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ⓐ Bell Atlantic

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 7, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW - Room 222  
Washington, D.C. 20554

Re: **Ex Parte**  
CC Docket No. 96-149, Implementation of the Non-  
Accounting Safeguards of Sections 271 and 272 of the  
Communications Act of 1934, as amended. Further  
Notice of Proposed Rulemaking on Information  
Disclosure Requirements Relating to Section  
272(e)(1)

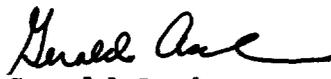
Dear Mr. Caton:

On July 7, 1997 Eli Diaz, representing NYNEX and Joann Barron, Rita Killian, Susan Smith and the undersigned representing Bell Atlantic met with David Kirschner and Lisa Sockett of the Federal Communications Commission, Policy and Program Planning Division regarding the above referenced docket. A copy of the handout, which provides response to the AT&T June 20, 1997 Ex Parte on the above referenced docket, used to guide the discussion is attached.

Other items discussed reflected the positions Bell Atlantic and NYNEX had provided in their written comments already on the record. An original and a copy of this Ex Parte is being filed in the office of the Secretary on July 7, 1997.

Please include it in the public record of this proceeding.

Respectfully submitted,

  
Gerald Asch

cc: Mr. Kirschner  
Ms. Sockett

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**I. CAPTURING DATA TO BE REPORTED**

- AT&T time to restore and trouble duration example:
  - Excessive amount of detail
  - Voluminous output
    - Reporting systems are limited to 4 data points per report
    - Multiple servers means multiple reports
  - Proprietary data at this level of detail
- Other IXC requirements and corresponding BA/NYNEX reporting uses average mean time to repair, not a percent cleared in hours
- Other IXCs will not have a benchmark with which to compare BOC affiliate data if AT&T metrics are used
- Today we report to AT&T percent cleared in less than 3 hours separately for DS1 and DS0 and, in addition, less than 1 hour for DS1

RECOMMENDED ALTERNATIVE:

- % Cleared within 3 Hours for DS1 and Above
- % Cleared within 3 Hours for DS0

**II. MEASURING CUSTOMER DESIRED DUE DATE VS. FIRM ORDER COMMITMENT DATE**

- Today AT&T does not receive measurements based on customer desired due date
- Today AT&T and other IXCs are provided % complete from Firm Order Commitment date to completion date
- System processes cannot measure interval from customer desired due date to completion date customer desired due date is not carried through all relevant systems
- Other IXCs are interested in the firm order commitment date vs. Customer desired due date
- IXC is responsible for fixing own input errors (See Order Flow Intervals Diagram). Carriers can take multiple days to correct their errors. Error routines are mechanized and are the same for all carriers. Common errors in IXC input are wrong customer address, busy carrier facilities (i.e., CFA), wrong NC/NCI codes.
- Same day service can be requested by carriers and provided when a carrier furnishes order by 7 a.m. and facilities are available (exception is when no facilities are available)

RECOMMENDED ALTERNATIVE:

- % Circuits Completed by Firm Order Commitment for DS1 and Above
- % Circuits Completed by Firm Order Commitment for DS0

In addition, a measurement from time in which a correct service order is received until time a firm order commitment is given can be measured as:

- % DS3 Orders Confirmed in 72 Hours
- % DS1/DS0 Orders Confirmed in 24 Hours

Note: DS3 orders require more time to commit to a date because a site visit must be made (Unless there are existing DS3s already installed at the location)

### **III. PIC CHANGE INTERVAL**

- Reporting by CIC could reveal competitively sensitive information.
- Rather than report by actual CIC value, affiliate CICs could be reported simply as CIC "A", CIC "B", CIC "C", etc.
- Local commissions require reporting of PIC change intervals for intraLATA PIC changes. This reporting is on an average basis and measures
  1. The interval for the composite of all IXC initiated requests (not by CIC)
  2. The interval for the LEC initiated requests
- All IXCs have the ability to execute "On-line" PIC changes in a matter of minutes. Some IXCs have elected not to use this ability
- IXCs currently measure LEC performance on their PIC change request.

#### **RECOMMENDED ALTERNATIVE:**

Measures Average Time From Receipt of Carrier Initiated PIC Change Request to Completion at the Switch

CIC "A"\* - Average # Hours  
CIC "B"\* - Average # Hours  
CIC "C"\* - Average # Hours

\*Alpha Character Rather than Actual PIC Value

### **IV. AT&T RECOMMENDATION TO MEASURE POTS**

- POTS is not an IXC service
- POTS is not reported to AT&T or any other IXC
- 272(e)(1) is a measurement of LEC provision of service to an IXC, not of a LEC provision of service to LEC residential and business customers

