

# ATTACHMENT 16

SWB  
May 8, 2000

Project No. 20400

SECTION 271 COMPLIANCE  
MONITORING OF SOUTHWESTERN  
BELL TELEPHONE COMPANY  
OF TEXAS

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PUBLIC UTILITY COMMISSION  
OF TEXAS

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**SOUTHWESTERN BELL TELEPHONE COMPANY'S  
BRIEF ON BENCHMARKS  
FOR HOT CUT PERFORMANCE MEASURES**

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<b>SECTION 271 COMPLIANCE</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>MONITORING OF SOUTHWESTERN</b>	<b>§</b>	
<b>BELL TELEPHONE COMPANY</b>	<b>§</b>	<b>OF TEXAS</b>
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**SOUTHWESTERN BELL TELEPHONE COMPANY'S  
BRIEF ON BENCHMARKS FOR  
HOT CUT PERFORMANCE MEASURES**

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At the April performance measure workshops, SWBT and participating CLECs reached broad agreement on prospective adjustments to Performance Measurements ("PMs") 114, 114.1, and 115. This agreement is remarkable in light of the ongoing debate before the FCC concerning SWBT's satisfaction of its section 271 obligations with respect to hot cuts. The parties' ability to agree on performance reporting in the midst of the disputed federal section 271 proceeding is testament to the strong collaborative foundation that supports local competition in Texas, and thus provides further evidence that the preconditions for interLATA relief have been satisfied.

The only issue on which SWBT and the CLEC participants were not able to agree is narrow, and inextricably intertwined with the FCC proceedings: what benchmarks are most appropriate for the three hot cut measures in light of the systems being measured, market conditions in Texas, and the FCC's guidance in the *Bell Atlantic New York Order*. See Memorandum Opinion and Order, *Application by Bell Atlantic-New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Services in the State of New York*, CC Docket No. 99-

295, FCC 99-404 (rel. Dec. 22, 1999). SWBT believes that these considerations point strongly to the following benchmarks:

- For PM 114 (Percentage of Premature Disconnects), maintain the current benchmark of 2% (or fewer) premature disconnects;
- For PM 114.1 (LNP with Loop Provisioning Interval), 90% within one hour for orders of 9 lines or less, and 90% within two hours for orders of 10 to 24 lines;
- For new PM 115 (Percent Provisioning Trouble Reports), 5% (or fewer) trouble reports by noon on the first business day after the scheduled cutover.

These benchmarks match the FCC guidelines that are analogous to PMs 114.1 and 115, while also reflecting a level of performance that – as this Commission has found – gives Texas CLECs a meaningful opportunity to compete.

**I. SWBT AND THE CLECS HAVE REACHED AGREEMENT ON MOST ASPECTS OF THE HOT CUT MEASURES**

The April workshops, and particularly discussions between AT&T and SWBT outside the hearing room, resolved all but a few issues regarding hot cut measures. Attachment 1 to this Brief provides SWBT's proposed measures, which we understand are agreed upon by all participants in the work sessions in all respects except for the benchmarks. See Apr. 17, 2000 Tr. at 211 (Ms. De Young, AT&T). Even with respect to the benchmarks, there appears to be agreement that the current standard for PM 114 (2% disconnects prior to 10 minutes before the scheduled start time) should remain in place.

On April 12, 2000 SWBT presented a set of initial proposals that were revised based on CLEC input. Significant features of the negotiated measures, which are reflected in Attachment 1, include the following:

