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March 19, 1998

EX PARTE OR LATE FILED

NOTICE OF EX PARTE PRESENTATION

RECEIVED
MAR 19 1998
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: In the Matters of Implementation of the Local Competition Provisions in the Telecommunications Act of 1998, CC Docket No. 96-98; Petition For Expedited Rulemaking by LCI International Telecom Corp. and Competitive Telecommunications Association, RM 9101; Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Oklahoma, CC Docket No. 97-121

Dear Ms. Salas:

Please be advised that yesterday Martin Grambow, Vice President and General Counsel, SBC Telecommunications, Inc., Paul Mancini, General Attorney, SBC Communications Inc., Elizabeth Ham, Executive Director-Interconnection and Resale Technical Implementation, Southwestern Bell Telephone Company, and Randy Dysart, Area Manager-Performance Measurements, Southwestern Bell Telephone Company, and the undersigned met with Michael Pryor, Bill Agee, Jake Jennings, Radhika Karmarkar, David Kirschner, Wendy Lader, Brent Olson, Jeannie Su, and Joe Welch of the Common Carrier Bureau's Policy and Program Planning Division and Patrick DeGraba of the Office of Plans and Policy in connection with the above-referenced proceedings. The purpose of the meeting was to discuss the methods Southwestern Bell is offering for access to its operations support systems (OSS) and the issue of performance measurements.

Under the Telecommunications Act of 1996, incumbent local exchange carriers (LECs) are obligated to offer, under nondiscriminatory conditions, retail services for resale at wholesale rates and to provide nondiscriminatory access to unbundled network elements.[1] The Commission has held that these duties "mandate[] equivalent access to OSS functions that an incumbent uses for its own internal purposes or offers to its customers or other carriers."[2] The Commission has

[1] 47 U.S.C. §§ 251(c)(3) & (4).

[2] Second Order on Reconsideration, In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98 (rel. Dec. 13, 1996) at ¶ 9;

further held that, in order to obtain in-region interLATA relief under Section 271, "equivalent access to OSS" requires the Bell Operating Companies (BOCs) to provide parity (i.e., access to OSS functions that is equivalent to the access the BOC provides itself) where there is a retail analogue as in the case of resale, and to provide an efficient competitor with a meaningful opportunity to compete where there is not retail analogue as in the case of unbundled network elements.[3]

In order to determine whether a BOC is providing parity or a meaningful opportunity to compete, the Commission has indicated that it will "examine whether specific performance standards exist for those functions."[4] In addition, the Department of Justice has stated that it will not support a BOC's Section 271 application for in-region interLATA relief, without the existence of adequate performance measurements. In the Department's view, "[w]ith clear performance benchmarks in place, both competitors and regulators will be better able to detect and remedy any shortcomings in the BOC's delivery of wholesale support systems," and therefore, "the Department will pay close attention to the adequacy of a BOC's established performance measurements."[5]

On May 30, 1997, LCI International Telecom Corp. and the Competitive Telecommunications Association filed a Petition For Expedited Rulemaking which, among other things, sought to have the Commission determine the appropriate

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see First Report and Order, In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98 (rel. Aug. 8, 1996) at ¶¶ 316, 517.

[3] Memorandum Opinion and Order, In the Matter of Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Michigan, CC Docket No. 97-137 (rel. Aug. 19, 1997) at ¶¶ 139-141 ("Michigan Order"); see Memorandum Opinion and Order, In the Matter of Application of BellSouth Corporation, *et al.* Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In South Carolina, CC Docket No. 97-208 (rel. Dec. 24, 1997) at ¶ 98; and Memorandum Opinion and Order, In the Matter of Application of BellSouth Corporation, *et al.* Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Louisiana, CC Docket No. 97-231 (rel. Feb. 4, 1998).

[4] Michigan Order at ¶ 141.

[5] Evaluation Of The United States Department Of Justice, In the Matter of Application of SBC Communications Inc. et al. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in the State of Oklahoma, CC Docket No. 97-121 (filed May 16, 1997) at pp. 47-48. The Department has drawn similar conclusions in its evaluations of Ameritech's Michigan Section 271 application, and BellSouth's South Carolina and Louisiana Section 271 applications. See Evaluation of the U.S. Department of Justice, Ameritech-Michigan, June 25, 1997 at pp. 38-40; Evaluation of the U.S. Department of Justice, BellSouth-South Carolina, November 4, 1997 at p. 29; and Evaluation of the U.S. Department of Justice, BellSouth-Louisiana, December 10, 1997 at pp. 31-33.

minimum performance standards for each OSS function.[6] This petition was placed on public notice, and comments and reply comments were filed by interested parties, including SBC. The Commission has not yet determined whether it will initiate such a rulemaking. However, significant developments have taken place on the issue of performance measurements which, SBC would submit, render the need for such a rulemaking moot.

