurements on a "stare and compare" basis.
2. The collaborative agreed to use the Modified Z approach to determine if the difference between the Qwest and CLEC means were statistically significant.

3. A step function to determine the critical z value to utilize for various sample sizes was proposed by Qwest and accepted by the collaborative after some discussion and modification. The proposal was accepted<sup>19</sup> as follows:

1. K Table eliminated.
2. For purposes of statistical testing on parity measurements, the following critical values will be used:

Sample Size	All Other	<i>LIS Trunks, UDITs, Resale, UBL – DS1 and DS3</i>
1-10	1.645	1.04*
11-150	1.645	1.645
151-300	2.0	2.0
301-600	2.7	2.7
601-3000	3.7	3.7
3001 and above	4.3	4.3

\* Applies for individual month testing. For purposes of determining consecutive month misses, 1.645 shall be used. Zone 1 and zone 2 shall be combined.

4. Permutation testing will be used for sample sizes of  $n \leq 30$ . For benchmark measurements, a mathematical function (incorporated into the Qwest PAP) will determine the benchmark target for  $n \leq 100$ .

## F. Payment Structure

1. The CLECs proposed a method to incorporate “sticky” (or “sliding”) duration by incrementing and decrementing remedy levels for each month when the target is missed and/or met. This will be accomplished using the remedy table that exists in the Qwest PAP. Qwest accepted this proposal, and it was subsequently adopted by the collaborative.
2. The collaborative accepted Qwest’s proposal to create a stepped penalty structure for the following Tier II measurements: GA-1, GA-2, GA-3, GA-4, GA-6, PO-1, OP-2, and MR-2. The Tier II remedies will be implemented on the month the measure is missed (rather than after 3 months, as originally proposed). PO-1 will be collapsed to EDI and GUI for remedy calculations. The following penalties apply:

<i>GA Measurements</i>	<i>Remedy Level</i>
$\leq 1\%$	\$1,000 / \$14,000
> 1% to 3%	\$10,000 / \$140,000
> 3% to 5%	\$20,000 / \$280,000
> 5%	\$30,000 / \$420,000

<sup>19</sup> Note in the next section that additional features were proposed and are in dispute.

<i>OP-2 and MR-2</i>	<i>Remedy Level</i>
≤ 1%	\$1,000 / \$14,000
> 1% to 3%	\$5,000 / \$70,000
> 3% to 5%	\$10,000 / \$140,000
> 5%	\$15,000 / \$210,000

<i>PO-1</i>	<i>Remedy Level</i>
2 sec. or less	\$1,000 / \$14,000
>2 sec. To 5 sec.	\$5,000 / \$70,000
>5 sec to 10 sec.	\$10,000 / \$140,000
> 10 sec.	\$15,000 / \$210,000

## G. Cap on Payments

1. The collaborative accepted the following proposal offered by Qwest regarding per-measure caps:
  - a. Remove the cap on PO-3
  - b. Retain the cap on BI-1, BI-3, and BI-4
  - c. Remove the cap on PO-1 (this measure will become a per-measure measure rather than a per-occurrence measure with a cap)
  - d. Remove the cap on PO-7
  - e. Do not divide by 24 on NI-1. The cap will be removed for NI-1 as well.
  - f. Qwest will verify with the TAG that NI-1 will not be counted in the remedy calculations in the month when a TGSR is issued.

## H. Other PAP Provisions

1. The collaborative agreed that RSIDs would not be combined for the purposes of remedy calculations.
2. Qwest will draft more general wording regarding the states' use of Tier II funds. This wording will be incorporated into the revised Qwest PAP.
3. Some reporting provisions were agreed to by the collaborative. Reports will be issued monthly to the CLECs and the states by the final day of the month following the month for which the performance results are being reported. There will be a grace period of 5 business days.

# List of Unresolved Issues

### **Part 3: List of Unresolved Issues**

The following issues were discussed, but no consensus was reached. The topics may be at impasse or open for further discussion as noted below.

#### **A. Principles and Framework Items**

2. The Framework items were not discussed separately as a specific workshop topic. The collaborative agreed to defer the Framework items and discuss the specific components of the plan as the meetings progressed.
3. The collaborative agreed on wording for Principles 4.1 through 4.5 at the October 24, 2000 workshop. This agreed upon wording is contained in the Revised Principles and Framework document posted on the collaborative web site. The Collaborative did not reach agreement on the wording for Principles 4.6 and 4.7. These Principles address the issues of exclusivity and enforcement.