- PMs 114 and 114.1 now measure premature disconnects for CHC/FDT LNP with Loop only. Premature disconnects for stand-alone LNP will be reported under PM 96 and percent out of service for stand-alone LNP will be reported under PM 101.
- Consistent with the recommendations of CLECs and the DOJ in the FCC's section 271 proceeding, the business rules for PM 114.1 were revised to provide that the conversion ends after the SWBT technician has notified the CLEC that the cut-over has been completed. *See, e.g.,* Evaluation of the United States Department of Justice, CC Docket No. 00-4, at 31 n.84 (Feb. 14, 2000); Apr. 12, 2000 Tr. at 54 (Ms. De Young) ("I think that would close that gap to our satisfaction.").
- New PM 115 measures the percent of CHC/FDT circuits for which the CLEC submits a provisioning trouble report ("PTR") on the day of the conversion, or by noon on the next business day. This measure provides the "outages on conversion" measurement that AT&T and other CLECs have indicated is important to them. *See, e.g.,* Apr. 12, 2000 Tr. at 97 (Ms. De Young). By relying upon trouble reports, this change also will render it unnecessary to perform the sort of manual, potentially subjective outage assessments that have been performed under the auspices of the PPIG. *See id.* at 38-39 (Mr. Cooper, SWBT); *see also id.* at 92 (Ms. De Young) ("It would be beneficial to CLECs and to SWBT to mechanize the tracking of these provisioning troubles.").
- PM 115 was established as a Tier 1 and Tier 2 "High" measurement at the CLECs' request. Apr. 17, 2000 Tr. at 170-71 (Ms. De Young).
- New PM 115.1 adds an additional dimension to hot cut reporting, by tracking the average duration of a provisioning trouble from the receipt of the PTR to the time it is cleared. Again, this approach will avoid the manual review of hot cut records and ensuing guesswork that has characterized the PPIG reconciliations.

These changes establish a hot cut reporting structure that should prove comprehensive, meaningful, reliable, and workable.

## **II. PMs 114 and 115 Should Be Reported on the Basis of Lines**

At the April 17 work session, AT&T agreed that it is appropriate to report PM 115 on the basis of lines cut-over, rather than on the basis of CHC or FDT orders. Apr. 17, 2000 Tr. at 211 (Ms. De Young) ("[W]e are persuaded that Southwestern Bell currently does not have the technical capability to measure the PTRs in Measure 115 at the . . .

customer level.”). As SWBT’s Mr. Cooper explained, SWBT maintains its trouble report records on a line (i.e., circuit) basis. PTRs thus could not be reported on an order basis, any more than SWBT’s other trouble report measures (such as PMs 59, 65, and 69) could be reported on a per-order basis. See Apr. 12, 2000 Tr. at 151, 162. Converting circuit records back to orders solely for reporting purposes would be a labor-intensive process of the sort that AT&T, the DOJ, and others have agreed should be avoided. See *Id.* at 160 (Mr. Dysart, SWBT).

Given the necessity of using lines as the unit for PTRs under PM 115, SWBT agrees with AT&T that it is least confusing to use lines in the measurement for PM 114 (premature disconnects) as well. See Apr. 17, 2000 Tr. at 211 (Ms. De Young) (“And we also feel strongly that the units for Measures 114 and 115 need to be the same”).

**III. The Benchmark for PM 114.1 Should be 90% Within One Hour, or 90% Within Two Hours for Larger Orders**

PM 114.1, which focuses on overall time intervals rather than specific types of provisioning difficulties, could sensibly be tracked using either lines or orders as the basis for calculations. AT&T suggested at the work sessions that it preferred to use lines in reporting conversion intervals under PM 114.1. Based on that preference (which SWBT did not oppose, see Apr. 17, 2000 Tr. at 211-12), AT&T went on to argue that the *Bell Atlantic New York Order’s* 90% on-time standard should be made much stricter, to reduce the number of misses allowed from 10% to 2%. Apr. 17, 2000 Tr. at 223 (Ms. De Young). AT&T’s admitted effort to impose a “much higher standard” than the one set by the FCC is indefensible. Apr. 12, 2000 Tr. at 133-34 (Ms. De Young).

In New York, the PSC set time windows within which “the entire hot cut must be completed.” *Bell Atlantic New York Order* ¶ 292. The windows were “a fixed period of

time ranging from one hour to eight hours, depending upon the number of lines involved. For orders with fewer than ten lines, Bell Atlantic [had] one hour in which to complete the coordinated cutover and report the completion of the hot cut to the competing carrier." *Id.* (footnote omitted). SWBT has proposed the same time interval for completing orders of 1 to 9 lines; this will cut the current 2-hour benchmark interval in half for smaller orders once the new benchmark takes effect.