Specifically, after the Commission rejected its Oklahoma Section 271 application, SBC began an intense series of discussions with the Department of Justice to resolve, among other issues, the question of performance measurements. SBC's incumbent LEC subsidiaries – Southwestern Bell, Pacific Bell, and Nevada Bell – had already agreed to a number of performance measurements in their interconnection agreements with certain large CLECs. Nonetheless, SBC worked closely with the Department and its performance measurements consultants to develop a comprehensive set of performance measurements that will be implemented in all seven of its in-region states – Arkansas, California, Kansas, Missouri, Oklahoma, Texas, and Nevada. These measurements are designed to demonstrate that Southwestern Bell, Pacific Bell, and Nevada Bell are providing CLECs with parity in the case of resale and/or an efficient competitor with a meaningful opportunity to compete in the case of unbundled network elements.

As a result of these discussions, the Department has approved a comprehensive list of performance measurements and has indicated that these performance measurements "would be sufficient, if properly implemented, to satisfy the Department's need for performance measures for evaluating a Section 271 application . . . ."[7] SBC is proud to report to the Commission that it has agreed to implement the Department's comprehensive list of performance measurements.[8] Moreover, SBC has developed a set of 66 performance measurements for implementation in Southwestern Bell that are in conformance with the Department's comprehensive list of performance measurements.[9] SBC will be implementing a nearly identical set of measures in Pacific Bell and Nevada Bell. The only differences will take into account the differences in OSS, and in processes and procedures for delivering resold services and unbundled network elements in California and Nevada.

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[6] Petition For Expedited Rulemaking by LCI International Telecom Corp. and Competitive Telecommunications Association, RM 9101.

[7] Letter from Donald J. Russell, Chief, Telecommunications Task Force, Antitrust Division, U.S. Department of Justice to Liam S. Coonan, Senior Vice President and Assistant General Counsel, SBC Communications Inc., dated March 6, 1998, enclosed herewith as Attachment 1.

[8] Id. at 1.

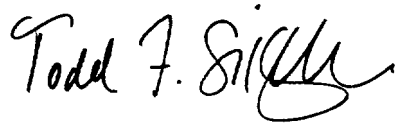
[9] Enclosed herewith as Attachment 2 is the list of Southwestern Bell's Section 271 Performance Measurements.

SBC believes that the Department's comprehensive list of performance measurements should be all that is necessary to demonstrate that it – or any other BOC, for that matter – is meeting the Commission's standards of parity and a meaningful opportunity to compete. The Department, to its credit, first identified the need for performance measurements in its evaluation of SBC's Oklahoma Section 271 application. The Department also has carefully studied both the need for and scope of performance measurements in the context of its evaluation of the Section 271 applications for Michigan, South Carolina, and Louisiana. The Department developed its comprehensive list of measurements in cooperation with SBC and many other parties. Southwestern Bell's set of 66 performance measurements were developed through an 8 month process, which included extensive meetings and presentations by SBC's subject matter experts to the Department, demonstrations of its OSS to the Department, and on-site visits by the Department and its consultants.

Accordingly, SBC submits that it would be counterproductive, unjustified and a waste of valuable Commission and BOC resources for the Commission to open a docket to develop a different set of performance measurements at some unspecified point of time in the future. The Department's comprehensive list of performance measurements will more than adequately and clearly demonstrate whether the CLECs are receiving parity and a meaningful opportunity to compete. SBC has already expended significant resources in developing and implementing a set of performance measurements in conformance with the Department's comprehensive list of performance measurements. Acceptance of the Department's measurements will thus provide finality on this important issue. Therefore, in considering the BOCs' applications for Section 271 relief, SBC urges the Commission to "give substantial weight to the Attorney General's evaluation" on this issue.

If the Commission should have any questions concerning this letter or the attachments, please do not hesitate to contact me or Marty Grambow at (202) 326-8868. In accordance with the Commission's rules, an original and one copy of this notification are submitted herewith.

Respectfully submitted,



Todd F. Silbergeld
Director-Federal Regulatory

Attachments

cc: Chairman and Commissioners
A. Richard Metzger, Jr., Esq.
Carol E. Mattey, Esq.
Meeting Attendees

ATTACHMENT 1

U. S. Department of Justice

Antitrust Division

City Center Building
1401 H Street, NW
Washington, DC 20530

March 6, 1998

Liam S. Coonan, Esq.
Senior Vice President and
Assistant General Counsel
SBC Communications, Inc.
175 E. Houston Street
San Antonio, Texas 78205

Re: SBC Performance Measures

Dear Mr. Coonan:

As part of the Department's commitment to work with all Bell companies on relevant issues in advance of their section 271 applications, the Department of Justice and SBC Communications, Inc. ("SBC") have, as you know, been spending considerable time discussing issues relating to wholesale support processes and performance measures. In that regard, you have provided us with a draft list of proposed performance measures, a list that you have supplemented as our discussions have progressed.

