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Bell Atlantic

November 20, 1997

Ex Parte

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

Re: Implementation of the Local Competition Provisions in the Telecommunications Act of 1997-RM 9101

Dear Mr. Caton,

Please find attached a written ex parte by Bell Atlantic that addresses LCI's ex parte, filed in the above proceeding on September 29, 1997, which attached the sixth version of LCUG's Service Quality Measurements document. Feel free to contact me if you have any questions.

Sincerely,

Dee May

Attachment

cc: Mr. Alex Belinfante
Mr. Jake Jennings
Ms. Wendy Lader
Ms. Radhika Karmarkar
Mr. Richard Metzger
Mr. Brent Olson
Ms. Florence Setzer
Mr. Don Stockdale
Mr. Richard Welch

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BELL ATLANTIC RESPONSE TO LCUG SERVICE QUALITY MEASUREMENTS VERSION 6.0

I. Introduction and Summary

LCI's most recent ex parte attaches the sixth version of LCUG's Service Quality Measurements document. Bell Atlantic has commented on earlier versions of the document in the comment phase of the above-referenced proceeding[1] as well as in a consolidated arbitration proceeding in Massachusetts and a carrier-to-carrier service proceeding in New York.

Bell Atlantic committed in the context of the proceeding to review the merger of Bell Atlantic and the former NYNEX that it will provide quarterly reports (with monthly detail) on some 22 different categories and covering 100 separate service performance measurements that address virtually all of the Service Quality Measurement (SQM) functions specified in the LCUG document.[2] In a few instances, the LCUG document demands measurements that are meaningless in the context of the way Bell Atlantic provides service, or that are simply impossible to perform.

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1 In its Comments and Reply Comments, Bell Atlantic explained that the Commission should not establish rules setting detailed standards that would abrogate the process of negotiation and arbitration contemplated by the Act. Instead, if the Commission decides that a rulemaking is appropriate, it should provide guidance to the industry, for example, with respect to areas that should be measured. Within particular areas, the precise definitions of what is measured and any standards that must be met should be determined through negotiation and, if necessary, arbitration in order to reflect the needs and operating environments of the particular parties.

2 See In the Matter of Applications of NYNEX Corporation Transferor, and Bell Atlantic Corporation Transferee, For Consent to Transfer Control of NYNEX Corporation and its Subsidiaries, File No. NSD-L-96-10, Memorandum Opinion and Order (rel. August 14, 1997), Appendices C, D ("Merger Order").

LCUG, however, proposes numerous "reporting dimensions" for each of its SQM functions, which would result in at least 1,179 separate measures of performance. When combined with LCUG's proposal to report separately for each MSA (there are approximately 73 in the Bell Atlantic region), LCUG would require Bell Atlantic to report over one-half million measures to the Commission each quarter. This level of detail not only would be tremendously cumbersome to report but at the same time would produce reports that are statistically unreliable. This makes no sense.

By contrast, Bell Atlantic has committed to report measurements that cover all three ways CLECs may choose to enter the local market – interconnection, resale, and unbundled network elements. In addition, the level of detail Bell Atlantic has committed to provide reflects the actual operation – the way work is assigned and performed – of its business. As a result, Bell Atlantic's performance monitoring reports will provide useful measures of the service it provides both to CLECs and to its retail customers.

Fundamentally, the commitments Bell Atlantic made in the merger proceeding address LCUG's Core Principles and the concerns expressed by LCUG with respect to Operations Support Systems. The Commission should not, therefore, subject Bell Atlantic to redundant performance reporting requirements.

II. The Service Performance Measurements Which Bell Atlantic Has Committed To Report Address LCUG's Concerns.[3]

A. Pre-Ordering

Bell Atlantic has committed that it will measure the response time of the pre-ordering interface for Customer Service Records, and for other pre-ordering requests – including Due Date Availability, Address Validation, Feature/Function availability, and Telephone Number selection and reservation – in the aggregate. These measurements correspond to the function LCUG proposes to measure: Average Response Interval for Pre-Ordering Information, which "is designed to monitor the time required for CLECs to obtain the pre-ordering information necessary to establish and modify service." (pp. 8, 22)

Bell Atlantic will perform these measurements using a system that replicates the key strokes of a CLEC service representative requesting pre-ordering information through the Bell Atlantic gateway, and the key strokes of a Bell Atlantic service representative requesting information from the underlying OSS. The system sends ten sample CLEC requests and the ten sample Bell Atlantic requests for the same information each hour from 8:00 a.m. to 5:00 p.m., and measures the elapsed time from receipt of the request at the gateway (for CLEC requests) or the underlying OSS (for Bell Atlantic requests) to return of the response. This methodology ensures that response times for identical information requests are compared, and eliminates variations resulting from CLEC choices about the equipment they use to connect to Bell Atlantic's gateway (such as

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[3] Attached as Exhibit A is a chart comparing the measurements proposed by LCUG with the measurements Bell Atlantic has committed to report.

modem speed, dial-up versus direct connection, etc.). Because of the sampling methodology, the system measures response times for CLECs in the aggregate, rather than on a CLEC-specific basis.

