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July 10, 2003

Ex Parte Presentation

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Application by SBC Communications Inc., et al. for Provision of In-Region,
InterLATA Services in Michigan, WC Docket No. 03-138*

Dear Ms. Dortch:

On behalf of SBC Communications Inc. ("SBC"), and at the request of FCC staff, I am attaching an updated analysis of BearingPoint's performance metrics review, incorporating data contained in BearingPoint's June 30, 2003, Draft Report. In accordance with this Commission's Public Notice, DA 03-2039 (June 19, 2003), SBC is filing this letter electronically through the Commission's Electronic Comment Filing System. Thank you for your kind assistance in this matter.

Sincerely,


Geoffrey M. Klineberg

Attachment

cc: Gina Spade
Susan Pié
Rodney Gregg
Layla Seirafi-Najar
Qualex International

ATTACHMENT

Updated Presentation of BearingPoint's Performance Metrics Review

In its June 19, 2003, supplemental filing, Michigan Bell provided a series of charts focusing on the then-current status of certain Performance Metrics Review (PMR) testing, based upon BearingPoint's April 2003 Draft Report. Michigan Bell demonstrated in its supplemental filing that the issues that BearingPoint has identified do not undermine Ernest & Young's performance audit conclusions that Michigan Bell's reported performance results are reliable.¹

On June 30, 2003, pursuant to the Michigan PSC's January 2003 Compliance Order,² BearingPoint issued a new bi-monthly report of the progress of its PMR testing in Michigan.³ This June 2003 Draft Report updates the April 2003 Report. In addition, at SBC's request, on June 30, 2003, BearingPoint provided an updated Blind Replication Status Summary as of June 23, 2003.

Based on this new information, Michigan Bell has updated its PMR4 and PMR5 analysis originally provided in Attachments B through F of the Ehr/Fioretti Joint Supplemental Affidavit. A summary of BearingPoint's June 2003 Draft Report and of Michigan Bell's revised attachments is provided below. The updated PMR4 and PMR5 attachments are attached hereto as Attachments Bv2 through Fv2.⁴

The BearingPoint June 30, 2003, Draft Report

The first BearingPoint Interim Report for Michigan was released on October 30, 2002. In January 2003, the Michigan PSC required BearingPoint to file bi-monthly PMR progress reports. In response to this directive, BearingPoint released Updated Metrics Reports on March 7, 2003, April 30, 2003, and June 30, 2003. The June 30, 2003 Draft Report provides an update of the test score based on test results as of June 10, 2003, unless otherwise noted in the report.

Although PMR testing is not completed, the June 30, 2003 Draft Report shows continued progress in each area of the test. The June 30, 2003 report documents 270 applicable test points; 152 (56.3%) test points are "Satisfied," 70 (25.9%) are considered "Not Satisfied," and 48 (17.8%) are "Indeterminate." The table below summarizes the Michigan PMR results based on

¹ See Ehr/Fioretti Joint Supp. Aff. ¶¶ 58-164 & Attachs. B-F (Supp. App. A, Tab 5).

² Opinion and Order, In the Matter, on the Commission's Own Motion, to Consider SBC's, f/k/a Ameritech Michigan, Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320, at 3 (MPSC Jan. 13, 2003) ("January 2003 Compliance Order") (App. C, Tab 134).

³ BearingPoint's OSS Evaluation Project Report Metrics Update (June 30, 2003) ("June 2003 Draft Report"). The June 30, 2003 Draft Report can be found at www.osstesting.com

⁴ Attachment Dv2, entitled "Blind Replication Status Summary as of June 23, 2003," was prepared by BearingPoint. In preparing its analysis, a 'match' indicates that BearingPoint's replication process has calculated a result within 1% of Michigan Bell's reported result. See Ehr/Fioretti Joint Supp. Aff. ¶ 136; see also Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC, WC Docket No. 03-138, Attach. (June 27, 2003) (providing a revised Attachment D to the Ehr/Fioretti Joint Supp. Aff.) ("June 27, 2003 Ex Parte").

the four interim reports and provides an update as to the scoring of the component PMR categories.

Michigan Performance Metrics Review Results									
Performance Metrics Review	Michigan 10/30/02	Percent of Applicable Test Points	Michigan 3/7/03	Percent of Applicable Test Points	Michigan 4/30/03	Percent of Applicable Test Points	Michigan 6/30/03	Percent of Applicable Test Points	
PMR1	Satisfied	0	0.0%	31	24.6%	63	50.0%	85	67.5%
	Not Satisfied	72	57.1%	35	27.8%	33	26.2%	30	23.8%
	Indeterminate	54	42.9%	60	47.6%	30	23.8%	11	8.7%
	Not Applicable	0	n/a	0	n/a	0	n/a	0	n/a
PMR2	Satisfied	3	100.0%	3	100.0%	3	100.0%	3	100.0%
	Not Satisfied	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Indeterminate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Not Applicable	0	n/a	0	n/a	0	n/a	0	n/a
PMR3	Satisfied	23	76.7%	27	93.1%	27	93.1%	29	100%
	Not Satisfied	7	23.3%	2	6.9%	2	6.9%	0	0.0%
	Indeterminate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Not Applicable	0	n/a	0	n/a	0	n/a	0	n/a
PMR4	Satisfied	0	0.0%	2	5.0%	5	12.5%	11	27.5%
	Not Satisfied	11	25.6%	14	35.0%	9	22.5%	3	7.5%
	Indeterminate	32	74.4%	24	60.0%	26	65.0%	26	65%
	Not Applicable	29	n/a	32	n/a	32	n/a	32	n/a
PMR5	Satisfied	4	5.6%	20	27.8%	27	37.5%	24	33.3%
	Not Satisfied	46	63.9%	42	58.3%	33	45.8%	37	51.4%
	Indeterminate	22	30.6%	10	13.9%	12	16.7%	11	15.3%
	Not Applicable	0	n/a	0	n/a	0	n/a	0	n/a
Total	Satisfied	30	10.9%	83	30.7%	125	46.3%	152	56.3%
	Not Satisfied	136	49.6%	93	34.4%	77	28.5%	70	25.9%
	Indeterminate	108	39.4%	94	34.8%	68	25.2%	48	17.8%
	Not Applicable	29	n/a	32	n/a	32	n/a	32	n/a

Data Integrity Analysis (PMR4) – Attachment Bv2

The Metrics Data Integrity (PMR4) test evaluates policies and practices used by Michigan Bell for processing the data used in the production of the reported performance results. Attachment B (PMR4 Analysis Exception Status as of 5/30/03) to the Ehr/Fioretti Joint Supplemental Affidavit and paragraphs 104-119 in the Supplemental Affidavit detailed the status of the five “Open” PMR 4 Exceptions as of May 30, 2003. Michigan Bell provides an updated Attachment Bv2 here to reflect progress as of July 1, 2003. All changes from the original Attachment B are “redlined,” and a REVISED stamp appears at the top right hand side of any page that has been updated.

As Attachment Bv2 shows, only one of the five PMR 4 exceptions remains “Open.” The updated Attachment Bv2 includes changes in the “Exception Status” column and the “Issue Description & SBC Midwest Comments” column, where additional responses since May 30, 2003 have been updated. The following table summarizes these status changes.

PMR 4 Analysis, Exception Status Summary as of 7/1/03		
Exception	Status as of 5/30/03	Status as of 7/1/03
E-134	Retest	Closed, Satisfied ⁵
E-175	Retest	Propose to Close, Not Satisfied ⁶
E-176	Retest	Closed, Satisfied
E-183	Retest	Closed, Satisfied

Metrics Calculations and Reporting (PMR5) – Attachments Cv2-Fv2

In the Metrics Calculations and Reporting Test (PMR5), BearingPoint evaluates the processes used by Michigan Bell to calculate performance results, and it also assesses whether Michigan Bell has appropriately calculated those results in light of the MPSC-approved business rules for each reported measure. Attachments C-F to the Ehr/Fioretti Joint Supplemental affidavit addressed the three open PMR 5 tests.⁷

PMR5-2 Blind Replication Status Chart – Attachments Cv2 and Dv2

Attachments C and D to the Ehr/Fioretti Joint Supplemental Affidavit are a BearingPoint letter dated June 2, 2003 and a BearingPoint chart entitled the “Blind Replication Status

⁵ Exception 134 was closed by BearingPoint in a “Satisfied” status on July 8, 2003.

⁶ Exception 175 was “Proposed to Close” by BearingPoint in a “Not Satisfied” status on June 24, 2003. SBC Midwest requested that BearingPoint not close the exception until the parties could meet to fully evaluate options to retest the data given that the closure is based on January – June 2002 “Test CLEC” data that cannot be re-created without re-opening the operational test. SBC Midwest does not expect a retest to change the final determination (“Not Satisfied”) but rather expects that BearingPoint may be able to validate the process and the measurement as it has been modified, based on the exception response and disposition.

⁷ PMR 5-1 has been fully satisfied. See Ehr/Fioretti Joint Supp. Aff. ¶ 124.

Summary as of May 16, 2003.” Michigan Bell provides an updated Attachment Cv2, dated June 30, 2003, and an updated Attachment Dv2, reflecting replication status as of June 23, 2003.

The Ehr/Fioretti Joint Supplemental Affidavit provides a detailed explanation of Attachment D. See Ehr/Fioretti Joint Supp. Aff. ¶¶ 133-139. A table following paragraph 138 depicts the relative number of “M” (match), “NM” (non-match), or “NMM” (non-material match) conditions that BearingPoint had identified through May 16.⁸

The table below provides an updated summary based on BearingPoint’s Attachment Dv2 chart, as of June 23, 2003.

Blind Replication Status Summary as of June 23, 2003							
	July 2002		August 2002		September 2002		Total
	CLEC	SBC	CLEC	SBC	CLEC	SBC	CLEC and SBC
Match (M)	269 (92.8%)	134 (94.4%)	184 (96.3%)	52 (100%)	172 (97.2%)	38 (100%)	849 (95.4%)
Non-Material Match (NMM)	9 (3.1%)	2 (1.4%)	1 (0.5%)	0 (0%)	2 (1.1%)	0 (0%)	14 (1.6%)
Non-Match (NM)	12 (4.1%)	6 (4.2%)	6 (3.2%)	0 (0%)	3 (1.7%)	0 (0%)	27 (3.0%)
Total Evaluated	290 (100%)	142 (100%)	191 (100%)	52 (100%)	177 (100%)	38 (100%)	890 (100%)
Total Possible Key Measures ⁹	385	162	385	162	372	158	1624

A comparison of the two tables shows that BearingPoint continues to replicate or “match” over 95% (95.4% as of June 23, 2003) of the “key” measures evaluated through June 23, 2003, for July through September 2002 based on a 1% deviation standard. Of the additional 87 submeasures BearingPoint evaluated between May 16 and June 23, 2003, 81 of them produced a “match” result within 1%.

⁸ See June 27, 2003 Ex Parte (providing a revised table and revised paragraph 138 through 139 of the Ehr/Fioretti Joint Supplemental Affidavit).

⁹ The difference in “Total Possible Key Measures” from July and August to September is due to the migration of performance reporting from the MorTel system to the ICS/DSS platform. These measures, while reported together, have been evaluated separately by BearingPoint. With the transition for these measures complete as of September, the totals for September are smaller.

Of the remaining sub-measures, an additional 4 (13 total or 1.6%) matched based on a 5% materiality threshold (i.e., “non-material matches”), accounting for a total match rate of nearly 97% (96.9% as of June 23, 2003) of the sub-measures evaluated to date. Finally, the remaining “non-matches” amount to an additional 2 (27 total or 3%) as of June 23, 2003. The table shows that SBC Midwest is maintaining a positive trend, as replication of the “key measures” continues to perform above 95% in all material respects.

PMR 5-2 Matrix – Attachment Ev2

Attachment E to the Ehr/Fioretto Joint Supplemental Affidavit (PMR5-2 Analysis “NM” Issues from BearingPoint PMR5 Status Matrix) and paragraphs 140-144 of the Joint Supplemental Affidavit detail the status of the “key” measures that BearingPoint identified as “non-matches” in Attachment D. Michigan Bell provides an updated Attachment Ev2 here, reflecting progress as of July 1, 2003. All changes from the original Attachment E are “redlined,” and a REVISED stamp appears at the top right hand side of any page that has been updated.

The updated Attachment Ev2 includes changes in the “Exception Status” column and the “Issue Description & SBC Midwest Comments” column, where additional responses since May 30, 2003 have been updated. The following tables summarize these status changes and new findings:

PMR5-2 Analysis “NM” Issues from BearingPoint PMR5 Status Matrix Summary as of 7/1/03		
Finding	Status as of 5/30/03	Status as of 7/1/03
NR116	Retest	Closed NR, Opened O-858
NR117	Retest	Closed NR, Opened O-862
O-613	This finding was not listed as the cause for the “NM” on original 5/30/03 matrix	Retest

PMR 5-3 and 5-4 Matrix – Attachment Fv2

Attachment F to the Ehr/Fioretto Joint Supplemental Affidavit (PMR5-3 and 5-4 Analysis from BearingPoint PMR5 Status Matrix) and paragraphs 145-157 of the Joint Supplemental Affidavit detail the status of the “key” measures that BearingPoint identified as either “Exclusion Discrepancies” or “Business Rule Discrepancies” in the Comments section of Attachment D. Michigan Bell provides an updated Attachment Fv2 here, to reflect progress as of July 1, 2003. All changes from the original Attachment F are “redlined,” and a REVISED stamp appears at the top right hand side of any page that has been updated.

Attachment Fv2 provides information regarding updates to the “Current Status” column and to the “BearingPoint Issue Description & SBC Midwest Comments” column in instances where additional responses were made or issues have been identified since the May 30, 2003 status. As shown in Attachment Fv2, this testing has seen positive progress since May 30, 2003, with only one new observation opened. The following tables summarize these status changes in existing PMR 5-3 and 5-4 issues and the one new finding.

PMR5-3 and 5-4 Analysis Changes in Existing Issues Summary as of 7/1/03		
Current Status	Number of Findings as of 5/30/03	Number of Findings as of 7/1/03
Open	4	0
Retest	17	20
Closed, Not Satisfied	27	24
Closed, Satisfied	1	8

PMR5-3 and 5-4 Analysis New Issues Summary as of 7/1/03	
New Findings Since 5/30/03	Status as of 7/1/03
O-854	Retest
O-856	Retest
O-859	Retest

Attachment Bv2

**PMR 4 Analysis
Exception Status as of 7/1/03**

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<i>PM Exception# Impact Test Points</i> ¹	Exception Status ²	BearingPoint Issue Description & SBC Midwest Comments ³
Provisioning & Maintenance PMs E 134 No Material Impact ⁴ < 5% PMR 4 (4-4-C, D, R)	<p align="center"> <u>Retest</u>⁵ <u>Closed, Satisfied</u>⁶ </p>	<p><i>SBC Midwest incorrectly populated the product name field in the Regulatory Reporting System (RRS). The product name is populated as “UNKNOWN” for as many as 29,662 records in the January 2002 version of the RRS “install_hicap_subrate_detail” table. BearingPoint has determined that the issues identified affect up to 25 performance measurements from the Ordering, Provisioning, Maintenance and Repair, and Other Measure Groups that use the Install HiCap Table or the Design Specials Inventory Table in conjunction with the Products Name Table (PMs 43, 44, 45, 46, 47, 48, 49, 50, 54, 54.1 55, 55.1, 55.2, 55.3, 56, 56.1, 58, 59, 60, 61, 62, 63, 10.4, MI2, WI1)</i></p> <p>SBC Midwest has taken a variety of corrective actions to address this issue in order to minimize the impact, including:</p> <ul style="list-style-type: none"> • Effective with August 2002 results reported in September 2002, the RRS application (<i>install_hicap_subrate_detail table</i>) was updated to map, when appropriate, the previously identified unknown products and a process was implemented to ensure that new products were included in the product table. March through July 2002 results were restated in September 2002 and on October 7, 2002. This change also responded to E&Y’s Finding IIa, 2(f)(i) for PMs 43-50, 52-54.1, 55-56.1, 58-63, 65-69, WI 1, WI 9, CLEC WI 11. • For the denominators of PMs 54 and 54.1 (for Resold Specials) as well as PMs 65 and 65.1 (for the retail equivalents), SBC Midwest implemented modifications to the Design Specials Inventory Table to address unmapped products in inventory (used in determining trouble report rate) effective with December 2002 results reported in January 2003. The source systems feed is in summary format using the product table to create the denominators. The prior months’ summaries do not contain the data at a level required to resolve the unknown products and thus the results cannot be restated.

¹ The PMs referenced in the finding, the BearingPoint Exception #; SBC Midwest’s classification of the impact that the Exception has on results filed with the FCC for the months of February – April 2003, and the specific test points associated with the Exception from the April 30, 2003, BearingPoint MI report.

² This column represents the current status of the BearingPoint Exception as of July 1, 2003.

³ This section contains a brief description of the issue identified by BearingPoint in the Exception; a summary of the SBC Midwest investigation and corrective actions to address the Exception; and SBC Midwest’s comments on the impact of the Exception on the posted results for the February – April 2003 data filed with the FCC.

⁴ The term “No Material Impact” indicates that although there is an outstanding issue during the February, March, or April 2003 timeframe, it does not cause material differences in the aggregate performance results for the data filed with the FCC. For purposes of this analysis SBC Midwest use the same “materiality” standard that is used in its PM restatement guidelines. These guidelines are published on the SBC CLEC website at <https://pm.sbc.com/pm.cfm> as an addendum to SBC Midwest’s Performance Measurements Internal Change Management Policy, Procedures, and Guidelines. Under these PM restatement guidelines, an assessment of “materiality” is based on whether the recalculated data would result (a) in a shift in the performance in the aggregate from a “make” to a “miss” condition or (b) in a further degradation of reported performance of more than 5% for measures that are in a “miss” condition, provided there are at least 100 CLEC transactions in the sub-metric.

⁵ ~~A Status of “Retest” indicates that SBC Midwest has responded to BearingPoint’s issues and is awaiting their review of the response and subsequent retesting of the finding.~~

⁶ A status of “Closed Satisfied” describes a situation where SBC Midwest’s response to an Observation or Exception successfully resolved any issue that BearingPoint had with respect to the circumstances that generated the finding.

**PMR 4 Analysis
Exception Status as of 7/1/03**

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<p align="center"><i>PM Exception# Impact Test Points¹</i></p>	<p align="center">Exception Status²</p>	<p align="center">BearingPoint Issue Description & SBC Midwest Comments³</p>
		<p>This change also responded to E&Y’s Finding IIa, 2(f)(ii) for PMs54, 54.1, 65 and 65.1.</p> <ul style="list-style-type: none"> • With the implementation of the revisions specified in CR071502, SBC Midwest determined that additional modifications would be needed for the Design Specials Inventory (PMs 54, 54.1, 65 and 65.1) due to the high number of remaining circuits identified as “UNKNOWN” and ER 1204 was opened to track these changes. ER1204 was implemented on a going forward basis with December 2002 results that were reported on 1/21/2003. • In order to continually monitor the level of unmapped products, on a monthly basis a summary report is run which tracks the number of Unknown/Unmapped products in the installation and repair results. This report is forwarded to the Network group to review. The Network organization then does analysis and issues ERs as required to map the “Unknown” and therefore unmapped products to specific product names. • Separately, BearingPoint also identified 182 items specified as “unknown products” in the HiCap Substrate Inventory Table – As these represent only a minute percentage (182 of 2,513,732 or .0072% of the records in this table) of the UNE Loop circuits in-service, SBC Midwest considers them immaterial and will continue to monitor the level through the monitor process. As part of the monitoring process, an enhancement ER is planned for the May 2003 report (April 2003 results) to refine the product current identification; this date coincides with other ERs for new products. <p>SBC Midwest has implemented corrective actions to address the “UNKNOWN” product issue across the data in RRS used to report provisioning, maintenance and other measure groups. A review of February 2003 results shows that “UNKNOWN” products identified in BearingPoint’s initial exception have been reduced to: .0184% of the total in the HiCap Substrate Inventory Table; 0.0203% in the HiCap Substrate Install Detail; less than 5.0% of the total in the Design Specials Inventory; and under 2.0% in the HiCap Substrate Repair Detail. The revision to the product identification processing for the Design Specials Inventory was implemented with January 2003 performance; it is this change that reduced the unknown product rate to less than 5.0%.</p> <p>SBC Midwest continues to monitor the level of “UNKNOWN” products in its results tables and believes that the impacts of these products remaining in its tables are even less material than described above. ER497 has been issued to resolve remaining issues with the product identification. Specific to the Design Specials Inventory, the revisions specified for ER 497 will reduce the number of unknown products to less than 0.5%. This revision is currently scheduled for June2003 results. It is important to note that even though the identification of products will be improving, the overall impact to the reported PM results will <u>not</u> be affected, since these particular “UNKNOWN” products are <u>not</u> products that are required to be reported for 271 performance results for either SBC Midwest retail or CLEC or are appropriately accounted for in other RRS tables, and therefore do <u>not</u> impact results. Additionally and in the same time frame, ER 497 will reduce unknown products in the HiCap Substrate Repair Detail to less than 1.0%.</p> <p>BearingPoint is currently retesting this Exception with a new sample of data from February 2003.</p> <p><u>On June 30, 2003, BearingPoint posted a disposition report for Exception 134. It states:</u></p> <ul style="list-style-type: none"> • <u>If implemented on a continuing basis, SBC Ameritech’s procedures for monitoring the assignment of “UNKNOWN” product names in the RRS system appear to present a reasonable framework for monitoring and addressing the “UNKNOWN” product name issue.</u>

**PMR 4 Analysis
Exception Status as of 7/1/03**

REVISED

<i>PM Exception# Impact Test Points¹</i>	Exception Status ²	BearingPoint Issue Description & SBC Midwest Comments ³
		<ul style="list-style-type: none"> • <u>The percentage of records in SBC Ameritech’s “Install Hicap Subrate Detail” table with an “UNKNOWN” assigned in the “Product Name” field appears to be less than 1% for the June 2002 and July 2002 data months.</u> • <u>Discrepancies appeared between the “Product Name” field value in SBC Ameritech’s “Install Hicap Subrate Detail” table and the product name assigned by BearingPoint’s Test CLEC for certain records in the June 2002 and July 2002 data months. In these cases, BearingPoint analyzed whether the differing product names would have affected the assignment of the record to the applicable disaggregation(s) in the appropriate performance measure(s) during the results calculation process. BearingPoint determined that for approximately 95% of the Test CLEC records reviewed, SBC Ameritech’s product name assignment either matched the BearingPoint Test CLEC product name, or would not have affected the assignment of the particular record to the applicable disaggregation(s) in the appropriate performance measure(s) during the results calculation process.</u> • <u>BearingPoint continues to evaluate, through the Test CLEC component of PMR4, SBC Ameritech’s assignment of “Reported Product Name” and “Product Family” field values. The “Reported Product Name” and “Product Family” fields are also used to allocate individual RRS records to specific disaggregation(s) in applicable performance measure(s) during the results calculation process.</u> • <u>The percentage of records in SBC Ameritech’s Install Hicap Subrate Detail” table with an “UNKNOWN” assigned in the “Product Name” field appears to be less than 1% for the August and September, 2002 data months.</u> • <u>The percentage of records in SBC Ameritech’s “Design Specials Inventory” table with an “UNKNOWN” assigned in the “Product Name” field appears to be less than 1% for the February 2003 data month.</u> <p><u>Based on these determinations, BearingPoint closed this Exception.</u></p> <p>These computer programming changes and process enhancements have been implemented by SBC Midwest with for data months before February 2003 and, as described above, the remaining applicable unknown product issues are diminus in nature. Therefore, this issue does not materially affect the February – April 2003 data filed with the FCC.</p> <p>Corrective actions for the issues identified by E&Y have been verified by E&Y.</p>

**PMR 4 Analysis
Exception Status as of 7/1/03**

REVISED

<p align="center"><i>PM Exception# Impact Test Points</i>¹</p>	<p align="center">Exception Status²</p>	<p align="center">BearingPoint Issue Description & SBC Midwest Comments³</p>
<p>PMs 114 & 115</p> <p>E 175</p> <p>No Impact⁷ (FDT)</p> <p>Interpretation⁸ (CHC)</p> <p>PMR4 (4-4-N)</p>	<p align="center">Retest Closed, Not Satisfied⁹</p>	<p><i>SBC Midwest is using incorrect data in its calculation of Performance Measurements 114 (Percentage of Premature Disconnects (Coordinated Cutovers) and 115 (Percentage of Ameritech Caused Delayed Coordinated Cutovers) for the months of January through June 2002. BearingPoint identified two issues: First, SBC Midwest does not capture the start time of a Frame Due Time (FDT) cut, which should be used in the calculation of the FDT cut disaggregation for performance measurements 114 and 115 according to the business rules for each measure. Instead, SBC Midwest populates the start time with the scheduled start time. As a result, the FDT start times provided in SBC Midwest’s performance measurement data will not match the BearingPoint CLEC FDT start times. Second, SBC Midwest captures the CLEC call to the Local Operations Center (LOC) as the start time of a Coordinated Hot Cut (CHC) rather than the cutover time, which should be used in the calculation of the CHC disaggregation for performance measures 114 and 115 according to the business rules for these measures. As a result, the CHC start times provided in SBC Midwest’s performance measurement data will not match the BearingPoint Test CLEC start times.</i></p> <p>Frame Due Time Cuts For PM 114: Effective with September 2002 results reported in October 2002, SBC Midwest implemented a network process change to better capture the actual start times of coordinated cutovers (FDT). Prior to this change, the actual start time could not be derived from the source system. A revised method of reporting had been implemented in the reporting system for August 2002 results reported in September 2002. June 2002 and July 2002 results were restated on October 7, 2002.</p> <p>For PM 115: Effective with September 2002 results reported in October 2002, the Company implemented an additional network process change to more precisely capture the actual start times coordinated cutovers (FDT). PM 115 was not restated for June 2002 through August 2002 as the process change could not be applied in arrears.</p> <p>Coordinated Hot Cut For PM 114: This interpretation issue is fully described in SBC Midwest’s February 18, 2003 response, as supplemented on May 20, 2003, to BearingPoint. SBC Midwest agrees with BearingPoint about the noted anomaly in the ‘Definition’ section of the ‘Ameritech Performance Measurement User Guide, Version 1.8_02_20_02’ for PM 114 is inconsistent with the ‘Business Rules’ section. The definition states that a premature disconnect occurs 10 minutes or more prior to the scheduled conversion. While the business rules states that a premature disconnect occurs 10 minutes or more prior to the CLEC ‘being on line’. SBC Midwest will propose clarification of wording in the ‘Definition’ of PM 114 to reflect the description of the Performance Measure Business Rule in the next scheduled 6-month review. Effective with the February</p>

⁷ An assessment of ‘No Impact’ indicates that the issue has no effect on the posted results in the performance results for the data months of February –March 2003 filed with the FCC.

⁸ The ‘Interpretation’ classification indicates that there is an issue related to this finding where BearingPoint is applying a different interpretation than what SBC Midwest has applied in its implementation.

⁹ A Status of ‘Closed, Not Satisfied’ indicates that BearingPoint has reviewed SBC Midwest’s response and/or implementation of modifications and, the modifications were not implemented within each of the consecutive test months (July, August, and September 2002) under review by BearingPoint.