Attachment A is a comprehensive list of performance measures. With the qualifications set forth below, we are satisfied that the performance measures listed in Attachment A, to which SBC has agreed,[1] would be sufficient, if properly implemented, to satisfy the Department's need for performance measures for evaluating a Section 271 application filed in the not-too-distant future.

We appreciate SBC's engagement with the Department on satisfying our competitive assessment in advance of a filing and look forward to working with you on additional related issues. One such issue is whether the performance measures in Attachment A have been "properly implemented," since the majority of our discussions have dealt with the performance measures themselves and since it is upon the actual measures that this letter focuses. As you can appreciate, there are important repercussions that may arise from how the measures are implemented. For example, definitional issues and other details connected with the measures themselves (such as

[1] As we have discussed with you, the Department has agreed to narrow variances from Attachment A in light of certain SBC processes and procedures. Specifically, we have agreed that SBC need not provide separate operator services and directory assistance speed-of-answer measurements for branded and unbranded calls and that SBC can limit its 911 measurements to an error-clearing interval measure that is presently under development.

the basis upon which due dates and start and stop times are set in particular measures) could significantly affect the meaning of the data. Thus, because we have not yet reached agreement on issues such as data retention, presentation, and reporting (*e.g.*, disaggregation, reporting intervals and formats), and analysis, we expect that Department staff and SBC will continue to work towards resolution of these issues. We also expect that Department staff and SBC will discuss performance standards and benchmarking, other important aspects of the Department's performance analysis.

Moreover, while we are satisfied at the present time that the measures set out in Attachment A would, if properly implemented, suffice for present purposes, performance measurement is a dynamic area and future developments could necessitate changes in our views of appropriate performance measures. For example, while the measures listed in Attachment A are structured to cover the provision of unbundled network elements, once it becomes clear how unbundled network elements will be provided so as to allow requesting carriers to combine such elements in order to provide a telecommunications service, we may find that other measures are necessary to assess performance in this situation. In addition, the development of new services or new methods of providing existing services could necessitate additional performance measures. Alternatively, through ongoing regulatory proceedings, our own investigation, or otherwise, we might learn of additional risks, and even occurrences, of discrimination of which we were not previously aware. Accordingly, we would expect SBC to implement additional measures or modifications to existing measures should it become apparent to the Department that they are necessary. On the other hand, developments might reveal that certain measures were no longer necessary and could be eliminated.

Our satisfaction with the performance measures set out in Attachment A must be placed in its proper context. First, it is limited to the Department's application of its competitive standard. Under section 271, the Department is to evaluate applications for Bell entry using "any standard" the Department believes is appropriate, and the FCC is required to give "substantial weight" to that evaluation. As we have explained, our standard, in addition to the specific statutory prerequisites, requires a demonstration that local markets in a state have been "fully and irreversibly opened to competition," and appropriate performance measures, standards, and benchmarks are important to the Department's application of our competitive standard.

Second, our conclusions relate only to the Department's evaluation of section 271 applications and should not be construed as an expression of the Department's views concerning the appropriate resolution of any federal or state regulatory proceeding relating to performance measures. The FCC and some state commissions have ongoing proceedings considering both performance measures and performance standards, including company-specific and state-specific issues. These proceedings may produce performance measures different from, or in addition to, those described in Attachment A.

I am hopeful that we can resolve the remaining issues expeditiously through our ongoing discussions. I appreciate your cooperation in addressing these issues and look

forward to our continuing mutual efforts. If you have any questions or suggestions regarding these issues, please call.

Sincerely,

Donald J. Russell
Chief
Telecommunications Task Force

PERFORMANCE MEASURES

I. PRE-ORDERING

1. *Pre-order OSS Availability*: Measures both the hours and days the BOC's pre-order OSSs are available to CLECs and non-scheduled downtime.

2. *Pre-order System Response Times*: Measures, in seconds, the speed with which the CLEC Service Representatives receive information (including rejection and error messages) for processes described below with a customer on the line. These cycle-time measures assume the CLEC has mechanical access to the BOC databases and should be measured in a manner that allows appropriate comparisons to like cycle times experienced by BOC retail service representatives. Times are provided separately for the following functions:

   a. Address verification

   b. Request for telephone number

   c. Request for customer service record (CSR)

   d. Service and product availability

   e. Appointment scheduling

II. ORDERING

1. *Firm Order Commitment (FOC) Cycle Time*: Measures the average time from CLEC service order submission to BOC response, confirming receipt of a properly formatted and appointed order and committing to complete the order by a specified date. In addition, may be presented as the percentage returned within an agreed upon interval.