#### **B. Performance Measurements**

3. Change management PIDs have been proposed by Qwest and are currently before the TAG. Any discussion of their inclusion in the PAP was deferred pending TAG consideration.
4. The CLECs proposed that “parity with a floor” be incorporated into PID standards. No specific proposal of benchmark “floors” was made. This proposal was made at the May 16, 2001 workshop. The collaborative had previously agreed to use the performance standard stated in the PID.
5. A matrix of the PIDs that were discussed for inclusion in the plan appears as Appendix A of this document. The matrix outlines areas of agreement and areas of no agreement for the PIDs.

#### **C. Classification of Performance Measurements**

1. Qwest proposed to increase the level of Tier 1 payments to CLECs by classifying Tier 1 measurements OP-8, OP-13a, MR-3, MR-5, and MR-6a, 6b, 6c as “high” and to decrease the level of Tier 2 payments to State Funds by classifying Tier 2 measurements OP-3, OP-4, OP-5, OP-6, MR-7, and MR-8 as “medium.” (See attachment 1 of the Qwest PAP.) The CLECs accepted the Tier 1 classifications, but made the classification of the Tier 2 measurements contingent upon Qwest accepting the classifications of PO3, PO7, PO8, MR3, MR5, MR6, BI3, CP1, CP3, CP4 as Tier 2 in same manner as Tier 1 e.g. H, M, L. Qwest rejected the entirety of the CLEC counter-proposal. The CLECs inquired as to Qwest’s response if only MR-3 and MR-5 were added as Tier2 measurements. Qwest stated that it would accept, if the CLECs were to make such a proposal. The Qwest proposal was left on the table for the CLECs to determine if they would formalize their inquiry as to MR-3 and MR-5.
2. The CLECs proposed that all performance measurements designated “low” be classified as “medium” and the “low” category be eliminated. Qwest rejected this proposal.

## D. Statistical Methods

1. Certain CLECs proposed that a 1.04 critical value be used for statistical testing for all parity performance measurements with samples sizes of 11 or less. The collaborative had previously agreed to a statistical approach that eliminated the K-Table and substituted a table of varying critical value. (See section 5.0 of the Qwest PAP.) Included in this table is a 1.04 critical value applied to sample sizes of 10 or less for performance measurements involving LIS trunks and to DS1s and DS3s for UDITs, resale, and unbundled loops. Qwest rejected this proposal. The previously agreed to statistical approach stands.

## E. Payment Structure

1. The CLECs proposed a payment structure for collocation that is that which was adopted by the Michigan Commission. This subject is under discussion in other venues and any agreements reached will be incorporated into the Qwest PAP for the participating ROC states.
2. The CLECs and Qwest discussed adjustments to the payment schedule for “high valued” services, defined as LIS trunks and DS1 and DS3 UDITs, resale, and unbundled loops. This subject is under discussion in other venues and any agreements reached will be incorporated into the Qwest PAP for the participating ROC states.
3. The CLECs proposed that severity of misses for percentage type measurements be incorporated into payment structure. No specific method was proposed. Qwest stated its opposition to the idea.
4. The CLECs proposed that there be no end to the escalation in the level of per occurrence payment amounts for consecutive month misses beyond six months. No specific dollar amounts were proposed. Qwest stated its opposition to the idea.
5. The CLECs proposed that the level of per occurrence payment amounts for the longer durations be increased. States indicated their preference for the per occurrence payment amounts at the shorter durations be decreased while those for the longer durations be increased. Qwest indicated its willingness to consider adjustments along the lines described by the states; however, no CLEC indicated acceptance of this concept.

## F. Cap on Payments

1. Qwest proposes a cap on payments equal to 36% of net revenues. (See section 12.0 of the Qwest PAP.) Individual state cap amounts are shown on Attachment 3 of the Qwest PAP. The CLECs oppose a cap on payments and propose a cap act as a trigger for a service investigation by the state commission. Qwest opposes any cap other than a hard cap of 36%.

## G. Other PAP Provisions

1. Audits and root cause analysis provisions were discussed by the collaborative. Qwest’s proposal is section 15.0 in its PAP. No specific proposals were made by the CLECs. No consensus on this matter was reached.
2. The limitation provisions were discussed by the collaborative. Qwest’s proposal is section 13.0 in its PAP. No consensus on limitations was reached.