**PMR 4 Analysis
Exception Status as of 7/1/03**

REVISED

<p align="center"><i>PM Exception# Impact Test Points¹</i></p>	<p align="center">Exception Status²</p>	<p align="center">BearingPoint Issue Description & SBC Midwest Comments³</p>
		<p>2003 results (reported in March) SBC Midwest enhanced the process of identifying premature conversions through the use of a jeopardy code.</p> <p><u>BearingPoint’s disposition report reflects its agreement with the method that SBC implemented in February 2003 for PM 114. It states “If the new LOC procedures produce accurate results regarding whether a customer has been disconnected 10 or more minutes prior to a CLEC call time during a coordinated cutover, it would appear that SBC Ameritech would have a reasonable basis, including the required underlying data, for calculating Performance Measurement 114 consistently with the published metrics business rules.”</u></p> <p><u>For PM 115:</u> The calculation SBC Midwest used to determine which specific disaggregation an “SBC Midwest Caused Delay” was reported in prior to April 2003 results was based on the use of “scheduled time” as the start time and the “CLEC call time” as the end time. SBC Midwest believes this is a reasonable interpretation of the business rules as currently written, and reflects the delay in <u>beginning a coordinated hot cut (“CHC”)</u>. However, based on discussions with BearingPoint regarding the reporting of meaningful data to the CLECs, the SBC Midwest implementation has been modified to use the “CLEC call time” as the start time and “CLEC call back time” as the end time. This modification is effective with April, 2003 results (reported in May) and reflects the delay in completing a CHC, as opposed to the delay in beginning work on a CHC, which the original implementation measured. SBC Midwest believes that either method is appropriate, given the existing language in the business rules.</p> <p>Although the modified implementation does not precisely follow the business rule as written, SBC Midwest believes it provides a meaningful result with respect to the intent of the measure. SBC Midwest will propose changes to PM 115 Business Rules at <u>the next scheduled</u> six-month review collaborative to clarify the definition and description of the start time to be used in the calculation. It is important to note that in both implementations of the calculation of the duration, all “SBC Midwest Caused Delays” were reported with the difference only being the disaggregation in which they were reported.</p> <p><u>BearingPoint’s disposition report reflects its agreement with the method that SBC implemented in April 2003 for PM 115, assuming collaborative approval of the proposed changes. It states “If approved by the collaborative and implemented consistently with SBC Ameritech’s current assertions, these modifications would appear to provide a reasonable basis for measuring the underlying activities associated with coordinated conversions, and produce the necessary data for SBC Ameritech to calculate Performance Measurement 115 consistently with the published metrics business rules.”</u></p> <p>CHC. The logic described for Performance Measurements 114 and 115 is consistent with using the PM 114.1 “start time” definition for Coordinated Hot Cuts and is in accordance with the Commission-approved January 2002 business rules. In addition, SBC Midwest will propose business rule documentation changes for PM 114 and 115 to clarify these definition and descriptions in its next six-month review. The modification made to PM 115 is in agreement with the intent of the business rules and is reflective of an interpretation that the focus of the measure is to be “SBC Midwest Caused Delays”. SBC Midwest believes that the reporting of CHC disaggregations in February, March, and April of 2003 for PMs 114 and 115 are based on reasonable interpretations of the business rules which accurately reflect performance.</p> <p><u>SBC Midwest and BearingPoint continue to evaluate retest options. However, since this exception focuses on “Test CLEC” data</u></p>

PMR 4 Analysis
Exception Status as of 7/1/03

REVISED

<i>PM</i> Exception# Impact Test Points ¹	Exception Status ²	BearingPoint Issue Description & SBC Midwest Comments ³
		<p><u>collected during the operational test and the sample data is available only for the January – June 2002 time period in which “Test CLEC” data was collected, BearingPoint’s retest capability is significantly limited. Given that modifications to the business rules are also required in order for BearingPoint to render a positive opinion, a retest will likely not be conducted.</u></p> <p>FDT. The process changes that SBC Midwest implemented in September 2002, with regard to the FDT disaggregations, ensure that this issue does not impact reported results going forward, including the 3 months of data filed with the FCC.</p> <p>The FDT related issues in this Exception were addressed by E&Y in Section III, #13 and corrective actions have been verified.</p>

**PMR 4 Analysis
Exception Status as of 7/1/03**

REVISED

<p align="center"><i>PM Exception# Impact Test Points¹</i></p>	<p align="center">Exception Status²</p>	<p align="center">BearingPoint Issue Description & SBC Midwest Comments³</p>
<p align="center"><i>PM 19 E 176 No Impact PMR 4 (4-1-E, 4-4-E)</i></p>	<p align="center"><u>Retest Closed, Satisfied</u></p>	<p><i>SBC Midwest's March, April, and May 2002 performance measurement data is missing daily usage feed (DUF) records used in the calculation of Performance Measure 19 ("Daily Usage Feed Timeliness"). SBC Midwest was not including Category 11 records in the calculation of Performance Measure 19.</i></p> <p>PM 19 is designed to measure "Daily <u>Usage</u> Feed Timeliness". For this reason, SBC Midwest had been excluding "<u>access</u>" or category 11 records from reported results. Despite the fact that SBC Midwest disagrees with BearingPoint's interpretation of the measure, SBC Midwest agreed to modify its performance measurement data collection processes to collect data on DUF Category 11 files effective with December, 2002 data reported in January 2003 to comply with the BearingPoint interpretation of the business rules.</p> <p>No restatement is planned because the impact of this change on prior results is not material based on SBC Midwest restatement guidelines.¹⁰ The inclusion of Category 11 files substantially increases volumes reported, but does not materially impact the posted performance result. For example, Michigan's results for the three months after the implementation of the modifications to include these records remained in the 96-99% range (above the 95% benchmark) while the average volume for that same period increased nearly threefold (based on the inclusion of more records).</p> <p><u>BearingPoint is currently in the process of retesting PM 19 with the inclusion of Category 11 files.</u></p> <p><u>In closing Exception 176, version 2, BearingPoint's disposition report of June 24, 2003 stated "BearingPoint reanalyzed SBC Ameritech's February 2003 data month, using volunteer CLEC data, to validate that SBC Ameritech now includes Category 11 DUF records in the processed performance measurement data for Performance Measurement 19. BearingPoint was able to match 100 percent of the Category 11 DUF records for all five states in SBC Ameritech's February 2003 Performance Measurement 19 processed data to the data provided by the volunteer CLEC. BearingPoint was able to match 100 percent of the Category 11 DUF records for Wisconsin in SBC Ameritech's February 2003 Performance Measurement 19 processed data to the data provided by the volunteer CLEC."</u></p> <p>December 2002 data results going forward agree with BearingPoint's interpretation of the business rules. Therefore, this issue has no impact to the February – April 2003 data filed with the FCC.</p> <p>The E&Y work papers indicate that E&Y did not consider Category 11 records to be required for inclusion in this PM and therefore it was not an audit issue.¹¹</p>

¹⁰ See note 4 above.

¹¹ Michigan Bell has tracked various BearingPoint and E&Y findings and work paper references. See Ex Parte Letter of Geoffrey M. Klineberg on behalf of SBC to Marlene Dortch, FCC (March 28, 2003) at Attachment A, Exhibit 2 (PMR4) and Exhibit 3 (PMR5); see also, Report of Independent Accountants Dated March 31, 2003 (regarding these Michigan Bell's management assertions), Ex Parte Letter of Geoffrey M. Klineberg on behalf of SBC to Marlene Dortch, FCC (April 1, 2003).

**PMR 4 Analysis
Exception Status as of 7/1/03**

<i>PM Exception# Impact Test Points¹</i>	Exception Status ²	BearingPoint Issue Description & SBC Midwest Comments ³
<p>PM 104.1 E 181¹² No Impact PMR 4 (4-3-J, 4-4-J)</p>	<p align="center">Retest¹³</p>	<p><i>SBC Midwest’s processed records for Performance Measure 104.1 (“The average time it takes to unlock the 911 record”) appear to be inconsistent with the unprocessed records from SBC Midwest’s source systems for the January 2002 reporting month. BearingPoint compared unprocessed data stored in SBC Midwest’s source systems to the corresponding processed data, used in the replication of the performance measurement. BearingPoint compared a sample of 149 records from SBC Midwest’s processed data used for the calculation of PM 104.1 to unprocessed data from SBC Midwest’s MOR/Tel Database and UNLOK report for the month of January 2002 and found discrepancies.</i></p> <p>This issue is related solely to the reporting of performance measure results and not the actual operational process of unlocking 9-1-1 records. This issue relates to SBC Midwest being unable to match all 9-1-1 database unlock records (which reflect that an unlock has occurred) to completed service order records in the Company’s systems in order to calculate the unlock interval.</p> <p>Three specific scenarios were identified in the records identified by Bearing Point.</p> <ul style="list-style-type: none"> • These records were attributed to human error on the part of SBC Midwest’s 9-1-1 vendor, Intrado. These numbers were manually unlocked by analysts based on an incoming “Migrate” record from the CLECs. The analysts did not follow procedures by verifying ownership in NPAC prior to issuing the record unlock. Corrective action was taken by reviewing procedures with the analysts to ensure understanding of the process. This issue was resolved in July 2002. Previous months were evaluated through SBC Midwest’s Change Management process and it was determined that no results would be restated. • Prior to July, the Unlock file coming from Intrado did not contain any TN’s that were manually unlocked, it contained only those generated by service order. The process was changed in July 2002 to include all numbers manually unlocked. May and June 2002 results were restated to include these manual unlocks. Previous months were evaluated through SBC Midwest’s Change Management process and it was determined that no results would be restated. • SBC Midwest implemented computer program code enhancements to improve the match rate between unlock records and service order completion data (ER1420), but additional program code enhancements were determined necessary. These enhancements were implemented for January 2003 results reported in February 2003. The impact was evaluated through SBC Midwest’s Change Management process and it was determined that no results would be restated. These improvements bring the match rate up to approximately 95%. SBC Midwest continues to monitor and evaluate this process in order to find opportunities to further increase this rate. The 95% match rate applies only to the percentage of records selected for inclusion (based on different data sources) in the measurement in any particular month and does not reflect on the operational processes to unlock records. <p>In addition to the improvements made in July 2002 for PM 104.1, SBC Midwest implemented various process and system modifications to improve the match rate for service orders and unlocks effective with January 2003 data. Therefore, this issue has no impact to the February – April 2003 data filed with the FCC.</p> <p>The match rate for unlocked records issue was addressed by E&Y in Section IIb, #8(i) and corrective actions have been verified.</p>

¹² Exception 181 covers PM 104.1 in IL, IN, OH, and MI while E-182 was issued relating to the same issues for PM 104.1 in WI

**PMR 4 Analysis
Exception Status as of 7/1/03**

REVISED

<p align="center"><i>PM Exception# Impact Test Points¹</i></p>	<p align="center">Exception Status²</p>	<p align="center">BearingPoint Issue Description & SBC Midwest Comments³</p>
<p align="center"><i>PM MI 11 E 183 No Impact PMR 4 (4-1-R)</i></p>	<p align="center"><u>Retest</u> <u>Closed</u> <u>Satisfied</u></p>	<p><i>SBC Midwest’s performance measurement data appears to be missing interface outage notifications used in the calculation of Performance Measurement MI 11 (“Average Interface Outage Notification”) for the months of January, March, April, and May 2002. Version 2 identified six additional items for September 2002 through December 2002.</i></p> <p>SBC Midwest has identified all of the items BearingPoint listed as missing from the log in the original version of E-183 and later in version 2. There are six common reasons for BearingPoint’s inability to identify these outage notifications in the performance measurement data:</p> <ol style="list-style-type: none"> 1. BearingPoint’s process was erroneously not looking for the “Time of Notification” as stored in the actual e-mail notification. 2. The outage was correctly not included in the restatement data because all outages that were not ‘initial’ are not reported. This issue was also addressed by E&Y in section IIb, # 11(i) 3. The outage was removed from the restatement data incorrectly due to manual processing errors. 4. The date and or time of notification are incorrect on the restatement data log due to manual processing errors. This issue was also addressed by E&Y in Section E&Y IIb, 11(ii). 5. BearingPoint did not recognize that original system noticed was not the same as the one listed on interface outage log due to later identification of a root cause in a different system. However, these outages were tracked and results were reported. 6. Human error on the part of the problem managers caused the outage notice to be omitted from the log. <p>SBC Midwest implemented process enhancements to reduce the manual errors identified in items 3, 4, and 6 above. As of September 2002, the Broadcast Fax manager crosschecks the problem manager logs to ensure appropriate recording of e-mail times. In addition, beginning in January 2003, the Senior Business Manager of Interconnection Compliance Support is also reviewing each entry against e-mail notifications as a secondary check.</p> <p>BearingPoint’s version 2 Exception 183 includes a review of data from the period spanning September through December of 2002, although SBC Midwest’s corrective action was not completely implemented until January 2003. SBC Midwest requested that BearingPoint retest a period that includes the corrective action.</p> <p><u>BearingPoint is currently retesting in a data month that includes SBC Midwest’s process improvements.</u></p> <p><u>BearingPoint posted a disposition report on June 5, 2003. It stated that:</u> <u>“SBC Ameritech’s April 11, 2003 response to Exception Report 183, version 2 stated that additional and new processes were implemented in both the September 2002 and January 2003 to reduce the number of manual errors that occurred when logging initial interface outage notifications.</u></p>

¹³ A Status of “Retest” indicates that SBC Midwest has responded to BearingPoint’s issues and is awaiting their review of the response and subsequent retesting of the finding.

PMR 4 Analysis
Exception Status as of 7/1/03

REVISED

<i>PM</i> Exception# Impact Test Points ¹	Exception Status ²	BearingPoint Issue Description & SBC Midwest Comments ³
		<p><u>In retesting this Exception Report, BearingPoint monitored the initial interface outage notifications SBC Ameritech sent to the BearingPoint Test CLEC between January 2003 and April 2003. All of the 21 initial interface outage notifications received by the Test CLEC during that period were also found in SBC Ameritech’s performance measurement data.</u></p> <p><u>BearingPoint has determined that the issue raised in this Exception Report has been addressed.”</u></p> <p>The process improvements implemented by SBC Midwest were effective with January 2003 data. Therefore, this issue has no impact to the February – April 2003 data filed with the FCC.</p> <p>The second issue noted above was addressed by E&Y in Section IIb, #11(i), while the fourth was addressed in E&Y in Section IIb, #11(ii) and both corrective actions have been verified.</p>

Attachment Cv2



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June 30, 2003

Mr. John Hudzik
Vice President, Long Distance Compliance
2000 West Ameritech Center Drive
4G42
Hoffman Estates, IL 60196

RE: FCC REQUEST FOR INFORMATION

Dear Mr. Hudzik:

BearingPoint, Inc. worked with SBC to develop the *Blind Replication Status Summary as of June 23, 2003*. This summary reflects the status of work for the applicable components of the Metrics Calculations and Reporting Verification and Validation Review test being conducted for the MPSC.

Sincerely,

A handwritten signature in black ink, appearing to read "John Eringis".

John Eringis
Managing Director
BearingPoint, Incorporated

Attachment Dv2

Legend for the Michigan Blind Replication* Status Summary as of June 23, 2003**

Column Heading	Definition	Possible Entries	Entry Descriptions
Performance Measurement	The performance measurement number and name as assigned in the published metrics business rules v1.8. (On June 12, 2003, BearingPoint was instructed by MPSC staff to use a modified version of the published metrics business rules v1.8 to execute the Michigan PMR5 test.)		
Product Disaggregation	The associated sub-metrics as defined in the published metrics business rules v1.8. This status summary presents blind replication progress (evaluation criterion type PMR5-2, "SBC Midwest-reported and BearingPoint-calculated metrics values agree") for the product-level disaggregations reported by SBC Midwest. SBC Midwest is required to report geographic disaggregations for some of these performance measures, as defined in the published metrics business rules. BearingPoint evaluates each of the disaggregations that SBC Midwest is required to report.		Example: % Orders Given Jeopardy Notices - POTS – Residential – Field Work
July 2002, August 2002, September 2002 <i>The test is being conducted using the February 5, 2003 posted results for the July 2002, August 2002 and September 2002 data months.</i>	CLEC Value - indicates whether BearingPoint-calculated values match SBC Midwest-reported aggregate CLEC values within +/- one percent (inclusive). SBC Midwest Value - indicates whether BearingPoint-calculated values match SBC Midwest-reported retail values within +/- one percent (inclusive). This status summary presents blind replication progress (evaluation criterion type PMR5-2, "SBC Midwest-reported and BearingPoint-calculated metrics values agree") for CLEC values and retail values (or retail affiliate values, where noted) reported by SBC Midwest for the state of Michigan. (The reported values for a performance measure may include a CLEC numerator, a CLEC denominator, a CLEC value, a retail value, a retail affiliate value, a benchmark and a z-value for each disaggregation, as defined in the published metrics business rules.)	M (Match) NM (Non Match) NMM (Non Material Match) Blank	Reported values and independently-calculated values agree within +/- one percent (inclusive). A discrepancy of +/- five percent or more; or a discrepancy of between +/- one and five percent that would, if corrected, cause the performance measurement's original reported parity attainment/failure or benchmark attainment/failure to reverse. A discrepancy that would, if corrected, change the original reported performance measurement result by between +/- one and five percent; and would not, if corrected, cause the performance measurement's original reported parity attainment/failure or benchmark attainment/failure to reverse. The evaluation of the reported value is not complete.
Status	The status of blind replication (evaluation criterion type PMR5-2, "SBC Midwest-reported and BearingPoint-calculated metrics values agree") for this disaggregation.	Not Started In Progress Completed	The evaluation of the reported value has not begun. The evaluation of the reported value is in progress. The evaluation of the reported value is complete.
Complete Date	The date on which blind replication (evaluation criterion type PMR5-2, "SBC Midwest-reported and BearingPoint-calculated metrics values agree") was completed.	Date Blank	The evaluation for the reported value was completed on the date provided. The evaluation of the reported value is not complete.
Comments	Published Observations and Exceptions numbers (see www.osstesting.com) pertinent to the corresponding disaggregation, along with the type of discrepancy (i.e., calculation (PMR5-2), business rule (PMR5-3), or exclusion (PMR5-4)) are noted.		
Footnotes	Notes to assist with interpretation of this status summary.		

* "Blind Replication" refers to evaluation criterion type PMR5-2, "SBC-reported and BearingPoint-calculated metrics values agree."

** Blind replication status is reported as of May 16, 2003, unless otherwise noted.

Michigan Blind Replication Status Summary as of June 23, 2003

SELECTED SBC Midwest PERFORMANCE MEASURES**PRE-ORDERING**

1.2 - Average Accuracy of Actual Loop Makeup Information Provided for DSL Orders

ORDERING

5 - Percent Firm Order Confirmations (FOCs) Returned within "X" Hours
 7 - Percent Mechanized Completions Returned Within One Hour of Completion in Ordering System
 9 - Percent Rejects
 10 - Percent Mechanized Rejects Returned Within One Hour of Receipt of Reject in MOR
 10.1 - Percent Mechanized Rejects Returned Within One Hour of Receipt of Order
 10.2 - Percent Manual Rejects Received Electronically and Returned Within Five Hours
 10.3 - Percent Manual Rejects Received Manually and Returned Within Five Hours
 10.4 - Percent of Orders Given Jeopardy Notices
 11 - Mean Time to Return Rejects
 11.1 - Mean Time to Return Manual Rejects that are Received via an Interface
 11.2 - Mean Time to Return Manual Rejects that are Received through the Manual Process
 13 - Order Process Percent Flow-Through

PROVISIONING

12 - Mechanized Provisioning Accuracy
 27 - Mean Installation Interval
 28 - Percent POTS/UNE-P Installations Completed Within the Customer Requested Due Date
 29 - Percent Ameritech Caused Missed Due Dates (Resale POTS)
 35 - Percent Trouble Reports Within 30 Days (I-30) of Installation
 45 - Percent Ameritech Caused Missed Due Dates (Resale Specials and UNE Loop and Port Combinations)
 56 - Percent Installations Completed Within Customer Requested Due Date
 56.1 - Percent Installations Completed With the Customer Requested Due Date for Loop With LNP
 58 - Percent Ameritech Caused Missed Due Dates (Unbundled Network Elements)

MAINTENANCE AND REPAIR

37 - Trouble Report Rate (Resale POTS)
 37.1 - Trouble Report Rate Net of Installation and Repeat Reports
 38 - Percent Missed Repair Commitments (Resale POTS)
 39 - Receipt to Clear Duration
 40 - Percent Out of Service (OOS) < 24 Hours (Resale POTS)
 41 - Percent Repeat Reports (Resale POTS)
 54.1 - Trouble Report Rate Net of Installation and Repeat Reports
 67 - Mean Time to Restore (Unbundled Network Elements)

BILLING

14 - Billing Accuracy
 17 - Billing Completeness
 18 - Billing Timeliness (Wholesale Bill)
 19 - Daily Usage Feed Timeliness

INTERCONNECTION TRUNKS

73 - Percentage Missed Due Dates - Interconnection Trunks
 78 - Average Interconnection Trunk Installation Interval

LOCAL NUMBER PORTABILITY

91 - Percent of LNP Due Dates with Industry Guidelines
 96 - Percentage Pre-mature Disconnects for LNP Orders

DIRECTORY ASSISTANCE DATABASE

110 - Percentage of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs

COORDINATED CONVERSION

114 - Percentage of Premature Disconnects (Coordinated Cutovers)
 114.1 - CHC/FDT LNP with Loop Provisioning Interval
 115 - Percentage of Ameritech Caused Delayed Coordinated Cutovers
 115.1 - Percent Provisioning Trouble Reports
 MI 3 - Coordinated Conversions Outside of the Interval

OTHER

MI 9 - Percentage Missing FOCs
 MI 11 - Average Interface Outage Notification
 MI 13 - Percent Loss Notification within One Hour of Service Order Completion
 MI 14 - Percent Completion Notifications Returned within "X" Hours of Completion of Maintenance Trouble Ticket

Michigan Blind Replication Status Summary as of June 23, 2003

Performance Measurement	REF #	Product Disaggregation	July-02		August-02		September-02		Status ²	Complete Date	Comments ³
			CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹			
Pre-Ordering Metrics											
1.2 ^b - Average Accuracy of Actual Loop Makeup Information Provided for DSL Orders	1	Accuracy of Actual LMU Info Provided for DSL Orders Manually	NM						In Progress		Calculation Discrepancies: NR119 Business Rule Discrepancies: O697 (closed unresolved), O856
	2	Accuracy of Actual LMU Info Provided for DSL Orders Electronically	M						In Progress		Business Rule Discrepancies: O697 (closed unresolved), O856
Selected Pre-Ordering Metrics - Total Non Matches			1	0	0	0	0	0			
Ordering Metrics											
5 ⁴ - Percent Firm Order Confirmations (FOC) Returned Within "X" Hours	3	% FOCs Returned within 24 Hrs - Man Sub Req - Simple Res & Bus - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	4	% FOCs Returned within 24 Hrs - Man Sub Req - Complex Bus (1 - 200 Lines) - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	5	% FOCs Returned within 48 Hrs - Man Sub Req - Complex Bus (> 200 Lines) - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	6	% FOCs Returned within 24 Hrs - Man Sub Req - UNE Loop (1 - 49 Loops) - MOR/Tel	M		M		M		In Progress		
	7	% FOCs Returned within 48 Hrs - Man Sub Req - UNE Loop (>= 50 Loops) - MOR/Tel	M		M		M		In Progress		
	8	% FOCs Returned within 24 Hrs - Man Sub Req - Switch Ports - MOR/Tel	M		M		M		In Progress		
	9	% FOCs Returned w/in 24 Hrs - Elec Sub Req - Complex Bus (1-200 Lines) - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	10	% FOCs Returned w/in 48 Hrs - Elec Sub Req - Complex Bus (> 200 Lines) - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	11	% FOCs Returned w/in 48 Hrs - Elec Sub Req - UNE Loop (>= 50 Loops) - MOR/Tel	M		M		M		In Progress		
	12	% FOCs Returned w/in 24 Clock Hrs - Man Sub Req - Simple Res & Bus - LNP Only (1 - 19 Lines) - MOR/Tel	M		M		M		In Progress		
	13	% FOCs Returned w/in 24 Clock Hrs - Man Sub Req - LNP w/Loop (1-19 Loops) - MOR/Tel	M		M		M		In Progress		
	14	% FOCs Returned w/in 48 Clock Hrs - Man Sub Req - Simple Res & Bus - LNP Only (20+ Lines) - MOR/Tel	M		M		M		In Progress		
	15	% FOCs Returned w/in 48 Clock Hrs - Man Sub Req - LNP w/Loop (20+ Loops) - MOR/Tel	M		M		M		In Progress		
	16	% FOCs Returned w/in 24 Clock Hrs - Man Sub Req - LNP Complex Bus (1-19 Lines) - MOR/Tel	M		M		M		In Progress		
	17	% FOCs Returned w/in 48 Clock Hrs - Man Sub Req - LNP Complex Bus (20-50 Lines) - MOR/Tel	M		M		M		In Progress		
	18	% FOCs Returned w/in 24 Clock Hrs - Man Sub Req - LNP Complex Bus (50+ Lines) - MOR/Tel	M		M		M		In Progress		
	19	% FOCs Returned w/in 48 Clock Hrs - Elec Sub Req - Simple Res & Bus - LNP Only (20+ Lines) - MOR/Tel	M		M		M		In Progress		
	20	% FOCs Returned w/in 48 Clock Hrs - Elec Sub Req - LNP w/Loop (20+ Loops) - MOR/Tel	M		M		M		In Progress		
	21	% FOCs Returned w/in 24 Clock Hrs - Elec Sub Req - LNP Complex Bus (1 - 19 Lines) - MOR/Tel	M		M		M		In Progress		
	22	% FOCs Returned w/in 48 Clock Hrs - Elec Sub Req - LNP Complex Bus (20-50 Lines) - MOR/Tel	M		M		M		In Progress		
	23	% FOCs Returned w/in 24 Clock Hrs - Elec Sub Req - LNP Complex Bus (50+ Lines) - MOR/Tel	M		M		M		In Progress		
	24	% FOCs Returned w/in 24 Hrs - Man Sub Req - CIA Centrex (1-200 Lines) - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	25	% FOCs Returned w/in 48 Hrs - Man Sub Req - CIA Centrex (> 200 Lines) - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	26	% FOCs Returned w/in 24 Hrs - Elec Sub Req - CIA Centrex (1-200 Lines) - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	27	% FOCs Returned w/in 48 Hrs - Elec Sub Req - CIA Centrex (> 200 Lines) - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	28	% FOCs Returned w/in 6 Days - Man & Elec Sub Req - Interconnection Trunks (<5 DS1) - MOR/Tel	M		M		M		In Progress		
	29	% FOCs Returned w/in 8 Days - Man & Elec Sub Req - Interconnection Trunks (>= 5 DS1) - MOR/Tel	M		M		M		In Progress		
	30	% FOCs Returned w/in 1 Bus Day - Elec Sub Req - Unbundled Local (Dedicated) Transport - DS1 - MOR/Tel	M		M		M		In Progress		
	31	% FOCs Returned 5 Bus Days - Elec Sub Req - Unbundled Local (Dedicated) Transport - DS3 - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	32	% FOCs Returned w/in 24 Hrs - Man Sub Req - UNE xDSL Cpbl Lp (1-49 Lps) - MOR/Tel	M		M		M		In Progress		
	33	% FOCs Returned w/in 48 Hrs - Man Sub Req - UNE xDSL Cpbl Lp (50+ Lps) - MOR/Tel	M		M		M		In Progress		
	34	% FOCs Returned w/in 24 Hrs - Man Sub Req - Line Sharing (1-49 Lps) - MOR/Tel	M		M		M		In Progress		
	35	% FOCs Returned w/in 48 Hrs - Man Sub Req - Line Sharing (50+ Lps) - MOR/Tel	M		M		M		In Progress		
	36	% FOCs Returned w/in 6 Bus Hrs - Elec Sub Req - UNE xDSL Cpbl Lp (1-19 Lps) < 6 hrs - MOR/Tel	M		M		M		In Progress		
	37	% FOCs Returned w/in 14 Bus Hrs - Elec Sub Req - UNE xDSL Cpbl Lp (>19 Lps) - MOR/Tel	M		M		M		In Progress		
	38	% FOCs Returned w/in 6 Bus Hrs - Elec Sub Req - Line Sharing (1-49 Lps) - MOR/Tel	M		M		M		In Progress		
	39	% FOCs Returned w/in 14 Bus Hrs - Elec Sub Req - Line Sharing (50+ Lps) - MOR/Tel	M		M		M		In Progress		
	40	% FOCs Returned w/in 24 Hrs - Man Sub Req - UNE P Simple Res & Bus - MOR/Tel	M		M		M		In Progress		
	41	% FOCs Returned w/in 24 Hrs - Man Sub Req - UNE P Complex Bus (1-200 Lines) - MOR/Tel	M		M		M		In Progress		
	42	% FOCs Returned w/in 48 Hrs - Man Sub Req - UNE P Complex Bus (> 200 Lines) - MOR/Tel	M		M		M		In Progress		
	43	% FOCs Returned w/in 2 Hrs - Elec Sub Req - Elec Prcsd - UNE Loop (1-49 Loops) - MOR/Tel	M		M		M		In Progress		
	44	% FOCs Returned w/in 5 Hrs - Elec Sub Req - Man Prcsd - UNE Loop (1-49 Loops) - MOR/Tel	M		M		M		In Progress		
	45	% FOCs Returned w/in 2 Hrs - Elec Sub Req - Elec Prcsd - Switch Ports - MOR/Tel	M		M		M		In Progress		
	46	% FOCs Returned w/in 5 Hrs - Elec Sub Req - Man Prcsd - Switch Ports - MOR/Tel	M		M		M		In Progress		
	47	% FOCs Returned w/in 2 Hrs - Elec Sub Req - Elec Prcsd - Simple Res & Bus - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	48	% FOCs Returned w/in 5 Hrs - Elec Sub Req - Man Prcsd - Simple Res & Bus - MOR/Tel	M		M		M		In Progress		Exclusion Discrepancies: O787
	49	% FOCs Returned w/in 2 Hrs - Elec Sub Req - Elec Prcsd - UNE-P Simple Res & Bus - MOR/Tel	M		M		M		In Progress		
	50	% FOCs Returned w/in 5 Hrs - Elec Sub Req - Man Prcsd - UNE-P Simple Res & Bus - MOR/Tel	M		M		M		In Progress		
	51	% FOCs Returned w/in 24 Hrs - Elec Sub Req - UNE-P Complex Bus (1-200 Lines) - MOR/Tel	M		M		M		In Progress		
	52	% FOCs Returned w/in 48 Hrs - Elec Sub Req - UNE-P Complex Bus (> 200 Lines) - MOR/Tel	M		M		M		In Progress		
	53	% FOCs Returned w/in 2 Bus Hrs - Elec Sub Req - Elec Prcsd - Simple Res & Bus-LNP Only (1-19 Lines) - MOR/Tel	M		M		M		In Progress		
	54	% FOCs Returned w/in 5 Bus Hrs - Elec Sub Req - Man Prcsd - Simple Res & Bus-LNP Only (1-19 Lines) - MOR/Tel	M		M		M		In Progress		
	55	% FOCs Returned within 2 Bus Hrs - Elec Sub Req - Elec Prcsd - LNP w/Loop (1-19 Loops) - MOR/Tel	M		M		M		In Progress		
	56	% FOCs Returned w/in 5 Bus Hrs - Elec Sub Req - Man Prcsd - LNP w/Loop (1-19 Loops) - MOR/Tel	M		M		M		In Progress		