Bell Atlantic has also committed that it will report actual availability of the pre-ordering interface as a percent of scheduled availability. Bell Atlantic service representatives and CLEC service representatives obtain pre-ordering information from the same underlying OSS. As a result, if a particular OSS is down, it is equally unavailable to Bell Atlantic employees and to CLEC employees. Any difference in availability, therefore, will be caused by unavailability of the interface, and that is what Bell Atlantic will report. This report is not CLEC-specific.

B. Ordering and Provisioning

Bell Atlantic has committed that it will provide measurements addressing each of LCUG's four proposed Ordering and Provisioning functions: Order Completion Intervals, Order Accuracy, Order Status, and Held Orders. The specific measurements to be provided within each function vary in some respects from those proposed by LCUG – in a few instances, the specific measures proposed by LCUG make no sense in the context of Bell Atlantic's operations; for the majority of LCUG proposed measures, Bell Atlantic's measures address the purpose underlying LCUG's proposal, even where the specific measurement proposed by LCUG cannot be accomplished.

Bell Atlantic has already committed that it will provide both of LCUG's specific measurements for Order Completion Intervals: Mean Completion Interval and Percent Orders Completed on Time. In addition, Bell Atlantic will measure the Average Offered

Interval, providing CLECs with assurance that Bell Atlantic is not offering service to its customers faster than it offers to provide service to CLECs.

LCUG proposes that ILECs should measure Order Accuracy by comparing "the original account profile and the order that the CLEC sent to the ILEC . . . to the services and features reflected upon the account profile as it existed following completion of the order by the ILEC." (p. 26) LCUG would have ILECs make this comparison for both CLEC orders and for ILEC orders. This is simply impractical. Bell Atlantic currently receives and processes approximately 229,000 orders every day. At these volumes, it would be physically impossible to compare all of the documents needed to do what LCUG suggests. Instead, Bell Atlantic will measure Installation Trouble Reports – reports of trouble within the first 30 days after installation. This measure serves two purposes: first, it measures whether the order was completed accurately, since a customer who did not receive a requested service will certainly call to complain; second, it measures whether the provisioning work itself was done properly, since a customer will complain about poor service even if the order was completed correctly. Bell Atlantic will also measure Percent Rejections and Percent Flow Through, both of which are Ordering Quality measurements recommended by the Department of Justice (DOJ).[4]

Bell Atlantic has already committed that it will provide measures addressing four of LCUG's proposed measurements under Order Status: Order Confirmation Timeliness (which corresponds to LCUG's Mean FOC Interval); Reject Timeliness (which corresponds to LCUG's Mean Reject Interval); Average Completed Interval and

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[4] DOJ South Carolina Evaluation, Exhibit 3 – Affidavit of Michael J. Friduss, at 15-17 ("Friduss Aff.").

Timeliness of Completion Notification (which together provide the information LCUG seeks in Mean Completion Interval); and Percent Missed Installation Appointments (which, like LCUG's Percent Jeopardies Returned, serves the purpose of "gaug[ing] whether initial commitments to the CLEC for order processing are at least as reliable as the commitments the ILEC makes for its own operations" (p. 27).

LCUG's request for Mean Jeopardy Interval measurements, on the other hand, evidences a deep misunderstanding of Bell Atlantic's normal operations. According to LCUG, this measures the interval between the ILEC issuing a notice to the CLEC that an order is in jeopardy of missing the due date and the committed completion time and date. (p. 28) LCUG's default benchmark for this measure is no less than 97% of jeopardies received by the CLEC a minimum of two business days prior to the due date. (p. 30) It is only in the rarest of circumstances, however, that Bell Atlantic would know before the actual due date that an order was in jeopardy of not being completed on time. Typically, a technician may find that orders to be worked on any given day take longer or shorter than the expected time. If several orders take longer than expected, it may be impossible to complete all of that technician's scheduled orders that day. The technician may not be able to make that assessment, however, until late in the afternoon. At that point, the technician will notify either Bell Atlantic customer contact personnel or the Telecom Industry Services Operations Center ("TISOC") who will in turn notify the Bell Atlantic customer or the CLEC, respectively. The process is the same, therefore, for CLECs and for Bell Atlantic customers, but there is no logical or meaningful interval measurement that can be reported.