2. *Rejected Order Cycle Time*: Measures the average time, from CLEC service order submission to BOC response, for rejecting an incomplete service order or one containing errors. Each submission of an order, up to and including the FOC, requires a response cycle-time result

3. *Ordering Quality*: The following performance measures are important determinants of service order processing parity or adequacy. Each is important in its own right and provides insights into different aspects of order quality. While the entire set would not be required, Percent Flow Through and either Percent Rejected Orders or Order Submissions per Order are necessary.

   a. *Percent Rejected Orders*: Measured at the BOC gateway, it is the result of dividing rejected orders by total orders submitted, manually or mechanically. It is an adequacy measure because there are no equivalent BOC analogs. BOC orders are "rejected" via automatic edits before the order leaves the service representative position.

   b. *Order Submissions per Order*: Measured at the BOC gateway, it is determined by dividing total order submissions by the number of orders receiving a firm order commitment.

c. *Percent Flow Through*: Measures the percentage of orders that flow from the BOC gateway to acceptance by the BOC service order processor without manual intervention. Orders rejected at the gateway are excluded.

4. *Ordering OSS Availability*: Measures both the hours and days the BOC's ordering OSSs are available to CLECs and non-scheduled downtime.

5. *Ordering Center Availability*: Reports both the hours and days of operation of the BOC ordering center.

6. *Speed of Answer–Ordering Center*: Measures the average time to reach a BOC service representative.

III. PROVISIONING

A. Service Provisioning Interval: Measures the time from customer request for service to completion when the appointment is offered by the BOC, either from a common appointment database, generally used in a resale environment, or by agreed-to appointment intervals, more commonly used in a UNE environment. Service Provisioning Interval should be measured both as a mean, or average interval, and as a percent over a standard interval. Next available appointments offered from the work schedule OSS and expedited requests should be included for measurement; customer-requested due dates longer than the offered appointment should be excluded.

1. *Average Service Provisioning Interval*: Measured in days from end-user request to order completion and counted separately for dispatched and non-dispatched orders.

2. *Percent Service Provisioned Out of Interval*: Measures the percentage of service orders completed in more than an agreed upon number of days. Ideally, measured incrementally by day. For example, orders completed in more than 3 days, 4 days, 5 days, and 6 days. This performance measure depicts the tail of the interval curve. Combined with the Average Installation Interval, portrays a robust picture of provisioning cycle time.

B. Other Provisioning Measures

1. *Percent Interconnection Facilities Provisioned Out of Interval*: Measures the percentage of interconnection facilities (switched trunks and dedicated circuits) provisioned in more than an agreed upon number of days.

2. *Percent Missed Appointments–Company Reasons*: Order completion is measured against the *original CLEC-requested due date*. No due date changes may be made unless explicitly specified by the end user or explicitly agreed to by the CLEC and the BOC. Orders missed for company reasons–load, facilities, or other–are included. Orders missed due to customer reasons are not counted as a miss for purposes of this measure.

3. *Percent New Service Failures*: Measures the number of trouble reports on newly provisioned service within an agreed number of days of the original trouble. Studies have shown high correlation between provisioning errors and trouble reports occurring within 10 days and lower correlations beyond 10 days.

4. *Completed Service Order Accuracy*: Measures the extent to which orders are completed by the BOC as ordered by the CLEC.

5. *Orders Held for Facilities*: Measures service orders not completed by the original due date because of a lack of network facilities (including loops and central office equipment) in terms of (a) the average time between the original due date and the final completion date, and (b) the number of pending orders, as of the report date, held beyond a specified period (usually 30 days) following the original due date.

6. *Average Completion Notice Interval*: Measures the average time from order completion to notification of the CLEC for orders submitted on a mechanized basis.

IV. MAINTENANCE

A. Trouble Reporting & Clearance

1. *Trouble Report Rate*: Measured as the number of trouble reports per customer or access line per month.

2. *Percent Repeat Reports*: Measured as the percentage of end-user troubles on the same access line within an agreed number of days of the original trouble. Studies have shown high correlation between repair errors and repeat reports occurring within 10 days and lower correlations beyond 10 days.

3. *Percent Out of Service Over 24 Hours*: Measured as a percentage of out-of-service troubles cleared within 24 hours.

4. *Percent Missed Appointments*: Measures the percentage of trouble reports cleared after the promised appointment. Requires that appointment times, once set, cannot be changed except by the end user.

5. *Mean Time to Repair*: Measured as the average interval from trouble report to clearance.

6. *Interconnection Facilities Restored Out of Interval*: Measures the percentage of interconnection facilities (switched trunks and dedicated circuits) reported out of service and restored after an agreed-to interval. May also be measured and reported as an average interval.

7. *Maintenance OSS Availability*: Measures both the hours and days the BOC's maintenance OSSs are available to CLECs and non-scheduled downtime.

