

**SOUTHWESTERN BELL  
PERFORMANCE MEASUREMENTS**

**17. Measurement - Billing Timeliness (Wholesale Bill)**

**Definition** - Billing Timeliness measures the length of time from message creation to the time it is made available to the CLECs. Data is collected from a transmission report obtained each month from CIDB. A mechanized bill will be considered timely if it is sent by midnight of the 6<sup>th</sup> 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** -  $(\text{Count of bills released on time} \div \text{total number of bills released}) * 100$ .

**Report Structure** - Reported for CLEC and all CLECs.

**18. Measurement - Daily Usage Feed Timeliness**

**Definition** - Usage information is sent to the CLECs on a daily basis. This usage data must be sent to the CLEC within 6 days in order to be considered timely.

**Calculation** -  $(\text{Number of usage feeds transmitted on time} \div \text{total number of usage feeds}) * 100$ .

**Report Structure** - Reported for CLEC and all CLECs.

**19. Measurement - Unbillable Usage**

**Definition** - The percent usage data that is unbillable. For CRIS billing, the total dollars for AMA/ECS writeoff is divided by the total CRIS AMA/ECS billing. For CABS, the total CABS uncollectible dollars are divided by total CABS billing.

**Calculation** -  $(\text{Total unbillable usage} \div \text{total usage}) * 100$ .

**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** -  $\text{Total queue time} \div \text{total calls}$ .

**Report Structure** - Reported for all calls to the LSC by operational separation and SWBT retail.

**21. Measurement - LSC Grade Of Service (GOS)**

**Definition** - % of calls answered by the LSC within a specified period of time

**Calculation** -  $\text{Total number of calls answered by the LSC within a specified period of time} \div \text{Total number of calls answered by the LSC}$

**Report Structure** - Reported for all calls to the LSC by operational separation and SWBT retail (RSC and BSC).

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22. **Measurement - Percent Busy in the LSC**  
**Definition -** Percent of calls which are unable to reach the Local Service Center due to a busy condition in the ACD  
**Calculation -** (Count of blocked calls ÷ Total calls offered) \* 100  
**Report Structure -** Reported for all CLECs and SWBT
23. **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.
24. **Measurement - LOC Grade Of Service (GOS)**  
**Definition -** % of calls answered by the LOC within a specified period of time  
**Calculation -** Total number of calls answered by the LOC within a specified period of time ÷ Total number of calls answered by the LOC  
**Report Structure -** Reported for all calls to the LSC by operational separation and SWBT retail (Repair Bureau).
25. **Measurement: Percent Busy in the LOC**  
**Definition:** Percent of calls which are unable to reach the Local Operations Center due to a busy condition in the ACD  
**Calculation:** (Count of blocked calls ÷ Total calls offered) \* 100  
**Report Structure:** Reported for all CLECs and SWBT

**II. RESALE POTS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT**

**A. Provisioning**

26. **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 -**  $[\sum(\text{completion date} - \text{application date})]/(\text{Total number of orders completed})$ .  
**Report Structure -** Reported for CLEC, all CLECs and SWBT, by Field Work (FW), No Field Work (NFW), Business and Residence.

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27. **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.
28. **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.
29. **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.)
30. **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 -**  $\Sigma(\text{Completion date} - \text{committed order due date}) / (\# \text{ of posted orders})$ .  
**Report Structure -** Reported for CLEC, all CLECs and SWBT Retail POTS.
31. **Measurement - Delay Days For Missed Due Dates**  
**Definition -** Average calendar days from due date to completion date on company missed orders.  
**Calculation -**  $\Sigma(\text{Completion date} - \text{committed order due date}) / (\# \text{ of posted orders})$ .  
**Report Structure -** Reported for CLEC, all CLECs and SWBT Retail POTS, UNE Loop and Port Combinations where SWBT does the combining.

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32. **Measurement** – Percent SWBT Caused Missed Due Dates greater than 30 days  
**Definition** – Percent of N,T,C orders where installation was completed greater than 30 days following the due date, excluding customer caused misses.  
**Calculation** – (Count of N, T, C orders completed greater than 30 days following the due date, excluding customer caused misses ÷ total number of N, T, C orders) \* 100.  
**Report Structure** – Reported for CLEC, all CLECs and SWBT for Resold POTS and UNE Loop and Port Combinations where SWBT does the combining.
33. **Measurement:** Count of orders canceled after the due date which were caused by SWBT.  
**Report Structure:** The count will be divided into 1-30, 31-90 and > 90. Reported for individual CLECs and the aggregate of all CLECs.
34. **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**
35. **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.
36. **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.

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37. **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** -  $\Sigma[(\text{Date and time ticket is cleared with customer}) - (\text{Date and time ticket received})] \div \text{Total customer network trouble reports.}$

**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.

38. **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** -  $(\text{Count of OOS trouble reports} < 24 \text{ hours} \div \text{total number of OOS trouble reports}) * 100.$

**Report Structure** - Reported for CLEC, all CLECs and SWBT retail.

39. **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** -  $(\text{Count of customer trouble reports, not caused by CPE or wiring and excluding subsequent reports, received within 10 calendar days of a previous customer report} \div \text{total customer trouble reports not caused by CPE or wiring and excluding subsequent reports}) * 100.$

**Report Structure** - Reported by CLEC, all CLECs and SWBT retail.

**III. RESALE SPECIALS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT (EXCLUDES "ACCESS" ORDERS)**

A. **Provisioning**

40. **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** -  $[\Sigma(\text{completion date} - \text{application date})]/(\text{Total number of orders completed}).$

**Report Structure** - Reported for CLEC, all CLECs and SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL), ISDN and any other services available for resale.

41. **Measurement - Percent Installations Completed Within "X" Business Days.**

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**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), ISDN and any other services available for resale.

**42. 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), ISDN and any other services available for resale.

**43. 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), ISDN and any other services available for resale.

**44. 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.

**45. 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** -  $\Sigma(\text{Completion date} - \text{Committed order due date}) / (\# \text{ of completed orders})$ .

**Report Structure** - Reported for CLEC, all CLECs and SWBT Retail Specials.

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46. **Measurement** – Delay Days For Missed Due Dates  
**Definition** – Average calendar days from due date to completion date on company missed orders.  
**Calculation** -  $\Sigma(\text{Completion date} - \text{committed order due date}) / (\# \text{ of posted orders})$ .  
**Report Structure** – Reported for CLEC, all CLECs and SWBT Retail Specials.
47. **Measurement** – Percent SWBT Caused Missed Due Dates greater than 30 days  
**Definition** – Percent of N,T,C orders where installation was completed greater than 30 days following the due date, excluding customer caused misses.  
**Calculation** –  $(\text{Count of N, T, C orders completed greater than 30 days following the due date, excluding customer caused misses} \div \text{total number of N, T, C orders}) * 100$ .  
**Report Structure** – Reported for CLEC, all CLECs and SWBT for Retail Specials.
48. **Measurement:** Count of orders canceled after the due date which were caused by SWBT.  
**Report Structure:** The count will be divided into 1-30, 31-90 and > 90. Reported for individual CLECs and the aggregate of all CLECs.

**B. Maintenance**

49. **Measurement** - Mean Time To Restore.  
**Definition** - Average duration of network customer trouble reports from the receipt of the customer trouble report to the time the trouble report is cleared excluding no access and delayed maintenance.  
**Calculation** -  $\Sigma[(\text{Date and time trouble report is cleared with the customer}) - (\text{date and time trouble report is received})] \div \text{total network customer trouble reports}$ .  
**Report Structure** - Reported for CLEC, all CLECs and SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL), ISDN and any other services available for resale.
50. **Measurement** - Percent Repeat Reports.  
**Definition** - Percent of network customer trouble reports received within 30 calendar days of a previous customer report.  
**Calculation** -  $(\text{Count of network customer trouble reports received within 30 calendar days of a previous customer report} \div \text{total network customer trouble reports}) * 100$ .  
**Report Structure** - Reported for CLEC, all CLECs and SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL), ISDN and any other services available for resale.

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**51. Measurement - Failure Frequency.**

**Definition** - The number of network customer trouble reports within a calendar month per 100 circuits.

**Calculation** -  $[\text{Count of network trouble reports} \div (\text{Total Resold circuits} + 100)]$ .

**Report Structure** - Reported for CLEC, all CLECs and SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL), ISDN and any other services available for resale.

**IV. UNBUNDLED NETWORK ELEMENTS (UNES)**

**A. Provisioning**

**52. Measurement - Average Installation Interval.**

**Definition** - Average business days from application date to completion date for N,T,C orders excluding customer cause misses and customer requested due date greater than "x" business days. The "x" business days is determined based on quantity of UNE loops ordered and the associated standard interval.

**Calculation** -  $[\sum(\text{completion date} - \text{application date})]/(\text{Total number of orders completed})$ .

**Report Structure** - Reported for CLEC and all CLECs for UNES contained in the UNE price schedule, *INP, and Loop with INP.*

**53. 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** -  $(\text{Count of N,T,C orders installed within business "x" business days} \div \text{total N,T,C orders}) * 100$ .

**Report Structure** - Reported for CLEC and all CLECs for UNES contained in the UNE price schedule, *INP and Loop with INP.*

**54. Measurement - Percent Missed Due Dates.**

**Definition** - Percent of UNE N,T,C orders where installations are not completed by the negotiated due date excluding customer caused misses.

**Calculation** -  $(\text{Count of N,T,C orders with missed due dates excluding customer caused misses} \div \text{total number of UNE N,T,C orders}) * 100$ .

**Report Structure** - Reported for CLEC and all CLECs for UNES contained in the UNE price schedule, *INP and Loop with INP.*

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**Definition** - Percent UNE N,T,C orders by item that receive a network customer trouble report within 30 calendar days of service order completion.

**Calculation** - (Count of UNE N,T,C orders by item that receive a network customer trouble report within 30 calendar days of service order completion ÷ total UNE N,T,C orders by item (excludes trouble reports received on the due date)) \* 100.

**Report Structure** - Reported for CLEC and all CLECs for UNEs contained in the UNE price schedule, INP and Loop with INP.

**56. Measurement - Percent 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 all UNEs contained in the UNE price schedule. by CLEC, all CLECs Reported for > 30 calendar days & > 90 calendar days

**57. 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** -  $\Sigma(\text{Completion date} - \text{committed order due date}) / (\# \text{ of completed orders})$ .

**Report Structure** - Reported for CLEC and all CLECs for UNEs contained in the UNE price schedule, INP and Loop with INP.

**58. Measurement – Delay Days For Missed Due Dates**

**Definition** – Average calendar days from due date to completion date on company missed orders.

**Calculation** -  $\Sigma(\text{Completion date} - \text{committed order due date}) / (\# \text{ of posted orders})$ .

**Report Structure** – Reported for CLEC and all CLECs for UNEs contained in the UNE price schedule, INP and Loop with INP.

**59. Measurement – Percent SWBT Caused Missed Due Dates greater than 30 days**

**Definition** – Percent of N,T,C orders where installation was completed greater than 30 days following the due date, excluding customer caused misses.

**Calculation** – (Count of N, T, C orders completed greater than 30 days following the due date, excluding customer caused misses ÷ total number of N, T, C orders) \* 100.

**Report Structure** – Reported for CLEC and all CLECs for UNEs contained in the UNE price schedule, INP and Loop with INP.

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60. **Measurement:** Count of orders canceled after the due date which were caused by SWBT.  
**Report Structure:** The count will be divided into 1-30, 31-90 and > 90. Reported for individual CLECs and the aggregate of all CLECs.

**B. Maintenance**

61. **Measurement - Trouble Report Rate.**  
**Definition -** The number of network customer trouble reports within a calendar month per 100 UNEs.  
**Calculation -**  $[\text{Count of network trouble reports} \div (\text{Total UNEs} \div 100)]$ .  
**Report Structure -** Reported for CLEC, all CLECs and SWBT for UNEs contained in the UNE price schedule, INP and Loop with INP.
62. **Measurement - Percent Missed Repair Commitments.**  
**Definition -** Percent of trouble reports not cleared by the commitment time for company reasons.  
**Calculation -**  $(\text{Count of trouble reports not cleared by the commitment time for company reasons} \div \text{total trouble reports}) * 100$ .  
**Report Structure -** Reported for each CLEC, all CLECs and SWBT for "POTS type" loops (2-Wire Analog 8dB Loop).
63. **Measurement - Mean Time To Restore.**  
**Definition -** Average duration of network customer trouble reports from the receipt of the customer trouble report to the time the trouble report is cleared excluding no access and delayed maintenance.  
**Calculation -**  $\Sigma[(\text{Date and time trouble report is cleared with the customer}) - (\text{date and time trouble report is received})] \div \text{total network customer trouble reports}$ .  
**Report Structure -** Reported for CLEC, all CLECs and SWBT for UNEs contained in the UNE price schedule, INP and Loop with INP by dispatch and no dispatch.
64. **Measurement - Percent Out Of Service (OOS) < 24 Hours.**  
**Definition -** Percent of OOS trouble reports cleared in less than 24 hours.  
**Calculation -**  $(\text{Count of UNE OOS trouble reports} < 24 \text{ hours} \div \text{total number of UNE OOS trouble reports}) * 100$ .  
**Report Structure -** Reported for CLEC, CLECs and SWBT by "POTS like" loop (2-Wire Analog 8dB Loop).

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65. **Measurement - Percent Repeat Reports.**

**Definition** - Percent of network customer trouble reports received within 30 calendar days of a previous customer report.

**Calculation** - (Count of network customer trouble reports received within 30 calendar days of a previous customer report ÷ total network customer trouble reports) \* 100.

**Report Structure** - Reported for CLEC, all CLECs and SWBT for UNEs contained in the UNE price schedule, INP and Loop with INP.

**V. INTERCONNECTION TRUNKS**

66. **Measurement - Percent Trunk Blockage**

**Definition** - Percent of calls blocked on outgoing traffic from SWBT end office to CLEC end office and from SWBT tandem to CLEC end office.

**Calculation** - (Count of blocked calls ÷ total calls offered) \* 100

**Report Structure** - Reported for CLEC, all CLECs and SWBT. The SWBT end office to CLEC end office and SWBT tandem to CLEC end office trunk blockage will be reported separately.

67. **Measurement - Common Transport Trunk Blockage.**

**Definition** - Percent of local common transport trunk groups exceeding 2% blockage.

**Calculation** - (Number of common transport trunk groups exceeding 2% blocking ÷ total common transport trunk groups) \* 100.

**Report Structure** - Reported on local common transport trunk groups.

68. **Measurement - Distribution Of Common Transport Trunk Groups Exceeding 2%.**

**Definition** - A distribution of trunk groups exceeding 2% reflecting the various levels of blocking.

**Calculation** - The number of trunk groups exceeding 2% will be shown in histogram form based on the levels of blocking.