Bell Atlantic has committed that it will provide several measurements giving LCUG the assurances it seeks with respect to Held Orders. As LCUG notes (p. 31), the term "held orders," to Bell Atlantic, means orders held for lack of facilities and Bell Atlantic has committed that it will report the percentage of orders whose due date is missed for lack of facilities. Beyond orders held for lack of facilities, however, LCUG seeks "assurances that the average period that CLEC orders are held, due to a delayed completion, is no worse for the CLEC when compared to ILEC orders." (pp. 9, 30) As discussed above, Bell Atlantic will report Average Offered Interval and Average Completed Interval for both CLECs and Bell Atlantic customers. CLECs therefore will be able to compare whether Bell Atlantic offers to provide service to them as quickly as it does to its own customers, and whether Bell Atlantic in fact completes service orders for CLECs as quickly as it does for its own customers. And, by comparing any difference between the average offered interval and the average completed interval, CLECs will have an indication whether any delays are different for CLECs than for Bell Atlantic customers. In addition, Bell Atlantic will report the percent missed installation appointments for CLECs and for Bell Atlantic. That measure will assure CLECs that, if there are delays in provisioning service, the percentage of customers affected is no worse for CLECs than for Bell Atlantic. Finally, Bell Atlantic has also committed to report, for POTS orders of five lines or fewer, the percentage of orders completed within five days. As a result, CLECs will have ample information addressing the concern underlying LCUG's proposed measures.

C. Maintenance and Repair

Bell Atlantic has already committed that it will report measurements for all four of the functions LCUG proposes to measure: Customer Trouble Report Rate (corresponds to LCUG's Frequency of Troubles); Missed Repair Appointments (corresponds to LCUG's Estimated Time to Restore Met); Mean Time to Repair (corresponds to LCUG's Time to Restore); and Percent Repeat Trouble Reports within 30 days (corresponds to LCUG's Frequency of Repeat Troubles). Bell Atlantic has also committed to report an additional measurement beyond what LCUG has proposed: Percent of Troubles Out of Service for more than 24 hours.

D. Billing

Bell Atlantic has already committed that it will report two measurements addressing LCUG's proposed Timeliness of Billing Record Delivery function. First, for usage originated at Bell Atlantic's switch, Bell Atlantic will report the percent of records provided to CLECs in three days, the percent provided in four days, the percent provided in five days, and the percent provided in eight days. Bell Atlantic, therefore, will provide CLECs with more information than LCUG's proposed Mean Time to Provide Recorded Usage Records. In addition, with respect to the carrier bill (or "invoice"), Bell Atlantic will report the percent of carrier bills ready for distribution to carriers within 10 days of the bill date. Bell Atlantic has, therefore, committed to provide measurements addressing both of LCUG's timeliness measures.

LCUG also proposes to measure the accuracy of both invoices and usage bills. Bell Atlantic has no way to measure this either for CLECs or for itself. Indeed, if Bell Atlantic *could* determine that a bill contained inaccuracies, it would fix the bill *before*

delivery. In any event, with respect to usage bills, Bell Atlantic's central office switches collect and record usage data as calls are processed. The switch does not separately capture CLEC and Bell Atlantic usage data. Because usage data are captured for the entire switch, any errors in the capture or delivery of that data are as likely to affect Bell Atlantic's customers as the CLEC.

E. Network Performance

Bell Atlantic has committed to report two measurements of network performance: Percent Common Trunk Blocking and Percent Dedicated Final Trunk Blocking. The Percent Common Trunk Blocking measures the number of trunk groups not meeting a B.005 engineering design standard. This is a standard Commission blocking report used by Bell Atlantic to monitor trunk groups for traffic from end offices to an access tandem. Because these trunk groups carry both Bell Atlantic and CLEC traffic without distinction, this measure is not Bell Atlantic or CLEC-specific. The Percent Dedicated Final Trunk Blocking measures the number of dedicated final trunk groups not meeting a B.01 engineering design standard. This measure will be reported on a CLEC-specific basis.