Michigan Blind Replication Status Summary as of June 23, 2003

Performance Measurement	REF #	Product Disaggregation	July-02		August-02		September-02		Status ²	Complete Date	Comments ³
			CLEC Value ¹	SBC Midwest Value1	CLEC Value ¹	SBC Midwest Value1	CLEC Value ¹	SBC Midwest Value1			
	57	% FOCs Returned within 24 Hrs - Man Sub Req - Simple Res & Bus - ICS/DSS							Not Started		Exclusion Discrepancies: 0787
	58	% FOCs Returned within 24 Hrs - Man Sub Req - Complex Bus (1 - 200 Lines) - ICS/DSS							Not Started		Exclusion Discrepancies: 0787
	59	% FOCs Returned within 48 Hrs - Man Sub Req - Complex Bus (> 200 Lines) - ICS/DSS							Not Started		Exclusion Discrepancies: 0787
	60	% FOCs Returned within 24 Hrs - Man Sub Req - UNE Loop (1 - 49 Loops) - ICS/DSS							Not Started		
	61	% FOCs Returned within 48 Hrs - Man Sub Req - UNE Loop (>= 50 Loops) - ICS/DSS							Not Started		
	62	% FOCs Returned within 24 Hrs - Man Sub Req - Switch Ports - ICS/DSS							Not Started		
	63	% FOCs Returned w/in 24 Hrs - Elec Sub Req - Complex Bus (1-200 Lines) - ICS/DSS							Not Started		Exclusion Discrepancies: 0787
	64	% FOCs Returned w/in 48 Hrs - Elec Sub Req - Complex Bus (> 200 Lines) - ICS/DSS							Not Started		Exclusion Discrepancies: 0787
	65	% FOCs Returned w/in 48 Hrs - Elec Sub Req - UNE Loop (>= 50 Loops) - ICS/DSS							Not Started		
	66	% FOCs Returned w/in 24 Clock Hrs - Man Sub Req - Simple Res & Bus - LNP Only (1 - 19 Lines) - ICS/DSS							Not Started		
	67	% FOCs Returned w/in 24 Clock Hrs - Man Sub Req - LNP w/Loop (1-19 Loops) - ICS/DSS							Not Started		
	68	% FOCs Returned w/in 48 Clock Hrs - Man Sub Req - Simple Res & Bus - LNP Only (20+ Lines) - ICS/DSS							Not Started		
	69	% FOCs Returned w/in 48 Clock Hrs - Man Sub Req - LNP w/Loop (20+ Loops) - ICS/DSS							Not Started		
	70	% FOCs Returned w/in 24 Clock Hrs - Man Sub Req - LNP Complex Bus (1-19 Lines) - ICS/DSS							Not Started		
	71	% FOCs Returned w/in 48 Clock Hrs - Man Sub Req - LNP Complex Bus (20-50 Lines) - ICS/DSS							Not Started		
	72	% FOCs Returned w/in 24 Clock Hrs - Man Sub Req - LNP Complex Bus (50+ Lines) - ICS/DSS							Not Started		
	73	% FOCs Returned w/in 48 Clock Hrs - Elec Sub Req - Simple Res & Bus - LNP Only (20+ Lines) - ICS/DSS							Not Started		
	74	% FOCs Returned w/in 48 Clock Hrs - Elec Sub Req - LNP w/Loop (20+ Loops) - ICS/DSS							Not Started		
	75	% FOCs Returned w/in 24 Clock Hrs - Elec Sub Req - LNP Complex Bus (1 - 19 Lines) - ICS/DSS							Not Started		
	76	% FOCs Returned w/in 48 Clock Hrs - Elec Sub Req - LNP Complex Bus (20-50 Lines) - ICS/DSS							Not Started		
	77	% FOCs Returned w/in 24 Clock Hrs - Elec Sub Req - LNP Complex Bus (50+ Lines) - ICS/DSS							Not Started		
	78	% FOCs Returned w/in 24 Hrs - Man Sub Req - CIA Centrex (1-200 Lines) - ICS/DSS							Not Started		
	79	% FOCs Returned w/in 48 Hrs - Man Sub Req - CIA Centrex (> 200 Lines) - ICS/DSS							Not Started		
	80	% FOCs Returned w/in 24 Hrs - Elec Sub Req - CIA Centrex (1-200 Lines) - ICS/DSS							Not Started		
	81	% FOCs Returned w/in 48 Hrs - Elec Sub Req - CIA Centrex (> 200 Lines) - ICS/DSS							Not Started		
	82	% FOCs Returned w/in 6 Days - Man & Elec Sub Req - Interconnection Trunks (<5 DS1) - ICS/DSS							Not Started		
	83	% FOCs Returned w/in 8 Days - Man & Elec Sub Req - Interconnection Trunks (>= 5 DS1) - ICS/DSS							Not Started		
	84	% FOCs Returned w/in 1 Bus Day - Elec Sub Req - Unbundled Local (Dedicated) Transport - DS1 - ICS/DSS							Not Started		
	85	% FOCs Returned 5 Bus Days - Elec Sub Req - Unbundled Local (Dedicated) Transport - DS3 - ICS/DSS							Not Started		Exclusion Discrepancies: 0787
	86	% FOCs Returned w/in 24 Hrs - Man Sub Req - UNE xDSL CpbL Lp (1-49 Lps) - ICS/DSS							Not Started		
	87	% FOCs Returned w/in 48 Hrs - Man Sub Req - UNE xDSL CpbL Lp (50+ Lps) - ICS/DSS							Not Started		
	88	% FOCs Returned w/in 24 Hrs - Man Sub Req - Line Sharing (1-49 Lps) - ICS/DSS							Not Started		
	89	% FOCs Returned w/in 48 Hrs - Man Sub Req - Line Sharing (50+ Lps) - ICS/DSS							Not Started		
	90	% FOCs Returned w/in 6 Bus Hrs - Elec Sub Req - UNE xDSL CpbL Lp (1-19 Lps) < 6 hrs - ICS/DSS							Not Started		
	91	% FOCs Returned w/in 14 Bus Hrs - Elec Sub Req - UNE xDSL CpbL Lp (>19 Lps) - ICS/DSS							Not Started		
	92	% FOCs Returned w/in 6 Bus Hrs - Elec Sub Req - Line Sharing (1-49 Lps) - ICS/DSS							Not Started		
	93	% FOCs Returned w/in 14 Bus Hrs - Elec Sub Req - Line Sharing (50+ Lps) - ICS/DSS							Not Started		
	94	% FOCs Returned w/in 24 Hrs - Man Sub Req - UNE P Simple Res & Bus - ICS/DSS							Not Started		
	95	% FOCs Returned w/in 24 Hrs - Man Sub Req - UNE P Complex Bus (1-200 Lines) - ICS/DSS							Not Started		
	96	% FOCs Returned w/in 48 Hrs - Man Sub Req - UNE P Complex Bus (> 200 Lines) - ICS/DSS							Not Started		
	97	% FOCs Returned w/in 2 Hrs - Elec Sub Req - Elec Prcsd - UNE Loop (1-49 Loops) - ICS/DSS							Not Started		
	98	% FOCs Returned w/in 5 Hrs - Elec Sub Req - Man Prcsd - UNE Loop (1-49 Loops) - ICS/DSS							Not Started		
	99	% FOCs Returned w/in 2 Hrs - Elec Sub Req - Elec Prcsd - Switch Ports - ICS/DSS							Not Started		
	100	% FOCs Returned w/in 5 Hrs - Elec Sub Req - Man Prcsd - Switch Ports - ICS/DSS							Not Started		
	101	% FOCs Returned w/in 2 Hrs - Elec Sub Req - Elec Prcsd - Simple Res & Bus - ICS/DSS							Not Started		
	102	% FOCs Returned w/in 5 Hrs - Elec Sub Req - Man Prcsd - Simple Res & Bus - ICS/DSS							Not Started		Exclusion Discrepancies: 0787
	103	% FOCs Returned w/in 2 Hrs - Elec Sub Req - Elec Prcsd - UNE-P Simple Res & Bus - ICS/DSS							Not Started		
	104	% FOCs Returned w/in 5 Hrs - Elec Sub Req - Man Prcsd - UNE-P Simple Res & Bus - ICS/DSS							Not Started		
	105	% FOCs Returned w/in 24 Hrs - Elec Sub Req - UNE-P Complex Bus (1-200 Lines) - ICS/DSS							Not Started		
	106	% FOCs Returned w/in 48 Hrs - Elec Sub Req - UNE-P Complex Bus (> 200 Lines) - ICS/DSS							Not Started		
	107	% FOCs Returned w/in 2 Bus Hrs - Elec Sub Req - Elec Prcsd - Simple Res & Bus-LNP Only (1-19 Lines) - ICS/DSS							Not Started		
	108	% FOCs Returned w/in 5 Bus Hrs - Elec Sub Req - Man Prcsd - Simple Res & Bus-LNP Only (1-19 Lines) - ICS/DSS							Not Started		
	109	% FOCs Returned within 2 Bus Hrs - Elec Sub Req - Elec Prcsd - LNP w/Loop (1-19 Loops) - ICS/DSS							Not Started		
	110	% FOCs Returned w/in 5 Bus Hrs - Elec Sub Req - Man Prcsd - LNP w/Loop (1-19 Loops) - ICS/DSS							Not Started		
7 ² - Percent Mechanized Completions Returned Within One Hour of Completion in	111	% Mechanized Completions Returned Within 1 Hour of Completion in Ordering Systems - Combinations							In Progress		Business Rule Discrepancies: 0429v4 Exclusion Discrepancies: 0854
	112	% Mechanized Completions Returned Within 1 Hour of Completion in Ordering Systems - Resale							In Progress		Business Rule Discrepancies: 0429v4 Exclusion Discrepancies: 0787, 0854
	113	% Mechanized Completions Returned Within 1 Hour of Completion in Ordering Systems - UNE							In Progress		Business Rule Discrepancies: 0429v4 Exclusion Discrepancies: 0854
9 ⁴ - Percent Rejects											
	114	% CLEC Caused Rejects - MOR/Tel	M		M				In Progress		Exclusion Discrepancies: 0688v2 (closed unresolved)

Michigan Blind Replication Status Summary as of June 23, 2003

Performance Measurement	REF #	Product Disaggregation	July-02		August-02		September-02		Status ²	Complete Date	Comments ³
			CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹			
	115	% Ameritech Caused Rejects (Re-flowed Orders) - MOR/Tel	M		M				In Progress		Exclusion Discrepancies: O688v2 (closed unresolved)
	116	% CLEC Caused Rejects - ICS/DSS							In Progress		Exclusion Discrepancies: O688v2 (closed unresolved)
	117	% Ameritech Caused Rejects (Re-flowed Orders) - ICS/DSS							In Progress		Exclusion Discrepancies: O688v2 (closed unresolved)
10 ⁴ - Percent Mechanized Rejects Returned Within One Hour of Receipt of Reject in MOR	118	% Mechanized Rejects Returned within 1 Hour of Receipt of Reject in MOR - MOR/Tel	M		M				In Progress		Business Rule Discrepancies: O809 (closed unresolved), O823 Exclusion Discrepancies: O803 (closed unresolved)
	119	% Mechanized Rejects Returned within 1 Hour of Receipt of Reject in MOR - ICS/DSS							Not Started		Business Rule Discrepancies: O809 (closed unresolved), O823 Exclusion Discrepancies: O803 (closed unresolved)
10.1 ⁹ - Percent Mechanized Rejects Returned Within One Hour of Receipt of Order	120	% Mechanized Rejects Returned within 1 Hour of Receipt of Order - MOR/Tel							Completed	6/5/2003	Exclusion Discrepancies: O755
	121	% Mechanized Rejects Returned within 1 Hour of Receipt of Order - ICS/DSS	NMM ⁷		NMM ⁷			NMM ⁷	Not Started		Exclusion Discrepancies: O755
10.2 ² - Percent Manual Rejects Received Electronically and Returned Within Five Hours	122	% Manual Rejects Received Electronically & Returned within 5 Hours - MOR/Tel							Completed	6/5/2003	Exclusion Discrepancies: O755
	123	% Manual Rejects Received Electronically & Returned within 5 Hours - ICS/DSS							Not Started		Exclusion Discrepancies: O755
10.3 ⁹ - Percent Manual Rejects Received Manually and Returned Within Five Hours	124	% Manual Rejects Received Manually & Returned within 5 Hours - MOR/Tel							Completed	6/5/2003	Exclusion Discrepancies: O755
	125	% Manual Rejects Received Manually & Returned within 5 Hours - ICS/DSS							Not Started		Exclusion Discrepancies: O755
10.4 ⁵ - Percent of Orders Given Jeopardy Notices	126	% Orders Given Jeopardy Notices - POTS – Residential – Field Work							In Progress		Business Rule Discrepancies: O756v2 (closed unresolved), O676v2 Exclusion Discrepancies: O687v2, O725
	127	% Orders Given Jeopardy Notices - POTS – Residential – No Field Work							In Progress		Business Rule Discrepancies: O756v2 (closed unresolved), O676v2 Exclusion Discrepancies: O687v2, O725
	128	% Orders Given Jeopardy Notices - POTS – Business – Field Work							In Progress		Business Rule Discrepancies: O756v2 (closed unresolved), O676v2 Exclusion Discrepancies: O687v2, O725
	129	% Orders Given Jeopardy Notices - POTS – Business – No Field Work							In Progress		Business Rule Discrepancies: O756v2 (closed unresolved), O676v2 Exclusion Discrepancies: O687v2, O725
	130	% Orders Given Jeopardy Notices - Resale Special – Field Work							In Progress		Business Rule Discrepancies: O756v2 (closed unresolved), O676v2 Exclusion Discrepancies: O687v2, O725
	131	% Orders Given Jeopardy Notices - Resale Special – No Field Work							In Progress		Business Rule Discrepancies: O756v2 (closed unresolved), O676v2 Exclusion Discrepancies: O687v2, O725

Michigan Blind Replication Status Summary as of June 23, 2003

Performance Measurement	REF #	Product Disaggregation	July-02		August-02		September-02		Status ²	Complete Date	Comments ³
			CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹			
	132	% Orders Given Jeopardy Notices - Unbundled Loop with LNP							In Progress		Business Rule Discrepancies: O756v2 (closed unresolved), O676v2 Exclusion Discrepancies: O687v2, O725
	133	% Orders Given Jeopardy Notices - Unbundled Loop without LNP							In Progress		Business Rule Discrepancies: O756v2 (closed unresolved), O676v2 Exclusion Discrepancies: O687v2, O725
	134	% Orders Given Jeopardy Notices - Unbundled Local Switching							In Progress		Business Rule Discrepancies: O756v2 (closed unresolved), O676v2 Exclusion Discrepancies: O687v2, O725
	135	% Orders Given Jeopardy Notices - UNE-P							In Progress		Business Rule Discrepancies: O756v2 (closed unresolved), O676v2 Exclusion Discrepancies: O687v2, O725
11 ⁴ - Mean Time to Return Rejects	136	Mean Time to Return Mechanized Rejects (hours) - MOR/Tel	M		M				In Progress		Business Rule Discrepancies: O643v2 (closed unresolved), O809 (closed unresolved), O823 Exclusion Discrepancies: O584v2 (closed unresolved), O803 (closed unresolved)
	137	Mean Time to Return Mechanized Rejects (hours) - ICS/DSS							Not Started		Business Rule Discrepancies: O809 (closed unresolved), O823 Exclusion Discrepancies: O584v2 (closed unresolved), O803 (closed unresolved)
11.1 ³ - Mean Time to Return Manual Rejects that are Received via an Interface	138	Mean Time to Return Manual Rejects that are Received via an Electronic Interface (hours) - MOR/Tel							Completed	6/5/2003	Business Rule Discrepancies: O643v2 (closed unresolved) Exclusion Discrepancies: O755
	139	Mean Time to Return Manual Rejects that are Received via an Electronic Interface (hours) - ICS/DSS	NMM ⁷						Not Started		Exclusion Discrepancies: O755
11.2 ³ - Mean Time to Return Manual Rejects that are Received through the Manual Process	140	Mean Time to Return Manual Rejects that are Received thru the Manual Process (hours) - MOR/Tel							Completed	6/5/2003	Business Rule Discrepancies: O643v2 (closed unresolved) Exclusion Discrepancies: O755
	141	Mean Time to Return Manual Rejects that are Received thru the Manual Process (hours) - ICS/DSS							Not Started		Exclusion Discrepancies: O755
13 ⁴ - Order Process Percent Flow-Through	142	Order Process Percent Flow Through - LNP - MOR/Tel	M		M				In Progress		Exclusion Discrepancies: O746 (closed unresolved)
	143	Order Process Percent Flow Through - LSNP - MOR/Tel	M		M				In Progress		Exclusion Discrepancies: O746 (closed unresolved)
	144	Order Process Percent Flow Through - Resale - MOR/Tel	M		M				In Progress		Exclusion Discrepancies: O746 (closed unresolved)
	145	Order Process Percent Flow Through - UNE Loops - MOR/Tel	M		M				In Progress		Exclusion Discrepancies: O746 (closed unresolved)
	146	Order Process Percent Flow Through - UNE-P - MOR/Tel	M		M				In Progress		Business Rule Discrepancies: O488v3 (closed unresolved) Exclusion Discrepancies: O746 (closed unresolved)
	147	Order Process Percent Flow Through - LNP - ICS/DSS							In Progress		Exclusion Discrepancies: O746 (closed unresolved)
	148	Order Process Percent Flow Through - LSNP - ICS/DSS							In Progress		Exclusion Discrepancies: O746 (closed unresolved)
	149	Order Process Percent Flow Through - Resale - ICS/DSS							In Progress		Exclusion Discrepancies: O746 (closed unresolved)
	150	Order Process Percent Flow Through - UNE Loops - ICS/DSS							In Progress		Exclusion Discrepancies: O746 (closed unresolved)
	151	Order Process Percent Flow Through - UNE-P - ICS/DSS							In Progress		Business Rule Discrepancies: O488v3 (closed unresolved) Exclusion Discrepancies: O746 (closed unresolved)

Michigan Blind Replication Status Summary as of June 23, 2003

Performance Measurement	REF #	Product Disaggregation	July-02		August-02		September-02		Status ²	Complete Date	Comments ³
			CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹			
Selected Ordering Metrics - Total Non Matches			0	0	0	0	0	0			
Provisioning Metrics											
12 - Mechanized Provisioning Accuracy	152	Mechanized Provisioning Accuracy	M	M	M	M	M	M	Completed	4/16/2003	Business Rule Discrepancies: 0794 (closed unresolved)
	27 - Mean Installation Interval	153	Mean Installation Interval - POTS - Bus Fw	M	M	M	M	M	Completed	4/24/2003	
	154	Mean Installation Interval - POTS - Bus No FW	M	M	M	M	M	Completed	4/24/2003		
	155	Mean Installation Interval - POTS - CIA Centrex FW	M	M	M	M	M	Completed	4/24/2003		
	156	Mean Installation Interval - POTS - CIA Centrex No FW	M	M	M	M	M	Completed	4/24/2003		
	157	Mean Installation Interval - POTS - Res FW	M	M	M	M	M	Completed	4/24/2003		
	158	Mean Installation Interval - POTS - Res No FW	M	M	M	M	M	Completed	4/24/2003		
	159	Mean Installation Interval - UNE P - Bus FW	M	M	M	M	M	Completed	4/24/2003		
	160	Mean Installation Interval - UNE P - Bus No FW	M	M	M	M	M	Completed	4/24/2003		
	161	Mean Installation Interval - UNE P - Res FW	M	M	M	M	M	Completed	4/24/2003		
	162	Mean Installation Interval - UNE P - Res No FW	M	M	M	M	M	Completed	4/24/2003		
28 - Percent POTS/UNE-P Completed Within the Customer Requested Due Date	163	% Installations Completed Within Customer Requested Due Date - POTS - Bus Fw	M	M	M	M	M	M	Completed	4/24/2003	Exclusion Discrepancies: 0739
	164	% Installations Completed Within Customer Requested Due Date - POTS - Bus No FW	M	M	M	M	M	M	Completed	4/24/2003	Exclusion Discrepancies: 0739
	165	% Installations Completed Within Customer Requested Due Date - POTS - CIA Centrex FW	M	M	M	M	M	M	Completed	4/24/2003	Exclusion Discrepancies: 0739
	166	% Installations Completed Within Customer Requested Due Date - POTS - CIA Centrex No FW	M	M	M	M	M	M	Completed	4/24/2003	Exclusion Discrepancies: 0739
	167	% Installations Completed Within Customer Requested Due Date - POTS - Res FW	M	M	M	M	M	M	Completed	4/24/2003	Exclusion Discrepancies: 0739
	168	% Installations Completed Within Customer Requested Due Date - POTS - Res No FW	M	M	M	M	M	M	Completed	4/24/2003	Exclusion Discrepancies: 0739
	169	% Installations Completed Within Customer Requested Due Date - UNE P - Bus FW	M	M	M	M	M	M	Completed	4/24/2003	Exclusion Discrepancies: 0739
	170	% Installations Completed Within Customer Requested Due Date - UNE P - Bus No FW	M	M	M	M	M	M	Completed	4/24/2003	Exclusion Discrepancies: 0739
	171	% Installations Completed Within Customer Requested Due Date - UNE P - Projects	M	M	M	M	M	M	Completed	4/24/2003	Exclusion Discrepancies: 0739
	172	% Installations Completed Within Customer Requested Due Date - UNE P - Res FW	M	M	M	M	M	M	Completed	4/24/2003	Exclusion Discrepancies: 0739
29 - Percent Ameritech Caused Missed Due Dates (Resale POTS)	173	% Ameritech Caused Missed Due Dates - POTS - Res No FW	M	M	M	M	M	M	Completed	4/24/2003	Exclusion Discrepancies: 0739
	174	% Ameritech Caused Missed Due Dates - POTS - Bus Fw	M	M	M	M	M	M	In Progress		
	175	% Ameritech Caused Missed Due Dates - POTS - Bus No FW	M	M	M	M	M	M	In Progress		
	176	% Ameritech Caused Missed Due Dates - POTS - Res FW	M	M	M	M	M	M	In Progress		
	177	% Ameritech Caused Missed Due Dates - POTS - Res No FW	M	M	M	M	M	M	In Progress		
	178	% Ameritech Caused Missed Due Dates - UNE P - Bus FW	M	M	M	M	M	M	In Progress		
	179	% Ameritech Caused Missed Due Dates - UNE P - Bus No FW	M	M	M	M	M	M	In Progress		
	180	% Ameritech Caused Missed Due Dates - UNE P - Res FW	M	M	M	M	M	M	In Progress		
35 - Percent Trouble Reports Within 30 Days (1-30) of Installation	181	% Ameritech Caused Missed Due Dates - UNE P - Res No FW	M	M	M	M	M	M	In Progress		
	182	% Trouble Reports Within 30 Days of Install - POTS - Bus - FW	M	M	M	M	M	M	In Progress		
	183	% Trouble Reports Within 30 Days of Install - POTS - Bus - No FW	M	M	M	M	M	M	In Progress		
	184	% Trouble Reports Within 30 Days of Install - POTS - Res - FW	M	M	M	M	M	M	In Progress		
	185	% Trouble Reports Within 30 Days of Install - POTS - Res - No FW	M	M	M	M	M	M	In Progress		
	186	% Trouble Reports Within 30 Days of Install - UNE-P Bus - FW	M	M	M	M	M	M	In Progress		
	187	% Trouble Reports Within 30 Days of Install - UNE-P Bus - No FW	M	M	M	M	M	M	In Progress		
	188	% Trouble Reports Within 30 Days of Install - UNE-P Res - FW	M	M	M	M	M	M	In Progress		
45 - Percent Ameritech Caused Missed Due Dates (Resale Specials and UNE Loop and Port Combinations)	189	% Trouble Reports Within 30 Days of Install - UNE-P Res - No FW	M	M	M	M	M	M	In Progress		
	190	% Ameritech Caused Missed Due Dates - Design - DDS	M	M	M	M	M	M	In Progress		
	191	% Ameritech Caused Missed Due Dates - Design - DS1	M	M	M	M	M	M	In Progress		
	192	% Ameritech Caused Missed Due Dates - Design - DS3	M	M	M	M	M	M	In Progress		
	193	% Ameritech Caused Missed Due Dates - Design - ISDN BRI	M	M	M	M	M	M	In Progress		
	194	% Ameritech Caused Missed Due Dates - Design - ISDN PRI	M	M	M	M	M	M	In Progress		
	195	% Ameritech Caused Missed Due Dates - Design - Other	M	M	M	M	M	M	In Progress		
	196	% Ameritech Caused Missed Due Dates - Design - VGPL	M	M	M	M	M	M	In Progress		
	197	% Ameritech Caused Missed Due Dates - Design - UNE Loop and Port - ISDN BRI	M	M	M	M	M	M	In Progress		
	198	% Ameritech Caused Missed Due Dates - Design - UNE Loop and Port - ISDN PRI	M	M	M	M	M	M	In Progress		
56 - Percent Installations Completed Within Customer Requested Due Date	199	% Ameritech Caused Missed Due Dates - Design - UNE Loop and Port - Other	M	M	M	M	M	M	In Progress		
	200	% Installs Cmpltd w/in Cust Req DD - 2 Wire Analog (1-10) -- 3 Days	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729
	201	% Installs Cmpltd w/in Cust Req DD - 2 Wire Analog (11-20) -- 7 Days	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729
	202	% Installs Cmpltd w/in Cust Req DD - 2 Wire Analog (20+) -- 10 Days	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729
	203	% Installs Cmpltd w/in Cust Req DD - 2 Wire Digital (1-10) -- 3 Days	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729
	204	% Installs Cmpltd w/in Cust Req DD - 2 Wire Digital (11-20) -- 7 Days	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729
	205	% Installs Cmpltd w/in Cust Req DD - 2 Wire Digital (20+) -- 10 Days	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729
	206	% Installs Cmpltd w/in Cust Req DD - Dedicated Transport DS0 (1 to 10) -- 3 Days	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729
	207	% Installs Cmpltd w/in Cust Req DD - Dedicated Transport DS0 (11 to 20) -- 5 Days	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729
	208	% Installs Cmpltd w/in Cust Req DD - Dedicated Transport DS0 (20+) and all other types -- ICB	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729
209	% Installs Cmpltd w/in Cust Req DD - Dedicated Transport DS1 (1 to 10) -- 3 Days	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729	
210	% Installs Cmpltd w/in Cust Req DD - Dedicated Transport DS1 (11 to 20) -- 5 Days	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729	
211	% Installs Cmpltd w/in Cust Req DD - Dedicated Transport DS1 (20+) and all other types -- ICB	M	M	M	M	M	M	In Progress		Business Rule Discrepancies: 0729	

Michigan Blind Replication Status Summary as of June 23, 2003

Performance Measurement	REF #	Product Disaggregation	July-02		August-02		September-02		Status ²	Complete Date	Comments ³
			CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹			
	212	% Installs Cmpltd w/in Cust Req DD - Dedicated Transport DS3 (1 to 10) -- 3 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	213	% Installs Cmpltd w/in Cust Req DD - Dedicated Transport DS3 (11 to 20) -- 5 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	214	% Installs Cmpltd w/in Cust Req DD - Dedicated Transport DS3 (20+) and all other types -- ICB	M		M		M		In Progress		Business Rule Discrepancies: 0729
	215	% Installs Cmpltd w/in Cust Req DD - DS1 loop (includes PRI) -- 3 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	216	% Installs Cmpltd w/in Cust Req DD - DS1 Trunk Port (1 to 10) -- 3 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	217	% Installs Cmpltd w/in Cust Req DD - DS1 Trunk Port (11 to 20) -- 5 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	218	% Installs Cmpltd w/in Cust Req DD - DS1 Trunk Port (20+) -- ICB	M		M		M		In Progress		Business Rule Discrepancies: 0729
	219	% Installs Cmpltd w/in Cust Req DD - DSL with Line Sharing	M	M ⁵	M	M ⁵	M	M ⁵	In Progress		Business Rule Discrepancies: 0729
	220	% Installs Cmpltd w/in Cust Req DD - DSL with no Line Sharing -- Conditioned -- 10 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	221	% Installs Cmpltd w/in Cust Req DD - DSL with no Line Sharing -- Non Conditioned -- 5 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	222	% Installs Cmpltd w/in Cust Req DD - Switch Ports -- Analog Port -- 2 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	223	% Installs Cmpltd w/in Cust Req DD - Switch Ports -- BRI Port (1-50) -- 3 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	224	% Installs Cmpltd w/in Cust Req DD - Switch Ports -- BRI Port (50+) -- 5 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	225	% Installs Cmpltd w/in Cust Req DD - Switch Ports -- PRI Port (1-20) -- 5 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	226	% Installs Cmpltd w/in Cust Req DD - Switch Ports -- PRI Port (20+) -- 10 Days	M		M		M		In Progress		Business Rule Discrepancies: 0729
	227	% Installs Cmpltd w/in Cust Req DD - UNE Loop Projects	M		M		M		In Progress		Business Rule Discrepancies: 0729
56.1 - Percent Installations Completed With the Customer Requested Due Date for Loop With LNP	228	% (UNE) Installs Cmpltd w/in Cust Req DD - Aggregate Loop w/LNP (1-10)	M		M		M		Completed	3/26/2003	Business Rule Discrepancies: 0729
	229	% (UNE) Installs Cmpltd w/in Cust Req DD - Aggregate Loop w/LNP (11-20)	M		M		M		Completed	3/26/2003	Business Rule Discrepancies: 0729
	230	% (UNE) Installs Cmpltd w/in Cust Req DD - Aggregate Loop w/LNP (20+)	M		M		M		Completed	3/26/2003	Business Rule Discrepancies: 0729
	231	% (UNE) Installs Cmpltd w/in Cust Req DD - CHC Loop w/LNP (1-10)	M		M		M		Completed	3/26/2003	Business Rule Discrepancies: 0729
	232	% (UNE) Installs Cmpltd w/in Cust Req DD - CHC Loop w/LNP (11-20)	M		M		M		Completed	3/26/2003	Business Rule Discrepancies: 0729
	233	% (UNE) Installs Cmpltd w/in Cust Req DD - CHC Loop w/LNP (20+)	M		M		M		Completed	3/26/2003	Business Rule Discrepancies: 0729
	234	% (UNE) Installs Cmpltd w/in Cust Req DD - FDT Loop w/LNP (1-10)	M		M		M		Completed	3/26/2003	Business Rule Discrepancies: 0729
	235	% (UNE) Installs Cmpltd w/in Cust Req DD - FDT Loop w/LNP (11-20)	M		M		M		Completed	3/26/2003	Business Rule Discrepancies: 0729
	236	% (UNE) Installs Cmpltd w/in Cust Req DD - FDT Loop w/LNP (20+)	M		M		M		Completed	3/26/2003	Business Rule Discrepancies: 0729
	237	% (UNE) Installs Cmpltd w/in Cust Req DD - Loop w/LNP Projects	M		M		M		Completed	3/26/2003	Business Rule Discrepancies: 0729
58 - Percent Ameritech Caused Missed Due Dates (Unbundled Network Elements)	238	% AIT Caused Missed Due Dates - UNE - 8.0 dB Loop with Test Access (FW)	M	M					In Progress		
	239	% AIT Caused Missed Due Dates - UNE - 8.0 dB Loop without Test Access (FW)	NM	M					In Progress		Calculation Discrepancies: O613v4
	240	% AIT Caused Missed Due Dates - UNE - Analog Trunk Port	M	M					In Progress		
	241	% AIT Caused Missed Due Dates - UNE - BRI Loop with Test Access	NM	M					In Progress		Calculation Discrepancies: O613v4
	242	% AIT Caused Missed Due Dates - UNE - Broadband DSL w/Line Sharing	M	M ⁵					In Progress		
	243	% AIT Caused Missed Due Dates - UNE - Broadband DSL w/out Line sharing	M						In Progress		
	244	% AIT Caused Missed Due Dates - UNE - Dark Fiber	M	M					In Progress		
	245	% AIT Caused Missed Due Dates - UNE - DS1 Dedicated Transport	M	M					In Progress		
	246	% AIT Caused Missed Due Dates - UNE - DS1 Loop with Test Access	NM	M					In Progress		Calculation Discrepancies: O613v4
	247	% AIT Caused Missed Due Dates - UNE - DS3 Dedicated Transport	M	M					In Progress		
	248	% AIT Caused Missed Due Dates - UNE - DSL Loops w/Line Sharing	M	M ⁵					In Progress		
	249	% AIT Caused Missed Due Dates - UNE - DSL Loops/w/out Line sharing	NMM						In Progress		Calculation Discrepancies: O613v4
	250	% AIT Caused Missed Due Dates - UNE - ISDN BRI Port	M	M					In Progress		
	251	% AIT Caused Missed Due Dates - UNE - Subtending Channel (1D)	M	M					In Progress		
252	% AIT Caused Missed Due Dates - UNE - Subtending Channel (23B)	M	M					In Progress			
253	% AIT Caused Missed Due Dates - UNE - Subtending Digital Direct Combination Trunks	M	M					In Progress			
Selected Provisioning Metrics - Total Non Matches			3	0	0	0	0	0			
Maintenance and Repair Metrics											
37 - Trouble Report Rate (Resale POTS)	254	Trouble Report Rate - POTS - Bus	NMM	NM					In Progress		Calculation Discrepancies: O627v3
	255	Trouble Report Rate - POTS - Res	NMM	NM					In Progress		Calculation Discrepancies: O627v3
	256	Trouble Report Rate - UNE-P Bus	NM	NM					In Progress		Calculation Discrepancies: O627v3
	257	Trouble Report Rate - UNE-P Res	NM	NM					In Progress		Calculation Discrepancies: O627v3
37.1 - Trouble Report Rate Net of Installation and Repeat Reports	258	Trouble Report Rate Net of Install & Repeat Reports - POTS - Bus	NMM	NMM					In Progress		Calculation Discrepancies: O639v3
	259	Trouble Report Rate Net of Install & Repeat Reports - POTS - Res	NMM	NM					In Progress		Calculation Discrepancies: O639v3
	260	Trouble Report Rate Net of Install & Repeat Reports - UNE-P - Bus	NM	NMM					In Progress		Calculation Discrepancies: O639v3
	261	Trouble Report Rate Net of Install & Repeat Reports - UNE-P - Res	NM	NM					In Progress		Calculation Discrepancies: O639v3
38 - Percent Missed Repair Commitments (Resale POTS) (Evaluated as of 6/26/03)	262	% Missed Repair Commitments - POTS - Bus - Dispatch	M	M	M	M	M	M	In Progress		
	263	% Missed Repair Commitments - POTS - Bus - No Dispatch	M	M	M	M	M	M	In Progress		
	264	% Missed Repair Commitments - POTS - Res - Dispatch	M	M	M	M	M	M	In Progress		
	265	% Missed Repair Commitments - POTS - Res - No Dispatch	M	M	M	M	M	M	In Progress		
	266	% Missed Repair Commitments - UNE-P Bus - Dispatch	NMM	M	M	M	M	M	In Progress		Calculation Discrepancies: NR129
	267	% Missed Repair Commitments - UNE-P Bus - No Dispatch	M	M	M	M	M	M	In Progress		
	268	% Missed Repair Commitments - UNE-P Res - Dispatch	M	M	M	M	M	M	In Progress		
269	% Missed Repair Commitments - UNE-P Res - No Dispatch	M	M	M	M	M	M	In Progress			
39 - Receipt to Clear Duration	270	Receipt to Clear Duration - POTS - Bus - Dispatch - Affecting Service (hours)	M	M	M	M	M	M	In Progress		
	271	Receipt to Clear Duration - POTS - Bus - Dispatch - Out of Service (hours)	M	M	M	M	M	M	In Progress		
	272	Receipt to Clear Duration - POTS - Bus - No Dispatch - Affecting Service (hours)	M	M	M	M	M	M	In Progress		
	273	Receipt to Clear Duration - POTS - Bus - No Dispatch - Out of Service (hours)	M	M	M	M	M	M	In Progress		