**Report Structure** - Reported on local common transport trunk groups.

69. **Measurement - Percent Missed Due Dates.**

**Definition** - Percent trunk order due dates missed on interconnection trunks.

**Calculation** - (Count trunk order orders missed ÷ total trunk orders) \* 100.

**Report Structure** - Reported for CLEC, all CLECs and SWBT.

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70. **Measurement** – Delay Days For Missed Due Dates  
**Definition** – Average calendar days from due date to completion date on company missed interconnection trunk orders.  
**Calculation** -  $\Sigma(\text{Completion date} - \text{committed order due date}) / (\# \text{ of completed trunk orders})$ .  
**Report Structure** – Reported for CLEC, all CLECs and SWBT for interconnection trunks.
71. **Measurement** – Percent SWBT Caused Missed Due Dates greater than 30 days  
**Definition** – Percent of N,T,C orders where installation was completed greater than 30 days following the due date, excluding customer caused misses.  
**Calculation** –  $(\text{Count of interconnection trunk orders completed greater than 30 days following the due date, excluding customer caused misses} \div \text{total number of interconnection trunk orders}) * 100$ .  
**Report Structure** – Reported for CLEC, all CLECs and SWBT for interconnection trunk.
72. **Measurement** - Average Trunk Restoration Interval.  
**Definition** - Average time to repair interconnection trunks.  
**Calculation** - Total trunk outage duration  $\div$  total trunk trouble reports.  
**Report Structure** - Reported for CLEC, all CLECs and SWBT.
73. **Measurement** - % Interconnection Trunks Repaired Within 24 Hours  
**Definition** - The percent of interconnection trunks restored within 24 hours of being reported to SWBT by the CLEC.  
**Calculation** -  $(\text{Number of Interconnection Trunks repaired within 24 hours} \div \text{Total Interconnection Trunks Repaired}) * 100$   
**Report Structure** - Reported for CLEC, all CLECs and SWBT.
74. **Measurement** - Average Interconnection Trunk Installation Interval  
**Definition** - The average time from receipt of a complete and accurate ASR until the completion of the trunk order.  
**Calculation** -  $\Sigma(\text{completion date of the trunk order} - \text{receipt of complete and accurate ASR}) \div \text{total trunk orders}$   
**Report Structure** - Reported by CLEC, all CLECs and comparable SWBT trunks disaggregated by interconnection trunks, SS7 links, OS/DA and 911 trunks .
75. **Measurement** - Standard Deviation of Interconnection Trunk Installation Interval  
**Definition** - Measure of the variation of the installation intervals around the mean installation interval  
**Calculation** -  $\text{sqrt}[\Sigma(\text{individual installation interval} - \text{mean installation interval})^2 / (\text{number of orders in the sample} - 1)]$   
**Report Structure** - Reported by CLEC, all CLECs and comparable SWBT trunks disaggregated by interconnection trunks, SS7 links, OS/DA and 911 trunks.

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**LVIII. DIRECTORY ASSISTANCE (DA) AND OPERATOR SERVICES (OS)**

76. **Measurement - Directory Assistance Grade Of Service.**  
**Definition -** % of directory assistance calls answered < 1.5, < 2.5, > 7.5, > 10.0, > 15.0 , > 20.0; and > 25.0 seconds.  
**Calculation -** Calls answered within "x" seconds ÷ total calls answered.  
**Report Structure -** Reported for the aggregate of SWBT and CLECs.
77. **Measurement - Directory Assistance 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 the aggregate of SWBT and CLECs.
78. **Measurement - Operator Services Grade Of Service.**  
**Definition -** % of operator services calls answered < 1.5, < 2.5, > 7.5, > 10.0, > 15.0, > 20.0, and > 25.0 seconds.  
**Calculation -** Calls answered within "x" seconds ÷ total calls answered.  
**Report Structure -** Reported for the aggregate of SWBT and CLECs.
79. **Measurement - Operator Services 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.  
**Structure -** Reported for the aggregate of SWBT and CLECs.
80. **Measurement - Percent Calls Abandoned**  
**Definition -** The percent of calls where the customer hangs up while the call is in queue.  
**Calculation -** (Number of calls abandoned ÷ number of operator positions requested) \* 100  
**Report Structure -** Reported for CLEC and SWBT in the aggregate.
81. **Measurement - Percent Calls Deflected**  
**Definition -** The percent of calls that are received and are unable to be placed in queue.  
**Calculation -** (Number of calls deflected ÷ number of operator positions requested) \* 100  
**Report Structure -** Reported for CLEC and SWBT in the aggregate.

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**82. Measurement - Average Work Time**

**Definition** - The average number of seconds an operator spends handling a customer's request for assistance in obtaining a telephone number, placing a call at the customer's request or in a position busy state. The Average Work Time normally begins when the customer connects to an operator position and ends when the operator position releases the customer after serving his/her request.

**Calculation** -  $\Sigma(\text{Time operator position releases customer} - \text{time customer connects to an operator position}) \div \text{calls}$

**Report Structure** - Reported for CLEC and SWBT in the aggregate.

**83. Measurement - Non-Call Busy Work Volumes**

**Definition** - The amount of time in CCS (Centum Call Second) that an operator has placed their position in make busy or in a position busy state

**Calculation** -  $\Sigma(\text{Time operator placed position in busy state} - \text{time operator removed position from busy state})$

**Report Structure** - Reported for CLEC and SWBT in the aggregate.

**VII. INTERIM NUMBER PORTABILITY (INP)**

**84. Measurement - % Installation Completed Within "x" (3, 7, 10) Business Days.**

**Definition** - % installations completed within "x" (3, 7, 10) business days excluding customer caused misses and customer requested due dates greater than "x" (3, 7, 10) business days.

**Calculation** -  $\text{Total INP orders installed within "x" (3, 7, 10) business days} \div \text{total INP orders}$

**Report Structure** - Reported for CLEC and all CLECs.

**85. Measurement - Average INP Installation Interval.**

**Definition** - Average business days from application date to completion date for INP orders excluding customer requested due dates greater than the SWBT standard interval.

**Calculation** -  $(\text{Total business days from application to completion date for INP orders} \div \text{total INP orders}) * 100$ .

**Report Structure** - Reported for CLEC and all CLECs.

**86. Measurement - Percent INP I-Reports Within 30 Days.**

**Definition** - Percent of INP N,T,C orders that receive a network customer trouble report not caused by CPE or wiring within 30 calendar days of service order completion excluding subsequent reports and all disposition code "13" reports (excludable reports).

**Calculation** -  $(\text{Count of INP N,T,C orders that receive a network customer trouble report within 30 calendar days of service order completion} \div \text{total INP N,T,C orders (excludes trouble reports received on the due date)}) * 100$ .

**Report Structure** - Reported for CLEC and all CLECs.

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**87. Measurement - Percent Missed Due Dates.**

**Definition** - Percent of INP N,T,C orders where installations are not completed by the negotiated due date excluding customer caused misses.

**Calculation** - (Count of INP N,T,C orders with missed due dates excluding customer caused misses ÷ total number of INP N,T,C orders ) \*100.

**Report Structure** - Reported for CLEC and all CLECs.

**VIII.911**

**88. Measurement - Average Time To Clear Errors.**

**Definition** - The average time it takes to clear an error after it is detected during the processing of the 911 database file. The clock will start upon receipt of the error file and end when the error is corrected. This is only on resale or UNE loop and port combination orders that SWBT installs.

**Calculation** -  $\Sigma(\text{Date and time error detected} - \text{date and time error cleared}) \div \text{total number of errors.}$

**Report Structure** - Reported for CLEC, all CLECs and SWBT.

**88 a ) Measurement - % Accuracy for 911 database updates**

**Definition** - *The percent of 911 records that were updated by SWBT in error. The data required to calculate this measurement will be provided by the CLEC based on the compare file. The CLEC will provide the number of records transmitted and the errors found. SWBT will verify the records determined to be in error to validate that the records were input by SWBT incorrectly.*

**Calculation** - *(Number of SWBT caused update errors ÷ Total number of updates)*

**Report Structure** - *Reported by CLEC and all CLECs for facility based providers. This measurement will apply to new resale orders, resale or retail to UNE - P conversion.*

**89. Measurement - Average Time Required to Update 911 Database (Facility Based Providers)**

**Definition** - The average time it takes to update the 911 database file. The clock starts when the data processing starts and ends when the data processing is complete. (See note 6)

**Calculation** -  $\Sigma(\text{Date and time data processing begins} - \text{date and time data processing ends}) \div \text{total number of files.}$

**Report Structure** - Reported for individual CLEC, all CLECs and SWBT.

**IX. POLES, CONDUIT AND RIGHTS OF WAY**

**90. Measurement - % of requests processed within 35 days**

**Definition** - The percent of requests for access to poles, conduits, and right-of-ways

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processed within 35 days.

**Calculation** - (count of number of requests processed within 35 days ÷ total number of requests) \* 100

**Report Structure** - Reported for individual CLEC and all CLECs. SWBT's objective is 90% of requests answered within 35 days.

91. **Measurement** - Average Days Required to Process a Request

**Definition** - The average time it takes to process a request for access to poles, conduits, and right-of-ways.

**Calculation** -  $\Sigma(\text{Date request returned to CLEC} - \text{date request received from CLEC}) \div \text{total number of requests}$ .

**Report Structure** - Reported for individual CLEC and all CLECs.

**X. COLLOCATION**

92. **Measurement** - % Missed Collocation Due Dates

**Definition** - The percent of SWBT caused missed due dates for Physical Collocation projects. *The due dates missed measure is determined by first counting both the number of commitments missed, and the number of commitments made (via FOCs) in the reporting period. For each report structure, the resulting count of commitments missed is divided by the number of commitments made in the reporting period and expressed as a percentage.*

**Calculation** - (count of number of SWBT caused missed due dates for physical collocation facilities ÷ total number of physical collocation projects) \* 100

**Report Structure** - Reported for individual CLEC and all CLECs. *The results are aggregated by Physical, Virtual, and Cageless Collocation.*

93. **Measurement** - Average Days Required to Complete Physical Collocation Facilities

**Definition** - The average time it takes to complete physical collocation facilities.

**Calculation** -  $\Sigma(\text{Date collocation work completed} - \text{date CLEC agrees files application authorizing to collocation work}) \div \text{total number collocation projects scheduled during the reporting Period.}$

**Report Structure** - Reported for individual CLEC and all CLECs by active and non-active. *The results are aggregated by Physical, Virtual, and Cageless Collocation.*

94. **Measurement** - % of requests processed within 35 business days

**Definition** - The percent of requests for collocation facilities processed within 35 business days. *The response interval for each request is determined by computing the elapsed time from the SWBT receipt of the request from the CLEC, to the time the ILEC returns the requested information to CLEC.*

**Calculation** - (count of number of requests processed within 35 days ÷ total number of requests) \* 100

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**Report Structure** - Reported for individual CLEC and all CLECs. SWBT's objective is 90% of requests answered within 35 business days. The results are aggregated by Physical, Virtual, and Cageless Collocation

**XI. DIRECTORY ASSISTANCE DATABASE (NOTE 7)**

95. **Measurement** - % of updates completed into the DA Database within 72 Hours for facility based CLECs

**Definition** - The percent of DA database updates completed within 72 hours of receipt of the update from the CLEC. The clock starts when SWBT receives the request from the CLEC and ends when the listing is updated in the DA database. The update clerks work hours are 6:30 a.m. to 3:00 p.m. On requests received after 3:00 p.m. the clock will start at 6:30 a.m. the following day. Weekends and holidays are excluded from this measurement.

**Calculation** -  $(\text{Count of updates completed within 72 hours} \div \text{total updates}) * 100$

**Report Structure** - Reported by CLEC and all CLECs for facility based providers. The objective will be 95% updated within 72 hours.

96. **Measurement** - Average Update Interval for DA database for facility based CLECs

**Definition** - The average update interval for DA database changes for facility based CLECs. The clock starts when SWBT receives the request from the CLEC and ends when the listing is updated in the DA database. The update clerks work hours are 6:30 a.m. to 3:00 p.m. On requests received after 3:00 p.m. the clock will start at 6:30 a.m. the following day. Weekends and holidays are excluded from this measurement.

**Calculation** -  $(\Sigma(8:00 \text{ a.m. of the day following the input into the LSS database} - \text{Time update received from CLEC}) \div \text{total updates})$

**Report Structure** - Reported by CLEC and all CLECs for facility based providers.

97. **Measurement** - % DA Database Accuracy For Manual Updates

**Definition** - The percent of DA records that were updated by SWBT in error. The data required to calculate this measurement will be provided by the CLEC. The CLEC will provide the number of records transmitted and the errors found. SWBT will verify the records determined to be in error to validate that the records were input by SWBT incorrectly.

**Calculation** -  $(\text{Number of SWBT caused update errors} \div \text{Total number of updates}) * 100$

**Report Structure** - Reported by CLEC and all CLECs for facility based providers. SWBT will commit to a 97% accuracy for DA database updates for the manual DA process.

**97a) Measurement - Percent of Electronic Update That Flows Through.**

**Definition** - Percent of orders or LSRs from entry to distribution that progress through SWBT ordering systems and DSR process for Directory Assistance database updates excluding rejects. (Tracking of this measure will begin after the implementation and testing of DSR process.)

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Calculation - (# of "good" orders that flow through ÷ total orders) \* 100  
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.

XII. COORDINATED CONVERSIONS

98. **Measurement - % Pre-mature disconnects (Coordinated Cutovers)**

**Definition -** Percent of coordinated cutovers where SWBT prematurely disconnects the customer prior to the scheduled conversion.

**Calculation -** (Count of prematurely disconnected customers ÷ total coordinated conversion customers) \* 100

**Report Structure -** Reported by CLEC and all CLECs disaggregated by INP, INP with UNE loop, type of loop, UNE combination Cutover, PNP, loop with PNP, and INP to PNP conversion. ~~The objective is 5% or less of customers disconnected prematurely.~~ The Objective is to have 2% or less premature disconnect starting 10 minutes before starting time.

99. **Measurement - % SWBT caused delayed Coordinated Cutovers**

**Definition -** Percent of SWBT caused late coordinated cutovers in excess of 30 minutes, 1 hour, 2 hour or more.

**Calculation -** (Count of SWBT caused late coordinated cutovers in excess of 30 minutes, 1 hour, 2 hour or more.  
÷ total coordinated cutovers) \* 100

**Report Structure -** Reported by CLEC and all CLECs disaggregated by INP, INP with UNE loop, type of loop, UNE combination Cutover, PNP, loop with PNP, and INP to PNP conversion. ~~The objective is 5% or less of SWB coordinated conversions delayed.~~ The objective is to have 2% or less for starting coordinated cutovers conversion 10 minutes before the scheduled time, and 8% for starting coordinated conversions beyond 30 minutes of scheduled conversion time, and 2% or less for starting conversion beyond 1 hour from scheduled time, and 0.1% for starting conversion beyond 2 hours.