For orders of between 10 and 49 lines, Bell Atlantic had 2 hours to complete the conversion. Joint Declaration of George S. Dowell and Julie A. Canny, Attach. B, CC Docket No. 99-295, at 41 (FCC filed Sept. 29, 1999). Again, SWBT has adopted the same interval as was applied to Bell Atlantic, proposing a 2-hour interval for orders of more than 10 lines and less than SWBT's "project" cut-off of 25 lines.

The FCC noted that "to meet the New York Commission's adopted standard, Bell Atlantic must provision 95 percent of hot cuts within the window applicable to the particular order." *Bell Atlantic New York Order* ¶ 292. But Bell Atlantic did not meet that standard, *id.*, and the FCC did not hold Bell Atlantic to it. Rather, the FCC "ma[d]e the independent judgment that" Bell Atlantic's demonstrated "on-time hot cut performance at a level of 90 percent or greater is sufficient to permit carriers to enter and compete in a meaningful way in the New York local exchange market." *Id.* ¶ 298.

The FCC's determination related only to Bell Atlantic's coordinated hot cut process. Bell Atlantic did not have a fully scheduled process analogous to FDT. See *id.* ¶ 291, n.925; see also Joint Declaration of Paul Lacouture and Arthur J. Troy Attach. F (CC Docket No. 99-295 filed Sept. 29, 1999). Inasmuch as SWBT's FDT process allows CLECs to obtain hot cuts with less investment of CLEC resources, the FCC's

"meaningful opportunity to compete" standard would suggest that a timeliness benchmark of less than 90% might be appropriate. SWBT has not sought such an adjustment, however, and is instead prepared to accept the 90% standard for FDT conversions as well as the CHC conversions that are analogous to Bell Atlantic's process.

The *Bell Atlantic New York Order* sheds no light on whether the FCC would have found its 90% standard appropriate if Bell Atlantic had reported timeliness as a percentage of loops, as opposed to a percentage of orders. Nor is the New York timeliness benchmark of 90% of orders necessarily more rigorous than a standard of 90% of lines. Whether one standard is stricter than the other depends upon the extent to which delays occur on multiple loops in the same order. This is a provisioning issue, not a statistical one.

To illustrate the point, based on SWBT's reconciliation with AT&T pursuant to Commission Order No. 4, Attachment 2 provides recalculated CHC and FDT conversion results for PM 114.1 in December 1999, January 2000, and February 2000. This recalculation shows that of the six monthly results, one (January CHCs) stayed the same when line-based results were recalculated on an order basis; SWBT's percentage of timely conversions decreased (by between 0.6% and 1.6%) for three results (December CHC and FDT, and February FDT) and SWBT's percentage of timely conversions improved (by between 1% and 1.3%) for two results (January FDT and February CHC). Averaging all six results, SWBT's overall timeliness was 95.1% for AT&T's orders using the line method and 94.9% using the order method; the results were essentially unchanged.

Given that line-based reporting will have no substantial or consistent impact on the reported results, and that line-based reporting is now urged by CLECs themselves, it would be inappropriate to penalize SWBT for employing this method. Yet that would be the result of *any* increase in the FCC's 90% benchmark – and certainly the dramatic increase to 98% that AT&T proposes.

Finally, the *Bell Atlantic New York Order* provides no support for AT&T's suggestion that the benchmark interval for FDT should be set at just a half hour – that is, half of the Bell Atlantic standard for orders of 1-9 loops and one-quarter the current 2-hour standard for FDT and CHC in Texas. As noted, Bell Atlantic did not make available a scheduled conversion process analogous to FDT. SWBT has offered FDT voluntarily as an alternative to the nondiscriminatory CHC process that meets the FCC's requirements. It would be nonsensical to have a stricter benchmark for the optional FDT process than for the CHC process that serves as the yardstick of nondiscriminatory performance. This would serve only to penalize SWBT for developing the FDT alternative, a penalty that this Commission has recognized would inappropriately discourage innovation by SWBT and other BOCs across the country. See *Evaluation of the Texas Public Utility Commission*, CC Docket No. 00-65, at 14 (Apr. 26, 2000). Establishment of a disproportionately short benchmark would likewise be inappropriate because FDT is a new and still-evolving process. As-yet undetermined process changes may be required to ensure the best possible service when CLECs select this method. AT&T has not demonstrated that a 30-minute benchmark is appropriate given today's FDT processes, and could not demonstrate that