LCUG, however, proposes to measure network performance parity by having ILECs test a "random and statistically reliable . . . sample of network configurations employed by the CLEC" on a variety of performance parameters.[5] There are a number of problems with this suggestion. First, Bell Atlantic does not test or monitor its own network in this way. Second, while a call is occurring, Bell Atlantic's switches have no

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[5] To the extent LCUG's suggestion is based on testing "UNE combinations," it is no longer relevant. Iowa Utilities Bd. v. FCC, No. 96-3321, slip op. (8th Cir. October 14, 1997).

way of discriminating between a CLEC end user making a call and a Bell Atlantic end user making a call.[6] As a result, differences in the "underlying quality of the ILEC network performance" (p. 50) would result from differences between one switch and another – but will affect all customers in any particular switch equally. Indeed, as DOJ notes, "[c]urrent network design, architecture, and operating systems mak[e] switching and transmission performance measure discrimination highly unlikely. Unless specifically reprogrammed to do so, the network is not likely to recognize the carrier 'owner' of a call processing through it."[7] Finally, LCUG's approach would require a statistically valid sample to be manually captured in every Central Office every month. There are over 600 central offices in New York alone and it is simply not practical or reasonable to do the kind of testing LCUG wants. While Bell Atlantic does monitor and alarm a variety of network equipment components, this equipment does not distinguish between CLEC services and Bell Atlantic services. In order to pinpoint problems with particular "network configurations employed by . . . CLEC[s]," therefore, Bell Atlantic relies on trouble reports. As noted above, Bell Atlantic will report on the frequency of customer trouble reports for both CLECs and Bell Atlantic end users.

F. General

LCUG proposes to measure two "general" functions: Systems Availability and Center Responsiveness. As discussed above, the OSS to which CLECs have access are

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6 As the call is made, the switch gathers information about the call (such as the originating number, terminating number, and duration) and stores this information on tape. This information is later sorted to the appropriate carrier's (CLEC or Bell Atlantic) output file so bills can be created.

7 Friduss Aff. at 25. Bell Atlantic has not reprogrammed its network to do so.

the same systems used by Bell Atlantic employees. If an OSS is down, it is unavailable to both CLEC and Bell Atlantic employees. Any difference in "system availability," therefore, would only occur as a result of unavailability of the gateway or interface used by the CLECs. As noted above, Bell Atlantic's commitments include a measure of gateway/interface availability.

By contrast, LCUG's proposed measurements for Center Responsiveness are not applicable to the way Bell Atlantic's CLEC support centers will function. LCUG proposes that ILECs measure mean time to answer calls and call abandonment rate similarly to the way calls are handled in ILEC retail customer call centers. Unlike Bell Atlantic's retail customer call centers, however, Bell Atlantic's TISOCs are not designed to be high volume call centers. Instead, they handle exceptions and "help" functions; indeed, the centers do not even have call distributors to measure call answer performance. The functions that LCUG apparently envisions being handled by CLEC support centers – such as requests for vanity telephone numbers (p. 41) – are, in Bell Atlantic, handled by the CLEC itself through the available interface to Bell Atlantic's OSS.

G. Operator Services and Directory Assistance

LCUG proposes that ILECs measure and compare the speed of answer to CLEC end user customers when the ILEC provides operator services and directory assistance with the speed of answer ILECs provide to their own customers. While Bell Atlantic reports its overall speed of answer to many of its state commissions, it has no way of measuring separately the speed of answer for CLECs. Operator services calls from CLEC end users are handled by the same operators and call distributors as calls from Bell Atlantic end users. Since all calls are in the same queue for handling, performance cannot

be different. Indeed, the only way to measure performance separately for a sub-group (whether an individual CLEC or all CLECs in the aggregate) would be to send that group's traffic to a separate operator group – which would increase, not reduce, the chance of disparate treatment.

H. Interconnect/Unbundled Elements and Combos

LCUG proposes to measure two functions in this category – Availability of Network Elements and Performance of Network Elements. Neither the category nor the proposed measures make sense, however. First, the category appears largely duplicative of the measurements already covered by Network Performance and Maintenance and Repair. As described above, Bell Atlantic has already committed to report a number of measurements in each of these areas. Moreover, to the extent LCUG proposes to measure combinations of elements, the category has been superseded by the Eighth Circuit's recent order. Iowa Utilities Bd., supra.

Finally, some of the proposed measurements make no sense or are simply unnecessary. For example, LCUG proposes that LECs provide reports of comparative performance for themselves and CLECs with respect to access to the 800, LIDB, and AIN databases. Access to the 800 database for CLECs using their own switches occurs through the same arrangements as access for other LECs, such as independent telephone companies (ITCs). Queries to the 800 database are processed without differentiation between CLEC, ITC, or Bell Atlantic origination. If a CLEC is using Bell Atlantic's unbundled switching to provide service, it will obtain access to and information from the 800 database at parity with Bell Atlantic's customers because, as noted above, the switch simply does not differentiate between calls originated by CLEC end users and calls

originated by Bell Atlantic end users. Bell Atlantic has provided access to its LIDB database for other carriers for several years, and provides the same access to CLECs. With respect to AIN, to the extent a CLEC is using its own switch to access Bell Atlantic's AIN database (SCP), Bell Atlantic has no control over what other services may be provided from the switch or what interactions there may be. It cannot tell, therefore, whether AIN services will work the same way for CLECs as they do for Bell Atlantic. On the other hand, if the CLEC is providing service using unbundled switching from Bell Atlantic, the switch does not distinguish whether a CLEC end user or a Bell Atlantic end user is initiating the call and therefore cannot provide different service to the CLEC customer. Because different AIN services may use different application service logic, however, the transaction time for an AIN database query may differ depending on the service(s) to which the end user subscribes. Bell Atlantic has no control over the application design for a CLEC's own AIN services.