100. **Measurement - % Missed mechanized INP/PNP conversions**

**Definition -** Percent of mechanized INP/PNP conversions not loaded in the switch within 30 minutes of the scheduled due time.

**Calculation -** (Count of mechanized INP/PNP conversions not loaded in the switch within 30 minutes of scheduled due time (Frame Due Time)) ÷ total mechanized INP/PNP conversions) \* 100.

~~Report Structure - Reported by CLEC and all CLECs. The objective is 5% or less of those started outside of scheduled time.~~ Report Structure - Reported by CLEC and all CLECs. The objective is to have 2% or less for starting mechanized INP conversion 10 minutes before the scheduled time, and 8% for starting Mechanized INP conversions beyond 30 minutes of scheduled conversion time, and 2% or

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less for starting conversion beyond 1 hour from scheduled time, and 0.1% for starting conversion beyond 2 hours.

**100 a) Measurement** : Average Time Inbound calls or blocked for NP conversion:

**Definition**: For measuring the period calls are blocked if the ILEC does not provide or takes down the 10-digit trigger in PNP routing too early, the time will start counting from when the 10-digit trigger was not activated or deactivated early. It will not start from the time CLEC first reports a problem but when the ILEC activity causing the disruption first took place.

**Calculations**: Average Time inbound Calls Blocked for NP conversions = Date & Time Cut - Date and Time 10-digit trigger.

**Report Structure** - Reported by CLEC and all CLECs

**XIII. NXX**

101. **Measurement** - % NXXs loaded and tested prior to the LERG effective date

**Definition** - The percent of NXXs loaded and tested prior to the LERG effective date.

**Calculation** - (Count of NXXs loaded and tested by LERG date ÷ total NXXs loaded and tested) \* 100

**Report Structure** - Reported by CLEC, all CLECs and SWBT.

102. **Measurement** - Average Delay Days for NXX loading and testing

**Definition** - Average calendar days from due date to completion date on company missed NXX orders.

**Calculation** -  $\Sigma(\text{Completion Date} - \text{LERG date}) / (\text{number of orders})$

**Report Structure** - Reported for CLEC, all CLECs and SWBT.

103. **Measurement** - Mean Time to Repair

**Definition** - Average calendar days from due date to completion date on company missed NXX orders.

**Calculation** -  $\Sigma(\text{Completion Date} - \text{LERG date}) / (\text{number of orders})$

**Report Structure** - Reported for CLEC, all CLECs and SWBT.

**XIV BONA FIDE REQUEST PROCESS (BFRs)**

104. **Measurement** - % of requests processed within 45 business days

**Definition** - The percent BFRs processed within 45 business days.

**Calculation** - (count of number of requests processed within 45 days ÷ total number of requests) \* 100

**Report Structure** - Reported for individual CLEC and all CLECs. SWBT's objective is 90% of requests answered within 45 business days.

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**Attachment - A**

105. Measurement - % Quotes Provided for Authorized BFRs within 30 business days  
Definition - The percent of responses with price quotes and provisioning dates to CLEC Authorized BFRs processed within 30 business days.  
Calculation - (count of number of Quotes Provided within 30 days ÷ total number of Quotes) \* 100  
Report Structure - Reported for individual CLEC and all CLECs. SWBT's objective is 90% of Quotes provided within 30 business days.

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**Attachment - A**

**NOTES:**

1. Measurements will be reported on a Market Area Basis.
2. Measurements for POTS resale will be broken down by business and residence.
3. Specials will be broken down by Voice Grade Private Line (VGPL), DDS, DS1, DS3 and ISDN.
4. SWBT does not provide repair commitments for design circuits. Design circuits are given a higher priority than POTS and are prioritized by type of service. Due to the shorter clearing times, SWBT feels that this measurement is not required. The CLEC will be able to assess non-discriminatory treatment from the MTTR measurement.
5. Some measurements described above are reported in the aggregate of SWBT and the CLECs (i.e. Directory Assistance and Operator Services) and in some cases no measurement has been required based on the process being the same for the CLECs as it is for SWBT (i.e. 911 Database, Billing). If SWBT changes its process that would change the underlying assumptions for these measurements, SWBT will notify the Department of Justice and the FCC of the change and initiate discussions to determine if additional performance measurements are required.
6. A facility based provider is responsible for updating the 911 Database with its customer information. The CLEC user logs on and drops off its TN file. The 911 FR/DBMS automatically begins processing the TN file one minute after the CLEC user logs off the system. A file is created that indicates the start and end time of the data processing. The number of records processed, the type of records processed, the number of errors and the types of errors are also provided in this statistics file. This information is currently provided to the CLEC in their home directory when processing is complete.
7. After some reasonable time after flow through is available on the DSR process, SWBT would like the Commission to reconsider requiring SWBT to report the performance on the manual process. Flow through will be available with the implementation of the ALPS/LIRA system scheduled for January 1999.

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**ATTACHMENT "B"**

**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE                                    | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|--|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|  | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
| <b>I. RESALE POTS, RESALE SPECIALS AND UNES</b>        |               |        |                         |        |               |        |                |        |  |
| <b>A. Pre-Ordering/Ordering</b>                        |               |        |                         |        |               |        |                |        |  |
| 1. Average Response Time For OSS Pre-Order Interfaces. | X             | -      | X                       | X      | X             | X      | X              | X      | Staff finds that this measure is critical for a CLEC. When EDI is capable of integrating pre-order, a parity performance analogous to SWBT's proprietary system is essential for broad-based competition. This measure is currently in liquidated damages section of AT&T interconnection agreement. |
| 2. EASE Average Response Time                          | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with all parties.  |
| 3. OSS Interface Availability                          | -             | -      | X                       | -      | X             | -      | X              | X      | Staff finds that this measure captures the availability of the OSS interfaces, including, EDI/LEX gateway, communication links, front-end processor, MOG and SORD system. While the CLECs access to SORD is via LASR and MOG, SWBT access to   |

**Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.**

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**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE  | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|--|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|  | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
|  |               |        |                         |        |               |        |                |        | SORD does not follow the same path. Therefore parity as related to the availability of the OSS system is critical for a CLEC in order to be competitive. |
| 4. % Firm Order Confirmations (FOCs) Received Within "X" Hours   | -             | -      | X                       | -      | X             | -      | X              | -      | This measure is currently under liquidated damages section of AT&T's interconnection agreement.  |
| 5. Average Time To Return FOC  | -             | -      | X                       | X      | X             | X      | X              | X      | The staff concurs with CLEC coalition that timely return of FOC is critical, because it affects CLECs ability to compete.                                |
| 6. Percent Mechanized Completions Returned Within 1 Hour Upon The Successful Execution Of The SORD (BU 340) Batch Cycle Which Updates The Order Status, Indicating A Completion Notice | X             | -      | X                       | -      | X             | -      | X              | -      | This measure is currently under liquidated damages section of AT&T's interconnection agreement   |
| 7. Average Time to Return Mechanized Completions   | -             | -      | -                       | X      | X             | X      | X              | -      | This performance measure should be under Tier -1, to ensure parity.  |
| 8. Percent Rejects   | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with all parties   |

**Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.**

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**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE   | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|---|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|   | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
|   |               |        |                         |        |               |        |                |        | on this measure.   |
| <b>MEASUREMENT</b>  |               |        |                         |        |               |        |                |        |  |
| 9. Percent Mechanized Rejects Returned Within 1 Hour Of The Start Of The EDI/LASR Batch Process | X             | -      | X                       | -      | X             | X      | X              | -      | This measure is currently under liquidated damages section of AT&T's interconnection agreement. The staff finds that this is a diagnostic measure that results in broad-based outcome measure No. 5.   |
| 10. Mean Time to Return Mechanized Rejects  | -             | -      | -                       | X      | X             | X      | -              | -      | Measure No. 5 captures the information.  |
| 11. Mechanized Provisioning Accuracy  | X             | -      | X                       | X      | X             | X      | X              | X      | This measure is currently under liquidated damages section of AT&T's interconnection agreement. The staff finds that this measure affects both customer and the ability of a CLEC to compete.  |
| 12. Order Process Percent Flow Through  | X             | -      | X                       | -      | X             | X      | X              | X      | This measure is currently under liquidated damages section of AT&T's interconnection agreement. If flow through is defined as end-to-end, including some of SWBT's back-end systems, then this measure is critical and affects a CLECs ability to compete. |

**Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.**

Performance Measures

Liquidated Damages apply to Measures Under Tier-1,

Broad Outcome Based Measures are Under Tier-2.

| PERFORMANCE MEASURE   | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS  |
|---|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|---|
|   | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |   |
| <b>B. Billing</b>   |               |        |                         |        |               |        |                |        |   |
| 13. Billing Accuracy  | -             | -      | X                       | X      | X             | X      | -              | -      | This measure does not produce any quantification; however, Measure No. 14, below captures the billing accuracy. |
| 14. Percent of Accurate And Complete Formatted Mechanized Bills | -             | -      | X                       | -      | X             | -      | X              | X      | This measure affects customers and the ability of a CLEC to compete.  |
| 15. Percent Of Billing Records Transmitted Correctly            | X             | X      | X                       | -      | X             | X      | X              | X      | This measure affects customers and the ability of a CLEC to compete.  |
| 16. Billing Completeness  | X             | X      | X                       | -      | X             | -      | X              | X      | This measure affects customers and the ability of a CLEC to compete.  |
| 17. Billing Timeliness (Wholesale Bill)                         | -             | -      | X                       | X      | X             | X      | X              | X      | This measure affects customers and the ability of a CLEC to compete   |
| 18. Daily Usage Feed Timeliness                                 | -             | -      | X                       | -      | X             | -      | -              | -      | The staff believes that this is diagnostic measure  |
| 19. Unbillable Usage  | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with all parties.   |
| <b>C. Miscellaneous Administrative</b>                          |               |        |                         |        |               |        |                |        |   |
| 20. LSC Average Speed Of Answer                                 | -             | -      | X                       | X      | X             | X      | X              | X      | This measure affects customers and the ability of a CLEC to compete   |
| 21. LSC Grade Of Service  | -             | -      | -                       | -      | -             | -      | -              | -      | This measure is diagnostic and  |

Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.

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Performance Measures**

**ATTACHMENT "B"**

**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE             | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|---------------------------------|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|                                 | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
| (GOS)                           |               |        |                         |        |               |        |                |        | the actual performance is captured under measure 20.   |
| 22. Percent Busy in the LSC     | -             | -      | X                       | -      | X             | -      | X              | -      | This performance measure provides parity measure for the business office answer time. Therefore, it is appropriate to include it under Tier-1. Because the number of busy signals affects Measure No 20 this measure may not be included under Tier-2. |
| 22. LOC Average Speed Of Answer | -             | -      | X                       | X      | X             | X      | X              | X      | This measure affects customers and the ability of a CLEC to compete  |
| 23. LOC Grade Of Service (GOS)  | -             | -      | -                       | -      | -             | -      | -              | -      | This measure is diagnostic and the actual performance is captured under Measure No. 22   |
| 24. Percent Busy in the LOC     | -             | -      | X                       | -      | X             | -      | X              | -      | This performance measure provides parity measure for the Repair Service answer time. Therefore, it is appropriate to include it under Tier-1. Because the number of busy signals affect Measure No. 22 this measure may not be included under Tier-2.  |
| <b>II. RESALE POTS AND</b>      |               |        |                         |        |               |        |                |        |  |

**Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.**

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**Performance Measures**

**Liquidated Damages apply to Measures Under Tier-1,**

**Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE   | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS  |
|---|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|---|
|   | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |   |
| <b>UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT</b>              |               |        |                         |        |               |        |                |        |   |
| <b>A. Provisioning</b>  |               |        |                         |        |               |        |                |        |   |
| 26. Mean Installation Interval                                      | X             | X      | X                       | -      | X             | X      | X              | X      | This measure affects customers and the ability of a CLEC to compete.  |
| 27. Percent Installations Completed Within "X" Business Days (POTS) | -             | -      | -                       | -      | -             | -      | -              | -      | The staff finds that the mean installation interval along with the standard deviation captures both disparity in performance and any discrimination; therefore, it is not necessary to include this measure under tier-1 or tier-2. |
| 28. Percent SWBT Caused Missed Due Dates                            | X             | X      | X                       | X      | X             | X      | X              | X      | This measure is both customer affecting and competition affecting, and therefore it is appropriate to include this under both tier -1 and tier-2.   |
| 29. Percent Company Missed Due Dates Due To Lack Of Facilities      | -             | -      | X                       | -      | X             | -      | X              | -      | This measure shall be included under tier -1 as a parity measure.   |
| 30. Delay Days For Missed Due Dates Due To Lack Of Facilities       | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with all parties.   |
| 31. Delay Days For  | X             | X      | X                       | -      | X             | X      | X              | X      | This measure is both customer   |

**Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.**

**Project No. 16251 - Section 271 Collaborative Process  
Performance Measures**

**ATTACHMENT "B"**

**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE  | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS  |
|--|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|---|
|  | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |   |
| Company Missed Due Dates   |               |        |                         |        |               |        |                |        | affecting and competition affecting, and therefore it is appropriate to include this under both tier -1 and tier-2. This measure is related to Measure No. 33. SWBT should include the number of canceled orders in calculating the percentage. |
| 32. Percent SWBT Caused Missed Due Dates greater than 30 days                            | -             | -      | X                       | -      | X             | -      | X              | -      | This measure should be under Tier-1, because of possibility of discriminatory treatment.  |
| 33. Count of orders canceled after the due date which were caused by SWBT                | -             | -      | -                       | -      | X             | -      | -              | -      | This measure is related to measure No. 31, therefore it is not necessary to include it under either tiers.  |
| 34. Percent Installation Reports (Trouble Reports) Within 10 Days (I-10) Of Installation | X             | X      | X                       | X      | X             | X      | X              | X      | This measurement is currently under the Liquidated Damages section of AT&T/MCI contract. The staff also finds that this measure is both customer affecting and competition affecting therefore, it should be included under both tiers.         |
| <b>B. Maintenance</b>  |               |        |                         |        |               |        |                |        |   |
| 35. Trouble Report Rate  | X             | X      | X                       | -      | X             | X      | X              | X      | The staff finds that this measure is both customer affecting and competition affecting, and   |

**Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.**

**Project No. 16251 - Section 271 Collaborative Process  
Performance Measures**

**ATTACHMENT "B"**

**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE  | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS  |
|--|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|---|
|  | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |   |
|  |               |        |                         |        |               |        |                |        | therefore it should be included under both tiers.   |
| 36. Percent Missed Repair Commitments  | X             | X      | X                       | -      | X             | -      | X              | X      | The staff concurs with SWBT that this should be included under both tiers.  |
| 37. Receipt To Clear Duration  | X             | X      | X                       | X      | X             | X      | X              | X      | The staff concurs with all parties that this should be included under both tiers  |
| 38. Percent Out Of Service (OOS) < 24 Hours  | X             | X      | X                       | -      | X             | -      | X              | X      | This measure is currently under liquidated damages section of AT&T interconnection agreement. The staff concurs with SWBT that this measure should be under tier-2. |
| 39. Percent Repeat Reports   | X             | X      | X                       | X      | X             | X      | X              | X      | The staff finds that this measure is both customer affecting and competition affecting, and therefore it should be included under both tiers.                       |
| <b>III. RESALE SPECIALS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT (EXCLUDES "ACCESS" ORDERS)</b> |               |        |                         |        |               |        |                |        |   |
| <b>A. Provisioning</b>   |               |        |                         |        |               |        |                |        |   |
| 40. Average Installation   | X             | X      | X                       | -      | X             | X      | X              | X      | The staff finds that this measure   |

**Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.**

**Project No. 16251 - Section 271 Collaborative Process  
Performance Measures**

**ATTACHMENT "B"**

**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE  | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS  |
|--|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|---|
|  | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |   |
| Interval   |               |        |                         |        |               |        |                |        | is both customer affecting and competition affecting, and therefore it should be included under both tiers.   |
| 41. Percent Installations Completed Within "X" Business Days                             | -             | -      | -                       | -      | -             | -      | -              | -      | The staff finds that the mean installation interval along with the standard deviation captures both disparity in performance and any discrimination; therefore, it is not necessary to include this measure under tier-1 or tier-2.     |
| 42. Percent SWBT Caused Missed Due Dates   | X             | X      | X                       | X      | X             | X      | X              | X      | This measure is both customer affecting and competition affecting, therefore it is appropriate to include this under both tier -1 and tier-2.   |
| 43. Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) Of Installation | X             | X      | X                       | X      | X             | X      | X              | X      | This measurement is currently under the Liquidated Damages section of AT&T/MCI contract. The staff also finds that this measure is both customer affecting and competition affecting therefore, it should be included under both tiers. |
| 44. Percent Missed Due Dates Due To Lack Of  | -             | -      | X                       | -      | X             | -      | X              | -      | This measure may be included under tier -1 as a parity measure,   |

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**Project No. 16251 - Section 271 Collaborative Process  
Performance Measures**

**ATTACHMENT "B"**

**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE   | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|---|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|   | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
| Facilities  |               |        |                         |        |               |        |                |        | because it is currently under liquidated damages section of AT&T interconnection agreement.  |
| 45. Delay Days For Missed Due Dates Due To Lack Of Facilities             | -             | -      | -                       | -      | -             | -      | -              | -      | This measure is not critical or competition affecting.   |
| 46. Delay Days For Company Missed Due Dates                               | X             | X      | X                       | -      | X             | X      | X              | X      | This measure is both customer affecting and competition affecting, therefore it is appropriate to include this under both tier-1 and tier-2. This measure is related to Measure No. 48. SWBT should include the number of canceled orders in calculating the percentage. |
| 47. Percent SWBT Caused Missed Due Dates greater than 30 days             | -             | -      | X                       | -      | X             | -      | X              | -      | This measure should be under Tier-1, because of a possibility of discriminatory treatment.   |
| 48. Count of orders canceled after the due date which were caused by SWBT | -             | -      | -                       | -      | X             | -      | -              | -      | This measure is related to measure No. 46  |
| <b>B. Maintenance</b>   |               |        |                         |        |               |        |                |        |  |
| 49. Mean Time To Restore  | X             | X      | X                       | X      | X             | X      | X              | X      | The staff concurs with all parties that this should be included under both tiers.  |
| 50. Percent Repeat Reports  | X             | X      | X                       | X      | X             | X      | X              | X      | The staff finds that this measure  |

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**Project No. 16251 - Section 271 Collaborative Process**

**ATTACHMENT "B"**

**Performance Measures**

**Liquidated Damages apply to Measures Under Tier-1,**

**Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE  | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS  |
|--|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|---|
|  | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |   |
|  |               |        |                         |        |               |        |                |        | is both customer affecting and competition affecting, and therefore it should be included under both tiers.   |
| 51. Failure Frequency  | X             | X      | X                       | -      | X             | -      | X              | -      | This measure is currently under Liquidated damages section of AT&T/MCI interconnection agreement. The staff concurs with CLEC coalition that there is no need to include this under Tier-2. |
| <b>IV. UNBUNDLED NETWORK ELEMENTS (UNES)</b>                 |               |        |                         |        |               |        |                |        |   |
| <b>A. Provisioning</b>                                       |               |        |                         |        |               |        |                |        |   |
| 52. Average Installation Interval                            | X             | X      | X                       | -      | X             | X      | X              | X      | The staff finds that this measure is both customer affecting and competition affecting, and therefore it should be included under both tiers.   |
| 53. Percent Installations Completed Within "X" Business Days | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with all parties on this measure.   |
| 54. Percent Missed Due Dates                                 | X             | X      | X                       | X      | X             | X      | X              | X      | This measure is both customer affecting and competition affecting; therefore, it is appropriate to include this under   |

**Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.**

**Project No. 16251 - Section 271 Collaborative Process**  
**Performance Measures**  
**Liquidated Damages apply to Measures Under Tier-1,**  
**Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE  | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS  |
|--|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|---|
|  | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |   |
|  |               |        |                         |        |               |        |                |        | both tier -1 and tier-2.  |
| 55. Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) Of Installation | X             | X      | X                       | X      | X             | X      | X              | X      | This measurement is currently under the Liquidated Damages section of AT&T/MCI contract. The staff also finds that this measure is both customer affecting and competition affecting; therefore, it should be included under both tiers.                                  |
| 56. Percent Missed Due Dates Due To Lack Of Facilities                                   | -             | -      | X                       | -      | X             | -      | X              | -      | This measure may be included under tier -1 as a parity measure, because it is currently under liquidated damages section of AT&T interconnection agreement.   |
| 57. Delay Days For Missed Due Dates Due To Lack Of Facilities                            | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with all parties.   |
| 58. Delay Days For Company Missed Due Dates  | X             | X      | X                       | -      | X             | X      | X              | X      | This measure is both customer affecting and competition affecting; therefore, it is appropriate to include this under both tier-1 and tier-2. This measure is related to Measure No. 60. SWBT should include the number of canceled orders in calculating the percentage. |

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**Project No. 16251 - Section 271 Collaborative Process**

**ATTACHMENT "B"**

**Performance Measures**

**Liquidated Damages apply to Measures Under Tier-1,**

**Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE   | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS  |
|---|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|---|
|   | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |   |
| 59. Percent SWBT Caused Missed Due Dates greater than 30 days             | -             | -      | X                       | -      | X             | -      | X              | -      | This measure should be under Tier-1, because of a possibility of discriminatory treatment.  |
| 60. Count of orders canceled after the due date which were caused by SWBT | -             | -      | -                       | -      | X             | -      | -              | -      | This measure is related to measure No. 58   |
| <b>B. Maintenance</b>   |               |        |                         |        |               |        |                |        |   |
| 61. Trouble Report Rate   | X             | X      | X                       | -      | X             | X      | X              | X      | The staff finds that this measure is both customer affecting and competition affecting, and therefore it should be included under both tiers.               |
| 62. Percent Missed Repair Commitments                                     | X             | X      | X                       | -      | X             | -      | X              | X      | The staff concurs with SWBT that this should be included under both tiers.  |
| 63. Mean Time To Restore  | X             | X      | X                       | X      | X             | X      | X              | X      | The staff concurs with all parties that this should be included under both tiers  |
| 64. Percent Out Of Service (OOS) < 24 Hours                               | X             | X      | X                       | -      | X             | -      | X              | X      | This measure is currently under liquidated damages section of AT&T interconnection agreement. The staff concurs with SWBT that this should be under Tier-2. |
| 65. Percent Repeat Reports  | X             | X      | X                       | X      | X             | X      | X              | X      | The staff finds that this measure is both customer affecting and competition affecting, and   |

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**Project No. 16251 - Section 271 Collaborative Process**

**ATTACHMENT "B"**

**Performance Measures**

**Liquidated Damages apply to Measures Under Tier-1,**

**Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE  | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|--|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|  | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
|  |               |        |                         |        |               |        |                |        | therefore it should be included under both tiers.  |
| <b>V. INTERCONNECTION TRUNKS</b>                               |               |        |                         |        |               |        |                |        |  |
| 66. Percent Trunk Blockage                                     | X             | X      | X                       | X      | X             | X      | X              | X      | The staff concurs with all parties that this measure should be included under both tier-1 and tier-2.  |
| 67. Common Transport Trunk Blockage                            | -             | -      | X                       | -      | X             | -      | X              | -      | The staff finds that this information is necessary to ensure that SWBT has adequate number of trunks to the extent SWBT has control over such provisioning; therefore, it is necessary to include this measure under tier-1. Because Measure No. 66 is under both tier-1 and tier-2, it is not necessary to include this measure under tier-2. |
| 68. Distribution Of Common Transport Trunk Groups Exceeding 2% | -             | -      | -                       | -      | -             | -      | -              | -      | The staff finds that this measurement is diagnostic, and therefore it should not be included under tier-1 or tier-2.   |
| 69. Percent Missed Due Dates                                   | X             | X      | X                       | X      | X             | X      | X              | X      | This measure is both customer affecting and competition affecting; therefore, it is  |

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**ATTACHMENT "B"**

**Performance Measures**

**Liquidated Damages apply to Measures Under Tier-1,**

**Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE   | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|---|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|   | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
|   |               |        |                         |        |               |        |                |        | appropriate to include this under both tier -1 and tier-2.   |
| 70. Delay Days For Missed Due Dates                                   | -             | -      | -                       | -      | X             | -      | X              | -      | The staff concurs with AT&T that this measure should be included under tier-1 , consistent with Measurement Nos. 30,46,58.       |
| 71. Percent SWBT Caused Missed Due Dates greater than 30 days         | -             | -      | X                       | -      | X             | -      | X              | -      | This measure should be under tier-1, in order to ensure that there is no discriminatory treatment.                               |
| 72. Average Trunk Restoration Interval                                | X             | X      | X                       | X      | X             | X      | X              | X      | The staff concurs with all parties that this should be included under both tiers   |
| 73. % Interconnection Trunks Repaired Within 24 Hours and 8 Hours     | -             | -      | X                       | -      | X             | -      | X              | -      | The staff concurs with CLEC coalition that this parity measurement is customer affecting.  |
| 74. Average Interconnection Trunk Installation Interval               | -             | -      | X                       | -      | X             | -      | X              | -      | The staff concurs with CLEC coalition that this parity measurement is customer affecting.  |
| 75. Standard Deviation of Interconnection Trunk Installation Interval | -             | -      | -                       | -      | -             | -      | -              | -      | The staff notes that this measurement is used to determine parity for average interconnection trunk installation, measure no 74. |

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**Project No. 16251 - Section 271 Collaborative Process  
Performance Measures**

**ATTACHMENT "B"**

**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE   | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|---|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|   | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
|   |               |        |                         |        |               |        |                |        | Therefore it is not necessary to include this under either tiers.                                      |
| <b>VI. DIRECTORY ASSISTANCE (DA) AND OPERATOR SERVICES (OS)</b> |               |        |                         |        |               |        |                |        |  |
| 76. Directory Assistance Grade Of Service                       | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with parties.  |
| 77. Directory Assistance Average Speed Of Answer                | -             | -      | X                       | X      | X             | X      | X              | X      | This measure affects customers and the ability of a CLEC to compete.                                   |
| 78. Operator Services Grade Of Service                          | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with parties.  |
| 79. Operator Services Average Speed Of Answer                   | -             | -      | X                       | X      | X             | X      | X              | X      | This measure affects customers and the ability of a CLEC to compete.                                   |
| 80. Percent Calls Abandoned                                     | -             | -      | X                       | -      | X             | -      | X              | -      | This measure is necessary to ensure non-discrimination; therefore, it should be included under tier-1. |
| 81. Percent Calls Deflected                                     | -             | -      | X                       | -      | X             | -      | X              | -      | This measure is necessary to ensure non-discrimination; therefore, it should be included under tier-1. |
| 82. Average Work Time   | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with parties.  |
| 83. Non-Call Busy Work Volumes                                  | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with parties.  |

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**Project No. 16251 - Section 271 Collaborative Process  
Performance Measures**

**ATTACHMENT "B"**

**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE  | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|--|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|  | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
| <b>VII. INTERIM NUMBER PORTABILITY (INP)</b>                     |               |        |                         |        |               |        |                |        |  |
| 84. % Installation Completed Within "x" (3, 7, 10) Business Days | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with parties.  |
| 85. Average INP Installation Interval                            | -             | -      | X                       | -      | X             | -      | X              | -      | This measure is necessary to ensure non-discrimination; therefore, it should be included under tier-1.   |
| 86. Percent INP I-Reports Within 30 Days                         | X             | X      | X                       | X      | X             | X      | X              | X      | This measurement is currently under the Liquidated Damages section of AT&T/MCI contract. The staff also finds that this measure is both customer affecting and competition affecting; therefore, it should be included under both tiers. |
| 87. Percent Missed Due Dates                                     | X             | X      | X                       | X      | X             | X      | X              | X      | This measure is both customer affecting and competition affecting, and therefore it is appropriate to include this under both tier-1 and tier-2.   |
| <b>VIII. 911</b>   |               |        |                         |        |               |        |                |        |  |
| 88. Average Time To Clear Errors                                 | -             | -      | X                       | -      | X             | -      | X              | -      | These measures are necessary to ensure non-discrimination, and therefore they should be included under tier-1.   |
| a) % accuracy for 911 database updates                           | -             | -      | X                       | -      | X             | -      | X              | -      |  |

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**Project No. 16251 - Section 271 Collaborative Process**  
**Performance Measures**  
**Liquidated Damages apply to Measures Under Tier-1,**  
**Broad Outcome Based Measures are Under Tier-2.**

**ATTACHMENT "B"**

| PERFORMANCE MEASURE   | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|---|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|   | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
| 89. Average Time Required to Update 911 Database (Facility Based Providers) | -             | -      | X                       | X      | X             | X      | X              | X      | This measure is both customer affecting and competition affecting; therefore, it is appropriate to include this under both tier-1 and tier-2.                  |
| <b>IX. POLES, CONDUIT AND RIGHTS OF WAY</b>                                 |               |        |                         |        |               |        |                |        |  |
| 90. % of requests processed within 35 days                                  | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with all parties   |
| 91. Average Days Required to Process a Request                              | -             | -      | X                       | -      | X             | -      | X              | -      | The Staff concurs with CLEC coalition that this measure should be under tier-1. The staff finds that this is essential to ensure non-discriminatory treatment. |
| <b>X. COLLOCATION</b>   |               |        |                         |        |               |        |                |        |  |
| 92. % Missed Collocation Due Dates  | X             | X      | X                       | X      | X             | X      | X              | X      | This measure is both customer affecting and competition affecting; therefore, it is appropriate to include this under both tier -1 and tier-2.                 |
| 93. Average Delay Days For SWBT Missed Due Dates                            | -             | -      | X                       | -      | X             | -      | X              | -      | The Staff concurs with CLEC coalition that this measure should be under tier-1. The staff finds that this is essential to ensure non-discriminatory treatment. |