8. *Maintenance Center Speed of Answer*: Measures the average time to reach a BOC repair service representative.

B. Network Quality

1. *Percent Blocked Calls*: Measures trunking grade (quality) of service. Should be provided separately for the following types of trunks:

   a. ILEC End Office to CLEC End Office Trunk Groups

   b. ILEC Tandem to CLEC End Office Trunk Groups

   c. ILEC Tandem to and from ILEC End Office Trunk Groups

V. BILLING

1. *Bill Timeliness*: Measures the percentage of billing records delivered within an agreed-to interval. Should be provided for the following billing information provided to CLECs:

   a. Daily Usage File (DUF): Measures, from message creation to the availability of the usage information to the CLEC, the percentage of DUF's provided within the interval.

   b. Wholesale Bill: Measures the percentage of wholesale bills issued within an agreed-to number of days following the end of the billing cycle.

2. *Bill Completeness*: Measures the percentage of complete billing records for usage charges, recurring charges, and non-recurring charges provided to CLECs. Should be measured after bills are released. Under approved conditions, sufficiently robust pre-release test and audit procedures could substitute for a post-release audit.

   a. Usage: Measures unbillable usage and usage from the current bill cycle not included on the current wholesale bill.

   b. Recurring Charges: Measures current bill cycle recurring charges not included on the current wholesale bill.

   c. Non-Recurring Charges: Measures non-recurring charges completed in the current bill period not included on the current wholesale bill.

3. *Bill Accuracy*: Measures the percentage of accurate billing records for usage charges, recurring charges, and non-recurring charges provided to CLECs. Should be measured after bills are released. Under approved conditions, sufficiently robust pre-release test and audit procedures could substitute for a post-release audit.

VI. OTHER

1. *Operator Services Toll Speed of Answer*: Measures raw interval in seconds or as a percentage under a set objective. Should be provided separately for unbranded and branded service.

2. *Directory Assistance Speed of Answer*: Measures raw interval in seconds or as a percentage under a set objective Should be provided separately for unbranded and branded service.

3. *911 Database Update Timeliness and Accuracy*: Measures the percentage of missed due dates of 911 database updates and the percentage of accurate updates.

ATTACHMENT 2

SOUTHWESTERN BELL
SECTION 271 PERFORMANCE MEASUREMENTS

I. RESALE POTS, RESALE SPECIALS AND UNES

A. Pre-Ordering/Ordering

1. **Measurement** - Average Response Time For OSS Pre-Order Interfaces.
   Definition - The average response time in seconds from the SWBT side of the Remote Access Facility (RAF) and return for pre-order interfaces (Verigate and DataGate) by function:
   - Address Verification
   - Request For Telephone Number
   - Request For Customer Service Record (CSR)
   - Service Availability
   - Service Appointment Scheduling (Due Date)
   - Dispatch Required.

   Calculation - Σ[(Query Response Date & Time) - (Query Submission Date & Time)]/(Number of Queries Submitted in Reporting Period).
   Report Structure - Reported on a company basis by interface for DATAGATE and VERIGATE.

2. **Measurement** - EASE Average Response Time.
   Definition - Average screen to screen response from the SWBT side of the Remote Access Facility (RAF) and return.
   Calculation - Σ[(Query Response Date & Time) - (Query Submission Date & Time)]/(Number of Queries Submitted in Reporting Period).
   Report Structure - Reported for all CLECs and SWBT by division name(CPU platform).

3. **Measurement** - OSS Interface Availability.
   Definition - Percent of time OSS interface is available compared to scheduled availability.
   Calculation - ((# scheduled system available hours - unscheduled unavailable system hours) ÷ scheduled system available hours)) * 100.
   Report Structure - Reported on a company basis by interface e.g. EASE, DATAGATE, VERIGATE, LEX, EDI and TOOLBAR. The RAF will be reported by CLEC.

4. **Measurement** - % Firm Order Confirmations (FOCs) Received Within "X" Hours.
   Definition - Percent of FOCs returned within a specified time frame from receipt of service requests to return of confirmation to CLEC.
   - All Res. And Bus. < 24 Hours
   - Complex Business - Negotiated
   - UNE Loop (1-49 Loops) < 24 Hours
   - UNE Loop (> 50 Loops) < 48 Hours
   - Switch Ports < 24 Hours.

   Calculation - (# FOCs returned within "x" hours ÷ total FOCs sent) * 100.
   Report Structure - Reported for CLEC and all CLECs. This includes mechanized from EDI and LEX and manual (FAX or phone orders). The FOC for EASE is considered to be at the time the due date is negotiated and is not included in the calculation.