III. The Measures Bell Atlantic Has Committed To Report Reflect The Actual Operation Of The Business.[8]

The level of detail Bell Atlantic has committed to report reflects the needs of CLECs and the actual operation of Bell Atlantic's business. For ordering, provisioning, and maintenance measurements, Bell Atlantic will report separately on five product groups: Interconnection Trunks, Resale POTS services, Resale Special services, UNE POTS services, and UNE Special services. As a result, Bell Atlantic has committed to

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[8] Attached as Exhibit B is a chart comparing the "report dimensions" proposed by LCUG with the level of detail Bell Atlantic has committed to provide in its performance reports.

provide reports that will reflect all three ways competitors can enter the market – interconnection of their own networks with Bell Atlantic's, purchase of unbundled network elements from Bell Atlantic, and resale of Bell Atlantic's services.

In addition, where relevant to the particular measure, Bell Atlantic will provide report detail by Dispatch and Non-Dispatch work. The breakdown between POTS and Special services, and between Dispatch and Non-Dispatch work reflects the way Bell Atlantic actually assigns and performs work for its own customers, as well as for CLECs. Moreover, because – for example – an installation order requiring a dispatch may take longer than one that does not, and because Special services require engineering design intervention while POTS services do not, reporting each separately provides a more accurate view of the work performed and avoids masking the performance of either type of work through averaging with other, different work. As a result, the 22 categories of measurements Bell Atlantic has committed to provide cover 100 separate measures of performance.

By contrast, the "reporting dimensions" LCUG proposes for its 27 categories of measurements would result in more than 1,179 separate measures of performance. Many of these "dimensions," however, would require Bell Atlantic to report on services that it does not provide for itself or for CLECs;[9] to separate out for report purposes work that is

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[9] For example, LCUG lists "Facility Availability" under Pre-Ordering. This information is not available to Bell Atlantic representatives or to CLEC representatives in the Pre-Ordering phase.

not tracked separately in practice;[10] or to report separately performance that, by its nature, must be identical for CLEC end users and for Bell Atlantic end users.[11]

Bell Atlantic has committed that it will report separately for each jurisdiction it serves – 13 states and the District of Columbia. This means that Bell Atlantic will be providing the Commission with 8400 separate measurements each quarter.[12] In addition, pursuant to the merger commitment, Bell Atlantic will report individually to each CLEC on its performance for that CLEC in each state where the CLEC operates. There are currently more than 276 certified CLECs in the Bell Atlantic region. Bell Atlantic will provide these reports within 45 days of the end of each calendar quarter.[13]

LCUG, however, proposes that reports be made on an MSA basis, "although further detail should be required where it improves the ability to make meaningful comparisons." (p. 5) In the Bell Atlantic region, there are approximately 73 MSAs. To comply with LCUG's proposal, Bell Atlantic would have to report 172,134 measures per

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[10] For example, LCUG proposes 15 separate "Standard Service Groupings" but Bell Atlantic does not maintain product-specific data in the provisioning environment.

[11] For example, LCUG proposes to measure Dial Tone Delay and Call Completion Performance. Both of these are measured by each switch for the switch as a whole – the switch cannot perform differently for some customers in the switch than for others. It is possible that performance will vary by switch type, but all customers in any particular switch will experience the same performance. See Friduss Aff. at 25.

[12] 14 jurisdictions x 100 measurements x 3 months per quarter for both Bell Atlantic and CLECs in the aggregate: 14 x 100 x 3 x 2 = 8400.

[13] LCUG demands that ILECs provide reports within 5 business days of the end of the reporting period. This is entirely unrealistic given the number of reports Bell Atlantic has committed to provide.

month to the Commission, or 516,402 measurements every quarter.[14] Yet the level of detail requested by LCUG would result in many of these measurements being based on sample sizes so small that they would be statistically unreliable. As a result, LCUG's own proposal undermines one of its key themes: that a measurement plan must "permit[ ] direct comparisons of the CLEC and CLEC industry experience to that of the ILEC through recognized statistical procedures." (p. 3)

IV. Bell Atlantic's Commitments Address LCUG's Core Principles.

The commitments Bell Atlantic made in the merger proceeding address all six of LCUG's "core principles": Service Parity, Performance Measurement, Electronic Interfaces, Systems Integrity, Notification of Change, and Standards Adherence. (p. 3) Bell Atlantic agrees that parity between the service provided for CLECs and service provided for its own retail operations (where there is a retail analog for the service provided to CLECs) is the appropriate standard of performance. The detailed performance measurement reports Bell Atlantic has committed to provide enable Bell Atlantic, CLECs and regulators to determine that that standard has been met.