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**Project No. 16251 - Section 271 Collaborative Process**

**ATTACHMENT "B"**

**Performance Measures**

**Liquidated Damages apply to Measures Under Tier-1,**

**Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE   | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|---|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|   | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
| 94. % of requests processed within 35 business days   | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with all parties   |
| <b>XI. DIRECTORY ASSISTANCE DATABASE</b>  |               |        |                         |        |               |        |                |        |  |
| 95. % of updates completed into the DA Database within 72 Hours for facility based CLECs    | -             | -      | -                       | -      | -             | -      | -              | -      | The staff concurs with all parties   |
| 96. Average Update Interval for DA database for facility based CLECs                        | -             | -      | X                       | X      | X             | X      | X              | X      | This measure is both customer affecting and competition affecting; therefore, it is appropriate to include this under both tier-1 and tier-2.                    |
| 97. % DA Database Accuracy For Manual Updates   | -             | -      | X                       | -      | X             | -      | X              | -      | The Staff concurs with CLEC coalition that these measures should be under tier-1. The staff finds that this is essential to ensure non-discriminatory treatment. |
| 97 a. % of electronic updates that flow through the DSR process without manual intervention | -             | -      | X                       | -      | X             | -      | X              | -      |  |
| <b>XII. COORDINATED CONVERSIONS</b>   |               |        |                         |        |               |        |                |        |  |
| 98. % Pre-mature disconnects (Coordinated Cutovers)   | -             | -      | X                       | X      | X             | X      | X              | X      | This measure is both customer affecting and competition affecting; therefore, it is appropriate to include this under both tier -1 and tier-2.                   |

**Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.**

**Project No. 16251 - Section 271 Collaborative Process  
Performance Measures**

**ATTACHMENT "B"**

**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE  | SWBT PROPOSAL |            | CLEC COALITION PROPOSAL |            | AT&T PROPOSAL |            | STAFF PROPOSAL |            | COMMENTS   |
|--|---------------|------------|-------------------------|------------|---------------|------------|----------------|------------|--|
|  | TIER 1        | TIER-2     | TIER 1                  | TIER-2     | TIER 1        | TIER 2     | TIER 1         | TIER 2     |  |
| 99. % SWBT caused delayed Coordinated Cutovers   | -             | -          | X                       | -          | X             | -          | X              | -          | The Staff concurs with CLEC coalition that this measure should be under tier-1. The staff finds that this is essential to ensure non-discriminatory treatment.   |
| 100. % Missed mechanized INP conversions<br><br><u>100 a) Measurement : Average Time Inbound calls or blocked for NP conversion:</u> | X<br><br>-    | X<br><br>- | X<br><br>-              | X<br><br>- | X<br><br>-    | X<br><br>- | X<br><br>-     | X<br><br>- | This measure is both customer affecting and competition affecting; therefore, it is appropriate to include this under both tier -1 and tier-2.<br><br><i>Revisit this measure after six month check up, if benchmark is established include under Tier-1</i> |
| <b>XIII. NXX</b>   |               |            |                         |            |               |            |                |            |  |
| 101. % NXXs loaded and tested prior to the LERG effective date   | -             | -          | X                       | X          | X             | X          | X              | X          | This measure is both customer affecting and competition affecting, therefore it is appropriate to include this under both tier-1 and tier-2.   |
| 102. Average Delay Days for NXX loading and testing  | -             | -          | X                       | -          | X             | -          | X              | -          | The Staff concurs with CLEC coalition that this measure should be under tier-1. The staff finds that this is essential to ensure non-discriminatory treatment.   |

**Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.**

**Project No. 16251 - Section 271 Collaborative Process  
Performance Measures**

**ATTACHMENT "B"**

**Liquidated Damages apply to Measures Under Tier-1,  
Broad Outcome Based Measures are Under Tier-2.**

| PERFORMANCE MEASURE   | SWBT PROPOSAL |        | CLEC COALITION PROPOSAL |        | AT&T PROPOSAL |        | STAFF PROPOSAL |        | COMMENTS   |
|---|---------------|--------|-------------------------|--------|---------------|--------|----------------|--------|--|
|   | TIER 1        | TIER-2 | TIER 1                  | TIER-2 | TIER 1        | TIER 2 | TIER 1         | TIER 2 |  |
| 103. Mean Time to Repair  | X             | X      | X                       | X      | X             | X      | X              | X      | The staff concurs with all parties that this should be included under both tiers   |
| <u>XIV BONA FIDE REQUEST PROCESS (BFRs)</u>                               |               |        |                         |        |               |        |                |        |  |
| 104. <u>% of requests processed within 45 business days</u>               |               |        |                         |        |               |        | X              | X      | This measure is both customer affecting and competition affecting, therefore it is appropriate to include this under both tier-1 and tier-2. |
| 105. <u>% Quotes Provided for Authorized BFRs within 30 business days</u> |               |        |                         |        |               |        | X              | X      | This measure is both customer affecting and competition affecting, therefore it is appropriate to include this under both tier-1 and tier-2. |

Note: MCI stated that all Performance measures should be under both liquidated damages and broad outcome based measures category.

**PROJECT 16251 - COLLABORATIVE PROCESS  
STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT  | SWBT  | CLEC COALITION | MCI          | AT&T  | STAFF RECOMMENDED BENCHMARK                      |
|--|---|----------------|--------------|---|--|
| <b>I. RESALE POTS, RESALE SPECIALS AND UNES</b>        |   |                |              |   |  |
| <b>A. Pre-Ordering/Ordering</b>                        |   |                |              |   |  |
| 1. Average Response Time For OSS Pre-Order Interfaces. | <p><b>Address Verification</b><br/>Datagate: 80% ≤ 5 sec<br/>90% ≤ 7 sec<br/>Verigate: 80% ≤ 5 sec<br/>90% ≤ 7 sec</p> <p><b>Request For Telephone Number</b><br/>Datagate: 80% ≤ 4 sec<br/>90% ≤ 6 sec Verigate: 80% ≤ 4 sec 90% ≤ 6 sec</p> <p><b>Request For Customer Service Record (CSR)</b><br/>Datagate: 80% ≤ 6 sec<br/>90% ≤ 8 sec Verigate: 80% ≤ 7 sec 90% ≤ 10 sec</p> <p><b>Service Availability</b><br/>Datagate: 80% ≤ 3 sec<br/>90% ≤ 5 sec Verigate: 80% ≤ 11 sec 90% ≤ 13 sec</p> <p><b>Service Appointment Scheduling (Due Date)</b><br/>Datagate: 80% ≤ 2 sec<br/>90% ≤ 3 sec Verigate: 80% ≤ 2 sec 90% ≤ 3 sec</p> <p><b>Dispatch Required</b></p> | Same as SWBT   | Same as SWBT | Same as SWBT for Datagate Verigate. Apart from the Datagate and Verigate benchmarks response criteria for preorder, SWBT should provide parity pre order response once the EDI gateway is accepting commercial volumes. | Same as SWBT and AT&T regarding the EDI gateway. |

Where no benchmarks have been set, SWBT shall provide historical data. 1

**PROJECT 16251 - COLLABORATIVE PROCESS  
STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT  | SWBT   | CLEC COALITION   | MCI   | AT&T   | STAFF RECOMMENDED BENCHMARK  |
|--|--|--|---|--------|--|
|  | Datagate: 80% ≤ 17 sec<br>90% ≤ 19 sec<br>Verigate: 80% ≤ 17 sec<br>90% ≤ 19 sec |  |   |        |  |
| 2. EASE Average Response Time                                  | Parity   | Parity   | <ul style="list-style-type: none"> <li>• Query for less than 30 TNs:<br/>Less than or equal to 2 seconds for 98% of queries and in no event greater than 5 seconds.</li> <li>• Query for 30 or more TNs:<br/>Not to exceed two hours</li> </ul> |        | The staff concurs with SWBT and CLEC Coalition that this is a parity measure.  |
| 3. OSS Interface Availability                                  | 99%  | Same as SWBT   | Less than 0.1% of unplanned down time, by interface type  |        | The staff concurs with SWBT and CLEC coalition that it should be 99%.  |
| 4. % Firm Order Confirmations (FOCs) Received Within "X" Hours | 90% within "X" hours   | 100% Res. And bus. <24 Hours<br>98% Complex Business (1-200)<48 Hours<br>Complex Business (200+) – negotiated.<br>100% UNE Loop (1-49 Loops) <24 Hours.<br>98% UNE Loop (>50 Loops) – 48 Hours.<br>98% Switch Ports <24 Hours. | 98% within 4 hours  | Parity | The staff concurs with CLEC coalition<br>100% Res. And bus. <24 Hours<br>98% Complex Business (1-200)<48 Hours<br>Complex Business (200+) – negotiated.<br>100% UNE Loop (1-49 Loops) <24 Hours.<br>98% UNE Loop (>50 Loops) – 48 Hours.<br>98% Switch Ports <24 Hours |
| 5. Average Time To Return FOC                                  | See measurement 4  | See measurement 4.   | All within 4 hours  | Parity | See Measurement 4  |

**PROJECT 16251 - COLLABORATIVE PROCESS**  
**STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES**  
**ATTACHMENT "C"**

| MEASUREMENT   | SWBT                              | CLEC COALITION                             | MCI   | AT&T  | STAFF RECOMMENDED BENCHMARK   |
|---|-----------------------------------|--|---|---|---|
| 6. 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 | 97%                               | 97% or greater within 1 Hour of Completion | 97% within one hour of completion   | Commission should reconsider the benchmark at a later date. | The staff concurs with CLEC coalition and MCI 97% within one hour of completion |
| 7. Average Time to Return Mechanized Completions  | See measurement 6                 | Same as SWBT                               | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Commission should reconsider the benchmark at a later date  | See measurement 6   |
| 8. Percent Rejects  | Diagnostic, no benchmark required | Same as SWBT                               | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition                                      | The staff concurs with SWBT. No Benchmark Required                              |
| 9. Percent Mechanized Rejects Returned Within 1 Hour Of The Start Of The EDI/LASR Batch Process   | 97% within 1 hour of PON          | Same as SWBT                               | 97% within one hour   | Same as CLEC coalition                                      | 97% within 1 hour of PON  |
| 10. Mean Time to Return Mechanized Rejects  | See measurement 9                 | Same as SWBT                               | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition                                      | See measurement 9   |
| 11. Mechanized Provisioning Accuracy  | Parity                            | Parity                                     | Completed CLEC orders, by reporting dimension, are accurate no less than 99% of the time. | Same as CLEC coalition                                      | Staff concurs with SWBT that parity measurement is appropriate                  |
| 12. Order Process Percent Flow Through  | Parity                            | Parity                                     | Mechanized flow through of orders   | Same as CLEC coalition                                      | Staff concurs with SWBT that parity   |

**PROJECT 16251 - COLLABORATIVE PROCESS  
STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT   | SWBT                                   | CLEC COALITION  | MCI   | AT&T                   | STAFF RECOMMENDED BENCHMARK  |
|---|--|---|---|------------------------|--|
|   |  |   | occurs at least 98% of the time.  |                        | measurement is appropriate   |
| <b>B. Billing</b>   |  |   |   | Same as CLEC coalition |  |
| 13. Billing Accuracy  | Parity                                 | Parity  | Greater than 98% of usage records transmitted, by usage type, reflect the agreed upon format and contain complete information.<br>Greater than 98% of wholesale bills, by invoice type, are accurate. | Same as CLEC coalition | Parity   |
| 14. Percent of Accurate And Complete Formatted Mechanized Bills | 99%                                    | Same as SWBT  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | 99%  |
| 15. Percent Of Billing Records Transmitted Correctly            | 95%                                    | Same as SWBT  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | 95%  |
| 16. Billing Completeness  | Parity                                 | Parity  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | Parity.<br>Compare CABs bill with CRIS for SWBT's if a retail analog exists, if not develop a benchmark. |
| 17. Billing Timeliness (Wholesale Bill)                         | 95% within the 6 <sup>th</sup> workday | Same as SWBT if SWBT proposed benchmark is at parity. | Greater than 99.95% of total service resale invoices received within 10 calendar days of bill cycle   | Same as CLEC coalition | 95% within the 6 <sup>th</sup> workday   |

**PROJECT 16251 - COLLABORATIVE PROCESS  
STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT                            | SWBT                                     | CLEC COALITION   | MCI  | AT&T                   | STAFF RECOMMENDED BENCHMARK  |
|--|--|--|--|------------------------|--|
|  |  |  | close.<br><br>Greater than 99.95% of wholesale (UNE) invoices received within 10 calendar days of bill cycle close.  |                        |  |
| 18. Daily Usage Feed Timeliness        | 95% within the 6 <sup>th</sup> workday   | Parity   | For usage records, separately for access usage and end user usage:<br>Greater than 99.9% records received within 24 hours or usage recording.<br>All usage is received within 48 hours of usage recording. | Same as CLEC coalition | Parity   |
| 19. Unbillable Usage                   | Aggregate message, no benchmark required | Same as SWBT   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | no benchmark required  |
| <b>C. Miscellaneous Administrative</b> |  |  |  |                        |  |
| 20. LSC Average Speed Of Answer        | Parity                                   | Greater than 95% of calls, by center, are answered within 20 seconds.<br><br>All calls are answered within 30 seconds. | <ul style="list-style-type: none"> <li>Greater than 95% of calls, by center, are answered within 20 seconds.</li> <li>All calls are answered within 30 seconds.</li> </ul>                                 | Same as CLEC coalition | The staff concurs with CLEC coalition<br>Greater than 95% of calls, by center, are answered within 20 seconds.<br><br>All calls are answered within 30 seconds |
| 21. LSC Grade Of Service (GOS)         | Parity                                   | Parity   | Benchmark to be negotiated that ensures competition a  | Same as CLEC coalition | Parity   |

**PROJECT 16251 - COLLABORATIVE PROCESS  
STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT  | SWBT   | CLEC COALITION   | MCI  | AT&T                   | STAFF RECOMMENDED BENCHMARK  |
|--|--------|--|--|------------------------|--|
|  |        |  | meaningful opportunity to compete  |                        |  |
| 22. Percent Busy in the LSC  | Parity | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                            | Same as CLEC coalition | Parity   |
| 23. LOC Average Speed Of Answer  | Parity | Greater than 95% of calls, by center, are answered within 20 seconds.<br><br>All calls are answered within 30 seconds. | Greater than 95% of calls, by center, are answered within 20 seconds.<br>All calls are answered within 30 seconds. | Same as CLEC coalition | The staff concurs with CLEC coalition<br>Greater than 95% of calls, by center, are answered within 20 seconds.<br><br>All calls are answered within 30 seconds |
| 24. LOC Grade Of Service (GOS)   | Parity | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                            | Same as CLEC coalition | Parity   |
| 25. Percent Busy in the LOC  | Parity | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                            | Same as CLEC coalition | Parity   |
| <b>II. RESALE POTS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT</b> |        |  |  |                        |  |
| <b>A. Provisioning</b>   |        |  |  |                        |  |
| 26. Mean Installation Interval   | Parity | Parity, except for conversion orders where parity should also apply,   | For installations that do not require a premise visit and do   | Same as CLEC coalition | For installations that do not require a premise visit and do   |