Michigan Blind Replication Status Summary as of June 23, 2003

Performance Measurement	REF #	Product Disaggregation	July-02		August-02		September-02		Status ²	Complete Date	Comments ³
			CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹			
	274	Receipt to Clear Duration - POTS - Res - Dispatch - Affecting Service (hours)	M	M	M	M	M	M	In Progress		
	275	Receipt to Clear Duration - POTS - Res - Dispatch - Out of Service (hours)	M	M	M	M	M	M	In Progress		
	276	Receipt to Clear Duration - POTS - Res - No Dispatch - Affecting Service (hours)	M	M	M	M	M	M	In Progress		
	277	Receipt to Clear Duration - POTS - Res - No Dispatch - Out of Service (hours)	M	M	M	M	M	M	In Progress		
	278	Receipt to Clear Duration - UNE-P Bus - Dispatch - Affecting Service (hours)	M	M	M	M	M	M	In Progress		Calculation Discrepancies: O858
	279	Receipt to Clear Duration - UNE-P Bus - Dispatch - Out of Service (hours)	M	M	M	M	M	M	In Progress		
	280	Receipt to Clear Duration - UNE-P Bus - No Dispatch - Affecting Service (hours)	M	M	M	M	M	M	In Progress		
	281	Receipt to Clear Duration - UNE-P Bus - No Dispatch - Out of Service (hours)	M	M	M	M	M	M	In Progress		
	282	Receipt to Clear Duration - UNE-P Res - Dispatch - Affecting Service (hours)	M	M	M	M	M	M	In Progress		
	283	Receipt to Clear Duration - UNE-P Res - Dispatch - Out of Service (hours)	M	M	M	M	M	M	In Progress		
	284	Receipt to Clear Duration - UNE-P Res - No Dispatch - Affecting Service (hours)	M	M	M	M	M	M	In Progress		
	285	Receipt to Clear Duration - UNE-P Res - No Dispatch - Out of Service (hours)	M	M	M	M	M	M	In Progress		
	286	Percent Out Of Service (OOS) < 24 Hours - POTS - Business	M	M					In Progress		
	287	Percent Out Of Service (OOS) < 24 Hours - POTS - Residence	M	M					In Progress		
	288	Percent Out Of Service (OOS) < 24 Hours - UNE-P Bus	M	M	M	M	M	M	In Progress		
	289	Percent Out Of Service (OOS) < 24 Hours - UNE-P Res	M	M	M	M	M	M	In Progress		
40 - Percent Out of Service (OOS) < 24 Hours (Resale POTS)	290	% Repeat Reports - POTS - Bus	M	M	M	M	M	M	In Progress		
41 - Percent Repeat Reports (Resale POTS)	291	% Repeat Reports - POTS - Res	M	M	M	M	M	M	In Progress		
	292	% Repeat Reports - UNE-P Bus	M	M	M	M	M	M	In Progress		
	293	% Repeat Reports - UNE-P Res	M	M	M	M	M	M	In Progress		
54.1 - Trouble Report Rate Net of Installation and Repeat Reports	294	Trouble Report Rate Net of Install & Repeat Rpts - Resale - DDS	M	M					In Progress		
	295	Trouble Report Rate Net of Install & Repeat Rpts - Resale - DS1	M	M					In Progress		
	296	Trouble Report Rate Net of Install & Repeat Rpts - Resale - DS3	M	M					In Progress		
	297	Trouble Report Rate Net of Install & Repeat Rpts - Resale - ISDN BRI	M	M					In Progress		
	298	Trouble Report Rate Net of Install & Repeat Rpts - Resale - ISDN PRI	M	M					In Progress		
	299	Trouble Report Rate Net of Install & Repeat Rpts - Resale - Other Services	M	M					In Progress		
	300	Trouble Report Rate Net of Install & Repeat Rpts - Resale - Voice Grade Private Line	M	M					In Progress		
	301	Trouble Report Rate Net of Install & Repeat Rpts - UNE Loop & Port - ISDN BRI	M	M					In Progress		Calculation Discrepancies: O664v2
	302	Trouble Report Rate Net of Install & Repeat Rpts - UNE Loop & Port - ISDN PRI	M	M					In Progress		
	303	Trouble Report Rate Net of Install & Repeat Rpts - UNE Loop & Port - Other Services	M	M					In Progress		
67 - Mean Time to Restore (Unbundled Network Elements)	304	Mean Time to Restore - UNE - 8.0 dB Loop with Test Access (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	305	Mean Time to Restore - UNE - 8.0 dB Loop with Test Access (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	306	Mean Time to Restore - UNE - 8.0 dB Loop without Test Access (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	307	Mean Time to Restore - UNE - 8.0 dB Loop without Test Access (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	308	Mean Time to Restore - UNE - Analog Trunk Port (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	309	Mean Time to Restore - UNE - Analog Trunk Port (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	310	Mean Time to Restore - UNE - BRI Loop with Test Access (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	311	Mean Time to Restore - UNE - BRI Loop with Test Access (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	312	Mean Time to Restore - UNE - Broadband DSL - Line Sharing - Dispatch (hours)	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	313	Mean Time to Restore - UNE - Broadband DSL - Line Sharing - No Dispatch (hours)	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	314	Mean Time to Restore - UNE - Broadband DSL - No Line Sharing - Dispatch (hours)	M						In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	315	Mean Time to Restore - UNE - Broadband DSL - No Line Sharing - No Dispatch (hours)	M						In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	316	Mean Time to Restore - UNE - Dark Fiber (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	317	Mean Time to Restore - UNE - Dark Fiber (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	318	Mean Time to Restore - UNE - DS1 Dedicated Transport (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	319	Mean Time to Restore - UNE - DS1 Dedicated Transport (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)

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Performance Measurement	REF #	Product Disaggregation	July-02		August-02		September-02		Status ²	Complete Date	Comments ³
			CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹			
	320	Mean Time to Restore - UNE - DS1 Loop with Test Access (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	321	Mean Time to Restore - UNE - DS1 Loop with Test Access (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	322	Mean Time to Restore - UNE - DS3 Dedicated Transport (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	323	Mean Time to Restore - UNE - DS3 Dedicated Transport (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	324	Mean Time to Restore - UNE - DSL Loops (hours) - Line Sharing - Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	325	Mean Time to Restore - UNE - DSL Loops (hours) - Line Sharing - No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	326	Mean Time to Restore - UNE - DSL Loops (hours) - No Line Sharing - Dispatch	M						In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	327	Mean Time to Restore - UNE - DSL Loops (hours) - No Line Sharing - No Dispatch	M						In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	328	Mean Time to Restore - UNE - ISDN BRI Port (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	329	Mean Time to Restore - UNE - ISDN BRI Port (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	330	Mean Time to Restore - UNE - Subtending Channel (1D) (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	331	Mean Time to Restore - UNE - Subtending Channel (1D) (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	332	Mean Time to Restore - UNE - Subtending Channel (23B) (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	333	Mean Time to Restore - UNE - Subtending Channel (23B) (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	334	Mean Time to Restore - UNE - Subtending Digital Direct Combination Trunks (hours)-Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
	335	Mean Time to Restore - UNE - Subtending Digital Direct Combination Trunks (hours)-No Dispatch	M	M					In Progress		Business Rule Discrepancies: E111 (closed unresolved)
Selected Maintenance and Repair Metrics - Total Non Matches			4	6	0	0	0	0			
Billing Metrics											
14 - Billing Accuracy	336	Billing Accuracy - Resale Monthly Recurring/Non-recurring	M	M	M	M	M	M	Completed	4/24/2003	
	337	Billing Accuracy - Resale Usage / Unbundled Local Switching	M	M	M	M	M	M	Completed	6/19/2003	
	338	Billing Accuracy - Other UNEs	M	M	M	M	M	M	Completed	3/21/2002	
17 - Billing Completeness	339	Billing Completeness	M	M	M	M	M	M	Completed	4/30/2003	Business Rule Discrepancies: O731 (closed unresolved)
18 - Billing Timeliness	340	Billing Timeliness (Wholesale Bill) - AEBS	M		M		M		Completed	4/16/2003	Exclusions Discrepancies: O845
	341	Billing Timeliness (Wholesale Bill) - CABS	M		M		M		Completed	4/16/2003	Exclusions Discrepancies: O845
19 - Daily Usage Feed Timeliness	342	Daily Usage Feed Timeliness	M		M		M		Completed	2/12/2003	Exclusion Discrepancies: O694V2 (closed unresolved), O846
Selected Billing Metrics - Total Non Matches			0	0	0	0	0	0			
Interconnection Trunk Metrics											
73 - Percentage Missed Due Dates - Interconnection Trunks	343	Percentage Missed Due Dates - Interconnection Trunks - 911	M		M		M		In Progress		
	344	Percentage Missed Due Dates - Interconnection Trunks - Interconnection Trunks (Non-projects)	M		M		M		In Progress		Calculation Discrepancies: O817
	345	Percentage Missed Due Dates - Interconnection Trunks - OS/DA	M		M		M		In Progress		
	346	Percentage Missed Due Dates - Interconnection Trunks - Projects	M		M		M		In Progress		
	347	Percentage Missed Due Dates - Interconnection Trunks - SS7	M		M		M		In Progress		
78 - Average Interconnection Trunk Installation Interval	348	Average Interconnection Trunk Installation Interval - 911 Trunks (days)	M		M		M		In Progress		
	349	Average Interconnection Trunk Installation Interval - Interconnection Trunks (days)	M		M		NMM		In Progress		Calculation Discrepancies: O824
	350	Average Interconnection Trunk Installation Interval - OS/DA (days)	M		M		M		In Progress		
	351	Average Interconnection Trunk Installation Interval - SS7 Links (days)	M		M		M		In Progress		
Selected Interconnection Trunk Metrics - Total Non Matches			0		0		0				
LNP Metrics											
91 ⁵ - Percent of LNP Due Dates with Industry Guidelines	352	% of LNP Only Due Dates Within Industry Guidelines - Complete							In Progress		Business Rule Discrepancies: O732 Exclusion Discrepancies: O834 (closed unresolved), O835 (closed unresolved)
	353	% of LNP Only Due Dates Within Industry Guidelines - Partials - NXX (1-100 TNs)							In Progress		Business Rule Discrepancies: O732 Exclusion Discrepancies: O834 (closed unresolved), O835 (closed unresolved)

Michigan Blind Replication Status Summary as of June 23, 2003

Performance Measurement	REF #	Product Disaggregation	July-02		August-02		September-02		Status ²	Complete Date	Comments ³
			CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹			
96 - Percentage Pre-mature Disconnects for LNP Orders	354	% Premature Disconnects for LNP Orders - LNP only	NMM						In Progress		Calculation Discrepancies: O805 Exclusion Discrepancies: O710
	355	% Premature Disconnects for LNP Orders - LNP with Loop	M						In Progress		Calculation Discrepancies: O805 Exclusion Discrepancies: O710
Selected LNP Metrics - Total Non Matches			0		0		0				
Directory Assistance Database Metrics											
110 - Percentage of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs	356	% of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs	M		M		M		Completed	2/19/2003	Exclusion Discrepancies: O689 (closed unresolved)
Selected Directory Assistance Database Metrics - Total Non Matches			0		0		0				
Coordinated Conversions Metrics											
114 - Percentage of Premature Disconnects (Coordinated Cutovers)	357	% Premature Disconnects - CHC	M		M		M		Completed	11/20/2002	Business Rule Discrepancies: O631v2, O815
	358	% Premature Disconnects - FDT	NM ⁷		NM ⁷		NM ⁷		Completed	6/15/2003	Business Rule Discrepancies: O570v2 (closed unresolved), O815
114.1 - CHC/FDT LNP with Loop Provisioning Interval	359	Provisioning Interval - CHC-LNP with Loop <10 lines	M		M		M		Completed	11/20/2002	
	360	Provisioning Interval - CHC-LNP with Loop 10-24 lines	M		M		M		Completed	11/20/2002	
	361	Provisioning Interval - FDT-LNP with Loop <10 lines	M		NM ⁷		M		Completed	11/20/2002	
	362	Provisioning Interval - FDT-LNP with Loop 10-24 lines	M		M		M		Completed	11/20/2002	
115 - Percentage of Ameritech Caused Delayed Coordinated Cutovers	363	% of Ameritech Caused Delayed Coordinated Cutovers - CHC-LNP with UNE Loop>30 Minutes	M		M		M		Completed	11/20/2002	Business Rule Discrepancies: O631v2, O677v2 (closed unresolved)
	364	% of Ameritech Caused Delayed Coordinated Cutovers - CHC-LNP with UNE Loop>60 Minutes	M		M		M		Completed	11/20/2002	Business Rule Discrepancies: O631v2, O677v2 (closed unresolved)
	365	% of Ameritech Caused Delayed Coordinated Cutovers - CHC-LNP with UNE Loop>120 Minutes	M		M		M		Completed	11/20/2002	Business Rule Discrepancies: O631v2, O677v2 (closed unresolved)
	366	% of Ameritech Caused Delayed Coordinated Cutovers - FDT-LNP with UNE Loop>30 Minutes	NM ⁷		NM ⁷		NM ⁷		Completed	11/20/2002	Business Rule Discrepancies: O570v2 (closed unresolved)
	367	% of Ameritech Caused Delayed Coordinated Cutovers - FDT-LNP with UNE Loop>60 Minutes	NM ⁷		NM ⁷		NM ⁷		Completed	11/20/2002	Business Rule Discrepancies: O570v2 (closed unresolved)
	368	% of Ameritech Caused Delayed Coordinated Cutovers - FDT-LNP with UNE Loop>120 Minutes	NM ⁷		NM ⁷		M		Completed	11/20/2002	Business Rule Discrepancies: O570v2 (closed unresolved)
115.1 - Percent Provisioning Trouble Reports	369	% of Ameritech Caused Delayed Coordinated Cutover - CHC	M		M		M		Completed	11/20/2002	Exclusion Discrepancies: O738 (closed unresolved)
	370	% of Ameritech Caused Delayed Coordinated Cutover - FDT	M		NM ⁷		M		Completed	11/20/2002	Exclusion Discrepancies: O738 (closed unresolved)
MI3 - Coordinated Conversions Outside of the Interval	371	Coordinated Conversions Outside of Interval - CHC	M		M		M		Completed	11/20/2002	Business Rule Discrepancies: O631v2
Selected Coordinated Conversions Metrics - Total Non Matches			4		6		3				
Other Metrics											
MI 9 ⁵ - Percentage Missing FOCs	372	% Missing FOCs - Resale							In Progress		Business Rule Discrepancies: O792 Exclusion Discrepancies: O661v2, O787
	373	% Missing FOCs - UNE (Loops, LNP, and LSNP)							In Progress		Business Rule Discrepancies: O792 Exclusion Discrepancies: O661v2, O787
	374	% Missing FOCs - UNE-P							In Progress		Business Rule Discrepancies: O792 Exclusion Discrepancies: O661v2, O787
MI11 - Average Interface Outage Notification	375	Average Interface Outage Notification (Minutes)	M		M		M		Completed	4/16/2003	Business Rule Discrepancies: O624v2, O594 (closed unresolved)
MI 13 ⁵ - Percent Loss Notifications	376	% Loss Notifications within 1 Hour of Service Order Completion - Resale							In Progress		Exclusion Discrepancies: O661v2, O787

Michigan Blind Replication Status Summary as of June 23, 2003

Performance Measurement	REF #	Product Disaggregation	July-02		August-02		September-02		Status ²	Complete Date	Comments ³
			CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹	CLEC Value ¹	SBC Midwest Value ¹			
Loss Notification within One Hour of Service Order Completion	377	% Loss Notifications within 1 Hour of Service Order Completion - UNE Loops							In Progress		Exclusion Discrepancies: O661v2, O787
	378	% Loss Notifications within 1 Hour of Service Order Completion - LNP							In Progress		Exclusion Discrepancies: O661v2, O787
	379	% Loss Notifications within 1 Hour of Service Order Completion - UNE P							In Progress		Exclusion Discrepancies: O661v2, O787
MI14 - Percent Completion Notifications Returned within "X" Hours of Completion of Maintenance Trouble Ticket	380	% Cmpltn Nofctns Rtrnd within "X" Hours of Cmpltn of Mntnce Trble Tckt - Resale Manual - Next Day	M						In Progress		Business Rule Discrepancies: O642v2, O847 Exclusion Discrepancies: O637v2
	381	% Cmpltn Nofctns Rtrnd within "X" Hours of Cmpltn of Mntnce Trble Tckt - Resale Electronic < 1 hour	M						In Progress		Business Rule Discrepancies: O847, O848
	382	% Cmpltn Nofctns Rtrnd within "X" Hours of Cmpltn of Mntnce Trble Tckt - UNE Loops Manual - Next Day	M		M		M		In Progress		Business Rule Discrepancies: O847
	383	% Cmpltn Nofctns Rtrnd within "X" Hours of Cmpltn of Mntnce Trble Tckt - UNE Loops Electronic < 1 hour							In Progress		Business Rule Discrepancies: O847, O848
	384	% Cmpltn Nofctns Rtrnd within "X" Hours of Cmpltn of Mntnce Trble Tckt - UNE P Manual - Next Day	M						In Progress		Business Rule Discrepancies: O642v2, O847, O859 Exclusion Discrepancies: O637v2
	385	% Cmpltn Nofctns Rtrnd within "X" Hours of Cmpltn of Mntnce Trble Tckt - UNE P Electronic < 1 hour							In Progress		Business Rule Discrepancies: O847, O848
Selected Other Metrics - Total Non Matches			0		0		0				
ALL Selected Metrics - Total Non Matches			12	6	6	0	3	0			

Footnotes:

1. A "Non-Material Match (NMM)" as recorded in this chart is indicated when a value did not match within +/- 1 percent (inclusive), but the difference between reported and independently-calculated values was between +/- 1 and 5 percent and did not cause the performance measurement's original reported parity attainment/failure or benchmark attainment/failure to reverse. It is noted that the materiality threshold applied in "blind replication" (i.e., the evaluation criterion type PMR5-2, "SBC Midwest-reported and BearingPoint-calculated metrics values agree") in BearingPoint's OSS test is +/- 1 percent.
2. "Status" applies to the status of "blind replication" (i.e., evaluation criterion type PMR5-2) progress for the disaggregation in the OSS test.
3. Published Observations and Exceptions numbers (see www.osstesting.com) pertinent to the corresponding disaggregation, along with the type of discrepancy (i.e., calculation, business rule, or exclusion) are noted.
4. The reporting of this performance measurement was transitioned from MOR/Tel to ICS/DSS during the test. The calculation of this performance measurement is based on data from both of these systems. For this reason, a distinction has been made in this chart between the "blind replication" status of the MOR/Tel data component and the ICS/DSS data component for this performance measure.
5. The reporting of this performance measurement was transitioned from MOR/Tel to ICS/DSS during the test. SBC Midwest calculates this performance measure using only ICS/DSS data.
6. The "SBC Affiliate" values are used as the retail component for parity comparison in the performance measurement. As such, the "SBC Midwest" column has been populated with the "blind replication" status of the "SBC Midwest Affiliate" values.
7. SBC Midwest has restated this value for this performance measure disaggregation.
8. In this disaggregation, the "SBC Midwest Affiliate" value is used as the retail component for parity comparison in the performance measurement. As such, the "SBC Midwest" column has been populated with the "blind replication" status of the "SBCMidwest Affiliate" values.
9. The reporting of this performance measurement, subsequent to 6/5/03, occurred out of both MOR/Tel and ICS/DSS system. On 6/5/03, SBC restated this performance measurement and transitioned the calculation to ICS/DSS entirely.

Attachment Ev2

PMR5-2 Analysis
“NM” Issues From BearingPoint PMR5 Status Matrix (Attachment D)

REVISED

PM and MI Issue # ¹ Impact ²	Current Status ³	BearingPoint Issue Description and SBC Midwest Comments ⁴
Pre-Ordering Metrics		
PM 1.2 NR 119 No Impact ⁵	Retest ⁶	<p><i>BearingPoint has been unable to replicate SBC Midwest’s July 2002 reported results for Performance Measurement 1.2 (“Accuracy of Actual Loop Makeup Information Provided for DSL Orders”).</i></p> <p>- PM 1.2: Accuracy of Actual LMU Info Provided for DSL Orders Electronically Manually (REF # 1 2)</p> <p>SBC Midwest has determined that BearingPoint was not using the correct version of the technical documentation (BTR) for replicating PM 1.2. SBC Midwest provided the correct version of the BTR to BearingPoint on May 29, 2003. SBC Midwest fully expects that BearingPoint will be able to successfully replicate PM1.2 when using the correct documentation.</p> <p><u>Upon receiving SBC Midwest’s response, BearingPoint resolved the issues associated with the “Electronic” disaggregation (REF#2) and lists an “NM” condition with the “Manual” disaggregation (REF#1) as identified on the PMR5 Summary Matrix. As of July 1, 2003, this finding remains in retest with BearingPoint although no additional information has been requested of SBC Midwest.</u></p> <p>SBC Midwest believes the remaining issue related to NR 119 is solely caused by BearingPoint’s use of an incorrect version of documentation in its replication activities for this PM. Therefore, this issue has no impact on the February – April 2003 data filed with the FCC.</p>

¹ In addition to the O/E/NR listed on this chart that resulted in Non-Match (“NM”) status, the BearingPoint PMR5 Status Matrix (Attachment D) contains six four other PMR5-2 Observations and one Notification Report (O613v3, O664v2, O805, O817, O819, and O824, and NR129). These six-five findings Observations are not listed on this report because they did not result in “NM” status. Although, these observations have been resolved, they will remain outstanding until BearingPoint completes the PMR5 testing associated with these PMs.

² The impacted performance measure; the related BearingPoint Observation, Exception, or Notification Request; and SBC Midwest’s classification of the impact that the Observation, Exception or Notification Request has on results filed with the FCC for the months of February – April 2003.

³ This column represents the status of the BearingPoint Observation, Exception, or Notification Request as of July 1, 2003, unless otherwise noted.

⁴ The specific BearingPoint issue affecting the performance measure and an itemized list of each disaggregation marked as a “NM” Non-Match with related SBC Midwest comments.

⁵ An assessment of “No Impact” indicates that the issue had no effect on the posted results for the data months February, March, or April 2003 filed with the FCC.

⁶ A Status of “Retest” indicates that SBC Midwest has responded to BearingPoint issues and is awaiting their review of the response and retest of the finding.

PMR5-2 Analysis
“NM” Issues From BearingPoint PMR5 Status Matrix (Attachment D)

REVISED

PM and MI Issue # ¹ Impact ²	Current Status ³	BearingPoint Issue Description and SBC Midwest Comments ⁴
Provisioning Metrics		
<p>PM 58</p> <p>O613v4</p> <p>No Impact</p>	<p>Retest</p>	<p><u><i>BearingPoint has been unable to replicate SBC Midwest’s February 2003 restated wholesale results for the July 2002 data month for Performance Measurement 58 (“Percent Ameritech Missed Due Dates”).</i></u></p> <ul style="list-style-type: none"> - <u><i>% AIT Caused Missed Due Dates – UNE – 8.0 dB Loop without Test Access (FW) (REF #239)</i></u> - <u><i>% AIT Caused Missed Due Dates – UNE – BRI Loop with Test Access (REF #241)</i></u> - <u><i>% AIT Caused Missed Due Dates – UNE – DS1 Loop with Test Access (REF #246)</i></u> <p><u>The updated Business technical requirements for performance measure 58 (provided to BearingPoint on 6/4/2002), and CR 040902 v2.1 describe the criterion for excluding a loop that is part of the FMOD process. The requirement was changed to the following: include in numerator and denominator only if (FMOD Indicator != 1 OR FMOD Indicator IS Null) OR (FMOD Indicator =1 AND Type of Form = “2D”). This change was implemented in the February 2003 restatement of July 2002 results that BearingPoint is attempting to replicate in Observation 613v4. It appears BearingPoint did not implement this change.</u></p> <p><u>For BRI and DS1 Loops, BearingPoint is not including records with (FMOD Indicator =1 AND Type of Form = “2D”), resulting in BearingPoint having fewer records than SBC for these products.</u></p> <p><u>For 8 dB Loops and DSL Loops, it appears that BearingPoint implemented the criterion-- FMOD Indicator =1-- but did not implement criterion-- AND Type of Form = “2D”, which resulted in BearingPoint having more records than SBC Midwest for these products.</u></p> <p><u>These explanations account for all the differences between BearingPoint’s and SBC’s results cited in Observation 613v4. In fact, SBC Midwest was able to replicate BearingPoint’s results exactly by not applying the new criterion.</u></p> <p><u>BearingPoint issued an additional information request on June 26, which SBC Midwest responded to on July 2, 2003.</u></p> <p><u>SBC Midwest believes the issue related to O613 is solely caused by an improper exclusion by BearingPoint. Therefore, this issue has no impact on the February - April 2003 data filed with the FCC.</u></p>

PMR5-2 Analysis
“NM” Issues From BearingPoint PMR5 Status Matrix (Attachment D)

REVISED

PM and MI Issue # ¹ Impact ²	Current Status ³	BearingPoint Issue Description and SBC Midwest Comments ⁴
Maintenance & Repair Metrics		
<p align="center">PM 37 O 627v3 No Impact</p>	<p align="center">Retest</p>	<p><i>BearingPoint has been unable to replicate SBC Midwest’s July 2002 reported results for Performance Measurement 37 (“Trouble Report Rate (Resale POTS)”).</i></p> <ul style="list-style-type: none"> - Trouble Report Rate – POTS – Bus (REF # 254) - Trouble Report Rate – POTS – Res (REF # 255) - Trouble Report Rate – UNE-P – Bus (REF # 256) - Trouble Report Rate – UNE-P – Res (REF #257) <p>SBC Midwest has reviewed observation #627v3 and, in a detailed response dated May 13, 2003 identified errors that both SBC Midwest made in its calculation and BearingPoint made in attempting to replicate this measure.</p> <p>The BearingPoint replication errors appear to be the result of incorrect application of the technical documentation. BearingPoint’s replication results a) contain records that should be excluded b) records incorrectly categorized based on the transposition error in the source file c) records that do not have the correct division logic applied and d) contain records that have not been correctly reassigned to the ADTS product category.</p> <p>The SBC Midwest calculation of PM37 was also in error, reflecting the use of incorrect reference tables. SBC Midwest used two tables that had incorrect records in them which caused the results to a) not include certain retail records in the results and b) duplicate records that fell within one geographic disaggregation. This issue has been addressed with February 2003 data going forward.</p> <p>Based on SBC Midwest’s analysis this issue does not meet the SBC Midwest materiality criteria for restatements.⁷ Although not required to restate based on SBC Midwest’s guidelines, SBC Midwest <u>is targeting a restatement of restated</u> this measure for July - September 2002 data months on <u>or before</u> July 7, 2003 in order to satisfy BearingPoint’s test requirements.</p> <p>SBC Midwest corrected the calculation errors identified in observation 627v3 effective with February 2003. Therefore, this issue has no impact on the February-April 2003 data filed with the FCC.</p>

⁷ SBC Midwest’s restatement guidelines are published on the SBC CLEC website at <https://pm.sbc.com/pm.cfm> as an addendum to SBC Midwest’s Performance Measurements Internal Change Management Policy, Procedures, and Guidelines. Under these guidelines, restatement of previously published performance results generally depends upon the materiality of the potential restatement. An assessment of materiality is based on whether the recalculated data would result (a) in a shift in the performance in the aggregate from a “make” to a “miss” condition or (b) in a further degradation of reported performance of more than 5% for measures that are in a “miss” condition, provided there are at least 100 CLEC transactions in the sub-metric.