In addition, Bell Atlantic has committed that it will provide uniform electronic interfaces within the former NYNEX region and the former Bell Atlantic region, respectively (and, ultimately, within the new Bell Atlantic region). LCUG complains about the variations and interim nature of the interfaces offered to date, but notes itself that there is a "lack" of industry guidelines at this point. (p. 3)

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[14] 73 MSAs x 1179 measurements x 3 months per quarter for both Bell Atlantic and CLECs in the aggregate: 73 x 1179 x 3 x 2 = 516,402. There would be an even greater

Bell Atlantic has committed that it will implement standards or guidelines established by the Alliance for Telecommunications Industry Solutions (ATIS) for interfaces used by carriers purchasing interconnection to obtain access to OSS within specific time frames, and has also committed that it will continue to make available existing interfaces that it agreed to make available pursuant to interconnection agreements. As a result, carriers know the time frame within which Bell Atlantic will implement new industry standards, and that older interfaces contained in their interconnection agreements will continue to be available.

CONCLUSION

Bell Atlantic has already committed to provide quarterly reports measuring virtually all of the functions LCUG demands. As discussed above, in a few areas, LCUG proposes measurements that either make no sense or are unavailable. Nevertheless, other measurements Bell Atlantic has committed it will provide address LCUG's reasonable underlying concerns. Requiring Bell Atlantic to implement LCUG's proposed measurements would subject it to an added, redundant layer on the reporting Bell Atlantic has already committed to provide. Because those reports will enable both the Commission and CLECs to monitor the performance Bell Atlantic provides for its retail customers and for CLECs, the Commission should not adopt LCUG's proposal.

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multiplier effect on the individual CLEC reports, since Bell Atlantic would have to provide each CLEC a separate report for each MSA in which it operates.

Comparison of Measurements Suggested by LCUG with Bell Atlantic Commitments
(Numbers in Bell Atlantic column correspond to measurement numbers in Merger Order, Appendix D)

	LCUG Proposed **Functions**/Measurements	Bell Atlantic Committed Measurements	Comments
	PRE-ORDERING (PO)		
PO-1	**Average Response Interval for Pre-Ordering Information** • Average Response Interval for Pre-Ordering Information	**1. Response Time OSS Interface**	LCUG proposes to measure Bell Atlantic's performance even when the CLEC's performance is faulty (LCUG would measure "elapsed time from the ILEC receipt of a query from the CLEC, *whether or not syntactically correct,* to the time the ILEC returns the requested data to the CLEC." (p. 22, emphasis added)) Bell Atlantic will sample 10* transactions per hour from 8 a.m. to 5 p.m. via Sentinel system. Sentinel will replicate transactions of a Bell Atlantic service representative using the OSS and of a CLEC representative accessing the OSS through the interface. (* TN to be 1 per hour to prevent TN inventory problems.) The sampling method measures the same type and complexity of requests for Bell Atlantic and for CLECs across the same time of day. Because of the sampling methodology, performance will be reported for all CLECs in the aggregate and for Bell Atlantic.
		2. OSS Interface Availability	Bell Atlantic will report % of time interface is actually available compared to scheduled availability.

	LCUG Proposed **Functions**/Measurements	Bell Atlantic Committed Measurements	Comments
	ORDERING & PROVISIONING (OP)		
OP-1	**Order Completion Intervals** • Mean Completion Interval	**8. Average Offered Interval** **9. Average Completed Interval** **6. Timeliness of Completion Notification** **10. % Completed within 5 Days (POTS 5 Lines or Less)**	LCUG proposes no exclusion for delays caused by the CLEC or its customer. LCUG proposes to measure Mean Completion Interval from ILEC receipt of a valid order to return of a completion notification to the CLEC. Bell Atlantic will report average interval to actual completion of orders and will separately report average time from completion to return of notice of completion to the CLEC. Bell Atlantic will also report two additional measures: Average Offered Interval and % POTS orders for 5 lines or less completed in 5 days.
OP-2	**Order Completion Intervals** • Percent Orders Completed on Time	**11. % Missed Installation Appointments**	LCUG proposes no exclusion for customer or carrier delays. Bell Atlantic's measure is the complement of LCUG's proposal, and measures % of orders which were not completed by the due date on the order confirmation. Like LCUG's proposal, this measure "monitors the reliability of ILEC commitments with respect to committed due dates." (p. 24)