it will be appropriate for the upcoming 6-month period until the next performance measurement review.

**IV. The Benchmark for PM 115 Should be Trouble Reports on No More Than 5% of Converted Lines**

PM 115 likewise should be reported in accordance with the FCC's most analogous benchmark, which is 5%.

In the *Bell Atlantic New York Order*, AT&T challenged Bell Atlantic's post-completion trouble report data, claiming that it was experiencing "outages for nearly 20 percent of its customers." *Bell Atlantic New York Order* ¶ 301. The New York PSC scrutinized that claim of AT&T, and found it to be false. *Id.* ¶ 302. However, the FCC's discussion of that New York PSC investigation appears to be the basis for AT&T's current argument regarding the proper benchmark for new PM 115. Specifically, the FCC stated at one point that "approximately five percent of AT&T customers suffered service outages as a result of Bell Atlantic errors." *Id.*, ¶ 302. It is this language on which AT&T likely will rely.

The FCC was imprecise. At another point in the same paragraph, the FCC stated that "less than 5 percent of the hot cuts that Bell Atlantic provisioned to AT&T . . . resulted in end-user service outages as a result of a Bell Atlantic provisioning failure." *Id.* This would seem to suggest a line-based standard, rather than a customer- or order-based standard.

In any event, as with PM 114.1, use of one standard or the other would not have any definite impact on performance results. If all orders with PTRs in a given month were for conversions of a single line, then the PTR percentage necessarily would be the same under either a line methodology or an order methodology. On the other hand,

where some orders are for multiple lines, and those multi-line orders experience provisioning troubles on many of the lines, calculating PTRs on a per-line basis would likely produce poorer percentage performance than calculating PTRs on a per-order basis.<sup>1</sup> Conversely, the per-order basis would produce poorer percentage performance if multi-line orders tended to have troubles on only one of the lines. In short, there is no empirical basis for setting a stricter standard than the FCC's 5% benchmark.

The new PTR performance report sought by CLECs also is not precisely the same as the *Bell Atlantic New York Order's* analysis of provisioning-related outages. This Commission certainly could conclude that, in terms of real-world impact on CLECs and their customers, setting the PM 115 standard at provisioning *trouble reports* on 5% of hot cut lines would be comparable to, or stricter than, the New York benchmark of reconciled provisioning *outages* on 5% of orders. Such a determination would be an independent basis for adopting SWBT's proposed 5% standard.

By the end of the work sessions, AT&T appeared to accept that a 5% standard is the appropriate starting point for new PM 115, and focused on the issue addressed above – whether some adjustment should be made due to the line-based reporting methodology. Apr. 17, 2000 Tr. at 214 (Ms. De Young). Yet AT&T previously had offered the radical proposal that the allowable “misses” for all three hot cut PMs should be 2% in the aggregate. *See generally*, Combined Matrix of Proposed Changes to

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<sup>1</sup> Consider a hypothetical month in which there were 4 orders of 1 line each and 1 order of 5 lines. If there were no PTRs on the four 1-line orders and PTRs on 3 lines in the 5-line order, the PTR rate would be 33% on a per-line basis (3 of 9 lines) but only 20% on a per-order basis (1 of 5 orders).

SWBT PM Plan filed by CLECs on April 12, 2000, at 129 ("Combined Matrix"). That proposal, if AT&T seeks to revive it in some form, should be unequivocally rejected.