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STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
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| MEASUREMENT   | SWBT   | CLEC COALITION                                       | MCI  | AT&T                   | STAFF RECOMMENDED BENCHMARK   |
|---|--------|--|--|------------------------|---|
|   |        | but a minimum benchmark should be at 1 business day. | not require anything beyond software updates: One business day.<br>For installation that require a premise visit or physical work: 3 business days |                        | not require anything beyond software updates: One business day.<br>For installation that require a premise visit or physical work: 3 business days. |
| 27. Percent Installations Completed Within "X" Business Days (POTS) | Parity | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement.  |
| 28. Percent SWBT Caused Missed Due Dates                            | Parity | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement.  |
| 29. Percent Company Missed Due Dates Due To Lack Of Facilities      | Parity | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement.  |
| 30. Delay Days For Missed Due Dates Due To Lack Of Facilities       | Parity | Parity   | Less than 0.1% of orders held for more than 15 calendar days<br>No orders held for more than 90 days.  | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement.  |
| 31. Delay Days For Missed Due Dates                                 | Parity | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement.  |

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STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT  | SWBT                              | CLEC COALITION  | MCI   | AT&T                   | STAFF RECOMMENDED BENCHMARK  |
|--|-----------------------------------|---|---|------------------------|--|
| 32. Percent SWBT Caused Missed Due Dates greater than 30 days                            | Parity                            | Parity  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 33. Count of orders canceled after the due date which were caused by SWBT                | Diagnostic, No Benchmark Required | Same as SWBT  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | No benchmark required  |
| <b>MEASUREMENT</b>   | <b>BENCHMARK</b>                  |   |   |                        |  |
| 34. Percent Installation Reports (Trouble Reports) Within 10 Days (I-10) Of Installation | Parity                            | Parity & a minimum benchmark of less than 0.5% of lines on a disaggregated basis for conversion orders only that experience a trouble in a report period. | Less than 0.5% of lines, by service type, regardless of disposition and cause, experience a trouble in a report period for "percent troubles on installations and order activity measures." | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| <b>B. Maintenance</b>  |                                   |   |   |                        |  |
| 35. Trouble Report Rate  | Parity                            | Parity  | Less than 0.5% of lines, by service type, regardless of disposition and cause, experience a trouble in a report period for "percent troubles on installations and order activity measures." | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 36. Percent Missed Repair Commitments  | Parity                            | Greater than 99% of all maintenance problems, by  | Greater than 99% of all maintenance   | Same as CLEC coalition | The staff finds that Parity measure is                                   |

Where benchmarks have been set, SWBT shall provide historical data.

**PROJECT 16251 - COLLABORATIVE PROCESS  
STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT                                 | SWBT   | CLEC COALITION   | MCI  | AT&T                   | STAFF RECOMMENDED BENCHMARK  |
|---|--------|--|--|------------------------|--|
|   |        | service type and regardless of trouble type, are resolved by the quoted or estimated date and time of repair.  | problems, by service type and regardless of trouble type, are resolved by the quoted or estimated date and time of repair.   |                        | appropriate for this measurement.  |
| 37. Receipt To Clear Duration               | Parity | <p>1. Out of service conditions where dispatch is required:<br/>90% resolved within 4 hours.<br/>95% resolved within 8 hours.<br/>99% resolved within 16 hours.</p> <p>2. Out of Service conditions where no dispatch is required:<br/>85% resolved within 2 hours.<br/>95% resolved within 3 hours.<br/>99% resolved within 4 hours.</p> <p>3. All other troubles resolved within 24 hours.</p> | <p>Out of Service conditions where dispatch is required:<br/>≥90% resolved within 4 hours<br/>≥95% resolved within 8 hours<br/>≥99% resolved within 16 hours</p> <p>Out of Service conditions where no dispatch is required:<br/>≥85% resolved within 2 hours<br/>≥95% resolved within 3 hours<br/>≥99% resolved within 4 hours</p> <p>≥ all other troubles resolved within 24 hours</p> | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 38. Percent Out Of Service (OOS) < 24 Hours | Parity | See proposed benchmark for Measure #37.  | See 37 above   | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 39. Percent Repeat Reports                  | Parity | Parity   | Less than 1% of trouble reports, by service type, experience a repeat report, regardless of the trouble  | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |

**PROJECT 16251 - COLLABORATIVE PROCESS  
STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT  | SWBT   | CLEC COALITION  | MCI   | AT&T                   | STAFF RECOMMENDED BENCHMARK  |
|--|--------|---|---|------------------------|--|
|  |        |   | disposition, within a 30-day period.  |                        |  |
| <b>III. RESALE SPECIALS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT (EXCLUDES "ACCESS" ORDERS)</b> |        |   |   |                        |  |
| <b>A.Provisioning</b>  |        |   |   |                        |  |
| 40. Average Installation Interval  | Parity | Parity, except for conversion orders where a minimum benchmark should be set at 1 business day.             | For installations that do not require a premise visit and do not require anything beyond software updates: One business day.<br>For installation that require a premise visit or physical work: 3 business days | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 41. Percent Installations Completed Within "X" Business Days   | Parity | Parity  | Benchmark to be negotiated that ensures competition a meaningful opportunity to complete  | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 42. Percent SWBT Caused Missed Due Dates   | Parity | Parity  | Benchmark to be negotiated that ensures competition a meaningful opportunity to complete  | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 43. Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) Of Installation                   | Parity | Parity & a minimum benchmark of less than 0.5% of lines on a disaggregated basis for conversion orders only | Less than 0.5% of lines, by service type, regardless of disposition and cause, experience a   | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |

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STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT   | SWBT                                | CLEC COALITION                                | MCI   | AT&T                   | STAFF RECOMMENDED BENCHMARK  |
|---|-------------------------------------|---|---|------------------------|--|
|   |                                     | that experience a trouble in a report period. | trouble in a report period for "percent troubles on installations and order activity measures."   |                        |  |
| 44. Percent Missed Due Dates Due To Lack Of Facilities                    | Parity                              | Parity  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 45. Delay Days For Missed Due Dates Due To Lack Of Facilities             | Parity                              | Parity  | <ul style="list-style-type: none"> <li>• Less than 0.1% of orders held for more than 15 calendar days</li> <li>• No orders held for more than 90 days.</li> </ul> | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 46. Delay Days For Missed Due Dates                                       | Parity                              | Parity  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 47. Percent SWBT Caused Missed Due Dates greater than 30 days             | Parity                              | Parity  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 48. Count of orders canceled after the due date which were caused by SWBT | Diagnostic, No Measurement Required | Measurement required. No benchmark required.  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | No benchmark required  |
| <b>B. Maintenance</b>   |                                     |   |   |                        |  |

**PROJECT 16251 - COLLABORATIVE PROCESS  
STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT                | SWBT   | CLEC COALITION   | MCI  | AT&T                   | STAFF RECOMMENDED BENCHMARK  |
|----------------------------|--------|--|--|------------------------|--|
| 49. Mean Time To Restore   | Parity | <p>1. Out of service conditions where dispatch is required:<br/>90% resolved within 4 hours.<br/>95% resolved within 8 hours.<br/>99% resolved within 16 hours.</p> <p>2. Out of Service conditions where no dispatch is required:<br/>85% resolved within 2 hours.<br/>95% resolved within 3 hours.<br/>99% resolved within 4 hours.</p> <p>3. All other troubles resolved within 24 hours.</p> | <p>Out of Service conditions where dispatch is required:<br/>≥90% resolved within 4 hours<br/>≥95% resolved within 8 hours<br/>≥99% resolved within 16 hours</p> <p>Out of Service conditions where <u>no dispatch is required</u>:<br/>≥85% resolved within 2 hours<br/>≥95% resolved within 3 hours<br/>≥99% resolved within 4 hours<br/>≥ all other troubles resolved within 24 hours</p> | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 50. Percent Repeat Reports | Parity | Parity   | Less than 1% of trouble reports, by service type, experience a repeat report, regardless of the trouble disposition, within a 30-day period.   | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |
| 51. Failure Frequency      | Parity | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | The staff finds that Parity measure is appropriate for this measurement. |

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STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT                                  | SWBT               | CLEC COALITION  | MCI  | AT&T                   | STAFF RECOMMENDED BENCHMARK   |
|--|--------------------|---|--|------------------------|---|
| <b>IV. UNBUNDLED NETWORK ELEMENTS (UNES)</b> |                    |   |  | Same as CLEC coalition |   |
| <b>A.Provisioning</b>                        |                    |   |  |                        |   |
| 52. Average Installation Interval            | See measurement 53 | 2 Wire Analog and Digital and INP (1-10) – 3 Days<br>2 Wire Analog and Digital and INP (11-20) – 7 Days<br>2 Wire Analog and Digital and INP (20+) – 10 Days<br>DS1 loop (includes PRI) – 3 Days<br>loop(includes PRI) – 3 Days<br>Switch Ports – Analog Port – 2 Days<br>Ports – BRI Ports 2 Days<br>Switch Ports – PRI Port – 3 Days<br>DS1 Trunk Port (1 to 10) – 3 days<br>DS1 Trunk Port (11 to 20) – 5 Days<br>DS1 Trunk Port (20+) – ICB<br>Dedicated Transport (DS0, DS1, and DS3) (1 to 10) – 3 days<br>Dedicated Transport (DS0, DS1, and DS3) (11 to 20) – 5 Days<br>Dedicated Transport (DS0, DS1, and DS3) (20+) and all other types – ICB | UNE Platform (at least DS0 loop + local switching + common transport elements) installation interval, premise visit required or not installation interval:<br>1 business day<br>Unbundled loops installation interval:<br>1 business day<br>UNE Channelized DS1 (DS1 unbundled loop + multiplexing) installation interval:<br>2 business days<br>Unbundled Switching Element installation interval:<br>2 business days<br>DS0/DS1 Dedicated Transport installation interval:<br>3 business days<br>All Other Dedicated Transport:<br>5 business days.<br>Access DS3s used for local interconnects:<br>10 business days<br>All orders requiring feature modification only:<br>5 hours | Same as CLEC coalition | The staff concurs with CLEC Coalition.<br>2 Wire Analog and Digital and INP (1-10) – 3 Days<br>2 Wire Analog and Digital and INP (11-20) – 7 Days<br>2 Wire Analog and Digital and INP (20+) – 10 Days<br>DS1 loop (includes PRI) – 3 Days<br>loop(includes PRI) – 3 Days<br>Switch Ports – Analog Port – 2 Days<br>Ports – BRI Ports 2 Days<br>Switch Ports – PRI Port – 3 Days<br>DS1 Trunk Port (1 to 10) – 3 days<br>DS1 Trunk Port (11 to 20) – 5 Days<br>DS1 Trunk Port (20+) – ICB<br>Dedicated Transport (DS0, DS1, and DS3) (1 to 10) – 3 days<br>Dedicated Transport (DS0, DS1, and DS3) (11 to 20) – 5 Days<br>Dedicated Transport (DS0, DS1, and DS3) (20+) and all other |

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STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
ATTACHMENT "C"**

| MEASUREMENT  | SWBT                | CLEC COALITION  | MCI   | AT&T                   | STAFF RECOMMENDED BENCHMARK   |
|--|---------------------|---|---|------------------------|---|
|  |                     |   | All disconnection orders: - 1 business day  |                        | types - ICB<br>DSL loops (1 to 10) - 3 days<br>DSL loops (11 to 20) - 5 Days<br>Enhanced Extended Links (EEL);<br>(1 to 24) analog or digital loops with DS-1 transport and Multiplexers - 5 Business Days<br>EEL 1-672 (Analog or digital DS0 loops) with DS-3 Transport 20 days<br>For EELs with Higher than DS-3 Transport - ICB |
| 52. Percent Installations Completed Within "X" Business Days                             | 80% within "X" days | 95% within scheduled interval.  | 98% within scheduled interval   | Same as CLEC coalition | 95% within scheduled interval   |
| <b>MEASUREMENT</b>   | <b>BENCHMARK</b>    |   |   |                        |   |
| 54. Percent Missed Due Dates   | Parity              | Parity  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | Parity  |
| 55. Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) Of Installation | Parity              | Parity & minimum benchmark of less than 0.5% of lines on a disaggregated basis for conversion orders only that experience a trouble in a report period. | Less than 0.5% of lines, by service type, regardless of disposition and cause, experience a trouble in a report period for both the "trouble rate" and "percent troubles on new installations | Same as CLEC coalition | Parity  |

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| MEASUREMENT   | SWBT                                | CLEC COALITION                               | MCI  | AT&T                   | STAFF RECOMMENDED BENCHMARK   |
|---|-------------------------------------|--|--|------------------------|---|
|   |                                     |  | and order activity measures."  |                        |   |
| 56. Percent Missed Due Dates Due To Lack Of Facilities                    | Parity                              | Parity                                       | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                                    | Same as CLEC coalition | Parity  |
| 57. Delay Days For Missed Due Dates Due To Lack Of Facilities             | Parity                              | Parity                                       | Less than 0.1% of orders held for more than 15 calendar days<br>No orders held for more than 90 days.                      | Same as CLEC coalition | Parity  |
| 58. Delay Days For Missed Due Dates                                       | Parity                              | Parity                                       | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                                    | Same as CLEC coalition | Parity  |
| 59. Percent SWBT Caused Missed Due Dates greater than 30 days             | Parity                              | Parity                                       | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                                    | Same as CLEC coalition | Parity  |
| 60. Count of orders canceled after the due date which were caused by SWBT | Diagnostic, No Measurement Required | Measurement required. No benchmark required. | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                                    | Same as CLEC coalition | No benchmark Required   |
| <b>B.Maintenance</b>  |                                     |  |  |                        |   |
| 61. Trouble Report Rate   | Parity                              | Parity                                       | Less than 0.5% of lines, by service type, regardless of disposition and cause, experience a trouble in a report period for | Same as CLEC coalition | Parity measurement disaggregated by service type and market area. for retail analog , when there is no retail analog no |