5. **Measurement** - Average Time To Return FOC.
   Definition - The average time to return FOC from receipt of service order to return of confirmation to CLEC.
   Calculation - Σ[(Date and Time of FOC) - (Date and Time of Order Acknowledgment)]/(# of FOCs).
   Report Structure - Reported for CLEC and all CLECs.

6. **Measurement** - Percent Mechanized Completions Returned Within 1 Hour Upon The Successful Execution Of The SORD (BU340) Batch Cycle Which Updates The Order Status, Indicating A Completion Notice. The batch process executes at the following times: 9:00 am, 12:00 noon, 3:00 pm, 6:00 pm, 10:30 pm.
   Definition - % mechanized completions returned within 1 hour for EDI and LEX.
   Calculation - (# mechanized completions returned to CLEC within 1 hour ÷ total completions) * 100.
   Report Structure - Reported for CLEC and all CLECs for the electronic interfaces (EDI and LEX). The 1 hour interval above is subject to change as the EDI polling time frame changes.

7. **Measurement** - Average Time to Return Mechanized Completions.
Definition - Average time required to return a mechanized completion.
Calculation - Σ[(Date and Time of Notice Of Completion Issued to the CLEC) - (Date and Time of Work Completion)]/(# of Orders Completed).
Report Structure - Reported on CLEC and all CLECs for the electronic interfaces (EDI and LEX). The standard interval for returning completion will be >97% received within 1 hour of order completion. The 1 hour interval is subject to change as the EDI polling time frame changes.

8. **Measurement** - Percent Rejects.
Definition - The number of rejects compared to the issued orders for the electronic interfaces (EDI, RMI and LEX).
Calculation - (# of rejects ÷ total orders issued) * 100.
Report Structure - Reported on CLEC and all CLECs for the electronic interfaces (EDI and LEX).

9. **Measurement** - Percent Mechanized Rejects Returned Within 1 Hour Of The Start Of The EDI/LASR Batch Process.
Definition - Percent mechanized rejects returned within 1 hour of the start of the EDI/LASR batch process. The EDI and LASR processes execute every two hours between 6:00 A.M. and 12:00 A.M.
Calculation - (# mechanized rejects returned within 1 hour ÷ total rejects) * 100.
Report Structure - Reported for CLEC and all CLECs for the electronic interfaces (EDI and LEX). The standard interval to send a reject will be 97% within 1 hour of PON.

10. **Measurement** - Mean Time to Return Mechanized Rejects.
Definition - Average time required to return a mechanized reject.
Calculation - Σ[(Date and Time of Order Rejection) - (Date and Time of Order Acknowledgment)]/(# of Orders Rejected).
Report Structure - Reported on CLEC and all CLECs for the electronic interfaces (EDI and LEX).

11. **Measurement** - Mechanized Provisioning Accuracy.
Definition - Percent of mechanized orders completed as ordered.
Calculation - (# of orders completed as ordered ÷ total orders) * 100.
Report Structure - Reported by individual CLEC, CLECs and SWBT.

12. **Measurement** - Order Process Percent Flow Through.
Definition - Percent of orders or LSRs from entry to distribution that progress through SWBT ordering systems excluding rejects.
Calculation - (# of "good" orders that flow through ÷ total orders) * 100
LASR orders that flow through are those orders that go to the mechanized order generation (MOG). Total orders are the sum or orders that go to the MOG and those that go to folders for manual handling. EASE orders that flow through are those orders that are issued by using the PF11 key and do not go to the error queue. The total orders are all PF11 issued orders.
Report Structure - Reported by individual CLEC, CLECs and SWBT for CLEC typed orders and LSC typed orders.

B. Billing

13. **Measurement** - Billing Accuracy.
Definition - SWBT performs three bill audits to ensure the accuracy of the bills rendered to its customers: CRIS, CABS and toll/usage. In addition, SWBT has developed a test order process to ensure the accuracy of the CRIS non-recurring charges (see Attachment 1).
Calculation - (# of bills not corrected prior to bill release ÷ total bills audited) * 100.
Report Structure - Reported for aggregate of all CLECs and SWBT for the CRIS, CABS and Usage bill audits.

14. **Measurement** - Percent of Accurate And Complete Formatted Mechanized Bills.
Definition - Measures the % of accurate and complete formatted mechanized bills via EDI.
Calculation - (Count of accurate and complete formatted mechanized bills via EDI ÷ total # of mechanized bills via EDI.) * 100.
Report Structure - Reported for CLEC and all CLECs.

15. **Measurement** - Percent Of Billing Records Transmitted Correctly.
    Definition - Measures % of billing records transmitted correctly on the usage extract feed.
    Calculation - (Count of billing records transmitted correctly ÷ total billing records transmitted) * 100.
    Report Structure - Reported for CLEC and all CLECs.