In making its proposal, AT&T recognized that there could be "double counting" between PMs 114, 114.1, and 115, so that SWBT might fail the proposed benchmark even if it provisioned better than 98% of all hot cut lines without a hitch. See *id.* at 129. Such a standard of virtual perfection finds absolutely no support in the *Bell Atlantic New York Order*. See generally *Bell Atlantic New York Order* ¶ 176 ("We note that we do not hold Bell Atlantic to a standard of perfection."). The FCC plainly did not intend that "misses" under its three hot cut criteria – timeliness, post-completion trouble reports, and outages – should be summed, much less that the resulting sum had to meet the *lowest* of the three relevant numerical standards applied in New York. Rather, the FCC stated that it considered "Bell Atlantic's demonstrated on-time hot cut performance at rates at or above 90 percent, in combination with the evidence indicating that fewer than five percent of hot cuts resulted in service outages and that fewer than two percent of hot cut lines had reported installation troubles, to be sufficient to establish compliance with the competitive checklist." *Id.*, ¶ 309. Bell Atlantic, of course, would have failed AT&T's suggested test by a wide margin.

Nor would AT&T's proposal be well-founded if AT&T abandoned its proposal for a single, cumulative benchmark, and simply urged a 2% benchmark for PM 114.1. Such a benchmark of 2% for pre-completion outages would be less than half the 5% outages standard set in the *Bell Atlantic New York Order*. It also would not be comparable to the 2% "I-7" report rate cited in the FCC's decision. *Bell Atlantic New York Order*, ¶ 300, n. 956. The I-7 measure in New York assessed troubles *after*

completion of the hot cut and thus served as a measure of the quality of the loop as installed. *Id.*, ¶¶ 299-300. PM 115, by contrast, will capture troubles associated with the provisioning process, when the end user may not yet view the CLEC as its service provider and the troubles can be more readily corrected. PM 115 is analogous to the FCC's examination of Bell Atlantic "provisioning failure[s]," which led to the 5% standard. *Bell Atlantic New York Order* ¶ 302.

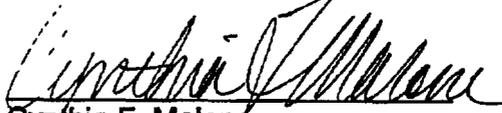
Finally, it should be noted that if they were applicable today, AT&T's proposed 2% benchmarks for hot cut PMs would brand SWBT's current performance as deficient, and subject SWBT to substantial Tier 1 and Tier 2 payments. This Commission, however, has found that SWBT is provisioning hot cuts "at an acceptable level of quality, and with a minimum of service disruptions, thereby offering competitors a meaningful opportunity to compete in the local exchange market." Evaluation of the Texas Public Utility Commission, CC Docket No. 00-65, at 23 (Apr. 26, 2000). There can be no justification for setting hot cut performance benchmarks above a level of performance that is nondiscriminatory and opens the local market to competition.

#### **CONCLUSION**

The hot cut PMs and associated benchmarks described in Attachment 1 should be approved.

Respectfully Submitted,

ANN E. MEULEMAN  
General Counsel-Austin



Cynthia F. Malone  
Senior Counsel  
Bar Card No. 12872500

Thomas J. Horn  
General Attorney

Kelly Murray  
Senior Counsel

ATTORNEYS FOR SOUTHWESTERN  
BELL TELEPHONE COMPANY  
1616 Guadalupe, Room 600  
Austin, Texas 78701  
Tel: (512) 870-5720  
Fax: (512) 870-3420

**CERTIFICATE OF SERVICE**

I, Cynthia F. Malone, Senior Counsel for Southwestern Bell Telephone Company, certify that a true and correct copy of this document was served on all parties of record in these proceedings on May 8, 2000, in the following manner: via facsimile transmission, U.S. mail or hand delivery.