PMR5-2 Analysis
“NM” Issues From BearingPoint PMR5 Status Matrix (Attachment D)

REVISED

PM and MI Issue # ¹ Impact ²	Current Status ³	BearingPoint Issue Description and SBC Midwest Comments ⁴
<p>PM 37.1 O 639v3 No Impact</p>	<p align="center">Retest</p>	<p><i>BearingPoint has been unable to replicate SBC Midwest’s July 2002 reported results for Performance Measurement 37.1 (“Trouble Report Rate Net of Installation and Repeat Reports”).</i></p> <ul style="list-style-type: none"> - Trouble Report Rate Net of Install & Repeat Reports – POTS – Res (REF # 259) - Trouble Report Rate Net of Install & Repeat Reports – UNE-P – Bus (REF# 260) - Trouble Report Rate Net of Install & Repeat Reports – UNE-P – Res (REF # 261) <p>SBC Midwest has reviewed observation #639v3 and, in a detailed response dated May 13, 2003, identified errors that both SBC Midwest made in its calculation and BearingPoint made in attempting to replicate this measure. The BearingPoint replication errors appear to be the result of incorrect application of the technical documentation. BearingPoint’s replication results a) contain records that should be excluded b) records incorrectly categorized based on the transposition error in the source file c) records that do not have the correct division logic applied and d) contain records that have not been correctly reassigned to the ADTS product category.</p> <p>The SBC Midwest calculation was also in error reflecting the use of incorrect reference tables. SBC Midwest used two tables that had incorrect records in them which caused the results to: a) not include certain retail records in the results and b) duplicate records that fell within one geographic disaggregation. This issue has been addressed with February 2003 data going forward.</p> <p>Based on SBC Midwest’s analysis, this issue does not meet the SBC Midwest materiality criteria for restatements.⁸ Although not required to restate based on SBC Midwest’s guidelines, SBC Midwest is targeting a restatement of restated this measure for July - September 2002 data months on or before July 7, 2003 in order to satisfy BearingPoint’s test requirements.</p> <p>SBC Midwest corrected the calculation errors identified in observation 639v3 effective with February 2003. Therefore, this issue has no impact on the February - April 2003 data filed with the FCC.</p>

⁸ See note 7.

PMR5-2 Analysis
“NM” Issues From BearingPoint PMR5 Status Matrix (Attachment D)

REVISED

PM and MI Issue # ¹ Impact ²	Current Status ³	BearingPoint Issue Description and SBC Midwest Comments ⁴
<p align="center">PM 39</p> <p align="center">NR-116 <u>O-858</u></p> <p align="center">No Impact</p>	<p align="center">Retest</p>	<p><i>BearingPoint has been unable to replicate SBC Midwest’s July 2002 reported results for Performance Measurement 39 (“Receipt to Clear Duration”).</i></p> <ul style="list-style-type: none"> - Receipt to Clear Duration – POTS – Res – Dispatch – Affecting Service (hours) (REF # 274) - Receipt to Clear Duration – POTS – Res – Dispatch – Out of Service (hours) (REF # 275) - Receipt to Clear Duration – POTS – Res – No Dispatch – Affecting Service (hours) (REF # 276) - Receipt to Clear Duration – POTS – Res – No Dispatch – Affecting Service (hours) (REF # 277) - Receipt to Clear Duration – UNE-P – Bus – Dispatch – Affecting Service (hours) (REF # 278) <p>SBC Midwest believes BearingPoint has incorrectly applied an exclusion that is no longer required and is also using an incorrect version of data. Specifically, SBC Midwest includes records with “Receipt To Clear duration >720 hours” while BearingPoint excluded them. Following these adjustments BearingPoint’s reported results for all disaggregation categories displayed in NR 116 will match SBC Midwest’s July 2002 results posted concurrent with ER 1244R-0902 on September 5, 2002.</p> <p>July 2002 results were restated concurrent with ER 1237R-0902 on December 5, 2002. Data files used for the December restatement were provided to BearingPoint on February 24, 2003. SBC Midwest believes that BearingPoint will be able to replicate July 2002 reported results when using the correct data files and removing the exclusion noted above.</p> <p><u>BearingPoint issued the remaining portion of this NR as Observation 858 on June 10th. As noted on the BearingPoint PMR5 Status Matrix as of June 23, 2003, all evaluated result values for PM 39 Match (‘M’) for the months of July, August, and September. SBC believes that this issue is a result of improper exclusions by BearingPoint in the replication process and has responded accordingly.</u></p> <p>SBC Midwest believes the issue related to NR 116 is solely caused by BearingPoint’s improper exclusion of certain records and its use of older data in its replication activities for this PM as described above. Therefore, this issue has no impact on the February – April 2003 data filed with the FCC.</p>

PMR5-2 Analysis
“NM” Issues From BearingPoint PMR5 Status Matrix (Attachment D)

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PM and MI Issue # ¹ Impact ²	Current Status ³	BearingPoint Issue Description and SBC Midwest Comments ⁴
<p>PM 41</p> <p><u>NR 117</u></p> <p><u>O-862</u></p> <p>No Impact</p>	<p align="center">Retest</p>	<p><i>BearingPoint has been unable to replicate SBC Midwest’s July 2002 reported results for Performance Measurement 41 (“Percent Repeat Reports (Resale POTS)”).</i></p> <p align="center">- % Repeat Reports – UNE-P Bus (REF # 291)</p> <p>In SBC Midwest’s May 8, 2003 response, SBC Midwest identified that BearingPoint was not using the most current set of data files in order to replicate PM 41. The current set of data, which was used to restate PM 41 results on December 5, 2002, was supplied to BearingPoint on February 24, 2003. SBC Midwest believes the differences in replicated values will be resolved when BearingPoint replicates with this updated set of data.</p> <p><u>BearingPoint issued the remaining portion of this NR as Observation 862 on June 11th. As noted on the BearingPoint PMR5 Status Matrix as of June 23, 2003, all result values for PM 41 Match (‘M’) for the months of July, August, and September.</u></p> <p>BearingPoint was able to replicate SBC Midwest’s results for this disaggregation for retail data in July and for both wholesale and retail results in August and September. SBC Midwest believes that BearingPoint will match SBC Midwest’s July data when replication is completed using the correct data file, which was sent to them on February 24, 2003. Therefore, since the underlying issue was limited to BearingPoint testing data that was not current for July 2002, this issue has no impact on the February – April 2003 data filed with the FCC.</p>

PMR5-2 Analysis
“NM” Issues From BearingPoint PMR5 Status Matrix (Attachment D)

PM and MI Issue # ¹ Impact ²	Current Status ³	BearingPoint Issue Description and SBC Midwest Comments ⁴
Coordinated Conversions Metrics		
PM 114 PM 114.1 PM 115 PM 115.1 O 793 No Impact	Complete Closed Satisfied ⁹	<p><i>BearingPoint has been unable to replicate SBC Midwest’s August 2002 reported results for PM 114 (“Percentage of Premature Disconnects (Coordinated Cutovers)”)</i>, <i>PM 114.1 (“CHC/FDT LNP with Loop Provisioning Interval”)</i>, <i>PM 115 (“Percentage of Ameritech Caused Delayed Coordinated Cutovers”)</i>, and <i>PM 115.1 (“Percent Provisioning Trouble Reports”)</i>.</p> <ul style="list-style-type: none"> - PM 114: % Premature Disconnects – FDT (REF # 358) - PM 114.1: Provisioning Interval FDT-LNP with Loop < 10 lines (REF # 361) - PM 115: % of Ameritech Caused Delayed Coordinated Cutover - FDT-LNP with UNE Loop > 30 Minutes (REF # 366) - PM 115: % of Ameritech Caused Delayed Coordinated Cutover - FDT-LNP with UNE Loop > 60 Minutes (REF # 367) - PM 115: % of Ameritech Caused Delayed Coordinated Cutover - FDT-LNP with UNE Loop > 120 Minutes (REF # 368) - PM 115.1: % of Ameritech Caused Delayed Coordinated Cutover – FDT (REF # 370) <p>SBC Midwest restated the results for six submetrics across four PMs (114, 114.1, 115 and 115.1) for August 2002 as a result of a manual data collection error made during the posting process. This manual error was made only for the August 2002 reported results and did not require a computer programming code update or change. SBC Midwest addressed this issue via the reinforcement of measurement process training within the applicable service delivery organization.</p> <p>BearingPoint closed this observation as “Satisfied” on April 22, 2003. However, this disaggregation is listed as ‘NM’ (Non-Match) on the BearingPoint PMR5 Status Matrix because of the restatement of August 2002 results. BearingPoint successfully replicated July and September 2002 results for these submetrics.</p> <p>This issue was a one-time manual error for August 2002. Therefore, it has no impact on the February-April 2003 data filed with the FCC.</p>

⁹ A status of “Closed Satisfied” describes a situation where SBC Midwest’s response to an Observation or Exception successfully resolved any issue that BearingPoint had with respect to the circumstances that generated the finding

Attachment Fv2

**PMR 5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

**Index of PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix**

REVISED

PM# ¹	Measure Description ²	PMR-5.3/5.4 Exc/Obs ³	E&Y Issue ⁴	Corrective Action Date ⁵	Feb-Apr '03 Impact ⁶
1.2	Accuracy of LMU for DSL (Manual)	O697 <u>O856</u>	N/A <u>N/A</u>	Jan '03 <u>N/A</u>	No Impact/ <u>No Material Impact</u>
5	% FOCs w/in "X" Hrs	O787	Work Papers	Jul '02	No Impact
7	% Mech CNs w/in 1 Hr of Completion	O429 O659 O787 <u>O854</u>	IV.5(i) Att B.4 Work Papers <u>N/A</u>	Jun '02 N/A Jul '02 <u>N/A</u>	No Impact Interpretation ⁸ , No Impact No Impact <u>No Impact</u>
9	% Rejects	O688 O727	Work Papers Att B.4	Jan '03 N/A	No Impact Interpretation, No Impact
10	% Mech Rejects w/in 1 Hr of Reject in MOR	O756 O803 O809 O823	Att B.4 N/A N/A III.4	N/A Sep '02 Aug '02 Apr '02	Interpretation, No Impact No Impact No Impact No Impact
10.1	% Mech Rejects w/in 1 Hr of Order	O727 O755	Att B.4 Work Papers	N/A <u>Jul Sep '02⁹</u>	Interpretation, No Impact No Impact
10.2	% Man Rejects Rcv'd Electronically w/in 5 Hrs	O727 O755	Att B.4 Work Papers	N/A <u>Jul Sep '02¹⁰</u>	Interpretation, No Impact No Impact
10.3	% Man Rejects Rcv'd Manually w/in 5 Hrs	O727 O755	Att B.4 Work Papers	N/A <u>Jul Sep '02¹¹</u>	Interpretation, No Impact No Impact

¹ This column contains the PM#s for the key (48) PMs that are analyzed in this chart.
² A brief description of the key (48) PMs
³ BearingPoint Observation or Exception (O/E) #
⁴ This column provides the specific link to the E&Y report. The corrective actions items are referenced to the April 16th E&Y report while the interpretation items are referenced to the January 14, 2003 version of E&Y's attachment B. The work paper items are referenced to SBC's March 28, 2003 Ex Parte. *See Ex Parte* Letter of Geoffrey M. Klineberg on behalf of SBC to Marlene Dortch, FCC (March 28, 2003) at Attachment A, Exhibit 2 (PMR4) and Exhibit 3 (PMR5); *see also*, Report of Independent Accountants Dated March 31, 2003 (regarding these Michigan Bell's management assertions), *Ex Parte* Letter of Geoffrey M. Klineberg on behalf of SBC to Marlene Dortch, FCC (April 1, 2003).
⁵ The 'Corrective Action Date' represents the first month for which a modification or restatement is effective; each O/E has no impact to posted results after the corrective action date
⁶ SBC Midwest's classification of the impact that the O/E has on results filed with the FCC for the months of –February through April 2003
⁷ "No Impact" indicates that the issue has no effect on the posted performance results for the data months of (February, March or April 2003, filed with the FCC.
⁸ "Interpretation" indicates that BearingPoint is applying an interpretation different from the interpretation SBC Midwest used in its implementation of the PM.
⁹ Although not required to restate based on SBC Midwest's guidelines, SBC Midwest is targeting a restatement of restated this measure for July and August 2002 data months on or before July 7 June 5, 2003 in order to satisfy BearingPoint's test requirements. Once this restatement occurs, the corrective action date will be July 2002.
¹⁰ Although not required to restate based on SBC Midwest's guidelines, SBC Midwest is targeting a restatement of restated this measure for July and August 2002 data months on or before July 7 June 5, 2003 in order to satisfy BearingPoint's test requirements. Once this restatement occurs, the corrective action date will be July 2002.

**Index of PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix**

REVISED

PM# ¹	Measure Description ²	PMR-5.3/5.4 Exc/Obs ³	E&Y Issue ⁴	Corrective Action Date ⁵	Feb-Apr '03 Impact ⁶
10.4	% Jeopardy Notices	O676	III.5(ii)	Jun '02	No Impact
		O687	N/A	Jul '02	No Impact
		O725	IV.7(i)	Jun '02	No Impact
		O756	Att B.4	N/A	Interpretation, No Impact
11	MTTRet Mech Rejects	O584	Att B.4	N/A	Interpretation & No Material Impact ¹²
		O643	N/A	Sep '02	No Impact
		O756	Att B.4	N/A	Interpretation, No Impact
		O803	N/A	Sep '02	No Impact
		O809	N/A	Aug '02	No Impact
11.1	MTTRet Man Rejects Rcv'd Electronically	O823	N/A	Apr '02	No Impact
		O643	N/A	Sep '02	No Impact
		O727	Att B.4	N/A	Interpretation, No Impact
11.2	MTTRet Man Rejects Rcv'd Manually	O755	Work Papers	Jul Sep '02 ¹³	No Impact
		O643	N/A	Sep '02	No Impact
		O727	Att B.4	N/A	Interpretation, No Impact
12	Mechanized Provisioning Accuracy	O755	Work Papers	Jul Sep '02 ¹⁴	No Impact
		O794	Work Papers	Aug '02	No Impact
13	Order Process % Flow Through	O488	III.6(ii) & IV.8	Sep '02	No Impact
		O746	Work Papers	N/A	Interpretation No Material Impact
14	Billing Accuracy				

¹¹ Although not required to restate based on SBC Midwest Midwest’s guidelines, SBC Midwest ~~is targeting a restatement of restated~~ this measure for July and August 2002 data months on ~~or before July 7 June 5, 2003~~ in order to satisfy BearingPoint’s test requirements. ~~Once this restatement occurs, the corrective action date will be July 2002.~~

¹² “No Material Impact” indicates that although there is an outstanding issue during the February, March, or April 2003 timeframe, it does not result in material differences in the aggregate performance results for the data filed with the FCC. For purpose of this analysis SBC Midwest is using the materiality standard in its PM restatement guidelines when assessing the impact of an issue or of corrective action. SBC Midwest’s restatement guidelines are published on the SBC CLEC website at <https://pm.sbc.com/pm.cfm> as an addendum to SBC Midwest’s Performance Measurements Internal Change Management Policy, Procedures, and Guidelines. Under these guidelines, restatement of previously published performance results generally depends upon the materiality of the potential restatement. An assessment of materiality is based on whether the recalculated data would result (a) in a shift in the performance in the aggregate from a “make” to a “miss” condition or (b) in a further degradation of reported performance of more than 5% for measures that are in a “miss” condition, provided there are at least 100 CLEC transactions in the sub-metric.

¹³ Although not required to restate based on SBC Midwest Midwest’s guidelines, SBC Midwest ~~is targeting a restatement of restated~~ this measure for July and August 2002 data months on ~~or before July 7 June 5, 2003~~ in order to satisfy BearingPoint’s test requirements. ~~Once this restatement occurs, the corrective action date will be July 2002.~~

¹⁴ Although not required to restate based on SBC Midwest Midwest’s guidelines, SBC Midwest ~~is targeting a restatement of restated~~ this measure for July and August 2002 data months on ~~or before July 7 June 5, 2003~~ in order to satisfy BearingPoint’s test requirements. ~~Once this restatement occurs, the corrective action date will be July 2002.~~

**Index of PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix**

REVISED

PM# ¹	Measure Description ²	PMR-5.3/5.4 Exc/Obs ³	E&Y Issue ⁴	Corrective Action Date ⁵	Feb-Apr '03 Impact ⁶
17	Billing Completeness	O731	Att B.11	N/A	Interpretation No Impact
18	Billing Timeliness (Wholesale Bill)	O845	N/A	N/A	Interpretation Not Material, Holds SBC Midwest to a Higher Standard ¹⁵
19	Daily Usage Feed Timeliness	O694	Work Papers	N/A	Interpretation Not Material, Holds SBC Midwest to a Higher Standard
		O846	Work Papers	Dec. '02	No Impact
27	Mean Install Interval	O814	N/A	N/A	Interpretation, No Impact
28	% Installs w/in Customer Requested DD	O739	Att B.16	Jan '03	Interpretation, No Impact
		O814	N/A	N/A	Interpretation, No Impact
29	% AIT-Caused Missed DDs	O628	Att B.17	N/A	Interpretation, No Impact
		O814	N/A	N/A	Interpretation, No Impact
35	% Troubles w/in 30 Days of Install	O814	N/A	N/A	Interpretation, No Impact
37	Trouble Report Rate	O814	N/A	N/A	Interpretation, No Impact
37.1	Trouble Rate Net of Installs & Repeats	O814	N/A	N/A	Interpretation, No Impact
38	% Missed Repair Commitments	O814	N/A	N/A	Interpretation, No Impact
39	Receipt to Clear Duration	O814	N/A	N/A	Interpretation, No Impact
40	% Out Of Service (OOS) <24 Hrs	O814	N/A	N/A	Interpretation, No Impact
41	% Repeat Reports	O814	N/A	N/A	Interpretation, No Impact
45	% AIT Caused Missed DDs – Design	O711	Att B.17	N/A	Interpretation, No Impact
54.1	Trouble Rate Net of Installs & Repeats				
56	% Installs w/in Customer Requested DD	O729	IV.14(ii)	Jan '03	No Impact
56.1	% (UNE) Installs w/in Customer Requested DD	O729	IV.14(ii)	Jan '03	No Impact
58	% AIT Caused Missed DDs – UNE	O711	Att B.17	N/A	Interpretation, No Impact
67	Mean Time to Restore	E111	N/A	Dec '02, Feb '03	Interpretation No Impact
73	% Missed DDs – Interconnection Trunks				
78	Avg Interconnection Trunk Install Interval	O719	Att B.26	N/A	Interpretation, No Impact

¹⁵ “Not Material, Holds SBC Midwest to a Higher Standard” indicates that SBC Midwest’s implementation does not comport to the literal reading of the business rules, but does produce a stricter, narrower standard than would be achieved by following the business rule as written.

**Index of PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix**

REVISED

PM# ¹	Measure Description ²	PMR-5.3/5.4 Exc/Obs ³	E&Y Issue ⁴	Corrective Action Date ⁵	Feb-Apr '03 Impact ⁶
91	% of LNP Only DDs w/in Industry Guidelines	O732	IV.19(iii)	Jun '02	No Impact
		O756	Att B.4	N/A	Interpretation, No Impact
		O834	N/A	Feb '03	No Impact
		O835	N/A	Feb '03	No Impact
96	% Premature Disconnects – LNP	O710	N/A	Jul Nov '02 ¹⁶	No Impact
110	% Updates Completed in DA Database w/in 72 Hrs	O689	Att B.32	Nov '02	Interpretation, Not Material, Holds SBC Midwest to a Higher Standard
114	% Premature Disconnects – Coordinated Cuts	O570	III.13	Sep '02	No Impact
		O631	N/A	Feb '02	Interpretation, No Impact
		O722	Att B.33	N/A	Interpretation, No Impact
		O815	N/A	Jul '02	No Impact
114.1	CHC/FDT LNP w/Loop Provisioning Interval				
115	% of AIT-Caused Delayed Coordinated Cuts	O570	III.13	Sep '02	No Impact
		O631	N/A	April '03	Interpretation, No Impact
		O677	Work Papers	Jul Oct '02 ¹⁷	No Impact
		O722	Att B.33	N/A	Interpretation, No Impact
115.1	% of AIT Caused Delayed Coordinated Cuts-FDT	O722	Att B.33	N/A	Interpretation, No Impact
		O738	Att B.34	Feb '03	No Impact
MI 3	Coordinated Conversions Outside of Interval	O631	N/A	May '03	Interpretation, No Impact
		O722	Att B.33	N/A	Interpretation, No Impact
MI 9	% Missing FOCs	O661	III.12(i)	Jun '02	No Impact
		O787	Work Papers	Jul '02	No Impact
		O792	N/A	Jul '02	No Impact
MI 11	Avg Interface Outage Notification	O594	IIB.11(ii)	Jan '03	No Impact
		O624	IIB.11(i)	Jan '03	No Impact
MI 13	% Loss Notifications w/in 1 Hr of SO Completion	O661	IV.21(iii)	Jun '02	No Impact
		O787	Work Papers	Jul '02	No Impact

¹⁶ Although not required to restate based on SBC Midwest Midwest’s guidelines, SBC Midwest ~~is targeting a restatement of restated~~ this measure for July, August, and September 2002 data months on ~~or before~~ July 7, 2003 in order to satisfy BearingPoint’s test requirements. ~~The corrective action was implemented on a going forward basis for the November 2002 data month, and therefore one month (October, 2002) was not corrected.~~

¹⁷ Although not required to restate based on SBC Midwest Midwest’s guidelines, SBC Midwest ~~is targeting a restatement of restated~~ this measure for July and August 2002 data months on ~~or before July 7 June 5,~~ 2003 in order to satisfy BearingPoint’s test requirements. ~~Once this restatement occurs, the corrective action date will be July 2002~~

**Index of PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix**

REVISED

PM# ¹	Measure Description ²	PMR-5.3/5.4 Exc/Obs ³	E&Y Issue ⁴	Corrective Action Date ⁵	Feb-Apr '03 Impact ⁶
MI 14	% CNs w/in "X" Hrs of TT Completion	O637	III.16(i)	Jun '02	No Impact
		O642	Work Papers	Jul Oct '02 ¹⁸	No Impact
		O847	N/A	N/A	Under Review ¹⁹
		O848	IV, #28	Dec. '02	Not Material, Holds SBC Midwest to a Higher Under Review
		O859	N/A	Feb. '03	No Impact
				Jun '03	No Material Impact

¹⁸ Although not required to restate based on SBC Midwest's guidelines, SBC Midwest ~~is targeting a restatement of restated~~ this measure for July - September 2002 data months on ~~or before~~ July 7, 2003 in order to satisfy BearingPoint's test requirements. ~~Once this restatement occurs, the corrective action date will be July 2002.~~

¹⁹ ~~"Under Review" indicates that SBC is currently investigating the finding.~~

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

<i>MI OE# Impact Test Points</i> ²⁰	<i>PMs</i> ²¹	<i>Status</i> ²²	<i>BearingPoint Issue Description & SBC Midwest Comments</i> ²³
<p align="center"><i>O 429v4</i></p> <p align="center">No Impact²⁴</p> <p align="center">PMR 5 (5-3-B)</p>	<p align="center">7</p>	<p align="center">Retest²⁵</p>	<p><i>Through its blind replication process, BearingPoint identified that SBC Midwest was missing start times on some of its orders in July, August, and September 2002 data, for Performance Measures 7 (“Percent Mechanized Completions Returned Within One Hour of Completion in Ordering Systems”) and 8 (“Average Time to Return Mechanized Completions”) for these months as well.</i></p> <p>The issue regarding blank Start Times has been corrected with a computer programming code change as referenced in ER 929-0502 and ER 1179-0802, which were implemented with October data reported November 20, 2002. SBC Midwest also stated that restatements were identified for PM 7 for June, July, August, and September 2002 on January 6, 2003 and February 5th, 2003.</p> <p>Corrective action occurred for June 2002 forward and therefore there is no impact to the February, March, and April 2003 data filed with the FCC.</p> <p>This issue was addressed by E&Y in Section IV, #5(i) and corrective actions have been verified.</p>

²⁰ BearingPoint Observation or Exception (O/E) #; SBC Midwest’s classification of the impact that the O/E has on results filed with the FCC for the months of February - April 2003; and the specific test points associated with the O/E from the April 30, 2003, BearingPoint MI report

²¹ The PM(s) impacted by the BearingPoint O/E

²² This column represents the current status of the BearingPoint O/E as of ~~May 30~~ July 1, 2003 unless otherwise noted.

²³ This section includes a brief description of the issue identified by BearingPoint in the O/E; a summary of the SBC Midwest investigation and corrective actions to address the O/E; and SBC Midwest’s comments on the impact of the O/E on the posted results for the February – April 2003 data filed with the FCC.

²⁴ An assessment of “No Impact” indicates that the issue has no effect on the posted results for the data months of February –April 2003 filed with the FCC.

²⁵ A Status of “Retest” indicates that SBC Midwest has responded to BearingPoint issues and is awaiting their review of the response and retest of the finding.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center"><i>O-488v3</i></p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-B)</p>	<p align="center">13</p>	<p align="center">Closed, Not Satisfied²⁶</p>	<p><i>SBC Midwest’s calculations of Performance Measurement 13 (“Order Process Percent Flow Through”) and Performance Measurement 13.1 (“Total Order Process Percent Flow Through) do not follow the published metrics business rule for July, August, and September 2003. BearingPoint learned that SBC Midwest does exclude revisions to orders from the calculation of the PMs.</i></p> <p>According to the published metrics business rules for Performance Measurements 13 and 13.1, revisions to orders should not be excluded from the calculation of the UNE disaggregation. BearingPoint learned that SBC Midwest was excluding revisions to orders from the calculation of the UNE disaggregation. Version 2 of this finding, issued on June 17, 2002, eliminated the reference to the UNE disaggregation, and modified its finding to state that SBC Midwest does exclude revisions to orders from the calculation of the PM 13 and 13.1 results. Version 3 of the finding updated it to focus on the July, August, and September 2002 results.</p> <p>SBC Midwest responded by stating that revisions that flow through for due date changes and cancellations were not being reported under Performance Measures 13 and 13.1. Until the August 2002 OSS Release, revisions for only Resale and UNE-P for due date changes and cancellations were designed to flow through as long as the Original Request was flow through eligible. Since then changes have been made that provided the capability of reporting supplemental order flow through for those products that are flow through eligible. Order revisions for due date and cancellations for UNE Loops, Line Sharing and LNP were made on August 28, 2002, effective with October 2002 results. September results were restated in December 2002. LSNP revisions for due date changes and cancellations were made flow through eligible with the November OSS Release and reflected in results effective with November, 2002 performance data.</p> <p>These computer code modifications now provide the capability of reporting supplemental flow through in accordance with the business rules. Restatements for July and August 2002, when this functionality was implemented, are not possible because additional computer program code to capture data needed for these PMs was not completed during that time period. Therefore, BearingPoint closed the issue as “Not Satisfied” because the issue was not completely corrected and implemented during their evaluation period (the three consecutive months of July, August, and September). LSNP revisions for due date changes and cancellations were first made flow through eligible in November and were reflected in the performance measure in the November data. All other corrective actions were completed effective with October 2002 results forward and therefore there is no impact to the February, March, and April 2003 data filed with the FCC.</p> <p>This issue was addressed by E&Y in Section III, #6 (ii) (Line Share) and in Section IV, #8 (UNE Loops and LNP) and corrective actions have been verified.</p>

²⁶ A Status of “Closed, Not Satisfied” indicates that BearingPoint has reviewed SBC Midwest’s response and/or implementation of modifications and, the modifications were not implemented within the each of the consecutive test months (July, August, and September 2002) under review by BearingPoint.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

<i>MI OE# Impact Test Points</i> ²⁰	<i>PMs</i> ²¹	<i>Status</i> ²²	<i>BearingPoint Issue Description & SBC Midwest Comments</i> ²³
<p align="center"><i>O 570v2</i></p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-N)</p>	<p align="center">114, 115</p>	<p align="center">Closed Not Satisfied</p>	<p><i>BearingPoint has determined that SBC Midwest’s posted results for Performance Measurements 114 (“Percentage of Premature Disconnects (Coordinated Cutovers)”) and 115 (“Percentage of Ameritech caused delayed Coordinated Cutovers”) do not follow the July, August and September 2002 published metrics business rules. The technical documentation for Performance Measurements 114 and 115 indicates that when performing the calculation for this disaggregation, SBC Midwest always assumes that the actual cutover time for Frame Due Time orders is equal to the time that the cutover was scheduled regardless of whether or not this was actually the case. This causes the numerator for the Frame Due Time – LNP with Loop disaggregation to always equal zero, and as a result, skews the reported result for these measures.</i></p> <p>For PM 114, effective with September 2002 results reported in October 2002, SBC Midwest implemented a network process change to better capture the actual start times of coordinated cutovers (FDT). Prior to this change, the actual start time could not be derived from the source system. A revised method of reporting had been implemented in the reporting system for August 2002 results reported in September 2002. June 2002 and July 2002 results were restated on October 7, 2002.</p> <p>For PM 115 effective with September 2002 results reported in October 2002, SBC Midwest implemented an additional network process change to more precisely capture the actual start times coordinated cutovers (FDT). PM 115 was not restated for June 2002 through August 2002 as the process change could not be applied in arrears.</p> <p>The process changes that SBC Midwest implemented in September 2002 ensure that this issue does not impact reported results going forward, including the three months of data filed with the FCC. BearingPoint closed this observation in a “Not Satisfied” condition because the corrective action was not <u>completely</u> implemented during the three month evaluation period. However, BearingPoint did verify that September data follows the business rules.</p> <p>The FDT related issues in this Exception were addressed by E&Y in Section III, #13 and corrective actions have been verified.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 584v2</p> <p align="center">Interpretation²⁷</p> <p align="center">No Material Impact²⁸</p> <p align="center">PMR 4 & PMR 5 (5-4-B)</p>	<p align="center">11</p>	<p align="center">Closed Not Satisfied</p>	<p><i>BearingPoint has determined that SBC Midwest is using inaccurate data in the calculation of PM 11 (“Mean Time to Return Mechanized Rejects). SBC Midwest updates the appropriate order receipt timestamps to reflect the next available business day when an order is received through an EDI / interface during MOR system downtimes as allowed for by the published business rules. SBC Midwest does not revise the corresponding reject response timestamps when responses are sent during MOR system downtimes. This causes a number of response timestamps to have values less than those of their corresponding receipt timestamps, resulting in negative time durations. SBC Midwest subsequently sets such negative time durations to zero, thus skewing the calculation of Performance Measures 11. BearingPoint no longer believes this issue applies to PM 10, as documented in additional information issued on October 21, 2002.</i></p> <p>The SBC Midwest analysis identified the following 4 scenarios affected by the issue raised in v2 of this observation in its calculation of PM 11:</p> <ol style="list-style-type: none"> 1. Transactions received by SBC Midwest prior to scheduled system downtime. Response sent to CLEC during scheduled system downtime. 2. Transactions received by SBC Midwest during scheduled system downtime. Response sent to CLEC during same scheduled system downtime. 3. Transactions received by SBC Midwest during scheduled system downtime. Response sent to CLEC during scheduled system uptime. 4. Transactions received by SBC Midwest prior to scheduled system downtime. Response sent to CLEC during scheduled system uptime after passing through a downtime period. <p>The SBC Midwest implementation handles these four scenarios in the following manner:</p> <ol style="list-style-type: none"> 1. For scenario 1, the duration time calculated from the time the transaction is received to the time the system is scheduled to go down. 2. For scenario 2, SBC Midwest calculates the duration as one minute since the transaction was received within the bounds of system downtime. 3. For scenario 3, the duration time included in the calculation is the time the system is scheduled to go up to the time the response is sent to CLEC since the response was not returned to the CLEC until after the system downtime window. 4. For scenario 4, the duration time included in the calculation is the time the transaction is received to the time the system went down

²⁷ The “Interpretation” classification indicates that there is an issue related to this finding where BearingPoint is applying a different interpretation than what SBC Midwest has applied in its implementation.