16. **Measurement** - Billing Completeness.
    Definition - Percent of service orders on the bill for the current bill period for both CRIS and CABS.
    Calculation - (Count of service orders included in current applicable bill period ÷ total service orders in current applicable bill period) * 100.
    Report Structure - Reported for CLEC, all CLECs and SWBT.

17. **Measurement** - Billing Timeliness (Wholesale Bill).
    Definition - The measurement will be % mechanized bills sent by midnight of the 6th work day after the end of the bill period. Since paper bills are handled via the same process that SWBT uses for paper distribution no measurement is provided.
    Calculation - (Count of bills released on time ÷ total number of bills released) * 100.
    Report Structure - Reported for CLEC and all CLECs.

18. **Measurement** - Daily Usage Feed Timeliness.
    Definition - The percent of usage data transmitted on time. (This measurement is still under development and therefore the definition may change).
    Calculation - (Number of usage feeds transmitted on time ÷ total number of usage feeds) * 100.
    Report Structure - Reported for CLEC and all CLECs.

19. **Measurement** - Unbillable Usage.
    Definition - The percent usage data that is unbillable. (This measurement is still under development and therefore the definition may change).
    Calculation - (Total unbillable usage ÷ total usage) * 100.
    Report Structure - Reported for the aggregate of SWBT and CLECs.

C. Miscellaneous Administrative

20. **Measurement** - LSC Average Speed Of Answer.
Definition - The average time a customer is in queue. The time begins when the customer enters the queue and ends when the call is answered by a SWBT representative.
Calculation - Total queue time ÷ total calls.
Report Structure - Reported for all calls to the LSC by operational separation and SWBT retail.

21. **Measurement** - LOC Average Speed Of Answer.
Definition - The average time a customer is in queue. The time begins when the customer enters the queue and ends when the call is answered by a SWBT representative.
Calculation - Total queue time ÷ total calls.
Report Structure - Reported for all calls to the LOC for all CLECs and SWBT retail.

II. RESALE POTS

A. Provisioning

22. **Measurement** - Mean Installation Interval.
Definition - Average business days from application date to completion date for N,T,C orders excluding customer caused misses and customer requested due dates greater than 5 business days.
Calculation - [Σ(completion date - application date)]/(Total number of orders completed).
Report Structure - Reported for CLEC, all CLECs and SWBT, by Field Work (FW), No Field Work (NFW), Business and Residence.

23. **Measurement** - Percent Installations Completed Within "X" Business Days (POTS).
    Definition - Measure of orders completed within "x" business days, 5 business days for FW and 3 business days for NFW, of receipt of confirmed service order for POTS resale service excluding orders where customer requested a due date greater than "x" business days and excluding orders with only customer caused misses.
    Calculation - (Count of N,T,C orders installed within business 5 days ÷ total N,T,C orders) * 100.
    Report Structure - Reported for CLEC, all CLECs and SWBT by Field Work (FW), No Field Work (NFW), Business and Residence.

24. **Measurement** - Percent SWBT Caused Missed Due Dates.
    Definition - Percent of N,T,C orders where installation was not completed by the due date, excluding customer caused misses.
    Calculation - (Count of N,T,C orders not completed by the due date, excluding customer caused misses ÷ total number of N,T,C orders) * 100.
    Report Structure - Reported for CLEC, all CLECs and SWBT by Field Work (FW), No Field Work (NFW), Business and Residence.

25. **Measurement** - Percent Company Missed Due Dates Due To Lack Of Facilities.
    Definition - Percent N,T,C orders with missed committed due dates due to lack of facilities.
    Calculation - (Count of N,T,C orders with missed committed due dates due to lack of facilities ÷ total N,T,C orders) * 100.
    Report Structure - Reported for CLEC, all CLECs and SWBT Retail for POTS. Reported for > 30 calendar days & > 90 calendar days. (Calculated monthly based on posted orders.)

26. **Measurement** - Delay Days For Missed Due Dates Due To Lack Of Facilities.
Definition - Average calendar days from due date to completion date on company missed orders due to lack of facilities.
Calculation - Σ(Completion date - committed order due date)/(# of posted orders).
Report Structure - Reported for CLEC, all CLECs and SWBT Retail POTS.

27. **Measurement** - Percent Installation Reports Within 10 Days (I-10).
Definition - Percent of N,T,C orders that receive a network customer trouble report not caused by CPE or wiring within 10 calendar days of service order completion excluding subsequent reports and all disposition code "13" reports (excludable reports).
Calculation - (Count of N,T,C orders that receive a network customer trouble report within 10 calendar days of service order completion ÷ total N,T,C orders (excludes trouble reports received on the due date)) * 100.
Report Structure - Reported for POTS Resale by CLEC, total CLECs and SWBT retail by Field Work (FW), No Field Work (NFW) business and residence.