<b>96. Measurement:</b>	
Percentage Premature Disconnects for Stand Alone LNP Orders	
<b>Definition:</b>	
Percentage of Stand Alone LNP <u>telephone numbers orders</u> where SWBT disconnects the customer (e.g. switch translations are removed) prior to the scheduled start time.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"> <li>• Stand alone LNP <u>telephone numbers orders</u> where the CLEC requests that the cut-over begin prior to the scheduled time.</li> <li>• <u>Change of the Due Date</u> by the CLEC less than four business hours prior to the <u>scheduled Date/Time</u></li> <li>• Stand Alone LNP <u>order/telephone numbers</u> where SWBT disconnects <math>\leq 10</math> minutes of the scheduled start time.</li> </ul>	
<b>Business Rules:</b>	
A premature disconnect occurs any time SWBT begins the cut-over more than 10 minutes prior to the scheduled start time.	
<b>Levels of Disaggregation:</b>	
None	
<b>Calculation:</b>	<b>Report Structure:</b>
(Count of prematurely disconnected Stand Alone LNP <u>order/telephone numbers</u> + total Stand Alone LNP <u>order/telephone numbers</u> * 100	Reported by CLEC and all CLECs
<b>Measurement Type:</b>	
Tier 1 – High Tier 2 – High	
<b>Benchmark:</b>	
$\leq 2\%$ premature disconnects.	

<b>98. Measurement:</b>	
Percentage Stand Alone LNP I-Reports in 10 Days	
<b>Definition:</b>	
Percentage of Stand Alone LNP Orders that receive a LNP related network customer trouble report within 10 calendar days of service order completion.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"> <li>• Trouble reports caused by CPE or inside wiring.</li> <li>• Exclude CLEC, IEC or USER Caused trouble.</li> </ul>	
<b>Business Rules:</b>	
The Start time is the date/time of completion of the service order. The End time is the date/time of receipt of trouble report. Count the number of LNP Only Orders that receive an LNP related trouble report within 10 calendar days of completion.	
<b>Levels of Disaggregation:</b>	
<ul style="list-style-type: none"> <li>• Stand Alone LNP</li> </ul>	
<b>Calculation:</b>	<b>Report Structure:</b>
(Count of Stand Alone LNP Orders that receive a network customer trouble report within 10 calendar days of service order completion + total LNP Only Orders) * 100.	Reported by CLEC and all CLECs, and SWBT.
<b>Measurement Type:</b>	
Tier 1 – High Tier 2 – High	
<b>Benchmark:</b>	
Parity with SWBT Retail POTS – No Field Work.	

<b>99. Measurement:</b>	
Average Delay Days for SWBT Missed Due Dates for Stand Alone LNP Orders	
<b>Definition:</b>	
Average calendar days from due date to completion date on company missed orders.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"> <li>• On time or early completions</li> </ul>	
<b>Business Rules:</b>	
The clock starts on the due date and the clock ends on the completion date based on posted Stand Alone LNP orders.	
<b>Levels of Disaggregation:</b>	
LNP Only	
<b>Calculation:</b>	<b>Report Structure:</b>
$\frac{\Sigma(\text{Stand Alone LNP Completion Date} - \text{Stand Alone LNP Order Due Date}) + \# \text{ total port out orders where there was a SWBT caused missed due date} * 100}{\text{Total Orders}}$	Reported for CLEC and all CLECs and SWBT.
<b>Measurement Type:</b>	
Tier 1 – Medium Tier 2 – Medium	
<b>Benchmark:</b>	
Parity with SWBT Retail POTS – No Field Work.	

<b>100. Measurement:</b>	
Average Time of Out of Service for LNP Conversions	
<b>Definition:</b>	
Average time to facilitate the activation request in SWBT's network.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"> <li>• CLEC-caused errors.</li> <li>• NPAC-caused errors unless caused by SWBT.</li> <li>• Orders with more than 500 number activations.</li> <li>• SWBT Network element Maintenance windows and system upgrades.</li> </ul>	
<b>Business Rules:</b>	
The Start time is the Receipt of the NPAC broadcast activation message in SWBT's LSMS. The End time is when the Provisioning event is successfully completed in SWBT's network as reflected in SWBT's LSMS. Calculate the total minutes of difference between the start time and end time in minutes for LNP activations during the reporting period.	
<b>Levels of Disaggregation:</b>	
None	
<b>Calculation:</b>	<b>Report Structure:</b>
$\frac{\sum(\text{LNP start time} - \text{LNP stop time})}{+ \# \text{ total LNP activations}}$	Reported for CLEC and all CLECs
<b>Measurement Type:</b>	
Tier 1 – High Tier 2 – High	
<b>Benchmark:</b>	
60 Minutes unless a different industry guideline is established that will override the benchmark referenced here.	