²⁸ The term “No Material Impact” indicates that although there is an outstanding issue during the February, March, or April 2003 timeframe, it does not generate material differences in the aggregate performance results for the data filed with the FCC. For purpose of this analysis SBC Midwest is using the materiality standard in its PM restatement guidelines when assessing the impact of an issue or of corrective action. Under these guidelines, restatement of previously published performance results generally depends upon the materiality of the potential restatement. An assessment of materiality is based on whether the recalculated data would result (a) in a shift in the performance in the aggregate from a “make” to a “miss” condition or (b) in a further degradation of reported performance of more than 5% for measures that are in a “miss” condition, provided there are at least 100 CLEC transactions in the sub-metric.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
			<p>plus the time the system is scheduled to be brought up to the time the response is sent to the CLEC.</p> <p>On January 10, 2003, BearingPoint agreed that SBC Midwest’s implementation for Scenarios 1, 3, and 4 is appropriate and accurately reflects the handling of scheduled system downtime. BearingPoint did not agree that the SBC Midwest handling of scenario 2 is appropriate and further reiterated the position that the exclusion of these transactions would more accurately reflect the overall average as calculated in this measure. SBC Midwest has determined that its current implementation is appropriate and has no plans to modify it for the following three reasons:</p> <ol style="list-style-type: none"> 1. SBC Midwest understands that CLECs expect the volumes reported in PM 11 to be the same as the volumes reported in PM 10. A variance caused by excluding transactions (BearingPoint’s solution) would cause concern and raise questions by the CLECs. 2. While the exclusion of scheduled system downtime has been added as a clarification to the business rules in the most recent six-month collaborative, the exclusion of responses has not. BearingPoint’s recommendation would require an exclusion that is not, or will not, be listed in the new business rules. 3. SBC Midwest has determined that the number of responses that are assigned as 1 minute duration due to the situation identified in scenario 2 was less than .01% of total responses for September 2002. Another sample from March 2003 revealed <u>zero</u> scenario 2 responses for that month. <p>BearingPoint recognized that three of the four scenarios described in this observation are appropriate and satisfy its concerns. SBC Midwest believes it is appropriately handling the fourth scenario and will propose clarification language in the business rule in the next six-month review that addresses this scenario 2 issue. Given that <1% of responses generally fall into this category, there is no material impact to reported results including the February – April 2003 data filed with the FCC.</p> <p>E&Y considered portions of this issue as a reasonable interpretation as represented in E&Y Attachment B Interpretation #4.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 594 No Impact PMR 5 (5-3-R)</p>	<p align="center">MI 11</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest's posted results for Performance Measurement MI 11 ("Average Interface Outage Notification") do not follow the January, February or March 2002 published metrics business rules. SBC Midwest's procedure for calculating this measure is incorrect, resulting in the reporting of a decreased notification interval.</i></p> <p>BearingPoint agreed that the outage identification time does not necessarily correspond to the CLEC call time. The only remaining item in this observation was that BearingPoint had observed instances in the Performance Measurement MI 11 data where the page time, representing the outage identification time, occurred after the notification e-mail time. SBC Midwest stated that there are a number of reasons why the e-mail might precede the page including a situation where two people are working the problem or if there were a system delay in the actual paging. These situations do not indicate that there is a system problem or that the data is erroneous, rather they indicate that SBC Midwest is notifying CLECs of outages immediately.</p> <p>In August 2002, IT Call Center personnel were directed to count 1 minute as the minimum whenever an e-mail preceded a page. However, this process change was not implemented prior to data restatement for January – July 2002. There are no occurrences of zero or negative durations for any month after August with the exception of one manual error in October 2002. These should have been converted to 1 minute by the final summarization process, but they were not. SBC Midwest has made significant changes to the manual data collection process since August. The business requirements (BTR) documents were updated in January 2003 to formalize the process via ER 1396-1202. As of January 2003, a senior manager who is responsible for creating the summary log and the ICS Senior Business Manager individually review each item in the log to ensure accuracy. In addition the final process of data summarization, which is currently manually handled, is in the process of being mechanized. The technical requirements include converting negative or zero values to 1 before creating the numerator for the measure. This will minimize human error from that portion of the process. The new mechanized process was run in test mode for January/February 2003 and was put into production for March 2003 business via ER S1485-1102.</p> <p>With the exception of one manual mistake in October 2002, SBC Midwest has ensured that no "zero minute" or negative durations were reported since August 2002. In addition, SBC Midwest has implemented additional controls to minimize manual errors in the reporting of PM MI 11, and as of March 2003, the process has been mechanized. There are no impacts to posted results from November 2002 going forward, including the February - April data filed with the FCC.</p> <p>This issue was addressed by E&Y in Section IIB, #11 (ii) and corrective actions have been verified.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
<p align="center">O 624v2</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3 R)</p>	<p align="center">MI 11</p>	<p align="center"><u>Retest</u> <u>Closed, Not</u> <u>Satisfied</u></p>	<p><i>BearingPoint reviewed this issue for July, August and September 2002 results. BearingPoint has determined that SBC Midwest’s posted results for Performance Measurement MI 11 (“Average Interface Outage Notification”) do not follow the July, August, or September 2002 published metrics business rules. BearingPoint discovered that multiple notifications may be sent out for a single outage, in order to keep the CLECs up-to-date on the status of the outage, and that these additional notifications are included in the final results for Performance Measurement MI 11. This causes misrepresentations in SBC Midwest’s published results.</i></p> <p>As discussed in connection with Exception 183, and E&Y finding IIB, 11(i), the basic issue identified by Observation 624 was that in some situations SBC Midwest was reporting multiple notices for the same outage. Effective with August 2002 results reported in September 2002, SBC Midwest changed its processes to capture and count only initial notifications in the results of PM MI 11. March through July 2002 results were restated on October 7, 2002.</p> <p>SBC Midwest has also simplified the reporting process, increased verification, and reduced the possibility of human error in creating the log as described in the updated technical requirements documentation provided to BearingPoint. SBC Midwest delivered updated processing requirements documents (BTRs) to BearingPoint on January 20, 2003 via ER # 1658-0103 for clarification on processing July, August, and September 2002 results. In addition, SBC Midwest has updated the PM MI 11 BTR to clarify the processing requirements, including the treatment of re-sent notifications (end of page 3 - beginning of page 4), for January 2003 results going forward via ER#255-0203.</p> <p>SBC Midwest proactively updated its BTR documentation to include specific handling for a unique occurrence of data in January 2003 that was not covered in the existing documentation. Three notifications from the same problem manager were included as initial notifications because the manager included new application downtime occurrences in the update notification for the first application. Each one was the initial notification for a specific application and an update for the prior one(s). The update and the initial notices should have been sent separately. Since they were not, SBC Midwest chose to include all of them as initial notifications, created a definition for this scenario, and updated the BTR (ER#255-0203) for handling this type occurrence in the future. SBC Midwest believes January data is correctly published according to the business rules. SBC Midwest responded to additional BearingPoint clarification questions on May 13, 2003.</p> <p><u>In its comments on the June 24, 2003 Observation/Exception Status call²⁹, BearingPoint noted that SBC Midwest is not following the Business Rules for their calculation of July and August 2002 results. BearingPoint also stated that SBC Midwest is following the Business Rules beginning in September 2002 and going forward and that since SBC Midwest is not planning on restating July and August 2002 data; there is no further work they can perform in July and August. BearingPoint therefore proposed to close this Observation Report as “Not Satisfied”.</u></p> <p>The implementation of new process controls, simplification of the reporting process, and updated documentation all help ensure that this issue has no impact on reported results for January 2003 results going forward, including the February – April results filed with the FCC.</p> <p>This issue was addressed by E&Y in Section IIB, #11 (i) and corrective actions have been verified.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

<i>MI OE# Impact Test Points</i> ²⁰	<i>PMs</i> ²¹	<i>Status</i> ²²	<i>BearingPoint Issue Description & SBC Midwest Comments</i> ²³
<p align="center">O 628v2</p> <p>Interpretation</p> <p align="center">No Impact</p> <p align="center">PMR 5-4 (5-4-C)</p>	<p align="center">29</p>	<p align="center">Closed Not Satisfied Closed, Satisfied³⁰</p>	<p><i>BearingPoint reviewed this issue for July, August and September 2002 results. BearingPoint has determined that SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 29 (“Percent Ameritech Caused Missed Due Dates”) for July, August and September 2002. SBC Midwest is applying appropriate exclusions to the numerator but not to the denominator.</i></p> <p>SBC Midwest responded that removing these orders from the denominator would result in an artificial lowering of the SBC Midwest performance. The intent of this measure is to measure SBC Midwest caused misses, and “CLEC caused misses” in any form should not lower the SBC Midwest performance result. All orders that are not delayed due to SBC Midwest reasons should therefore be included in the denominator.</p> <p>SBC Midwest proposed changes in the most recent six-month review to clarify that this exclusion is to be applied to the numerator only. No opposition to these changes was expressed by CLECs during the collaborative, and this change was subsequently approved by the MPSC.³¹ SBC Midwest has requested that the MPSC staff direct BearingPoint to utilize business rules that incorporate these “documentation only” clarifications. This issue is based on BearingPoint’s literal interpretation of the business rules and becomes moot once BearingPoint adopts the clarified set of business rules.</p> <p><u>On June 12, 2003, the MPSC subsequently directed BearingPoint to utilize the May 26, 2003 “hybrid 1.8: business rules” for the purposes of PMR testing in Michigan. This action changed the “Closed, Not Satisfied” status to “Closed, Satisfied”³² for this observation.</u></p> <p>SBC Midwest is following the intent of PM 29 by including CLEC caused misses in the denominator but not in the numerator (since they were not missed due to SBC Midwest reasons). The February - April data filed with the FCC reflects these clarifications in the business rules.</p> <p>Prior to the business rule clarification, E&Y considered this issue as a reasonable interpretation. See E&Y Attachment B Interpretation #17.</p>

²⁹ BearingPoint comments on Observations in the weekly Observation/Exception status call are found at <http://www.osstesting.com/Observations.htm> in the section entitled “Notice: New Status Reports” by selecting either the Open or Closed Status Report options.

³⁰ A status of “Closed Satisfied” describes a situation where SBC Midwest’s response to an Observation or Exception successfully resolved any issue that BearingPoint had with respect to the circumstances that generated the finding.

³¹ The modified business rules were approved by the Michigan Public Service Commission on February 20, 2003. See Order Amending Prior Orders, In the Matter of Ameritech Michigan’s Submission on Performance Measures, Reporting, and Benchmarks, Pursuant to the October 2, 1998 Order in Case No. U-11654, Case No. U-11830 (MPSC Feb. 20, 2003), included as Attachment D to the Ehr Reply Affidavit. This is referred to in this analysis as “the most recent six month review.”

³² The MPSC directed BearingPoint to utilize a “hybrid 1.8” version of the business rules, reflecting “documentation only” clarifications in a letter from Tom Lonergan, Director Communications Division of the MPSC, to BearingPoint on June 12, 2003. Findings in this category are therefore not referenced in the corresponding “Comments” section of the Michigan June 30, 2003 BearingPoint Report as a source for a “Not Satisfied” condition.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
<p align="center">O 631v2</p> <p align="center">Interpretation</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-N)</p>	<p align="center">114, 115, MI 3</p>	<p align="center">Open³³ Closed, Not Satisfied</p>	<p><i>BearingPoint has determined that SBC Midwest’s posted results for Performance Measurements 114 (“Percentage of Premature Disconnects (Coordinated Cutovers)”), 115 (“Percentage of Ameritech caused delayed Coordinated Cutovers”) and MI 3 (“Coordination Conversions Outside of Interval”) do not follow the July, August or September 2002 published metrics business rules. The technical documentation for Performance Measurements 114, 115 and MI 3 indicates that when performing the calculation for coordinated hot cut (CHC) disaggregations, SBC Midwest should be using <u>the time the CLEC calls the Local Operations Center (LOC)</u> as the start time for each of these measures.</i></p> <p><u>PM 114 - Percentage of Premature Disconnects</u> BearingPoint states that <i>“A premature disconnect occurs any time Ameritech disconnects the CLEC customer 10 or more minutes prior to the <u>CLEC being online</u>.” Since the CLEC call time is used as the start time, there is no way to capture any instances of SBC Midwest causing a premature disconnect.</i> Contrary to BearingPoint’s assessment, SBC Midwest <u>does</u> capture premature disconnects. A coordinated hot cut is recorded as <i>premature</i> if the end-user service was disconnected 10 or more minutes prior to the time that the CLEC calls. A premature cut is identified when the CLEC called to notify SBC Midwest that the cut has started early, and this is noted in the “Beginning of Cut” field. However, the technical documents (BTR 114, BTR 115, and BTR MI3) defined the start time (beginning of cut) only as the time the CLEC calls the LOC. Subsequently, SBC Midwest has updated documentation with the issuance of ER 166-0103 dated February 10, 2003 to reflect the actual process. This is a documentation change and does not impact the February – April 2003 data. In addition, SBC Midwest enhanced the operational and performance reporting processes effective with February 2003 data to include a jeopardy code to flag premature disconnects to aid in identifying those premature disconnects where the CLEC did not notify SBC Midwest of an early cut.</p> <p>SBC Midwest agrees with BearingPoint about the noted anomaly in the “Ameritech Performance Measurement User Guide, Version 1.8_02_20_02.” The “Definition” section of the PM is inconsistent with the “Business Rules” section. The definition states that a premature disconnect occurs 10 minutes or more <u>prior to the scheduled conversion</u>, while the business rules states that a premature disconnect occurs 10 minutes or more <u>prior to the CLEC “being on line.”</u> SBC Midwest will propose clarification of wording in the “Definition” to resolve this conflict (to modify “scheduled cut time” to “CLEC call time”) and reflect the description of the Performance Measure Business Rule in the next scheduled 6-month review.</p> <p><u>PM 115 - Percentage of Ameritech (SBC Midwest) Caused Delayed Coordinated Cutovers</u> Bearing Point cites that <i>“A coordinated cutover is delayed if Ameritech is not ready within “x” (30, 60, and 120) minutes after <u>the scheduled cut time</u>.” This measure is calculated based on the scheduled start time. Since the CLEC call time is used as the start time, there is no way to track delays introduced by SBC Midwest.</i> From September 2002 through March 2003, SBC Midwest’s implementation of PM 115 measured “scheduled time” to begin time, using the CLEC call time as “begin time” for the cut. This interpretation is in compliance with the business rules. However, SBC Midwest believes that utilizing the CLEC call time as the start time to calculate delayed coordinated conversions produces the most meaningful result. The intent of this performance measure is to identify “SBC Midwest Caused Delays”. There is no methodology available to measure whether SBC Midwest resources were available</p>

³³ A Status of “Open” indicates that BearingPoint has issued an Observation/Exception (O/E) or Additional Questions to an O/E for which SBC Midwest has not yet completed its investigation and responded to BearingPoint.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
			<p>at the time the coordinated cutover was “scheduled” and measuring the delay would be meaningless since the cut cannot actually start until the CLEC calls. Therefore effective with April 2003 data, SBC Midwest measures whether a delay was caused by SBC Midwest once the cutover is initiated by the CLEC. SBC Midwest will propose changes to PM 115 Business Rules at the next scheduled collaborative to clarify the definition and description of the scheduled cut time.</p> <p><u>MI 3 - Coordinated Conversions Outside of Interval</u> BearingPoint cites that <i>“The start date and time is the date and time the central office/translations work begins.” SBC Midwest is using the CLEC call time as the start time, which is not the start time stated in the business rules.</i></p> <p>This PM measures whether SBC Midwest has started a Coordinated Hot Cut (CHC) within an hour of the "start scheduled time". Currently SBC Midwest measures the interval from the scheduled time to the CLEC call time, which initiates the cut. The definition in MI 3 identifies the intent is to measure whether CHCs started within one hour of the cut scheduled time. The Business Rule further defines the “start” as when the central office work begins. SBC Midwest’s process assumes that all work begins when the CLEC calls to initiate the cut. In addition as noted below, data for PM 114.1 demonstrates that SBC Midwest not only starts but finishes coordinated conversions within the agreed upon provisioning intervals.</p> <p>SBC Midwest currently measures from the cut schedule time to the CLEC call time. SBC Midwest believed this to be the most accurate way to measure as all cuts are “started” when the CLEC calls as agreed upon in industry collaboratives and the performance measure definition states that the measure is for cutover started within one hour of the scheduled time. The business rules for this measure also state that the “cutover is considered complete when the work is completed by Ameritech.” This performance is measured in Performance Measure 114.1 –“CHC/FDT LNP with Loop provisioning Interval”. This performance measure requires SBC Midwest to provision 9 lines or less within one hour and 10-24 lines within two hours. SBC Midwest has far exceeded the benchmark in Michigan for the past twelve months. This data demonstrates that SBC Midwest must have “started” a cutover on time since they are completed within the required provisioning interval.</p> <p>In an effort to satisfy BearingPoint, SBC Midwest developed a more stringent method of reporting the performance intended for this particular measure. Effective May 1, 2003 SBC Midwest will modify the calculation to measure each CHC from the time the CLEC calls to initiate the cut to the time SBC Midwest calls the CLEC back to advise them of the cut completion. By using the CLEC call time as the "start" through the cut “completion” time SBC Midwest will be applying a far more stringent measurement than what is required in MI 3. The performance measure states that the start time is when the central office work begins and only requires measurement of the “start”. SBC Midwest will not only be calculating the additional time between the CLEC call and the CO start time but also including the duration of the cut. These additional time increments will hold SBC Midwest to a higher standard than required for this performance measure.</p> <p>SBC Midwest received additional clarifying questions from BearingPoint on May 19, 2003 and is in the process of preparing a response to the questions.</p> <p><u>In closing Observation 631, BearingPoint noted the following:</u></p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
			<ul style="list-style-type: none"> • <u>For PM 114, SBC Midwest is not calculating consistent with the business rules in place for July-September, 2002 and will implement calculation changes such that future months will be consistent with the business rules.</u> • <u>For PM 115 and MI 3, the modifications that SBC Midwest is implementing would also not be in accordance with the existing business rules, but that if approved by the collaborative and implemented consistently with Ameritech’s current assertions, these modifications would appear to provide a reasonable basis for measuring the underlying activities associated with coordinated conversions, and produce the necessary data for Ameritech to calculate Performance Measurements 115 and MI 3 consistently with the published metrics business rules.</u> <p>There are no negative impacts to the February – April data filed with the FCC.</p> <ul style="list-style-type: none"> • A business rule clarification is required at the next six-month review to resolve issues related to the anomaly in PM 114. The other issues for PM 114 were resolved with a documentation update and process enhancement from February 2003 forward. • A business rule clarification is required at the next six-month review to resolve the issue documented for PM 115 in order to make the business rule meaningful. • SBC Midwest’s interpretation of PM MI 3 is appropriate. Clarification of this performance measure is required at the next six-month review to make this a more meaningful measure. MI 3 is a diagnostic measure with no benchmark.
<p align="center">O 637v2</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-R)</p>	<p align="center">MI 14</p>	<p align="center">Retest</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement MI 14 (“Percent Completion Notifications Returned Within X Hours of Completion of Maintenance Trouble Ticket”). SBC Midwest is excluding CLEC caused missed due dates.</i></p> <p>SBC Midwest agrees with BearingPoint that SBC Midwest should not be excluding the trouble codes “CPE”, “IEC”, and “INF”. SBC Midwest issued ER1259-0902 to fix the Performance Measurement going forward starting with September 2002 data reported on October 20, 2002. In addition, SBC Midwest restated this Performance Measurement via ER1259R-0902, which allowed for June 2002 through August 2002 results to be reposted on October 7, 2002. SBC Midwest has provided the updated BTR reflecting the changes made by ER 1259-0902 to BearingPoint</p> <p>The implemented fix and restatements discussed above ensure that this issue has no impact to posted results from June 2002 going forward, including the February - April data filed with the FCC.</p> <p>This issue was addressed by E&Y in Section III, #16(i) and corrective actions have been verified</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 642v2</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-R)</p>	<p align="center">MI 14</p>	<p align="center">Retest³⁴</p>	<p><i>BearingPoint has determined that SBC Midwest's posted results for Performance Measurement MI 14 ("Percent Completion Notifications Returned Within X Hours of Completion of Maintenance Trouble Ticket") do not follow the July, August or September 2002 published metrics business rules.</i></p> <p>SBC Midwest agrees with BearingPoint that, although the business rules do not explicitly allow the exclusion of duplicate notices, counting the initial notice is the appropriate process for this PM. SBC Midwest was counting duplicate notifications for manual UNE-P and Resale levels of disaggregation. SBC Midwest issued ER 1477-1002 via the normal change management process to discontinue this practice. This change is effective with October data results posted on November 20, 2002 reporting cycle going forward. In conjunction with this change, SBC Midwest updated the corresponding Business Technical Requirements (BTR) documentation and provided them to BearingPoint.</p> <p>All of the changes have been made to the appropriate databases and the October 2002 results reported in November reflect these changes.</p> <p><u>Although not required to restate based on SBC Midwest's guidelines, SBC Midwest restated this measure for July, August, and September 2002 data months on July 7, 2003 in order to satisfy BearingPoint test requirements.</u></p> <p>The corrective action described above was implemented effective with October July 2002 data and, therefore this issue has no impact to posted results going forward, including the February – April data filed with the FCC.</p> <p>The E&Y work papers indicate that this had no material impact on reported results.</p>

³⁴ This Observation was previously stuated as “Closed, Not Satisfied”. However, due to SBC Midwest’s decision to restate for the months of July-September 2002, SBC Midwest has requested that BearingPoint retest once the restatement is complete to verify the implementation of the associated modifications.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center"><i>O 643v2</i></p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-B, I)</p>	<p align="center">11, 11.1, 11.2</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest is truncating lower dateparts (seconds) during time interval calculations in all of the Performance Measures that use time durations using MOR/TEL data. As a result, these orders do not reflect actual time intervals.</i></p> <p>SBC Midwest believes that the overall practical effect is minimal. Using the calculation methodology identified in Observation 643, the results can at most be underreported by one minute. While there may be a statistical difference as noted by the BearingPoint Additional Information document sent March 20, 2003, the difference of one minute in the overall average does not skew the results enough to cause them to be considered unreliable.</p> <p>Additionally, SBC Midwest transitioned this measure from the MorTel system to the ICS/DSS platform in September 2002. In response to the clarification question asked in the by BearingPoint, the ICS/DSS calculation methodology does not use the method of truncating lower date parts. Nonetheless, BearingPoint considers this Observation “Closed Not Satisfied” because the fix was not implemented during their evaluation period.</p> <p>In its closure status, BearingPoint narrowed the scope of this observation to apply only to PMs 6, 11, 11.1, 11.2, and 95.</p> <p>SBC Midwest has addressed the identified issue as noted above with September 2002 results going forward. This issue has no impact to posted results from September 2002 going forward, including the February - April data filed with the FCC.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 659v2</p> <p>Interpretation</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-B)</p>	<p align="center">7</p>	<p align="center">Closed Not Satisfied Closed Satisfied</p>	<p><i>BearingPoint has determined that SBC Midwest’s posted results for Performance Measurements 7 (“Percent Mechanized Completions Returned Within One Hour of Completion in Ordering Systems”), 7.1 (“Percent Mechanized Completions Returned Within One Day Of Work Completion”) and 8 (“Average Time to Return Mechanized Completions”) do not follow the July, August or September 2002 published metrics business rules. According to BearingPoint, the metrics business rules state that the calculation of the Performance Measurements 7 is based on calendar days. However, BearingPoint found that SBC Midwest calculates Performance Measurement 7 based on system hours of operation.</i></p> <p>This is a mechanized process and it is only operational while the system is running. Neither SBC Midwest nor the CLECs expect that SBC Midwest will send transactions during the published (CLEC Online) scheduled system downtime.</p> <p>The implementation of PM 7 follows this same philosophy and is only tracking the hours in which a notification can actually be sent (the scheduled system available hours noticed to CLECs via CLEC Online).</p> <p>SBC Midwest proposed changes in the most recent six-month review to clarify that these performance measures are measured based on system available time. No opposition to these changes was expressed by CLECs during the collaborative, and the MPSC approved this change. SBC Midwest has requested that the MPSC staff direct BearingPoint to utilize business rules that incorporate these “documentation only” clarifications. This issue is based on BearingPoint’s literal interpretation of the business rules and becomes moot once BearingPoint utilizes this clarified set of business rules, as the Observation then gets categorized as “Closed” in a satisfied status.</p> <p><u>On June 12, 2003, the MPSC subsequently directed BearingPoint to utilize the May 26, 2003 “hybrid 1.8: business rules” for the purposes of PMR testing in Michigan. This action changed the “Closed, Not Satisfied” status to “Closed, Satisfied”³⁵ for this observation.</u></p> <p>SBC Midwest believes it is appropriately following the intent of PMs 7. As a business rule clarification, this issue has no impact to posted results, including the February - April data filed with the FCC.</p> <p>E&Y considered this issue as a reasonable interpretation. See E&Y Attachment B Interpretation #4.</p>