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| MEASUREMENT                           | SWBT   | CLEC COALITION   | MCI   | AT&T                   | STAFF RECOMMENDED BENCHMARK  |
|---------------------------------------|--------|--|---|------------------------|--|
|                                       |        |  | "percent troubles on installations and order activity measures."  |                        | more than 6%   |
| 62. Percent Missed Repair Commitments | Parity | Greater than 99% of all maintenance problems, by service type and regardless of trouble type, are resolved by the quoted or estimated date and time of repair.   | Greater than 99% of all maintenance problems, by service type and regardless of trouble type, are resolved by the quoted or estimated date and time of repair.  | Same as CLEC coalition | Parity measurement disaggregated by service type and market area. for retail analog , when there is no retail analog no more than 1%.  |
| 63. Mean Time To Restore              | Parity | <p>1. Out of service conditions where dispatch is required:<br/>90% resolved within 4 hours.<br/>95% resolved within 8 hours.<br/>99% resolved within 16 hours.</p> <p>2. Out of Service conditions where no dispatch is required:<br/>85% resolved within 2 hours.<br/>95% resolved within 3 hours.<br/>99% resolved within 4 hours.</p> <p>3. All other troubles resolved within 24 hours.</p> | <p>Out of Service conditions where dispatch is required:<br/>≥90% resolved within 4 hours<br/>≥95% resolved within 8 hours<br/>≥99% resolved within 16 hours</p> <p>Out of Service conditions where no dispatch is required:<br/>≥85% resolved within 2 hours<br/>≥95% resolved within 3 hours<br/>≥99% resolved within 4 hours<br/>≥ all other troubles resolved within 24 hours</p> | Same as CLEC coalition | <p>Parity measurement disaggregated by service type and market area. for retail analog , when there is no retail analog the following benchmark applies;</p> <p>1. Out of service conditions where dispatch is required:<br/>90% resolved within 4 hours.<br/>95% resolved within 8 hours.<br/>99% resolved within 16 hours.</p> <p>2. Out of Service conditions where no dispatch is required:<br/>85% resolved within 2 hours.<br/>95% resolved within 3 hours.<br/>99% resolved within 4 hours.</p> |

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| MEASUREMENT                                 | SWBT   | CLEC COALITION  | MCI   | AT&T                   | STAFF RECOMMENDED BENCHMARK   |
|---|--|---|---|------------------------|---|
|   |  |   |   |                        | 3. All other troubles resolved within 24 hours.   |
| 64. Percent Out Of Service (OOS) < 24 Hours | Parity                                       | Set benchmark at levels shown for Measure #63   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | Staff agrees with CLEC Coalition. The benchmark should be the same as shown for Measure 63 above.   |
| 65. Percent Repeat Reports                  | Parity                                       | Parity  | Less than 1% of trouble reports, by service type, experience a repeat report, regardless of the trouble disposition, within a 30-day period.                                      | Same as CLEC coalition | Parity measurement disaggregated by service type and market area. for retail analog, when there is no retail analog no more than 1%   |
| <b>V.<br/>INTERCONNECTION TRUNKS</b>        |  |   |   |                        |   |
| 66. Percent Trunk Blockage                  | Parity                                       | Parity and a benchmark for Dedicated Trunk Groups: Not to exceed blocking standard of B.01            | Dedicated Trunk Groups: Not to exceed blocking standard of B.01   | Same as CLEC coalition | Dedicated Trunk Groups not to exceed blocking standard of B.01.;  |
| 67. Common Transport Trunk Blockage         | Aggregate measurement, no benchmark required | No more than 1% of end offices may have more than 2% blockage a month based on the Erlang-B.01 scale. | Common Trunk Groups:<br><br>Where CLEC/LD traffic share common ILEC trunks: No more than 1% of end offices may have more than 2% blockage a month based on the Erlang-B.01 scale. | Same as CLEC coalition | Common trunk Groups; no more than 1% of end offices may have 2% blockage in a month based on Erlang B.01 scale; If common trunk groups are different for CLECs than for the ILEC's trunk group, then no more than 2% of end offices |

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| MEASUREMENT  | SWBT   | CLEC COALITION   | MCI  | AT&T                   | STAFF RECOMMENDED BENCHMARK   |
|--|--|--|--|------------------------|---|
|  |  |  | Where CLEC traffic traverses a separate common network from ILEC traffic: No more than 2% of end offices may have more than 2% blocking. |                        | may have more than 2% blocking  |
| 68. Distribution Of Common Transport Trunk Groups Exceeding 2% | Aggregate measurement, no benchmark required | Same as SWBT   | Benchmark to be negotiated that ensures CLEC a meaningful opportunity to compete   | Same as CLEC coalition | No benchmark required   |
| 69. Percent Missed Due Dates                                   | Parity                                       | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | Parity  |
| 70. Delay Days For Missed Due Dates                            | Parity                                       | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | Parity  |
| 71. Percent SWBT Caused Missed Due Dates greater than 30 days  | Parity                                       | less than 0.1 % of orders held for more than 15 calendar days.<br>No orders held for more than 90 calendar days. | Less than 0.1 % of orders held for more than 15 calendar days.<br>No orders held for more than 90 calendar days.                         | Same as CLEC coalition | Parity when there is a retail analog; if there is no retail analog the following benchmarks apply<br>Less than 1 % of orders held for more than 30 calendar days.<br>No orders held for more than 90 calendar days. |

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| MEASUREMENT   | SWBT   | CLEC COALITION   | MCI  | AT&T                   | STAFF RECOMMENDED BENCHMARK   |
|---|--|--|--|------------------------|---|
| 72. Average Trunk Restoration Interval                                | Parity                                       | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | Parity  |
| 73. % Interconnection Trunks Repaired Within 24 Hours and 8 Hours     | Parity                                       | Service affecting trouble (20% or more of trunk group) will be restored within 1 hour of notification. Non service affecting trouble will be restored within 24 hours of notification. | Service affecting trouble (20% or more of trunk group) will be restored within 1 hour of notification. Non service affecting trouble will be restored within 24 hours of notification. | Same as CLEC coalition | The staff concurs with CLEC coalition. Service affecting trouble (20% or more of trunk group) will be restored within 1 hour of notification. Non service affecting trouble will be restored within 24 hours of notification. |
| 74. Average Interconnection Trunk Installation Interval               | Parity                                       | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | Parity  |
| 75. Standard Deviation of Interconnection Trunk Installation Interval | Parity                                       | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | Parity  |
| <b>VI. DIRECTORY ASSISTANCE (DA) AND OPERATOR SERVICES (OS)</b>       |  |  |  |                        |   |
| 76. Directory Assistance Grade Of Service                             | Aggregate measurement, no benchmark required | Parity, but not less than the minimum standard imposed by Subst. Rule 23.61.   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition | See recommendation for measure no 77  |

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| MEASUREMENT                                      | SWBT   | CLEC COALITION  | MCI   | AT&T                   | STAFF RECOMMENDED BENCHMARK   |
|--|--|---|---|------------------------|---|
| MEASUREMENT                                      | BENCHMARK                                    |   |   |                        |   |
| 77. Directory Assistance Average Speed Of Answer | Aggregate measurement, no benchmark required | More than 90% of calls answered by a "live" agent, separately for OS and DA services, within 10 seconds.<br>All calls answered by a Voice Response Unit, separately for OS and DA services, within 2 seconds. | More than 90% of calls answered by a "live" agent, separately for OS and DA services, within 10 seconds.<br><br>All calls answered by a Voice Response Unit, separately for OS and DA services, within 2 seconds. | Same as CLEC coalition | Benchmark should be same as the Current PUC Sub Rule 23.61 (e) (3)(A)(iii).   |
| 78. Operator Services Grade Of Service           | Aggregate measurement, no benchmark required | See proposed benchmark for Measure #76.   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | See recommendation for Measurement No. 79                                     |
| 79. Operator Services Average Speed Of Answer    | Aggregate measurement, no benchmark required | More than 90% of calls answered by a "live" agent, separately for OS and DA services, within 10 seconds.<br>All calls answered by a Voice Response Unit, separately for OS and DA services, within 2 seconds. | More than 90% of calls answered by a "live" agent, separately for OS and DA services, within 10 seconds.<br><br>All calls answered by a Voice Response Unit, separately for OS and DA services, within 2 seconds. | Same as CLEC coalition | Benchmark should be same as the same as the PUC Sub Rule 23.61 (e) (3)(A)(i). |
| 80. Percent Calls Abandoned                      | Aggregate measurement, no benchmark required | Same as SWBT  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | No benchmark required   |
| 81. Percent Calls Deflected                      | Aggregate measurement, no benchmark required | Same as SWBT  | Benchmark to be negotiated that   | Same as CLEC coalition | No benchmark required   |

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| MEASUREMENT  | SWBT   | CLEC COALITION  | MCI   | AT&T                   | STAFF RECOMMENDED BENCHMARK   |
|--|--|---|---|------------------------|---|
|  |  |   | ensures competition a meaningful opportunity to compete   |                        |   |
| 82. Average Work Time  | Aggregate measurement, no benchmark required | No measurement required   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | No benchmark required   |
| 83. Non-Call Busy Work Volumes                                   | Aggregate measurement, no benchmark required | No measurement required   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete   | Same as CLEC coalition | No benchmark required   |
| <b>VII. INTERIM NUMBER PORTABILITY (INP)</b>                     |  |   |   |                        |   |
| 84. % Installation Completed Within "x" (3, 7, 10) Business Days | 80% within "X" business days                 | 95% within scheduled interval.  | 95% within scheduled interval.  | Same as CLEC coalition | 90% within the scheduled interval is within the range.  |
| 85. Average INP Installation Interval                            | See measurement 84                           | 95% within scheduled interval.  | 95% within scheduled interval.  | Same as CLEC coalition | 90% within the scheduled interval is within the range   |
| 86. Percent INP I-Reports Within 30 Days                         | Parity                                       | Parity & a minimum benchmark of less than 0.5% of lines on a disaggregated basis for conversion orders only that experience a trouble in a report period. | <ul style="list-style-type: none"> <li>Less than 0.5% of lines, by service type, regardless of disposition and cause, experience a trouble in a report period for "percent troubles on installations and order activity measures."</li> </ul> | Same as CLEC coalition | Parity and a minimum benchmark of less than 0.5% of lines on a disaggregated basis for conversion orders only that experience a trouble in a report period. |

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| MEASUREMENT  | SWBT                                    | CLEC COALITION   | MCI   | AT&T                   | STAFF RECOMMENDED BENCHMARK                             |
|--|---|--|---|------------------------|---|
| 87. Percent Missed Due Dates   | Parity                                  | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete | Same as CLEC coalition | Parity  |
| <b>VIII. 911</b>   |   |  |   |                        |   |
| 88. Average Time To Clear Errors<br>• a) % accuracy for 911 database updates | Parity                                  | Parity   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete | Same as CLEC coalition | Parity<br>Parity  |
| 89. Average Time Required to Update 911 Database (Facility Based Providers)  | Parity                                  | Parity - database updates to be processed every 4 hours. | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete | Same as CLEC coalition | Parity - database updates to be processed every 4 hours |
| <b>IX. POLES, CONDUIT AND RIGHTS OF WAY</b>                                  |   |  |   |                        |   |
| 90. % of requests processed within 35 days                                   | 90% of requests answered within 35 days | Same as SWBT   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete | Same as CLEC coalition | 90% of requests answered within 35 days                 |
| 91. Average Days Required to Process a Request                               | See measurement 90                      | Same as SWBT   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete | Same as CLEC coalition | 90% of requests answered within 35 days                 |
| <b>X. COLLOCATION</b>  |   |  |   |                        |   |

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| MEASUREMENT  | SWBT   | CLEC COALITION   | MCI  | AT&T                   | STAFF RECOMMENDED BENCHMARK  |
|--|--|--|--|------------------------|--|
| 92. % Missed Collocation Due Dates   | Still Under Investigation, Proposal By 10/19/98                          | No less than 98% of commitments must be met for Physical, Virtual and other alternative collocation offerings. | No less than 98% of commitments must be met for Physical, Virtual and other alternative collocation offerings. | Same as CLEC coalition | No less than 95% of commitments must be met for Physical, Virtual and other alternative collocation offerings. |
| 93. Average Delay Days For SWBT Missed Due date  | New Measurement As Of 10/6/98, Under Investigation. Proposal by 10/19/98 | 0 delay days.  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                        | Same as CLEC coalition | The staff concurs with CLEC coalition.   |
| 94. of requests processed within 35 business days  | 90% of requests answered within 35 business days                         | Same as SWBT   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                        | Same as CLEC coalition | 90% of requests answered within 35 days  |
| <b>XI. DIRECTORY ASSISTANCE DATABASE</b>   |  |  |  |                        |  |
| 95. % of updates completed into the DA Database within 72 Hours for facility based CLECs | 95% updated within 72 hours  | Same as SWBT   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                        | Same as CLEC coalition | 95% updated within 72 hours  |
| 96. Average Update Interval for DA database for facility based CLECs                     | See measurement 95   | Same as SWBT   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                        | Same as CLEC coalition | 95% updated within 72 hours  |
| 97. % DA Database Accuracy For Manual Updates  | 97% accuracy for DA database updates for the manual DA process           | Same as SWBT   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete                        | Same as CLEC coalition | 97% accuracy for DA database updates for the manual DA process   |
| 97 a. % of electronic updates that flow through the DSR process without                  |  |  |  |                        | Parity   |

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STAFF RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES  
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| MEASUREMENT  | SWBT  | CLEC COALITION  | MCI  | AT&T                               | STAFF RECOMMENDED BENCHMARK  |
|--|---|---|--|------------------------------------|--|
| manual intervention  |   |   |  |                                    |  |
| <b>XII. COORDINATED CONVERSIONS</b>  |   |   |  |                                    |  |
| 98. % Pre-mature disconnects (Coordinated Cutovers)  | 5% or less of customers disconnected prematurely                  | 2% or less premature disconnect starting 10 minutes before scheduled time.  | 98% of unscheduled disruptions causing loss of dialtone or inbound call blocking should be corrected in one hour and 100% within 2 hours | Same as CLEC coalition             | 2% or less premature disconnect starting 10 minutes before scheduled time  |
| 99. % SWBT caused delayed Coordinated Cutovers   | 5% or less of SWB coordinated conversions delayed                 | 8% or less of coordinated cutovers started beyond 30 minutes of scheduled time. 2% or less started beyond 1 hour of scheduled time. .1% started beyond 2 hours of scheduled time. | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete  | Same as CLEC coalition             | 2% or less for starting coordinated cutovers conversion 10 minutes before the scheduled time, and 8% for starting coordinated conversions beyond 30 minutes of scheduled conversion time, and 2% or less for starting conversion beyond 1 hour from scheduled time, and 0.1% for starting conversion beyond 2 hours. |
| 100. % Missed mechanized INP conversions<br><br><u>100 a) Measurement : Average Time Inbound calls or blocked for NP conversion:</u> | 5% or less of those started outside of scheduled time<br><br>None | See proposed benchmarks for Measures #98 and 99.<br><br>None  | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete<br><br>None                                      | Same as CLEC coalition<br><br>None | See proposed benchmarks for Measures #98 and 99.<br><br><i>Diagnostic measure, therefore, Benchmark to be developed during the 6-month</i>   |