	LCUG Proposed **Functions**/Measurements	Bell Atlantic Committed Measurements	Comments
OP-3	**Order Accuracy** • Percent Order Accuracy	**13. % Installation Troubles within 30 Days** **5. % Rejects** **7. % Flow-Through Orders**	LCUG proposes that, "for each order," Bell Atlantic compare "the original account profile and the order that the CLEC sent to the ILEC" with "the services and features reflected upon the account profile as it existed following completion of the order by the ILEC." (p. 26) Bell Atlantic currently processes approximately 229,000 orders per day for itself, and that number will only increase with CLEC activity. It is simply not realistic to make the physical comparison that LCUG proposes on every order. Bell Atlantic will report % Installation Trouble within 30 days. This measure captures both orders that are completed incorrectly (incorrect services/features) and poor quality provisioning. Bell Atlantic will also report two measures of Ordering Quality recommended by DOJ. Friduss Aff. at 15-17.
OP-4	**Order Status** • Mean Reject Interval	**4. Reject Timeliness** **5. % Rejects**	Bell Atlantic will report average interval to return rejection or query to the CLEC. Bell Atlantic will also report the % of each CLEC's orders rejected.
OP-5	**Order Status** • Mean FOC Interval	**3. Order Confirmation Timeliness** **7. % Flow-Through Orders**	Bell Atlantic will report average interval to return order confirmation to the CLEC. Bell Atlantic will also report, for all CLECs in the aggregate, the % of orders processed directly to the legacy provisioning systems without manual intervention.
OP-6	**Order Status** • Mean Jeopardy Interval		A jeopardy is a "probable miss." Bell Atlantic notifies both its end users and CLECs when a jeopardy situation is identified. The point at which a jeopardy is known is random, varying by time of day, and is not tracked in any OSS. In many situations, a potential miss is not known until the miss actually occurs. Bell Atlantic does not track this for itself. No measure is included in the Bell Atlantic commitment.

	LCUG Proposed **Functions**/Measurements	Bell Atlantic Committed Measurements	Comments
OP-7	**Order Status** • Mean Completion (notice) Interval	**6. Timeliness of Completion Notification**	Bell Atlantic will report average interval to return order completion notice to the CLEC. Many "notices" are actually phone calls.
OP-8	**Order Status** • Percent Jeopardies Returned	**11. % Missed Installation Appointments**	Bell Atlantic will report % of orders not completed by the due date on the order confirmation. Like LCUG's proposal, this measure "will gauge whether initial commitments to the CLEC for order processing are at least as reliable as the commitments the ILEC makes for its own operations." (p. 27)
OP-9	**Held Orders** • Mean Held Order Interval	**12. Facility Missed Orders** **8. Average Offered Interval** **9. Average Completed Interval**	Bell Atlantic defines a held order as one missed due to lack of facilities. Bell Atlantic will report the % of orders with missed appointments resulting from lack of facilities. Bell Atlantic will also report Average Offered Interval and Average Completed Interval. This will provide "assurances that the average period that CLEC orders are held, due to a delayed completion, is no worse for the CLEC when compared to ILEC orders." (pp. 9, 30)
OP-10	**Held Orders** • Percent of Orders Held ≥ 90 Days	**8. Average Offered Interval** **9. Average Completed Interval** **10. % Completed within 5 Days (POTS 5 Lines or Less)**	Bell Atlantic does not have the ability to measure held orders, as defined by LCUG, for itself or for CLECs. However, Bell Atlantic's reports of Average Offered Interval and Average Completed Interval will provide "assurances that the average period that CLEC orders are held, due to a delayed completion, is no worse for the CLEC when compared to ILEC orders." (pp. 9, 30)
OP-11	**Held Orders** • Percent of Orders Held ≥ 15 Days	**8. Average Offered Interval** **9. Average Completed Interval** **10. % Completed within 5 Days (POTS 5 Lines or Less)**	*See* Comments in OP-10, above.