3. The reporting provisions were discussed by the collaborative. Qwest's proposal is section 14.0 in its PAP. No consensus was reached as to payments for late reports, inaccurate reports, or incomplete reports.
4. Tier 1 payment method was discussed by the collaborative. Qwest's proposal is section 11.0 in its PAP. Qwest volunteered to work with CLECs and the states on the bill credit format and documentation of the payment calculation. No consensus was reached; however, the CLECs indicated that the information may satisfy their concerns over bill credits.
5. The CLECs propose that the PAP be effective upon state commission approval of the PAP. Qwest proposes that the PAP be effective upon FCC approval of its section 271 application for that state. (See section 13.1 of the Qwest PAP.) No consensus on this matter was reached.
6. The CLECs propose that at the effective date of the Qwest PAP that the initial payment levels reflect the number of consecutive months of misses prior to the effective date. No consensus on this matter was reached.

## H. Other Topics

1. The CLECs proposed that the provisions of the PAP apply to special access services. No specific proposal of how such would be accomplished was made. Qwest opposed inserting special access as an issue for the first time in the May workshop and rejected the inclusion of special access on the basis that inclusion of special access was inappropriate.

# **Appendix A**

## **PID Measurements Matrix**

## Appendix A PID Measurements Martix

### Measurements Matrix

ELECTRONIC GATEWAY AVAILABILITY		Tier I	Tier II	Agreement	No Agreement
GA-1	Gateway Availability - IMA-GUI		X		
GA-2	Gateway Availability - IMA-EDI		X		
GA-3	Gateway Availability - EB-TA		X		
GA-4	System Availability - Exact		X		
GA-6	System Availability - GUI Repair		X		
<b>ORDERING AND PROVISIONING</b>					
PO-1	Pre-Order/Order Response Times		X		
PO-2	Electronic Flow-Through			Diagnostic	
PO-3	LSR Rejection Notice Interval	X		Limited to a-1, b-1, c	X (Tier II)
PO-4	LSRs Rejected			Diagnostic	
PO-5	FOCs On Time (%)	X	X		
PO-6	Work Completion Notification Interval	X		Family w/PO-7	
PO-7	Billing Completion Notification Timeliness	X		Family w/PO-6	X (Tier II)
PO-8	Jeopardy Notice Interval	X			X (Tier II)
PO-9	Timely Jeopardy Notices	X			
PO-10	LSR Accountability			Diagnostic	
PO-15	Number of Due Date Changes per Order			Diagnostic	
<b>ORDERING AND PROVISIONING</b>					
OP-2	Calls Answered within Twenty Seconds -		X		
OP-3	Installation Commitments Met	X	X	Family 3a/3b, 3d/3e	
OP-4	Installation Interval	X	X	Family w/ OP-6	
OP-5a	New Service Installation Quality	X	X		
OP-5b	New Service Installation Quality			Diagnostic	
OP-6	Delayed Days	X	X	Combine 6a/6b, Family w/ OP-4	
OP-7	Coordinated "Hot Cut" Interval - UBL			Diagnostic	
OP-8	Number Portability Timeliness	X	X		
OP-13a	Coordinated Cuts On Time - UBL	X	X		
OP-13b	Coordinated Cuts On Time - UBL			Diagnostic	
<b>MAINTENANCE AND REPAIR</b>					
MR-2	Calls Answered within Twenty Seconds - Interconnect Repair Center		X		
MR-3	Out of Service Cleared within 24 Hours	X	*		X (Tier II)
MR-4	All Troubles Cleared within 48 Hours			Not Included	
MR-5	All Troubles Cleared within 4 Hours	X	*		X (Tier II)
MR-6	Mean Time to Restore	X		6a, 6b, 6c only	X (Tier II)
MR-7	Repair Repeat Report Rate	X	X		
MR-8	Trouble Rate	X	X		
MR-9	Repair Appointments Met			Not Included	
MR-10	Customer-Related Trouble Reports			Diagnostic	
<b>BILLING</b>					
BI-1	Time to Provide Recorded Usage Records	X	X		
BI-2	Invoices Delivered within 10 Days			Not Included	
BI-3	Billing Accuracy - Adjustments for Errors	X			X (Tier II)
BI-4	Billing Completeness	X	X		

## Appendix A (continued)

DATABASE UPDATES		Tier I	Tier II	Agreement	No Agreement
DB-1	Time to Update Databases			Not Included	
DB-2	Accurate Database Updates			Not Included	
DIRECTORY ASSISTANCE					
DA-1	Speed of Answer - Directory Assistance			Not Included	
DA-2	Calls Answered within Ten Seconds - Directory Assistance			Not Included	
OPERATOR SERVICES					
OS-1	Speed of Answer - Operator Services			Not Included	
OS-2	Calls Answered within Ten Seconds - Operator Services			Not Included	
NETWORK PERFORMANCE					
NI-1	Trunk Blocking	X	X		
NP-1	NXX Code Activation	X	X		
COLLOCATION					
CP-1	Installation Interval	X			X (Tier II)
CP-2	Installation Commitments Met	X	X		
CP-3	Feasibility Study Interval	X			X (Tier II)
CP-4	Feasibility Study Commitments Met	X			X (Tier II)
CP-5	Quote Interval			remove	
CP-6	Quote Commitments Met			remove	
	* CLECs inquired if Qwest would agree to included MR-3 and MR-5 in Tier 2 as a resolution of Tier 2 measures and other proposals made by Qwest at the May 16, 2001				