³⁵ The MPSC directed BearingPoint to utilize a “hybrid 1.8” version of the business rules, reflecting “documentation only” clarifications in a letter from Tom Lonergan, Director Communications Division of the MPSC, to BearingPoint on June 12, 2003. Findings in this category are therefore not referenced in the corresponding “Comments” section of the Michigan June 30, 2003 BearingPoint Report as a source for a “Not Satisfied” condition.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 661v2</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-R)</p>	<p align="center">MI 9, MI 13</p>	<p align="center">Retest</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurements MI 9 (“Percentage Missing FOCs”) and MI 13 (“Percent Loss Notification Within One Hour of Service Order Completion”) for the July, August and September 2002 data months. BearingPoint found that SBC Midwest excludes “Project” orders from their calculation. However, metrics business rules for the above Performance Measures do not state to exclude “Project” orders from the calculation.</i></p> <p>SBC Midwest agrees with BearingPoint that ‘projects’ were incorrectly excluded from performance measures MI 9 and MI 13. Following the documented change management policy, SBC Midwest corrected this issue for the identified performance measures. The following summarizes the enhancements made:</p> <ul style="list-style-type: none"> • ER 974-0502 was opened to include Projects in MI 9 and implemented with the August 2002 results, published in September 2002. Subsequently, ER 974 was opened to restate June and July 2002 and was worked with ER 1520. The restatement was posted with December 2002 results, which were published on January 6, 2003. • ER # 1410-1002 was opened to include Projects in MI 13 and implemented with the November 2002 results, published in December 2002. Subsequently, ER 1410R and 1410RA were opened to restate August 2002 through October 2002 and June 2002 through July 2002 MI 13 results. These restatements were posted with December 2002 results, which were published on January 6, 2003. <p>SBC Midwest has addressed the identified issue as noted above with June 2002 results going forward. This issue has no impact to posted results from July 2002 going forward, including the February - April data filed with the FCC.</p> <p>This issue was addressed by E&Y in Section IV, #21(iii) for MI 13, Section III, #12(i) for MI 9 and corrective actions have been verified.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 676v2</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-B)</p>	<p align="center">10.4</p>	<p align="center">Retest</p>	<p><i>BearingPoint has determined that SBC Midwest's posted results for Performance Measurement 10.4 ("Percentage of Orders Given Jeopardy Notices") and MI 2 ("Percentage of Orders Given Jeopardy Notices Within 24 Hours of the Due Date") do not follow the July 2002 published metrics business rules. Each jeopardy should be measured using its transaction timestamp (i.e., ordmsg_sent_dt) with the order due date at the issuance time of the jeopardy (i.e., order_schedule_dt or substitute with revline_original_txt if a revision). However, SBC Midwest updates the order_schedule_dt with the latest revline_original_txt for orders that have multiple jeopardies. Therefore, if the order had three jeopardies, the first two would not be calculated correctly, only the latest jeopardy will be calculated correctly.</i></p> <p>During the code reviews with BearingPoint, changes were made in the approach to provide better tracking of the interim due dates. These enhancements were noted in ER 1089-07 and implemented with August 2002 data reported on September 20th. From a high level perspective this new computer program code reported jeopardies on order due dates instead of completion dates and only counted the order once, even for the occurrence of multiple due date changes. Thus if an order receives a Jeopardy and no Revision is received, the code uses the order_schedule_dt as the due date on the order. If a revision is received, the Revision data is examined to determine the due date being changed by the jeopardy.</p> <p>ERs# 1089R-1102 and 1089RA-0103 implemented this correction for July results reported on January 6 2003 and June results reported on February 5, 2003. Updated documentation needed for replication was provided to BearingPoint in association with these changes.</p> <p>SBC Midwest has addressed the identified issue as noted above with June 2002 results going forward. This issue has no impact to posted results from July 2002 going forward, including the February - April data filed with the FCC.</p> <p>This was addressed by E&Y in Section III, #5(ii) and corrective actions have been verified</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 677v2</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-N)</p>	<p align="center">115</p>	<p align="center">Retest³⁶</p>	<p><i>BearingPoint has determined that SBC Midwest’s posted results for Performance Measurement 115 (“Percentage of Ameritech caused delayed Coordinated Cutovers”) do not follow the July, August or September 2002 published metrics business rules. SBC Midwest is only counting orders delayed between 30 and 60 minutes in the “beyond 30 minutes” benchmark and orders delayed between 60 and 120 minutes in the “beyond 60 minutes” benchmark. As a result, SBC Midwest is only counting delayed orders within one benchmark.</i></p> <p>SBC Midwest agrees with BearingPoint’s finding in Observation 677, and has addressed the issue. Following the documented change management process, SBC Midwest has modified the logic used for PM115 (delayed CHC/FDT) beginning with October 2002 data reported on November 20th via ER 1479-1002. In the past, the logic for calculating PM 115 only allowed an order to miss one disaggregation. For example, if an order was 70 minutes late, it would only have missed the >60 minute disaggregation. Now, with the updated logic, a 70 minute late order will miss both the >30 and >60 minute disaggregations. This applies to both CHC and FDT.</p> <p>Although not required to restate based on SBC Midwest’s guidelines, SBC Midwest is targeting a restatement of restated this measure for July, August, and September 2002 data months on or before July 7 June 5, 2003 in order to satisfy BearingPoint test requirements. On May 7, 2003, SBC Midwest requested that BearingPoint re-open this observation and continue its testing activities associated with this observation concurrent with the SBC Midwest restatement.</p> <p>SBC Midwest has addressed this issue for October 2002 data going forward. It does not impact reported data for October 2002 going forward, including the February - April data filed with the FCC.</p> <p>E&Y work papers identified this issue as not material for the March, April, May months that they evaluated.</p>
<p align="center">O 687v2</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-B)</p>	<p align="center">10.4</p>	<p align="center">Retest</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 10.4 (“Percentage of Orders Given Jeopardy Notices”). For orders with blank schedule_date or if a date cannot be parsed, SBC Midwest excludes the Jeopardy and Unsolicited FOCs from the numerator of Performance Measurement 10.4 (“Percentage of Orders Given Jeopardy Notices”) while including them in the denominator.</i></p> <p>SBC Midwest addressed the issue above with a code update, documented in the associated ER# 1089-07. This ER was implemented with August 2002 data, reported on September 20, 2002. In addition, SBC Midwest has prepared ER# 1089R-1102 documenting a restatement of July 2002-August 2002 data on January 6, 2003. SBC Midwest provided updated code and documentation to BearingPoint in order to retest this issue.</p> <p>SBC Midwest has addressed this issue for July 2002 data going forward. It does not impact reported data for July 2002 going forward, including the February - April data filed with the FCC.</p>

³⁶ This Observation was previously stautused as “Closed, Not Satisfied”. However, due to SBC Midwest’s decision to restate for the months of July-September 2002, SBC Midwest has requested that BearingPoint retest once the restatement is complete to verify the implementation of the associated modifications.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

<i>MI OE# Impact Test Points</i> ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
<p align="center">O 688v2</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-B)</p>	<p align="center">9</p>	<p align="center">Closed, Not Satisfied</p>	<p><i>BearingPoint has determined that SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 9 (“Percentage Rejects”) for July and August 2002. BearingPoint learned that SBC Midwest excludes rejects that were falsely initiated by SBC Midwest from Performance Measurement 9. The performance measure is supposed to track rejected orders which should include both valid rejects (i.e., CLEC-Caused Rejections) and the false rejects (i.e., Ameritech-Caused Rejections). SBC Midwest is excluding the false rejects from this performance measure.</i></p> <p>SBC Midwest had not been tracking SBC Midwest caused rejects for Revisions. This is true <u>only</u> for revisions received under LSOG Version 4 and does not impact LSOR Version 5 requests. SBC Midwest has determined a method for tracking this event. The change is identified in ER 1703-1202 and was implemented with January 2003 data reported in February 2003.</p> <p>The associated Business Technical Requirements (BTR) documentation for PM 9 was updated and sent to BearingPoint on 2/7/03 (i.e., SBC Midwest SYS REQ_PM 9-LSOG4 (eff SEP02-OCT02)_02_07_03). More specifically, the associated Business Technical Requirements (BTR) documentation state that when the ORDMSG_RESPONSE_TYPE equals 'REJ', to include the record in the calculation. The category REJ includes both valid and invalid (i.e., false) rejects.</p> <p>BearingPoint considers this Observation “Closed Not Satisfied” since the modifications were not implemented during the period of time that they are evaluating.</p> <p>SBC Midwest has addressed this issue for January 2003 data going forward. Therefore, this issue has no impact to reported data for January 2003 going forward, including the February - April data filed with the FCC.</p> <p>The E&Y work papers state that this omission would have no material impact on the results for PM 9.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 689</p> <p align="center">Interpretation</p> <p align="center">Not Material, Holds SBC Midwest to a Higher Standard³⁷</p> <p align="center">PMR 5 (5-4-M)</p>	<p align="center">110</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurements 110 (“Percentage of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs”) and 111 (“Average Update Interval for DA Database for Facility Based CLECs”) for July, August, and September 2002. The published metrics business rules for Performance Measurements 110 and 111 list weekends and holidays among the exclusions for these performance measurements. Due to the method by which the DA database is updated, SBC Midwest is not applying the holiday exclusion to its electronic results if the holiday falls on a weekday, e.g., Monday. SBC Midwest is therefore incorrectly applying its documented exclusions when calculating the results for these performance measurements</i></p> <p>SBC Midwest has issued ER1587-1202 to fix the holiday exclusion issue for PM110 and 111:</p> <ul style="list-style-type: none"> • System changes have been put in place for ACIS/SOD, ALPSS, BRAVO and DA so that no Directory cycles would be run on holidays. This change was effective 11/27/02 with the implementation of ER1587-1202. • The list of holidays that SBC Midwest is including for these specific measures do not include Martin Luther King Day and Good Friday, which are optional holidays at SBC Midwest, and can be included in this measure as the processing of these updates by the Directory organization is not impeded by reduced force. This process is different than that described in the SBC Midwest Service Center listing for official holidays, published on the web and holds SBC Midwest to a higher standard than using the standard holidays, as might be inferred from the current business rule. <p>SBC Midwest will propose the modifications to this business rule for PM 110 and 111, to state for Exclusions 'Weekends and Holidays, except Martin Luther King Day and Good Friday', at the next six month review.</p> <p>SBC Midwest has addressed this issue for November 2002 data going forward. In addition, SBC Midwest will propose clarifications to the business rules at the next 6-month review. This issue has no impact to reported data for November 2002 data going forward, including the February - April data filed with the FCC.</p> <p>E&Y considered this issue as a reasonable interpretation. See E&Y Attachment B Interpretation #32.</p>

³⁷ The term “Not Material, Holds SBC Midwest to a Higher Standard” indicates that SBC Midwest’s implementation does not comport to the literal reading of the business rules, but does produce a stricter, narrower standard than would be achieved by following the business rule as written.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 694v2</p> <p align="center">Interpretation</p> <p align="center">Not Material, Holds SBC Midwest to a Higher Standard</p> <p align="center">PMR 5 (5-4-E)</p>	<p align="center">19</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 19 (“Daily Usage Feed Timeliness”). The published metrics business rules state that weekdays and holidays should be excluded from the calculations of Performance Measurement 19. In its posted July, August, and September 2002 results, SBC Midwest is including weekends and holidays in its calculations for this performance measurement.</i></p> <p>SBC Midwest agrees with BearingPoint that the business rules for Performance Measure 19 state that SBC Midwest should exclude DUF files sent on weekends and holidays. When reporting results, SBC Midwest included Saturday and certain weekday holiday transmissions in reporting data. The present calculation procedure holds SBC Midwest to a higher standard than required by the business rules.</p> <p>SBC Midwest Performance Measure 19 is defined as: Usage information is sent to CLECs on a daily basis. This usage data must be set to the CLEC within 6 workdays in order to be considered timely. Exclusions: Weekends and Holidays.</p> <p>As required by contractual agreement, SBC Midwest transmits a Daily Usage Files to CLECs every Monday, Tuesday, Wednesday, Thursday, Friday, and Saturday, even if a holiday falls on one of those six “workdays.” SBC Midwest calculates the timeliness of <u>every</u> DUF file sent to every CLEC. In the context of this measurement, SBC Midwest considers these “workdays”. If SBC Midwest were to begin suppressing transmission metrics calculated on files sent on Saturday and holidays that fall on a weekday, every CLEC could be denied critical metrics on more than 60 files transmitted to them every year. When SBC Midwest calculates the interval of time that passed between the date on which a call detail record was created, and the date on which it was transmitted, SBC Midwest counts calendar days, not workdays. It includes Sundays, even though no file is transmitted on a Sunday.</p> <p>SBC Midwest will continue calculating the time interval in consecutive calendar days, including Sundays, for a variety of reasons:</p> <ul style="list-style-type: none"> • CAMPS transmits the vast majority of these call detail records two or three days after they were created, even though DUF files are not transmitted on Sundays; • the current calculation logic creates a scoring advantage for CLECs and effectively holds SBC Midwest to a higher standard of performance than required by the business rules; • the current calculation logic does not prevent SBC Midwest from meeting this measure by a significant margin. SBC Midwest has transmitted millions of call detail records to CLECs and consistently met or exceeded the benchmark. <p>At the next six-month review, SBC Midwest will propose to modify the “weekends and holidays” exclusion to clarify the business rules. This will correct the current anomaly in the business rules that hold SBC Midwest to the more appropriate higher performance standard. BearingPoint identifies this Observation as “Closed, Not Satisfied” due to its literal interpretation of the business rules.</p> <p>SBC Midwest believes its is accurately calculating and reporting results in accordance with the intent of the business rules for PM 19 including the February - April data filed with the FCC. In addition, SBC Midwest will propose clarifications to the business rules at the next 6-month review.</p> <p>The E&Y work papers state that this issue is not material.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 697</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-A)</p>	<p align="center">1.2</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest's posted results for Performance Measurement 1.2 ("Accuracy of Actual Loop Makeup Information Provided for DSL Orders") do not follow the July, August or September 2002 published metrics business rules. The calculation method described within the technical documentation1 for Performance Measurement 1.2 results in some circuits being double counted.</i></p> <p>SBC Midwest agrees with BearingPoint that the method over counted circuits that had a trouble ticket and circuits that had multiple orders, although the business rule does not explicitly allow for this. At the time of the Observation, SBC Midwest was over counting trouble tickets and circuits that had multiple orders. SBC Midwest issued ER 1758-0103 via the normal change management process to stop the over counting of trouble tickets and circuits that had multiple orders. This change is effective with January results posted on February 20, 2003 going forward. In conjunction with this change, SBC Midwest has updated the corresponding Business Technical Requirements (BTR) documentation, and forwarded them to BearingPoint. The total impact to July through December 2002 results across 5 states was only 250 WFA records from a denominator that totaled 257,223. In addition, the change did not take SBC Midwest out of parity. Based on this analysis, SBC Midwest has determined that the change to reported results is immaterial and therefore no restatement will be made.</p> <p>SBC Midwest and CLECs have agreed that the "Reporting of (the current) PM 1.2 (is to be) Suspended Upon Implementation of PM 1.3". PM 1.2 was thus modified in the 6-month review collaborative, and this change was approved by the MPSC. The new PM 1.3 is targeted for implementation for the <u>was implemented with</u> April results, posted May 20, 2003 and at that point, PM 1.2 will no longer be reported.</p> <p>SBC Midwest has fixed this identified issue for January 2003 results going forward. In addition, SBC Midwest has determined that there was no material effect (<0.10%) on posted results, thus no restatements were necessary.</p> <p>This issue has no impact to reported results for January 2003 going forward, including the February - April data filed with the FCC. Finally, this measurement will be suspended with the implementation of PM 1.3.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

<i>MI OE# Impact Test Points</i> ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
<p align="center">O 710</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-I)</p>	<p align="center">96</p>	<p align="center">Retest³⁸</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurements 96, (“Percentage of Pre-mature Disconnects for LNP Orders”), 97 (“Percentage of Time Ameritech Applies the 10-Digit Trigger Prior to the LNP Order Due Date”) and 98 (“Percentage Trouble LNP (I-Reports) in 30 Days of Installation”) for July, August and September 2002. With respect to PM 96 BearingPoint found that SBC Midwest’s technical documentation for PM 96 excluded CLEC caused misses, which is not an allowed exclusion in the published Metrics Business Rules for these measures.</i></p> <p>SBC Midwest removed the exclusion of CLEC caused misses from the denominator for PM 96 via enhancement request (ER 1450-1002) on December 20, 2002, beginning with November 2002 results.</p> <p>SBC Midwest also updated the PM Criteria document for PM 96 and supplied this documentation (PM96_LNP_2001_01b) to BearingPoint on January 15, 2003.</p> <p>Although not required to restate based on SBC Midwest Midwest’s guidelines, SBC Midwest <u>is targeting a restatement of restated</u> this measure for July, August, and September 2002 data months on <u>or before</u> July 7, 2003 in order to satisfy BearingPoint test requirements. On May 8, 2003, SBC Midwest requested that BearingPoint re-open this observation and continue its testing activities associated with this observation concurrent with the SBC Midwest restatement.</p> <p>This issue identified for PM 96 was fixed with <u>November</u>-July³⁹ 2002 results and has no impact to posted results for November 2002 going forward, including the February - April data filed with the FCC.</p>

³⁸ This Observation was previously stated as “Closed, Not Satisfied”. However, due to SBC Midwest’s decision to restate for the months of July-September 2002, SBC Midwest has requested that BearingPoint retest once the restatement is complete to verify the implementation of the associated modifications.

³⁹ The corrective action was implemented on a going forward basis for the November 2002 data month and restated for July, August, and September of 2002 for the BearingPoint test; therefore one month (October, 2002) was not corrected.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
<p align="center">O 711</p> <p>Interpretation</p> <p>No Impact</p> <p>PMR 5 (5-4-C,Q)</p>	<p align="center">45, 58</p>	<p align="center"><u>Closed Not Satisfied</u> <u>Closed</u> <u>Satisfied</u></p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurements 45 and 58 (“Percent Ameritech Caused Missed Due Dates”) for July, August and September 2002. BearingPoint determined that SBC Midwest is not properly excluding “CLEC caused misses” from the published performance measure results. The published metrics business rules for Performance Measurements 45 and 58, list “CLEC caused misses” as an exclusion. Using SBC Midwest’s technical documentation as a guide, BearingPoint has concluded that SBC Midwest is excluding CLEC caused misses from the calculation of the numerator of performance measures 45 and 58, but is not excluding CLEC caused misses from the calculation of the denominator.</i></p> <p>SBC Midwest agrees that the current business rules do not clearly state the exclusion of “CLEC caused misses” applies to the numerator only. However, SBC Midwest believes that it is an obvious conclusion to reach, as removing these orders from the denominator would result in an artificial lowering of the SBC Midwest performance. The intent of this measure is to measure SBC Midwest caused misses, and “CLEC caused misses” in any form should not lower the SBC Midwest performance result. All orders that are not delayed due to SBC Midwest reasons should therefore be included in the denominator.</p> <p>SBC Midwest proposed changes in the most recent six-month review to clarify that this exclusion is to be applied to the numerator only. No opposition to these changes was expressed by CLECs during the collaborative and the change was approved by the MPSC. SBC Midwest has requested that the MPSC staff direct BearingPoint to utilize business rules that incorporate these “documentation only” clarifications. This issue is based on BearingPoint’s literal interpretation of the business rules and becomes moot once BearingPoint utilizes this clarified set of business rules, as the Observation then gets categorized as “Closed” in a satisfied status.</p> <p>SBC Midwest believes it is appropriately following the intent of PMs 45 and 58. In addition, SBC Midwest believes this will be validated when BearingPoint reevaluates this measure with the updated set of Business Rules agreed to by CLECs and commission staffs. Therefore, SBC Midwest believes it has appropriately calculated posted results, including the February - April data filed with the FCC.</p> <p><u>On June 12, 2003, the MPSC subsequently directed BearingPoint to utilize the May 26, 2003 “hybrid 1.8: business rules” for the purposes of PMR testing in Michigan. This action changed the “Closed, Not Satisfied” status to “Closed, Satisfied”⁴⁰ for this observation.</u></p> <p>E&Y considered this issue as a reasonable interpretation. See E&Y Attachment B #17.</p>

⁴⁰ The MPSC directed BearingPoint to utilize a “hybrid 1.8” version of the business rules, reflecting “documentation only” clarifications in a letter from Tom Lonergan, Director Communications Division of the MPSC, to BearingPoint on June 12, 2003. Findings in this category are therefore not referenced in the corresponding “Comments” section of the Michigan June 30, 2003 BearingPoint Report as a source for a “Not Satisfied” condition.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
<p align="center">O 719</p> <p>Interpretation</p> <p>No Impact</p> <p>PMR 5 (5-4-G)</p>	<p align="center">78</p>	<p align="center">Closed Not Satisfied Closed Satisfied</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 78 (“Average Interconnection Trunk Installation Interval”) for the July, August and September 2002 data months. Using SBC Midwest’s technical documentation as a guide, BearingPoint has concluded that SBC Midwest is excluding “customer caused misses,” which is not listed as a valid exclusion in the published metrics business rules.</i></p> <p>SBC Midwest agrees that the version 1.8 business rules do not clearly state the exclusion of “customer caused misses”. However, SBC Midwest believes that it is an obvious conclusion to reach, as including these orders would result in an artificial lowering of the SBC Midwest performance. The intent of this measure is to measure SBC Midwest caused misses, and “customer caused misses” in any form should not lower the SBC Midwest performance result.</p> <p>SBC Midwest proposed changes in the most recent six-month review to clarify the business rules by adding this exclusion. No opposition to these changes was expressed by CLECs during the collaborative and the MPSC approved this change. SBC Midwest has requested that the MPSC staff direct BearingPoint to utilize business rules that incorporate these “documentation only” clarifications. This issue is based on BearingPoint’s literal interpretation of the business rules and becomes moot once BearingPoint utilizes this clarified set of business rules, as the Observation then gets categorized as “Closed” in a satisfied status.</p> <p>SBC Midwest believes it is appropriately following the intent of PMs 78. In addition, SBC Midwest believes this will be validated when BearingPoint reevaluates this measure with the updated set of Business Rules agreed to by CLECs and commission staffs. Therefore, SBC Midwest believes it has appropriately calculated posted results, including the February - April data filed with the FCC.</p> <p><u>On June 12, 2003, the MPSC subsequently directed BearingPoint to utilize the May 26, 2003 “hybrid 1.8: business rules” for the purposes of PMR testing in Michigan. This action changed the “Closed, Not Satisfied” status to “Closed, Satisfied”⁴¹ for this observation.</u></p> <p>E&Y considered this issue as a reasonable interpretation. See E&Y Attachment B #26.</p>

⁴¹ The MPSC directed BearingPoint to utilize a “hybrid 1.8” version of the business rules, reflecting “documentation only” clarifications in a letter from Tom Lonergan, Director Communications Division of the MPSC, to BearingPoint on June 12, 2003. Findings in this category are therefore not referenced in the corresponding “Comments” section of the Michigan June 30, 2003 BearingPoint Report as a source for a “Not Satisfied” condition.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
<p align="center">O 722</p> <p>Interpretation</p> <p>No Impact</p> <p>PMR 5 (5-4-N)</p>	<p align="center">114, 115, 115.1, MI 3</p>	<p align="center">Closed Not Satisfied Closed Satisfied</p>	<p><i>The July, August, and September technical documentation provided for measures 114, 115, 115.1, and MI 3 indicates that orders with greater than 24 lines are being excluded from these measures. However, the July, August, and September 2002 published metrics business rules do not include this exclusion.</i></p> <p>While the business rules for these measures do not indicate an explicit exclusion for orders of > 24 lines, the definition of CHC and FDT indicates that a CHC and FDT must consist of 1-24 lines. If an order has >24 lines, it is not to be considered a CHC or FDT and therefore should not be included in CHC or FDT measures.</p> <p>SBC Midwest has proposed clarifications in the most recent six-month review to modify the business rules for PMs 114, 115, 115.1, and MI3. The clarifications address the 24 line limit for each of these PMs by including the following language:</p> <p align="center">“CHC and FDT orders, by definition, must consist of 1-24 lines, therefore this measure only includes orders with 1-24 lines”</p> <p>SBC Midwest proposed changes in the most recent six-month review to clarify that these performance measures, by product definition, only apply to quantities of 1-24 lines. No opposition to these changes was expressed by CLECs during the collaborative, and this change was approved by the MPSC. SBC Midwest has requested that the MPSC staff direct BearingPoint to utilize business rules that incorporate these “documentation only” clarifications. This issue is based on BearingPoint’s literal interpretation of the business rules and becomes moot once BearingPoint utilizes this clarified set of business rules, as the Observation then gets categorized as “Closed” in a satisfied status.</p> <p>SBC Midwest is appropriately following the intent of PMs 114, 115, 115.1, and MI 3. In addition, SBC Midwest believes this will be validated when BearingPoint reevaluates this measure with the updated set of Business Rules agreed to by CLECs and commission staffs. Therefore, SBC Midwest believes it has appropriately calculated posted results, including the February - April data filed with the FCC.</p> <p><u>On June 12, 2003, the MPSC subsequently directed BearingPoint to utilize the May 26, 2003 “hybrid 1.8: business rules” for the purposes of PMR testing in Michigan. This action changed the “Closed, Not Satisfied” status to “Closed, Satisfied”⁴² for this observation.</u></p> <p>E&Y considered this issue as a reasonable interpretation. See E&Y Attachment B #33.</p>

⁴² The MPSC directed BearingPoint to utilize a “hybrid 1.8” version of the business rules, reflecting “documentation only” clarifications in a letter from Tom Lonergan, Director Communications Division of the MPSC, to BearingPoint on June 12, 2003. Findings in this category are therefore not referenced in the corresponding “Comments” section of the Michigan June 30, 2003 BearingPoint Report as a source for a “Not Satisfied” condition.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 725</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-B)</p>	<p align="center">10.4</p>	<p align="center">Retest</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurements 10.4 (“Percentage of Orders Given Jeopardy Notices”) and MI 2 (“Percentage of Orders Given Jeopardy Notices Within 24 Hours of the Due Date”) for July, August and September 2002.</i></p> <p>BearingPoint’s findings that exclusions were not properly applied for PM 10.4 and MI 2 are correct. A code migration was tracked through ER 1429-1002 and implemented with November 2002 results, which were published in December 2002. The code migration to the DSS system enabled SBC Midwest to apply the exclusion of CLEC/End User Initiated Jeopardy Codes to the calculation of Performance Measurements 10.4 and MI 2.</p> <p>SBC Midwest restated LSOG 4 and LSOG 5, PM 10.4 and MI 2 results to include the above code migration for June 2002 through October 2002 performance measure results on January 6th, 2003.</p> <p>Effective with November 2002 results going forward and the restatement of June 2002 through October 2002 results, SBC Midwest has ensured that this particular issue has no impact to posted results, including the February - April data filed with the FCC.</p> <p>This issue was addressed by E&Y in Section IV, #7(i) and corrective actions have been verified.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 727</p> <p>Interpretation</p> <p>No Impact</p> <p>PMR 5 (5-3-B, I)</p>	<p align="center">9, 10.1, 10.2, 10.3, 11.1, 11.2</p>	<p align="center">Closed Not Satisfied Closed Satisfied</p>	<p><i>SBC Midwest’s posted results for Performance Measurements 9, (“Percent Rejects”), 10.1 (“Percent Mechanized Rejects Returned Within One Hour of Receipt of Reject in System (Auto/Auto”), 10.2 (“Percentage Manual Rejects Received Electronically and Returned Within 5 Hours”), 10.3 (“Percent Manual Rejects Received Manually and Returned Within 5 Hours”), 11.1 (“Mean Time to Return Manual Rejects that are Received Electronically via EDI”), 11.2 (“Mean Time to Return Manual Rejects that are Received thru Manual Process”), and 95 (“Average Response Time for Non-Mechanized Rejects Returned With Complete and Accurate Codes”) do not follow the July, August or September 2002 published metrics business rules. The July, August and September 2002 published metrics business rules for Performance Measurements 9, 10.1, 10.2, 10.3, 11.1, 11.2, and 95 do not state that system downtime, weekends and holidays should be excluded. However, SBC Midwest’s implementation of these measures excludes system downtime, weekends and holidays.</i></p> <p>Each of the processes measured by the performance measurements listed above has a mechanized component that must operate in order for the process to successfully complete. By definition, mechanized processes are only operational when their underlying systems are running and SBC Midwest personnel are present. The times when systems are not available are published to CLECs via the scheduled system available hours that are provided via CLEC Online. It is not logical, nor would CLECs expect, for SBC Midwest to be responsible for sending transactions to the CLECs when these systems are scheduled for downtime. Downtime hours include Sundays and holidays. Downtime hours do not include Saturday hours that are published as system available hours via CLEC Online.</p> <p>SBC Midwest consistently follows this policy for all of its mechanized timeliness performance measures, and believes that in the absence of explicit documentation, it is reasonable to expect this policy to be followed. Nevertheless, in the interest of absolute clarity, SBC Midwest proposed changes in the most recent six-month review to clarify that these performance measures are measured based on system available time. No opposition to these changes was expressed by CLECs during the collaborative, and the MPSC approved this change. SBC Midwest has requested that the MPSC staff direct BearingPoint to utilize business rules that incorporate these “documentation only” clarifications. This issue is based on BearingPoint’s literal interpretation of the business rules and becomes moot once BearingPoint utilizes this clarified set of business rules, as the Observation then gets categorized as “Closed” in a satisfied status.</p> <p><u>On June 12, 2003, the MPSC subsequently directed BearingPoint to utilize the May 26, 2003 “hybrid 1.8: business rules” for the purposes of PMR testing in Michigan. This action changed the “Closed, Not Satisfied” status to “Closed, Satisfied”⁴³ for this observation.</u></p> <p>PM 9 measures the percentage of rejects and therefore this observation, which assesses duration, does not apply.</p> <p>SBC Midwest believes it is appropriately following the intent of PMs 10.1, 10.2, 10.3, 11.1, and 11.2. Therefore, SBC Midwest believes it has appropriately calculated posted results, including the February - April data filed with the FCC.</p> <p>E&Y considered this issue as a reasonable interpretation (it does not list PM 9). See E&Y Attachment B #4.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
<p align="center">O 729</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-C)</p>	<p align="center">56, 56.1</p>	<p align="center"><u>Open⁴⁴</u> <u>Retest</u></p>	<p><i>SBC Midwest’s posted results for Performance Measurement 56 (“Percent Installations Completed within Customer Requested Due Date”) and Performance Measurement 56.1 (“Percent Installations Completed within Customer Requested Due Date for Loop with LNP”) do not follow the July, August or September 2002 published metrics business rules. Using SBC Midwest’s technical documentation as a guide, BearingPoint has determined that SBC Midwest is using an incorrect duration when calculating these performance measures. SBC Midwest uses a duration entitled “MSRD_APPLN_DUE_BEW_DURTN to calculate these performance measures. According to the SBC Midwest SME’s, the duration described by the field noted is the duration between the application date and the “company offered due date”. The business rules state that the only duration which should be used is the duration between the application date and the “customer requested due date”.</i></p> <p>SBC Midwest agrees with BearingPoint’s assessment that performance measures 56 and 56.1 were calculated using an incorrect time-stamp. Through its documented change management process, SBC Midwest has addressed this issue via ER# 1086-0702. This ER was implemented beginning with January 2003 results posted on February 20, 2003. SBC Midwest has not yet completed its work with regard to scheduling of restatements and will notify CLECs of these restatements via the web site News Page as they are identified.</p> <p>SBC Midwest received additional clarifying questions from BearingPoint on May 15, 2003 and is in the process of preparing a response.</p> <p>On June 9, 2003, SBC Midwest provided BearingPoint with the names of the data fields that are used to calculate the duration of disaggregation for PM 56 and 56.1, which are applicable only to DSL Line Share and Broadband Line Share. These additional questions did not create new issues.</p> <p>This issue has no impact to posted results for February – April data filed with the FCC as the modifications were implemented in January 2003 going forward.</p> <p>The Line Share disaggregation for these measures was addressed by E&Y in Section IV, #14(ii) and corrective actions have been verified.</p>

⁴³ ~~The MPSC directed BearingPoint to utilize a “hybrid 1.8” version of the business rules, reflecting “documentation only” clarifications in a letter from Tom Lonergan, Director Communications Division of the MPSC, to BearingPoint on June 12, 2003. Findings in this category are therefore not referenced in the corresponding “Comments” section of the Michigan June 30, 2003 BearingPoint Report as a source for a “Not Satisfied” condition.~~