B. Maintenance

28. **Measurement** - Trouble Report Rate.
Definition - The number of customer trouble reports not caused by CPE or wiring, CPE and disposition code "13" reports within a calendar month per 100 lines.
Calculation - [Total number of customer trouble reports ÷ (total lines ÷100)].
Report Structure - Reported for POTS Resale trouble reports by CLEC, all CLECs and SWBT retail. This measurement is only valid for line counts of 300,000 or greater.

29. **Measurement** - Percent Missed Repair Commitments.
    Definition - Percent of trouble reports not cleared by the commitment time, excluding disposition code "13" reports.
    Calculation - (Count of trouble reports not cleared by the commitment time for company reasons ÷ total trouble reports) * 100.
    Report Structure - Reported for CLEC, all CLECs and SWBT retail by dispatch and no dispatch.

30. **Measurement** - Receipt To Clear Duration.
    Definition - Average duration of customer trouble reports from the receipt of the customer trouble report to the time the trouble report is cleared with the customer excluding subsequent, and all disposition code "13" reports (excludable).
    Calculation - Σ[(Date and time ticket is cleared with customer) - (Date and time ticket received)] ÷ Total customer network trouble reports.
    Report Structure - Reported for POTS Resale trouble reports by CLEC, all CLECs and SWBT retail for Out of Service and Affecting Service by Dispatch and No-Dispatch.

31. **Measurement** - Percent Out Of Service (OOS) < 24 Hours.
    Definition - Percent of OOS trouble reports cleared in less than 24 hours excluding subsequents, tickets received on Saturday or Sunday, no access and all disposition code "13" reports (excludable).
    Calculation - (Count of OOS trouble reports < 24 hours ÷ total number of OOS trouble reports) * 100.
    Report Structure - Reported for CLEC, all CLECs and SWBT retail.

32. **Measurement** - Percent Repeat Reports.
Definition - Percent of customer trouble reports received within 10 calendar days of a previous customer report that were not caused by CPE or wiring excluding subsequent reports and all disposition code "13" reports (excludable).
Calculation - (Count of customer trouble reports, not caused by CPE or wiring and excluding subsequent reports, received within 10 calendar days of a previous customer report ÷ total customer trouble reports not caused by CPE or wiring and excluding subsequent reports) * 100.
Report Structure - Reported by CLEC, all CLECs and SWBT retail.

III. RESALE SPECIALS (EXCLUDES "ACCESS" ORDERS)

A. Provisioning

33. **Measurement** - Average Installation Interval.
Definition - Average business days from application date to completion date for N,T,C orders by item. Excludes customer cause misses and customer requested due date greater than "x" business days.
Calculation - [Σ(completion date - application date)]/(Total number of orders completed).
Report Structure - Reported for CLEC, all CLECs and SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL) and ISDN.

34. **Measurement** - Percent Installations Completed Within "X" Business Days.
Definition - Percent installations completed within "x" business days excluding customer caused misses and customer requested due date greater than "x" business days.
Calculation - (Count of N,T,C orders by item installed within business "x" business days ÷ total N,T,C orders by item) * 100.
Report Structure - Reported for CLEC, all CLECs and SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL) and ISDN.

35. **Measurement** - Percent SWBT Caused Missed Due Dates.
Definition - Percent of N,T,C orders where installations were not completed by the negotiated due date excluding customer caused misses.
Calculation - (Count of N,T,C orders by item with missed due dates excluding customer caused misses ÷ total number of N,T,C orders by item) * 100.
Report Structure - Reported for CLEC, all CLECs and SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL) and ISDN.

36. **Measurement** - Percent Installation Reports Within 30 Days (I-30).
Definition - Percent of N,T,C orders by item that receive a network customer trouble report within 30 calendar days of service order completion.
Calculation - (Count of N,T,C orders by item that receive a network customer trouble report within 30 calendar days of service order completion ÷ total N,T,C orders by item (excludes trouble reports received on the due date)) * 100.
Report Structure - Reported for CLEC, all CLECs and SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL) and ISDN.

37. **Measurement** - Percent Missed Due Dates Due To Lack Of Facilities.
Definition - Percent N,T,C orders by item with missed committed due dates due to lack of facilities.
Calculation - (Count of N,T,C orders by item with missed committed due dates due to lack of facilities ÷ total N,T,C orders by item) * 100.
Report Structure - Reported for Specials Resale by CLEC, all CLECs and SWBT Retail. Reported for > 30 calendar days & > 90 calendar days. (Calculated monthly based on posted orders.)

38. **Measurement** - Delay Days For Missed Due Dates Due To Lack Of Facilities.
Definition - Average calendar days from due date to completion date on company missed orders due to lack of facilities.
Calculation - Σ(Completion date - Committed order due date)/(# of posted orders).
Report Structure - Reported for CLEC, all CLECs and SWBT Retail Specials.