NO RECOMMENDED ALTERNATIVE SHOULD BE REQUIRED

### **V. DEFINITION OF MEAN TIME TO CLEAR/AVERAGE DURATION OF TROUBLE**

- Proposed measurements, "Mean Time to Clear", are not consistent with industry standard which is "Mean Time to Restore/Repair"
- Today IXCs (including AT&T) are provided mean time to restore
- Concern about capturing 100% (instead of 95%) troubles can be addressed with mean time to restore. Mean time to restore measures the average time to clear all measured troubles

#### **RECOMMENDED ALTERNATIVE:**

Mean Hours to Restore DS1 and Above  
Mean Hours to Restore DS0

**VI. REQUEST TO MEASURE PIC TROUBLES IN HOURS**

- PIC troubles occur when a customer is connected to a carrier other than their selected IXC
- Systems cannot measure PIC troubles by carrier. Troubles are tracked by end user telephone #  
Multiple systems accept PIC troubles - Business Office, 611 Repair, Carrier Single Point of Contact and Regional Carrier Access Service Center
- If IXC directs its customers to call the IXC (vs. the LEC), the IXC has been provided the ability to execute "On-line" PIC changes in a matter of minutes

NO VIABLE ALTERNATIVE CAN BE RECOMMENDED

**VII. COUNTING TEN DS1 CONNECTIONS AS ONE "INSTALLATION" (to Prevent LEC Gaming)**

- Experience has shown AT&T normally orders one circuit per access service request. This should be a non-issue with AT&T.
- Today we report to AT&T and other IXCs order completion by individual circuits.

**VIII. ADDITION OF FAILURE FREQUENCY MEASUREMENT IS APPROPRIATE**

- Significant differences in failure frequency results could signal potential discrepancy levels in service provided

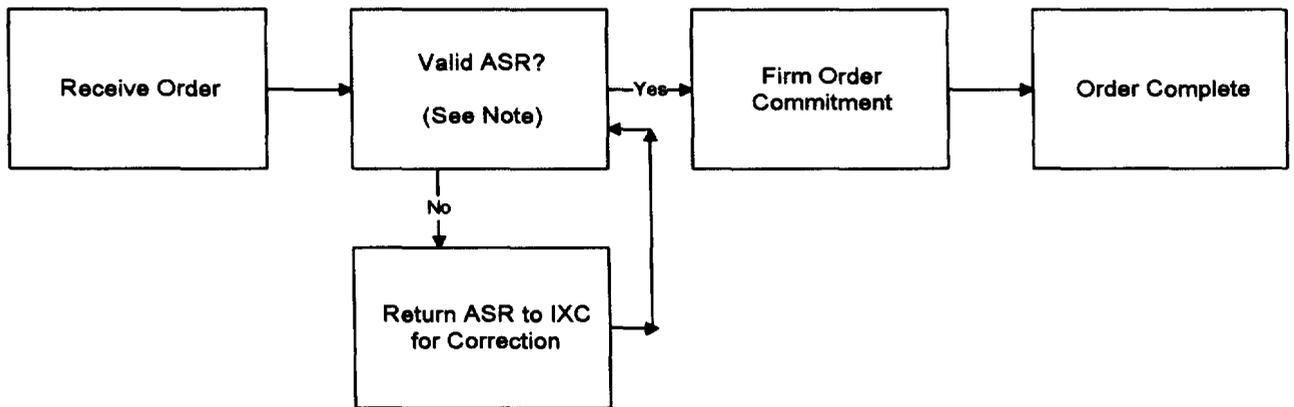
SUGGESTED REPORTING:

% Failure Frequency for DS1 and Above  
% Failure Frequency for DS0

**IX. AT&T REQUESTED 24 HOUR JEOPARDY NOTIFICATION (AT&T Exhibit 4)**

- Corporate policy is to have orders for the day completed by 5 p.m.
- For same day service, the 24 hour notice would have to be made prior to same day service being completed - prior to 7 a.m. Notification of desire for same day service. That means every same day service would automatically require a jeopardy notice
- 24 hour jeopardy notice is not a current AT&T requirement

## ORDER FLOW INTERVALS



Note: IXC can take multiple days to correct an error.

**272(e)(1) Nondiscrimination Measurements**  
 (Recommended Alternative Report)

MEASUREMENT	TYPE OF ACCESS	BOC/BOC AFFILIATE
Percent Circuits Completed by Firm Order Commitment Date	DS1 and Above	xxx %
	DS0	xxx %
Percent of Orders Confirmed Within Established Parameters	DS1/DS0 Orders - in 24 hrs	xxx %
	DS3 Orders - in 72 hrs	xxx %
Average Time of PIC Change (from receipt of Carrier initiated Change to Completion at Switch)	CIC "A"*	## hrs
	CIC "B"*	## hrs
	CIC "C"*	## hrs
	*Alpha representation of multiple CICs ( in lieu of actual CIC value)	
Percent Troubles Cleared within 3 Hours	DS0	xxx %
	DS1 and Above	xxx %
Mean Time To Restore/Repair Service	DS0	## hrs
	DS1 and Above	## hrs
Percent Failure Frequency	DS0	xxx %
	DS1 and Above	xxx %