	LCUG Proposed **Functions**/Measurements	Bell Atlantic Committed Measurements	Comments
	MAINTENANCE AND REPAIR (MR)		
MR-1	**Time To Restore** • Mean Time to Restore	**16. Mean Time to Repair** **17. Out of Service > 24 Hours**	Bell Atlantic will report average interval from receipt of trouble report to clearance. In addition, Bell Atlantic will report the percent of troubles that took longer than 24 hours to clear.
MR-2	**Frequency of Repeat Troubles** • Repeat Trouble Rate	**18. % Repeat Trouble Reports within 30 Days**	Bell Atlantic will report % of network troubles for which repeat reports (resulting from Bell Atlantic causes) are received within 30 days.
MR-3	**Frequency of Troubles (Troubles per 100 Lines)** • Trouble Rate	**14. Customer Trouble Report Rate**	Bell Atlantic will report the rate of troubles found in the network per 100 lines. Troubles not found (not there), no access and CPE troubles should be minimized by the CLEC in its dialog with the end user and through testing in the same manner in which Bell Atlantic performs trouble analysis when taking a trouble from one of its end users.
MR-4	**Estimated Time To Restore Met** • Percentage of Customers Troubles Resolved within Estimate	**15. Missed Repair Appointments**	LCUG's proposal does not exclude misses caused by lack of required customer access during the appointment period. Bell Atlantic's measure is the complement of LCUG's proposal, and measures % of repair appointments missed. Like LCUG's proposal, this measure "can be used to establish that CLECs are receiving equally reliable (as compared to the ILEC operations) estimates of the time required to complete service repairs." (p. 11)
	GENERAL (GE)		
GE-1	**Systems Availability** • Percent System Availability	**2. OSS Interface Availability**	Bell Atlantic will report gateway/interface availability. If an OSS is down, it will be down for all users. Any difference in availability for CLECs would result from the gateway/interface being down.

	LCUG Proposed **Functions**/Measurements	Bell Atlantic Committed Measurements	Comments
GE-2	**Center Responsiveness** • Mean Time to Answer Calls		Transactions for CLECs are electronic in nature. The call centers handling CLECs are designed as "fall-out" centers, handling exceptions and performing "help" functions. Consequently these centers are not designed to be high volume call centers and are not analogous to the retail center handling calls for Bell Atlantic end users. Accordingly, this is not a meaningful measure.
GE-3	**Center Responsiveness** • Call Abandonment Rate		*See* Comments in GE-2, above.
	BILLING (BI)		
BI-1	**Timeliness of Billing Record Delivery** • Mean Time to Provide Recorded Usage Records	**21. Timeliness of Daily Usage Feed** • **% in 3 business days** • **% in 4 business days** • **% in 5 business days** • **% in 8 business days**	The LCUG proposal fails to consider the processes used by Bell Atlantic to capture its own end user records. Usage is only transmitted on business days and not weekends and holidays. Bell Atlantic will report timeliness of usage delivery.
BI-2	**Timeliness of Billing Record Delivery** • Mean Time to Deliver Invoices	**22. Timeliness of Carrier Bill**	Bell Atlantic will report the percent of invoices sent in 10 business days.
BI-3	**Accuracy of Billing Records** • Percent Invoice Accuracy		Bell Atlantic assumes that the invoice is accurate when it is delivered. If it had the ability to measure this, it would fix the invoice before delivery. Only the CLEC can measure this and report it to Bell Atlantic. Bell Atlantic has no measure of bill accuracy for its own end user bills.

	LCUG Proposed **Functions**/Measurements	Bell Atlantic Committed Measurements	Comments
BI-4	• Percent Usage Accuracy		Bell Atlantic assumes that the usage tapes are accurate. Like invoice accuracy, the CLEC is in the position to measure this and not Bell Atlantic. Bell Atlantic has no measure of usage accuracy for itself. Bell Atlantic's central office switches collect and record usage data as calls are processed. Because the switch does not separately capture CLEC and Bell Atlantic usage data, the usage collected for CLECs will be as accurate as it is for Bell Atlantic end users.
	OPERATOR SERVICES AND DIRECTORY ASSISTANCE (OS, DA)		
OS/DA-1	**Speed To Answer** • Mean Time to Answer		Operator Services calls for CLECs are handled by the same Operators and call distributors as Bell Atlantic end users operator services calls. Because both types of calls are in the same queue to answer, performance can not be different. The only way to measure performance separately for a CLEC would be to put all of their traffic on to a separate operator group - thereby increasing the likelihood of different treatment. In many states this measure is provided to the state commission.
	NETWORK PERFORMANCE (NP)		
NP-1	**Network Performance Parity** • Network Performance Parity	**19. % Common Trunk Blocking** **20. % Dedicated Final Trunk Blocking** **16. Mean Time to Repair** **17. Out of Service > 24 Hours** **18. % Repeat Trouble Reports within 30 Days** **14. Customer Trouble Report Rate**	Particularly in the area of switch performance, the switch has no way of discriminating between a CLEC end user making a call compared to a Bell Atlantic end user making a call. See Friduss Aff. at 25. The measurement approach recommended by LCUG would require every Central Office (there are over 600 in New York alone) to have a statistically valid sample - manually captured each month.