# **Appendix B**

## **PEPP Collaborative Participants**

## Appendix B Collaborative Participants

NAME	ASSOCIATION
Andrea P. Harris	Allegiance Telecom
Kimberly M. Kirby	ALTS
John Finnegan	AT&T
Michael Kalb	AT&T
Michelle Engel	AT&T
Steve Weigler	AT&T
Timothy M. Connolly	AT&T
Molly O'Leary	Avista Communication
Mana Jennings-Fader	Colorado Ass't Attorney
Wendie Alstot	Colorado PUC
Lans Chase	Covad
Lise Strom	Davis Wright Tremaine
Joyce Hundleyus	DOJ
Mary Tee	Electric Lightwave
Mary Tee	Electric Lightwave
Nigel Bates	Electric Lightwave
Garth Morrisette	Eschelon
Gena Doyscher	Global Crossing
Amy Hartzler	ICG Communications
Julia Waysdorf	ICG Communications
Wayne Hart	Idaho PUC
Dennis Rosauer	Iowa Utility Board
John Ridgeway	Iowa Utility Board
Penny Baker	Iowa Utility Board
Vince Hanrahan	Iowa Utility Board
Andrew Newell	JATO
Rod Cox	McLeod USA
Todd McNally	McLeod USA
Mary Lohnes	Midcontinent Communications
Mike Lee	Montana
Allen Buckalew	Montana Consumer Counsel
John Bushnell	Montana Consumer Counsel
Kate Whitney	Montana PSC
Marla Larson	Montana PSC
Michael Lee	Montana PSC
Gene Vuckovich	Montana Rural Development
Theodore Otis	Montana Wireless, Inc
Bob Center	MTG
Denise Anderson	MTG
Marie Bakunas	MTG
Peggy Caraway	MTG
M. Marsh	Nebraska Commission
Chris Post	Nebraska PSC
Dick Palazzolo	Nebraska PSC

## Appendix B (continued)

NAME	ASSOCIATION
William Taylor	NERA
Kathleen Shotsky	New Edge Networks
Penny H. Bewick	New Edge Networks
Karl Wyler	New Mexico
Maryanne Reilly	New Mexico Public Reg. Comm
Mike Ripperger	New Mexico Public Reg. Comm
Patrick Fahn	North Dakota PSC
Frank Darr	NRRI
Barbara Combs	Oregon PUC
Sterling Sawyer	Oregon PUC
Marlon "Buster" Griffing	QSI Consulting
Andrew Crain	Qwest
Barbara Brohl	Qwest
Bill Taylor	Qwest
Carl T. Inouye	Qwest
David Gonazales	Qwest
David Sather	Qwest
Dennis Wu	Qwest
Ione Wilkens	Qwest
Jeff Carmon	Qwest
Joanne Ragge	Qwest
Lynn Stang	Qwest
Mark Reynolds	Qwest
Michael Williams	Qwest
Nita Taylor	Qwest
Paul McDaniel	Qwest
Peter Cummings	Qwest
Wayne Kobbervig	Qwest
Douglas Hsiao	Rythms
Cheryl Boyd	SBC Telecom
Mark Mattson	SBC Telecom
Harlan Best	South Dakota PUC
Keith Senger	South Dakota PUC
Rolayne Wiest	South Dakota PUC
Barb Young	Sprint
Don Low	Sprint
Jim Kite	Sprint
Dennis Miller	Utah
Wendy Fuller	Utah
Judith Hooper	Utah Division of PUC

Appendix B (continued)

<b>NAME</b>	<b>ASSOCIATION</b>
Dave Griffiths	Washington Utilities & Trans Com
Tom Spinks	Washington Utilities & Trans Com
Chad Warner	Worldcom
Karen Kinard	Worldcom
Liz Balvin	Worldcom
Terry Tan	Worldcom
Thomas Priday	Worldcom
Tom Dixon	Worldcom
Mike Korber	Wyoming PSC
David LaFrance	XO Communications
Rex Knowles	XO Communications
George Ford	Z-Tel
Janet Livengood	Z-Tel