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| MEASUREMENT   | SWBT   | CLEC COALITION  | MCI   | AT&T                   | STAFF RECOMMENDED BENCHMARK                                |
|---|--------|---|---|------------------------|--|
|   |        |   |   |                        | <i>check in period if required.</i>                        |
| <b>XIII. NXX</b>  |        |   |   |                        |  |
| 101. % NXXs loaded and tested prior to the LERG effective date            | Parity | • 100% completed by LERG effective date.  | • 100% completed by LERG effective date.  | Same as CLEC coalition | Parity   |
| 102. Average Delay Days for NXX loading and testing                       | Parity | 0 delay days.   | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete | Same as CLEC coalition | Parity   |
| 103. Mean Time to Repair  | Parity | All troubles resolved within 4 hours of notification for any affected end office. | Benchmark to be negotiated that ensures competition a meaningful opportunity to compete |                        |  |
| <b><u>XIV BONA FIDE REQUEST PROCESS (BFRs)</u></b>                        |        |   |   |                        |  |
| <u>104. % of requests processed within 45 business days</u>               |        |   |   |                        | 90% of Responses to BFRs provided within 45 business days. |
| <u>105. % Quotes Provided for Authorized BFRs within 30 business days</u> |        |   |   |                        | 90% of Quotes provided within 30 business days.            |



# Public Utility Commission of Texas

## Memorandum

TO: Chairman Pat Wood, III  
Commissioner Judy Walsh  
Commissioner Patricia A. Curran

FROM: Donna Nelson <sup>DWN</sup><sub>KTF</sub>  
Assistant Director, Office of Regulatory Affairs  
Kathy Farroba <sup>KTF</sup>  
Administrative Law Judge, Office of Policy Development

RE: Item One on Agenda for 10/8/98 Open Meeting; Project No. 16251; Flow-through and Commercial Volume/Testing Issues Relating to the Operations Support Systems (OSS) of Southwestern Bell Telephone Company (SWBT)

DATE: October 9, 1998

On September 25, 1998, the parties filed briefs addressing the above-referenced issues. Additionally, SWBT filed a response to the participant briefs on October 2, 1998. In lieu of providing a status report for this open meeting, Staff has prepared this memorandum that generally discusses the positions of the parties and provides Staff comments and/or recommendations on these issues. The other Commission Staff members working on these issues are Howard Siegel and Nara Srinivasa. The discussion relating to the definition of flow through is limited to requirements for electronic orders.

### I. Flow-Through

#### *Position of SWBT:*

In its brief, SWBT argues that when applying the term "flow-through" to SWBT's operations, "flow-through" means flow-through to SWBT legacy systems (*i.e.*, SORD). SWBT cites to the approved language in its interconnection agreements with AT&T and MCI that measure flow-through by determining the percentage of competitive local exchange carrier (CLEC) orders "that completely flow through the order process to SWBT legacy systems and require no manual intervention on the part of SWBT than analogous retail services, and automated provisioning to the extent that it is provided for analogous services." (AT&T and MCI Int. Agr's. at ¶ 9.2.24)

SWBT also argues that this definition of flow-through is consistent with the definition used by the FCC in its notice of proposed rulemaking (NPRM) relating to performance measurements and reporting requirements for operations support systems (OSS).

Finally, SWBT argues that: (1) "AT&T's and MCI's new version of 'flow-through' is not merely unsupported, but also appears to be an attempt to require SWBT, at its own cost, to provide these customers with a network superior to the one that SWBT uses for its own retail operations" (SWBT Brief at 7); and (2) that "once an order reaches SWBT's legacy systems, the process is the same for wholesale as it is for retail" because there is no distinction in the way customer orders and SWBT retail orders are processed by SWBT's legacy systems (SWBT Brief at 8).

***Positions of the CLECs:***

AT&T, Sprint, the CLEC coalition, and MCI all filed briefs that state predominantly the same position. They argue that "flow-through" cannot be defined in a manner that artificially limits the term. Sprint, for example, cited ¶ 72 of the FCC's NPRM in the performance measures docket for the proposition that flow-through is defined as "orders that the (ILEC) processes electronically through its gateway and accepts into its back office without manual intervention." MCI defined flow-through as requiring an "LSR [local service request] submitted by a CLEC [being] processed from beginning to end, without manual intervention, irrespective of the number of computer systems the LSR goes through." (MCI Brief at 3.)

Beyond the issue of the flow of a local service request, most of the CLECs have argued that for SWBT to meet its flow-through obligations, error notifications must be electronically returned to the CLECs without relying on manual intervention. Specifically, CLECs raise concerns about the fact that errors that fall out of SORD are corrected by SWBT personnel rather than electronically returned to the CLEC for correction.

AT&T has also raised concerns regarding some order types that can be handled with Business EASE but not LEX or EDI (SWBT has stated that the order types mentioned by AT&T have not obtained an OBF standard, to date, but will be addressed in future phases once standards are developed.)

**Staff Recommendation:**

***Flow Through Obligation under FTA:***

To some extent, the purpose and intent of the "flow-through" requirement has been lost in the semantics of defining the term. The Federal Telecommunications Act's (FTA's) requirement is *parity*. As far as defining the term "flow-through" for purposes of defining the extent to which the term "flow-through" can be applied to SWBT's OSSs for purposes of § 271, MCI's

definition correctly and succinctly *defines* the term. Flow-through should be conceptually defined as follows:

Flow-through can encompass the processing of an LSR from beginning to end, without manual intervention, irrespective of the number of computer systems the LSR goes through.

In agreeing with this definition, the Staff expressly recommends declining to follow the "flow to SORD" definition suggested by SWBT because it would artificially limit the breadth of the Commission's review of parity.

*SWBT's obligation, however, is limited to parity:*

Addressing the definition of flow-through is only the first step of the analysis. The FTA does not require perfect flow-through. Instead, the FTA requires *parity* flow-through. As the CLEC coalition quoted from the Ameritech-Michigan Order at ¶ 135, access to the incumbent LEC's processes is "fundamental to the requirement of nondiscriminatory access." Moreover, on countless points when citing FCC precedent, the CLEC coalition refers to the obligation to provide flow-through as necessary to create "equivalent access."

Therefore, *although flow-through must be defined broadly to assure no gaps in the Commission's review, the obligation to provide flow-through includes only that level of flow-through that assures parity.* Consequently, if SWBT provides electronic flow-through for itself from SORD to a downstream database, similar flow-through must be provided to CLECs. However, if manual work takes place for SWBT downstream of SORD, SWBT is not obligated to provide electronic processes for CLECs.

For these reasons, two conditions must be met before it can be determined that sufficient flow-through is provided to assure parity. First, CLECs need electronic flow through whether to SORD, or beyond, comparable to SWBT. Second, for downstream systems that only CLECs need by the nature of the way SWBT has designed its systems, if any, electronic flow-through is necessary.<sup>1</sup>

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<sup>1</sup> Under this understanding of the term, further discussion at the October 13, 1998 collaborative session regarding (1) the implementation of an electronic process for LIDB and (2) a discussion relating to whether there are any other downstream databases that may have an asymmetric application, would be necessary.

*Flow of Error Rejections:* Again, the focus of SWBT's flow-through obligations is parity. Staff believes SWBT will meet its flow-through obligations regarding error rejections using processes consistent with the discussion below.

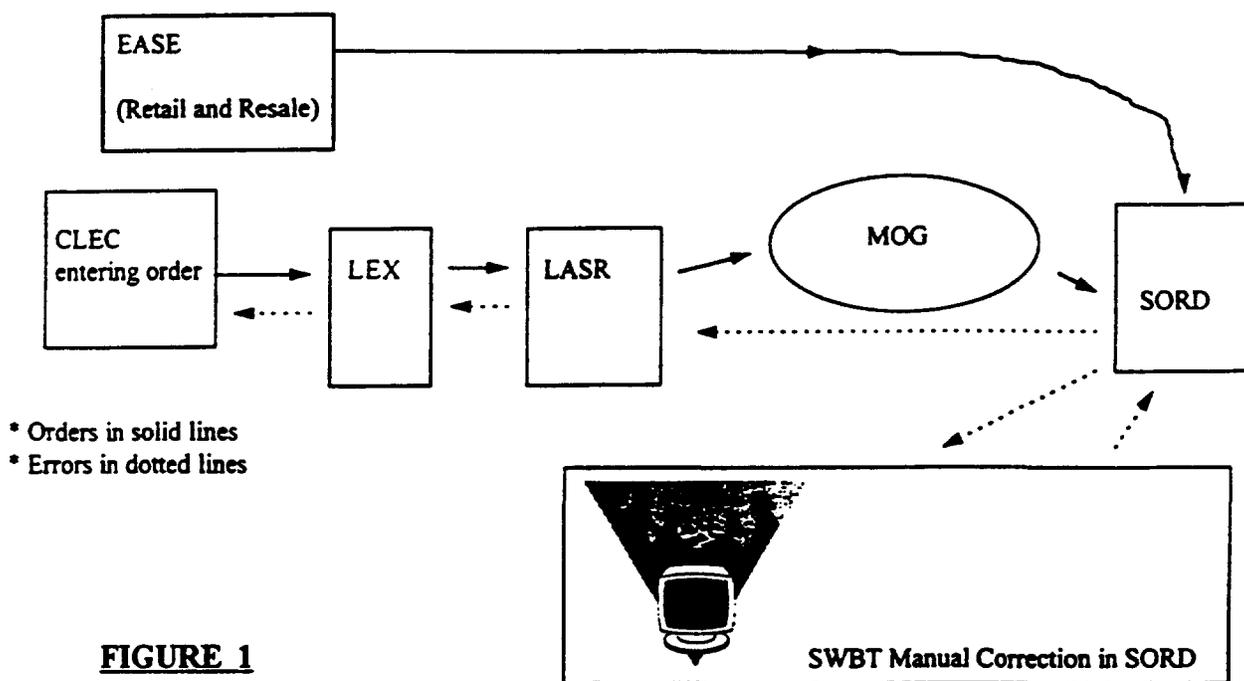


Figure 1 attempts to demonstrate the way orders and errors are processed. Errors caught in LEX, LASR, or MOG are electronically returned to the CLEC. This is necessary since these are steps in the process that do not exist for CLECs. Consequently, it would not be proper to insert manual steps into a process that is not faced by SWBT in its retail operations.

For errors caught in SORD, the error is manually corrected by SWBT. SWBT supports this correction process because (1) the order at this stage of the process has been converted out of the LSR format used by the CLEC into the format used by SORD; (2) the error correction only requires modification of the erroring field, rather than a time consuming redo of the entire order in SORD; and (3) the same process is followed by SWBT on its retail side.

Staff agrees that the manual correction of the SORD errors by SWBT personnel does not prevent SWBT from demonstrating parity flow-through once OSS Recommendation Nos. 12,

18, 19, and 20 are met.<sup>2</sup> First, as Figure 1 demonstrates, this appears to be the same process that SWBT uses for EASE. Second, parity appears to exist at the service representative level because neither the CLEC service representative nor the SWBT service representative makes these corrections. Third, when a SORD error is corrected, the fall-out of the electronic process is measured by the SWBT performance measures. Thus, if a CLEC has a larger percentage of similarly-situated orders falling into this process, this measurement data will demonstrate this fact. (In fact, it is for this reason, in part, that SWBT has worked and continues to work toward moving edits to LASR so a flow-through disparity does not occur.)

Finally, to address concerns by CLECs regarding their need to be aware of recurring errors so they can be avoided, Staff recommends that SWBT agree to expand the error trend analysis it has offered in the manual context to the electronic context.<sup>3</sup>

*Service Order Types Handled by Business EASE but not EDI/LEX:*

Regarding the few order types that can be handled with Business EASE but not EDI or LEX, Staff recognizes the difficult position created by the fact that there is a preference for systems that follow national standards but no national standards exist for these few order types. This is especially the case for EDI because AT&T and MCI have requested that SWBT's systems be as consistent with national standards as possible. Staff recommends addressing this issue as follows:

1. SWBT either develop a non-standard fix for the problem that will be transitioned to national standards as they are developed <OR> SWBT be required to add these order types to EDI and LEX as national standards are adopted in the manner described in the change management document.
2. If SWBT chooses to wait for the development of national standards, SWBT must agree to waive the service order charges on these orders until the national standard processes are developed. Such a waiver would be an interim measure to compensate CLECs for the inconvenience and would act as a post-entry incentive to follow through on this commitment.

## II. Commercial Volumes / Testing

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<sup>2</sup> The actual details and factual evidence to support parity flow through of error rejection will be addressed under OSS Recommendation Nos. 12, 18, 19, and 20, currently scheduled for the October 13, 1998 OSS work session.

<sup>3</sup> Further, direct access to SORD by CLECs is being addressed under OSS Recommendation No. 16.

Recommendation OSS-7 states: *SWBT shall demonstrate that improved flow through capability enables SWBT's OSS to handle commercial volumes.*

***Position of SWBT:***

In its brief, SWBT states that the affidavit evidence it provided demonstrates its capacity well beyond CLEC forecasts. By creating further flow-through, greater capacity to handle commercial volumes was assured. Also, moving more edits from SORD to LASR created greater efficiency and thereby capacity.

Although SWBT believes that it has demonstrated that its systems can handle readily foreseeable volumes and is scaleable, SWBT has agreed to develop a two-part test with the Commission to test flow-through and stress test its systems. SWBT disfavors a third-party test because of the administrative delay it would cause and the cost.

***Positions of the CLECs:***

AT&T and others argue that commercial volumes have not been demonstrated and that stress testing is necessary.

In their briefs, CLECs favor third-party testing as the best method of determining commercial volumes, short of the CLECs entering the market with commercial volumes.<sup>4</sup> The CLEC Coalition argued that SWBT should be required to pay for any third-party testing.

**Staff Recommendation:**

**Option 1:**

The Commission could direct Staff to proceed with a plan for third party testing which would include stress testing and flow-through testing of SWBT's OSS functions. The third party testing plan would include a process similar to that used in New York, but would be tailored to the Texas market and would take into account any information already established in this 271 process to avoid any unnecessary duplication of effort and expense.

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<sup>4</sup> See CLEC coalition Brief at pp. 9-10 for a discussion regarding the small number of unbundled network element (UNE) orders that have been placed.

**Option 2:**

The Commission could direct staff to develop a testing plan for stress testing and flow-through testing of SWBT's systems. Such a plan might include coordinated assistance by SWBT and Participants in submitting orders in EDI and LEX and use of alternative carrier identification numbers so CLECs can submit EDI orders using simulators that would not flow test orders into the CLECs' back office systems. At the next open meeting, Staff could present a proposal to the Commission relating to what would constitute an adequate stress test and the methods and procedures that could be used.

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