<b>101. Measurement:</b>	
Percent Out of Service < 60 minutes	
<b>Definition:</b>	
The Number of LNP related conversions where the time required to facilitate the activation of the port in SWBT's network is less than 60, expressed as a percentage of total number of activations that took place.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"> <li>• CLEC-caused errors.</li> <li>• NPAC-caused errors unless caused by SWBT.</li> <li>• Orders with more than 500 number activations.</li> <li>• SWBT Network element Maintenance windows and system upgrades.</li> </ul>	
<b>Business Rules:</b>	
The Start time is the receipt of the NPAC broadcast activation message in SWBT's LSMS. The End time is when the Provisioning event is successfully completed in SWBT's network as reflected in SWBT's LSMS. Count the number of activations that took place in less than 60 minutes.	
<b>Levels of Disaggregation:</b>	
<ul style="list-style-type: none"> <li>• None</li> </ul>	
<b>Calculation:</b>	<b>Report Structure:</b>
(Number of activations provisioned in less than 60minutes) + (total LNP activations) * 100.	Reported by CLEC and all CLECs.
<b>Measurement Type:</b>	
Tier 1 – Medium Tier 2 – Medium	
<b>Benchmark:</b>	
96.5%	

**114. Measurement**

Percentage of Premature Disconnects for CHC/FDT LNP with Loop OrdersLines.

**Definition:**

Percentage of CHC/FDT LNP with Loop orderslines where SWBT disconnects the customer (e.g. switch translations and/or the cross connect is removed) prior to the scheduled start time.

**Exclusions:**

- CHC/FDT LNP with Loop orderslines where the CLEC requests that the cut-over begin prior to the scheduled time.
- Change of the Due Date by the CLEC less than four business hours prior to the scheduled Date/Time

**Business Rules:**

A premature disconnect occurs any time SWBT begins the cut-over more than 10 minutes prior to the scheduled start time. .

**Levels of Disaggregation:**

- Coordinated Hot Cuts (CHC) – LNP with Loop
- Frame Due Time (FDT) – LNP with Loop

**Calculation:**

(Count of prematurely disconnected CHC/FDT LNP with Loop orderslines + total CHC/FDT LNP with Loop orderslines \* 100

**Report Structure:**

Reported by CLEC and all CLECs.

**Measurement Type:**

Tier 1 – High  
Tier 2 – High

**Benchmark:**

≤ 2% premature disconnects..

<b>114.1 Measurement</b>	
CHC/FDT LNP with Loop Provisioning Interval.	
<b>Definition:</b>	
The % of CHC/FDT LNP with Loop orders/lines completed by SWBT within the established provisioning intervals.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"> <li>• CHC/FDT LNP with Loop orders with greater than 24 loops (including multiple orders totaling 25 or more lines to the same customer premise on the due date).</li> <li>• CLEC caused delays (e.g., no dial tone from CLEC; CLEC translations) that do not allow SWBT the opportunity to complete CHC/FDT order within the designated interval.</li> <li>• IDLC (pair gain systems) identified on or before the due date.</li> </ul>	
<b>Business Rules:</b>	
<p>The start time is at the direction of the CLEC and based on a negotiated and scheduled time for coordinated hot cut orders (CHC) and on the frame due time for frame due time orders (FDT). For CHC orders, the clock starts when the CLEC calls the SWBT LOC to start the conversion, and ends when the SWBT technician completes the cross connect to the CLEC facilities and has called the CLEC to notify that the cut-over has been completed. For FDT orders, the clock starts at the frame due time and ends when the SWBT technician completes the cross connect to the CLEC facilities. This measurement only includes Coordinated Hot Cuts and Frame Due Time orders with 1-24 loops. A conversion with 25 or more lines (including multiple orders totaling 25 or more lines to the same customer premise on the same due date) is considered a project and is negotiated with the CLEC at the time of conversion.</p>	
<b>Levels of Disaggregation:</b>	
<p>CHC</p> <ul style="list-style-type: none"> <li>LNP with loop <ul style="list-style-type: none"> <li>• &lt; 10 lines</li> <li>• 10-24 lines</li> </ul> </li> </ul> <p>FDT</p> <ul style="list-style-type: none"> <li>LNP with loop <ul style="list-style-type: none"> <li>• &lt; 10 lines</li> <li>• 10-24 lines</li> </ul> </li> </ul>	
<b>Calculation:</b>	<b>Report Structure:</b>
Total CHC/FDT LNP with Loop lines orders within the designated interval + total CHC/FDT LNP with Loop lines orders.	Reported by CLEC and all CLECs.
<b>Measurement Type:</b>	
Tier 1 – Medium Tier 2 – Medium	
<b>Benchmark:</b>	
CHC/FDT orders for < 10 lines loops-90 % within one hour. CHC/FDT orders for 10-24 lines loops-90% within two hours.	

<b>115. Measurement</b>	
Percent Provisioning Trouble Reports (PTR).	
<b>Definition:</b>	
Measures the percent of CHC/FDT circuits for which the CLEC submits a trouble report on the day of conversion, or before noon on the next business day.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"> <li>• Reports for which the trouble is not attributable to the SWBT network (unless SWBT had knowledge of the trouble prior to the due date).</li> <li>• IDLC (pair gain systems) identified on or before the due date.</li> </ul>	
<b>Business Rules:</b>	
The percent of CHC/FDT circuits for which the CLEC submits a trouble report on the day of conversion, or before noon on the next business day.	
PMs 55.2, 56.1, 58, 91 and 99 will include any PTRs that extend past the original due date in the calculation as appropriate.	
PMs 59, 69 and 98 will exclude PTRs from the calculation.	
<b>Levels of Disaggregation:</b>	
CHC and FDT	
<b>Calculation:</b>	<b>Report Structure:</b>
Count of CHC/FDT circuits for which the CLEC submits a trouble report on or before noon on the next business day after conversion + total # of CHC/FDT circuits converted.	Reported by CLEC and all CLECs.
<b>Measurement Type:</b>	
Tier 1 –High	
Tier 2 – High	
<b>Benchmark:</b>	
5 % or less CHC/FDT trouble reports on the day of conversion, or before noon on the next business day.	

<b>115.1 Measurement - New</b>	
Mean Time To Restore – Provisioning Trouble Report (PTR)	
<b>Definition:</b>	
Average duration of the outage from the receipt of PTR to the time it is cleared.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"> <li>• Excludes non-measured reports (CPE, Interexchange Carrier, and Information reports.)</li> <li>• Excludes no access to the end user's location..</li> </ul>	
<b>Business Rules:</b>	
The start time is when the report is received. The stop time is when the report is cleared.	
<b>Levels of Disaggregation:</b>	
<ul style="list-style-type: none"> <li>• CHC and FDT</li> </ul>	
<b>Calculation:</b>	<b>Report Structure:</b>
$\Sigma[(\text{Date and time PTR is closed with the customer}) - (\text{date and time PTR is received})] + \text{total PTRs.}$	Reported by CLEC, all CLECs.
<b>Measurement Type:</b>	
Tier 1 – Medium Tier 2 – Medium	
<b>Benchmark:</b>	
Parity: 1. 8.0 dB Loop with Test Access and 8.0 dB Loop without Test Access  2. 5.0 dB Loop with Test Access and 5.0 dB Loop without Test Access	Retail Comparison POTS (Res/Bus) POTS (Res/Bus NFW) – excludes "C" orders with only features and supercedes  Parity with SWBT Non-Switched VGPL