⁴⁴ ~~Observation 729 is listed in the “Open” status because of the additional questions received May 15, 2003 and because SBC Midwest initially indicated to BearingPoint that it would restate June November 2002 data on February 5, 2003. Scheduling issues have caused SBC Midwest to reconsider the date for this restatement. No date for restatement had been set as of May 30, 2003.~~

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 731</p> <p>Interpretation</p> <p>No Impact</p> <p>PMR 5 (5-3-E)</p>	<p align="center">17</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest’s posted results for Performance Measure 17 (“Billing Completeness”) do not follow the July, August or September 2002 published metrics business rules. If a Service Order (SO) “completes” one day before the end of the bill cycle measurement period and then “posts” one day after this date, it will be included in the performance measure calculations as “late” based on the method SBC Midwest currently uses to calculate this measure. However, by the business rules definition this service order is “on-time” as it completed and posted within the allotted 19 cycles and should be counted as on-time in the following month’s performance measures.</i></p> <p>SBC Midwest’s current implementation reflects an interpretation of PM 17 that an order that does not post prior to the first bill cycle (for the account to which the order applies) has posted “late”. This interpretation holds SBC Midwest to a higher standard than the PM may actually require.</p> <p>SBC Midwest proposed changes in the most recent six-month review to clarify that these performance measures. No opposition to these changes was expressed by CLECs during the collaborative, and this change was approved by the MPSC</p> <p>This issue has no impact to posted results, including the February - April data filed with the FCC.</p> <p>E&Y considered this issue as a reasonable interpretation. See E&Y Attachment B #11.</p>
<p align="center">O 732</p> <p>No Impact</p> <p>PMR 5 (5-3-I)</p>	<p align="center">91</p>	<p align="center">Retest</p>	<p><i>SBC Midwest’s posted results for Performance Measurements 91 (“Percentage of LNP Only Due Dates within Industry Guidelines”) do not follow the July and August 2002 published metrics business rules. The July and August 2002 published metrics business rules state that the Performance Measurement 91 should be calculated as the “(# of LNP TNs implemented within Industry guidelines ÷ total LNP TNs) *100”. BearingPoint found that SBC Midwest does not use this formula. Instead SBC Midwest calculates this performance measures as the “(# of LNP orders implemented within Industry guidelines ÷ total LNP orders) * 100”.</i></p> <p>Effective with November 2002 data reported in December 2002, SBC Midwest implemented new computer program code to report this PM at the telephone number level. June 2002 through October 2002 results were restated in conjunction with other issues on January 6, 2003. The Business and Technical Requirements were also updated and provided to BearingPoint.</p> <p>SBC Midwest has addressed this issue through a fix in November 2002 data and a restatement of June through October 2002 data. This issue does not have an impact to posted results from June 2002 going forward, including the February - April data filed with the FCC.</p> <p>This issue was addressed by E&Y in Section IV, #19(iii) and corrective actions have been verified.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 738</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-N)</p>	<p align="center">115.1</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 115.1 (“Mean Time to Restore – Provisioning Trouble Reports”) for July, August and September 2002. BearingPoint determined that SBC Midwest is not excluding “Reports for which the trouble is attributable to the Ameritech network (unless Ameritech had knowledge of the trouble prior to the due date)” from the published performance measure results. The published metrics business rules for July, August and September 2002 for Performance Measurement 115.1, list “Reports for which the trouble is attributable to the Ameritech network (unless Ameritech had knowledge of the trouble prior to the due date)” as an exclusion.</i></p> <p>Beginning November 18, 2002 SBC Midwest tracked, but did not code for the exclusion, “Reports for which the trouble is attributable to the Ameritech network (unless Ameritech had knowledge of the trouble prior to the due date)”. To address this situation, SBC Midwest applied ER# 185-0103 which implements the necessary documentation and data processing changes to include these trouble reports as exclusions. Changes associated with ER#185-0103 are effective for February 2003 data to be reported March 20, 2003. Since the coding information needed to exclude reports for which the trouble is attributable to the SBC Midwest network was not available until the December 2002 data month and correction of this issue will only improve SBC Midwest's performance results, SBC Midwest will not be restating.</p> <p>The improvements detailed above would only improve SBC Midwest’s results prior to February 2003, so no restatements were made. This issue has no impact to posted results for February 2003 going forward, including the February - April data filed with the FCC.</p> <p>E&Y considered this issue as a reasonable interpretation as represented in Attachment B #34.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 739</p> <p align="center">Interpretation</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-C)</p>	<p align="center">28</p>	<p align="center">Retest</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 28 (“Percent POTS/UNE-P Installations Completed Within Customer Requested Due Date”) for the July, August and September 2002 data months. BearingPoint has determined that SBC Midwest is not properly excluding “customer requested due dates beyond the offer date” from the published performance measure results. The published metrics business rules for Performance Measurement 28 lists the following exclusions:</i></p> <ul style="list-style-type: none"> • <i>Field Work orders -- excludes customer requested due dates beyond the offer date.</i> • <i>No Field Work orders -- excluded if order applied for before 3:00 p.m.; and the due date requested is not same day; and if order applied for after 3:00 p.m.; and the due date requested is beyond the next business day.</i> • <i>CIA Centrex excluded if customer requested due dates greater than 5 business days.</i> <p><i>Using SBC Midwest’s technical documentation as a guide, BearingPoint has concluded that SBC Midwest is including orders with customer requested due dates beyond the company offered date in the calculation of Performance Measure 28. Since they are listed as exclusions, "customer requested due dates beyond the offer date" should not be included in this measure.</i></p> <p>SBC Midwest disagrees with BearingPoint’s assessment. Performance Measure 28 assesses the Percent of POTS/UNE-P Installations Completed within the Customer Requested Due Date and contains conflicting requirements. The PM definition states:</p> <ul style="list-style-type: none"> • <i>“Measure of orders completed within the customer requested due date when that date is later than or equal to the offered due date/interval or, if expedited (accepted or not accepted), the date agreed to by Ameritech.”</i> <p>In the Exclusion section of the business rules PM 28 states:</p> <ul style="list-style-type: none"> • <i>CIA Centrex excluded if customer requested due dates greater than 5 business days.</i> <p>The five day interval is the standard interval for CIA Centrex No Field Work, as indicated in the exclusion and the benchmark. If SBC Midwest were to exclude CIA Centrex orders with customer requested due dates greater than the 5 day standard interval (as the business rule and BearingPoint suggest) and follow the literal reading of the measure which states that it is intended to measure only those orders when the customer requested due date is later than or equal to the offered interval, then SBC Midwest would, by definition, be measuring no orders.</p> <p>In recognition that the CIA Centrex disaggregation contains an anomaly, SBC Midwest has left the prior version of the Business Rules in effect since the Version 1.8 Business Rules were conflicting. SBC Midwest has engaged the CLEC participants in the 6-month review process and the State Commission Staff’s to develop modifications to this business rule. A modification to the business rules has been proposed and accepted by CLECs at the recently 6-month review to correct this documentation error and remove the exclusion. In the interim, SBC Midwest has made an appropriate inclusion to meet the intent of the business rule.</p> <p>SBC Midwest agrees that orders are not being properly excluded for ‘customer requested due dates beyond the offered date’. Following its documented change management process, SBC Midwest has opened two ERs to implement the exclusions allowed in the business rules: ER 772 and ER 1437. These ERs address the POTS residence, business, UNE-P residence, and business disaggregations. These ERs were implemented with January 2003 results on the February report.</p> <p>SBC Midwest addressed the non-CIA Centrex issues with computer programming changes effective with January 2003 results.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
			<p>Moreover, SBC Midwest believes it is appropriately following the intent of PM 28 with respect to CIA Centrex. Therefore, SBC Midwest believes it has appropriately calculated posted results, for the February – April 2003 data filed with the FCC.</p> <p>E&Y considered the issue relating to the Business Rule anomaly as a reasonable interpretation as represented in Attachment B #16.</p>
<p align="center">O 746</p> <p align="center">Interpretation</p> <p align="center">No Material Impact</p> <p align="center">PMR 5 (5-4-B)</p>	<p align="center">13</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 13 (“Order Process Percent Flow Through”) for the July, August and September 2002 data months. The published metrics business rules state that an order should be excluded if it is “both electronically generated and rejected if the error is caused by CLEC.” SBC Midwest excludes all electronically generated rejected orders, regardless of who caused the error. According to the published metrics business rules, the only allowable exclusion is for those rejects resulting from errors caused by the CLEC.</i></p> <p>It is appropriate that SBC Midwest excludes all electronically generated rejected orders from Performance Measurement 13. This is true for both CLEC and SBC Midwest caused rejects. None of the rejects are included in the calculation of PM 13 (flow through) as there is no transaction to count; it was not received or processed as it was electronically returned to the CLEC via a reject. Therefore, it is not flow through eligible.</p> <p>The exclusions in the current business rules should be modified to reflect, “all rejected orders”, as PM 13 is a calculation of orders received that process mechanically to distribution. If a request is rejected then it does not go in to the ordering process and therefore is appropriately not included. SBC Midwest will propose a clarification in the next 6-month review to modify the exclusions listed in the business rule for PM 13 to address this issue. Additionally, SBC Midwest measures the percentage of SBC Midwest caused rejects in PM9. This reject percentage ranges between .09% and .49% of all electronically submitted orders between April 2002 and March 2003.</p> <p>SBC Midwest believes it is accurately calculating and reporting results in accordance with the intent of the business rules for PM 13 regardless of the fact that it does not meet the literal interpretation of the business rule applied by BearingPoint. SBC Midwest will propose clarifications to the business rules at the next 6-month review.</p> <p>If SBC Midwest’s interpretation is accepted at the six-month review collaborative, this issue has no impact to reported results, including the February - April data filed with the FCC. If SBC Midwest’s interpretation is not accepted, the impact to February – April data is not material based on the analysis of SBC Midwest caused rejects.</p> <p>The E&Y work papers state that this is not an issue since a reject is not eligible to be counted as flow through.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 755</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-B, I)</p>	<p align="center">10.1, 10.2, 10.3, 11.1, 11.2</p>	<p align="center">Retest⁴⁵</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 10.1 (“Percent Mechanized Rejects Returned Within 1 Hour of Receipt of Order”), 10.2 (“Percent Manual Rejects Received Electronically and Returned Within 5 Hours”), 10.3 (“Percent Manual Rejects Received Manually and Returned Within 5 Hours”), 11.1 (“Mean Time to Return Manual Rejects that are Received via an Electronic Interface”), 11.2 (“Mean Time to Return Manual Rejects that are Received Thru the Manual Process”) and 95 (“Average Response Time for Non-Mechanized Rejects Returned With Complete and Accurate Codes”) for July, August and September 2002. BearingPoint has learned that SBC Midwest excludes false rejects to revisions from the calculation of the performance measurements listed above. These performance measures are intended to track both valid rejects (CLEC caused) and false rejects (SBC Midwest caused) to both original orders and revisions. The business rules do not allow for false rejects to revisions to be excluded.</i></p> <p>SBC Midwest has not been tracking SBC Midwest caused rejects for Revisions in SBC Midwest 10.1, 10.2, 10.3, 11.1, 11.2, 95. This is true <u>only</u> for LSOG Version 4 and does not impact LSOG Version 5 requests. SBC Midwest has changed its approach for tracking these rejects and, following the documented change management policy, SBC Midwest corrected this issue for the identified performance measures. ER 1419-1002 was opened to track false rejects for performance measures 10.1, 10.2, 10.3, 11.1, 11.2, 95 and was implemented with September 2002 data reported in October 2002.</p> <p>The implementation of ER 1419-1002 resulted in less than a 5% change in the calculated PMs 10.1, 10.2, 10.3, 11.1, 11.2, and 95 totals for July 2002 and August 2002, thus did not meet the established SBC Midwest criteria for a restatement.</p> <p>Although not required to restate based on SBC Midwest Midwest’s guidelines, SBC Midwest restated is targeting a restatement of this measure for July and August 2002 data months on or before July 7 June 5, 2003 in order to satisfy BearingPoint test requirements. On May 7, 2003, SBC Midwest requested that BearingPoint re-open this observation and continue its testing activities associated with this observation concurrent with the SBC Midwest restatement.</p> <p>SBC Midwest addressed the identified issue via ER 1419-1002 for September 2002 data going forward. Results prior to September 2002 were not initially restated, as the impacts of the identified issue did not meet SBC Midwest restatement guidelines. SBC Midwest has since determined that it will restate restated these measures in order to satisfy the BearingPoint testing. As this issue was addressed in <u>September July</u>, it has no impact on reported results for September July 2002 going forward, including the February - April data filed with the FCC.</p> <p>The E&Y work papers indicate that false rejects represent less than 0.3% of the rejects in any state for posted results as reported in PM 9. As a result, the inclusion of SBC Midwest caused rejects in these other measures prior to the implementation of corrective action in September could not be material.</p>

⁴⁵ This Observation was previously stauted as “Closed, Not Satisfied”. However, due to SBC Midwest’s decision to restate for the months of July-August 2002, SBC Midwest has requested that BearingPoint retest once the restatement is complete to verify the implementation of the associated modifications.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 756v2</p> <p align="center">Interpretation</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-B, I)</p>	<p align="center">10, 10.4, 11, 91</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest’s posted results for Performance Measurements 10 (“Percent Mechanized Rejects Returned Within One Hour of Receipt of Reject in the System”), 10.4 (“Percentage of Orders Given Jeopardy Notices”), 11 (“Mean Time to Return Mechanized Rejects”), 91 (“Percentage of LNP Only Due Dates within Industry Guidelines”, and MI 2 (“Percent of Orders Given Jeopardy Notices Within 24 Hours of the Due Date”) do not follow the July, August or September 2002 published metrics business rules. The July, August, and September 2002 published metrics business rules for Performance Measurements 10, 10.4, 11 and 91 do not state that system downtime, weekends and holidays should be excluded from the calculation of these measures.</i></p> <p>SBC Midwest PM 10, 10.4, and 11: The Business Rules state, “The start time used is the date and time the reject is available to MOR and the end time is the date and time the reject notice is sent to the CLEC.” This is measuring the system’s ability to receive and transmit a reject or jeopardy event back to the CLEC. This is a mechanized process and is only operational while the system is running. Given that these processes are mechanized, the implementation of PMs 10, 10.4, and 11 follow this same philosophy and is only tracking the hours in which a notification can actually be sent (the scheduled system available hours noticed to CLECs via CLEC Online).</p> <p>SBC Midwest PM 91: The performance measure is tracking the percentage of LNP Due date interval that meets the industry standard. The Business Rules indicate the industry guideline is established in “business days”. SBC Midwest asserts that the implementation of this performance measure is consistent with these Rules. Saturdays, Sundays, and Holidays are not business days and are not included in the time interval for this measure. No special handling is needed for scheduled down time for this measure.</p> <p>SBC Midwest has proposed clarifications to the business rules (or the associated consolidated business rule in the case of PM 10) for PMs 10, and 11, and 91 in the most recent six-month review in order to clarify that these performance measures are measured based on system available time. No opposition to these changes was expressed by CLECs during the collaborative and was approved by the MPSC. SBC Midwest has requested that the MPSC staff direct BearingPoint to utilize business rules that incorporate these “documentation only” clarifications. This issue is based on BearingPoint’s literal interpretation of the business rules and becomes moot once BearingPoint utilizes this clarified set of business rules, as the Observation then gets categorized as “Closed” in a satisfied status. No proposal has been made for PM 10.4 in the most recent six-month review. SBC Midwest will address these this PM in the next six-month review session.</p> <p><u>On June 12, 2003, the MPSC subsequently directed BearingPoint to utilize the May 26, 2003 “hybrid 1.8: business rules” for the purposes of PMR testing in Michigan. Excepting PM 10.4, this action would change the “Closed, Not Satisfied” status to “Closed, Satisfied”⁴⁶ for this observation. PM 10.4 was not included as a documentation change in the recent six-month review. It will be addressed in the next six-month review.</u></p> <p>SBC Midwest believes it has appropriately calculated reported results, including the February - April data filed with the FCC. SBC Midwest’s interpretation of the business rules for PMs 10, 11 and 91 was approved in the most recent six-month review, and</p>

⁴⁶ The MPSC directed BearingPoint to utilize a “hybrid 1.8” version of the business rules, reflecting “documentation only” clarifications in a letter from Tom Lonergan, Director Communications Division of the MPSC, to BearingPoint on June 12, 2003.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

<i>MI OE# Impact Test Points</i> ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
			<p>its similar interpretation of PM 10.4 will be addressed in the next six-month review.</p> <p>E&Y considered this issue as a reasonable interpretation as represented in Attachment B #4.</p>
<p align="center">O 787</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-B, R)</p>	<p align="center">5, 7, MI 9, MI 13</p>	<p align="center">Retest</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of 6 performance measures for July, August and September 2002. SBC Midwest is excluding orders with particular order class codes. The order class code is used to identify the type of order to which a product relates.</i></p> <p>Following its documented change management process, SBC Midwest issued ER# 1407-1002 to include orders with the class code of “37” and “65” in the calculation of PMs 5, 7, MI 9, and MI 13 for November 2002 results going forward. Additionally, SBC Midwest issued 1407R-1102 and 1407RA-1102 to restate PMs 5 and 6 for Jul’02-Oct’02 results on December 5th, 2003 and incorporated the modifications identified in 1407-1002 as part of these restatements. SBC Midwest issued ER 1192R-0802 and ER 1164RB-1102 to restate PM 7 on January 6th, 2003 for Aug’02-Oct’02 results and February 5th, 2003 for Jul’02 results, respectively, and incorporates the modifications identified in 1407-1002 as part of these restatements. SBC Midwest issued ER 1410R-1002 to restate PMs MI 9 and MI 13 on January 6th, 2003 for Jul’02-Oct’02 results and incorporated the modifications identified in 1407-1002 as part of these restatements.</p> <p>SBC Midwest addressed the issue identified in this observation through ER 1407-1002 for November 2002 data going forward for all PMs mentioned. In addition, SBC Midwest has restated these PMs (5, 7, MI 9, and MI 13) from July through October 2002.</p> <p>There is no impact to reported results from this issue from November 2002 going forward, including the February - April data filed with the FCC.</p> <p>The E&Y work papers deemed this issue as immaterial.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 792</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3)⁴⁷</p>	<p align="center">MI 9</p>	<p align="center">Retest</p>	<p><i>SBC Midwest’s posted results for Performance Measurement MI 9 (“Percentage Missing FOCs”) do not follow the July 2002 published metrics business rules.</i></p> <p><i>In the process of conducting the PMR5 (Metrics Calculations and Reporting) test, BearingPoint found that in the case of revision orders SBC Midwest is incorrectly comparing only FOCs (positive acknowledgements) and REJs (rejects) to determine the percent of FOCs missing. The correct comparison to use in making this determination is FOCs or ADVs or REJs.</i></p> <p>When calculating the percentage of FOCs missing for revisions, SBC Midwest implemented ER 975-0502 with August 2002 data to start comparing 'ADV' messages in addition to FOCs and REJs. A restatement for MI 9 was issued under 974R-1002 to restate July 2002 results for MI 9 and posted on 1/6/03. It also incorporated the changes implemented under ER 975-0502 in the restated July results.</p> <p>There is no impact to reported results from this issue from July 2002 going forward, including the February - April data filed with the FCC.</p>
<p align="center">O-794</p> <p align="center">No Impact</p> <p align="center">PMR5 (5-3-C)</p>	<p align="center">12</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest’s posted results for Performance Measurement 12 (“Mechanized Provisioning Accuracy”) do not follow the July and August 2002 published metrics business rules. In the process of conducting the PMR5 (Metrics Calculations and Reporting) test, BearingPoint has determined that SBC Midwest is improperly calculating the CABS disaggregations of Performance Measurement 12 by counting LATA 342 in Wisconsin rather than Michigan.</i></p> <p>BearingPoint has determined that SBC Midwest is improperly calculating the CABS disaggregations of Performance Measurement 12 by counting LATA 342 in Wisconsin rather than Michigan.</p> <p>SBC Midwest implemented ER # 295-0203 to ensure records were counted in LATA 342 for the state of Michigan rather than for the state of Wisconsin. The fix for performance measure 12 was implemented with August 2002 results reported in September 2002. The Business Technical Requirements (BTR) documentation was updated with the appropriate information in October 2002.</p> <p>On closing this finding, BearingPoint stated that SBC Midwest’s February 24 response indicates that SBC Midwest has corrected the logic to count LATA 342 in Michigan via ER# 295-0203 and that this change is effective with the August 2002 results. BearingPoint stated that they are now able to match SBC Midwest’s posted August results.</p> <p>This issue does not have an impact to posted results from August 2002 going forward, including the February - April data filed with the FCC.</p> <p>The E&Y work papers deemed this issue as immaterial.</p>

⁴⁷ This observation was not included on the April 30, 2003, BearingPoint MI report, although SBC believes it should have been, and therefore does not contain a test point reference.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 803</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-B)</p>	<p align="center">10, 11</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 10 (“Percent Mechanized Rejects Returned Within One Hour of Receipt of Reject in System”), and Performance Measurement 11 (“Mean Time to Return Mechanized Rejects”) for July, August and September 2002. In the process of conducting the PMR5 (Metrics Calculations and Reporting) test, BearingPoint has determined that SBC Midwest is excluding Complex LNP orders with greater than 50 lines from the calculation of these performance measurements. The business rules for these two measures only allow LNP orders to be excluded if there are greater than 100 lines.</i></p> <p>Coincident with the migration to ICS, SBC Midwest corrected reporting logic to exclude LNP orders that are greater than 100 lines. This change was made for September data reported in October 2002 and is reflected in ER 1136. Based on SBC Midwest restatement guidelines the impact of this change was not material and therefore it will not be restating data for these performance measurements.</p> <p>This issue has no impact to reported results from September 2002 data going forward, including the February - April data filed with the FCC.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 809</p> <p align="center">No Impact</p> <p align="center">PMR 4 & PMR 5 (5-3-B)</p>	<p align="center">10, 11</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest appears to be using inaccurate data in the calculation of Performance Measurements 10 (“Percent Mechanized Rejects Returned within One Hour of Receipt of Reject in MOR”) and 11 (“Mean Time to Return Rejects”). According to the published business rules for Performance Measurements 10 and 11, “The start time used is the date and time the reject is available to MOR and the end time is the date and time the reject notice is sent to the CLEC.” BearingPoint understands that SBC Midwest uses different mechanisms to assign the “time the reject is available to MOR” and the “time the reject notice is sent to the CLEC.”</i></p> <p><i>Since it is not logically possible for any transaction to be sent before it is available to be sent (and thus have a negative duration), it appears that SBC Midwest does not maintain synchronicity between the two applicable time-stamping mechanisms.</i></p> <p><i>Based on assertions by SBC Midwest and its instructions for calculation, BearingPoint understands that SBC Midwest adjusts transactions with negative durations to have “0” time durations. While this may mitigate some of the effects of these negative durations, it does not yield accurate performance measurement results for Performance Measurements 10 and 11.</i></p> <p>During July 2002, SBC Midwest discovered the existence of negative time intervals for PMs 10 and 11. On July 22nd, 2002, SBC Midwest re-synchronized the system to ensure accurate capture of start and end times for mechanized rejects.</p> <p>The negative time intervals in PMs 10 and 11 were in the range of -1 to -7 minutes of which 96% were less than -5 minutes. In addition, the average response time reported in August (after the re-sync) for SBC Midwest across all 5 states, 3.72 minutes, was not significantly different from July, 2.28 minutes. This would indicate that the server timing issue did not play a significant role in the measurement of results.</p> <p>Based on the SBC Midwest restatement guidelines and because the exact difference cannot be calculated, SBC Midwest will not be restating July results.</p> <p>SBC Midwest addressed the issue identified in this observation through the re-synchronization of the system in July 2002. This issue has no impact to reported results from August 2002 data going forward, including the February - April data filed with the FCC.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 814</p> <p>Interpretation</p> <p>No Impact</p> <p>PMR 5 (5-4-C, D)</p>	<p>27, 28, 29, 35, 37, 37.1, 38, 39, 40, 41</p>	<p align="center"><u>Open</u> <u>Closed</u> <u>Satisfied</u></p>	<p><i>SBC Midwest’s posted results for Provisioning and Maintenance and Repair POTS performance measurements (27, 28, 29, 30, 31, 32, 33, 35, 37, 37.1, 38, 39, 40, 41, 42) do not follow the July, August or September 2002 published metrics business rules for UNE-P.</i></p> <p><i>BearingPoint has determined that SBC Midwest is excluding UNE Loop and Port ISDN BRI non-designed orders from the calculation of the Provisioning and Maintenance and Repair POTS performance measurements listed above. Based on conversations with SBC Midwest SMEs, it is BearingPoint’s understanding that UNE Loop and Port ISDN BRI non-designed orders are provisioned through the LMOS system and are considered a POTS service. As such, these orders should be captured in the POTS performance measurements. SBC Midwest, in the calculation of these performance measurements, specifically excludes service type codes equal to 20, 26, 27, and 33, the four service type codes that designate ISDN service. As UNE Loop and Port ISDN BRI non-designed are POTS services, these type codes should be included in the calculation of these performance measurements.</i></p> <p>There are two categories of provisioning and maintenance and repair measures. One is referred to as “Resale POTS and UNE Loop and Port Combinations” that includes PMs 28 through 42, e.g. “POTS.” The second category of provisioning and maintenance and repair measures is referred to as “Resale Specials and UNE Loop and Port Combinations” that includes PMs 43 through 54.1, e.g. “Specials.” The POTS PMs have no disaggregation for ISDN loop and port combinations; the Specials PM have a specific ISDN disaggregation: UNE Loop and Port—ISDN BRI and UNE Loop and Port—ISDN PRI. SBC Midwest is correctly reporting all UNE Loop and Port ISDN BRI orders and troubles under the specifically-defined submeasures within UNE Loop and Port category of both the Specials provisioning and maintenance measures.</p> <p>For purposes of wholesale PM reporting ISDN-BRI is considered a “Special” service, separate and distinct from POTS. Because of that, ISDN BRI service is not listed anywhere within the description, levels of disaggregation, or other details of the current business rules cited by BearingPoint. Although SBC Midwest agrees that non-design ISDN-BRI circuits are provisioned and maintained in a similar manner to POTS circuits, absent industry agreement and Commission approval to change those business rules, SBC Midwest should not include them in the published metrics for those rules. Like treatment (by SBC Midwest) of circuits in different categories is insufficient justification for including them in the performance calculations for metrics which, by definition, are dedicated to distinctly different services. Therefore, SBC Midwest is in compliance with the current business rules by <u>including</u> ISDN-BRI circuits in the calculations for the performance metrics associated with Special Services.</p> <p>Based on the business rules as currently written, SBC Midwest believes it is appropriate to exclude these circuits from the POTS measures. At the next Performance Measure collaborative, SBC Midwest will request language changes to these performance measures to ensure clarity. SBC Midwest received additional clarifying questions from BearingPoint on May 27, 2003 and is in the process of preparing a response SBC Midwest responded on June 3, 2003.</p> <p>SBC Midwest is currently reporting the disaggregation in question correctly in different performance measures than BearingPoint expects. SBC Midwest is addressing the issues identified in this observation through clarifications it will propose in the next 6-month review process. Since SBC Midwest has correctly implemented this measure, this issue has no impact to reported results, including the February - April data filed with the FCC.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
			<p><u>SBC Midwest agreed that a proposal would be made at the next six-month review to address both the designed and non-designed services in the POTS and Specials performance measurements. Ameritech will propose that all non-designed services be reported under the POTS performance measurements, while only designed services are included in the Specials performance measurements. BearingPoint stated that this is satisfactory, and closed this Observation Report on June 17, 2003.</u></p>
<p align="center">O 815</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-N)</p>	<p align="center">114</p>	<p align="center"><u>Retest</u> <u>Closed</u> <u>Satisfied</u></p>	<p><i>SBC Midwest's posted results for Performance Measurement 114 ("Percentage of Premature Disconnects (Coordinated Cutovers)") do not follow the published metrics business rules for July, August and September 2002. BearingPoint observed that SBC Midwest's numerator calculation does not match the published metrics business rules. The business rules indicate that an order should be included in the numerator if SBC Midwest disconnects the customer "10 minutes or more prior to the scheduled conversion time". SBC Midwest's numerator calculation only counts orders that are disconnected 11 minutes or more prior to the scheduled conversion.</i></p> <p>ER 512-0303 was issued to change the calculation and Business Technical Requirements documentation to be effective with February 2003 data reported March 20, 2003. SBC Midwest is restating July 2002, through January 2003, coincident with ER 512R-0303, May 5, 2003.</p> <p><u>BearingPoint reported that based on Ameritech's May 5, 2003 restatement and the response and updated documentation provided on June 9, 2003, BearingPoint agrees that the numerator calculation for the FDT disaggregation of Performance Measurement 114 is posted correctly, including orders disconnected 10 or more minutes prior to the scheduled conversion time. BearingPoint closed this Observation Report on July 1, 2003</u></p> <p>SBC Midwest addressed this issue effective with February 2003 data going forward and a restatement of July 2002 through January 2003 data. This issue has no impact to reported results for July 2002 data going forward, including the February - April data filed with the FCC.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 823</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-B)</p>	<p align="center">10, 11</p>	<p align="center">Retest</p>	<p><i>SBC Midwest’s posted results for Performance Measurements 10, (“Percent Mechanized Rejects Returned Within One Hour of Receipt of Reject in the System”) and 11 (“Mean Time to Return Mechanized Rejects”) do not follow the July or August 2002 published metrics business rules. In the process of conducting the PMR5 test, BearingPoint has found an inconsistency in SBC Midwest’s July and August 2002 reported results for Performance Measurement 10 and Performance Measurement 11. According to the business rules, these two performance measurements should have the same denominator, “total mechanized rejects.” However, the July and August posted results for these two performance measurements report different denominators (volumes).</i></p> <p>SBC Midwest issued ER 1137-0802 to correct the improper exclusion of auto/man (received electronically/handled manually) rejects in PM 10 for LSOG 5 orders for August 02 data reported on September 20, 2002. Additionally, SBC Midwest issued ER 1137R-0802 to restate this measure for April 2002 through Jul 2002 data on September 5, 2003. SBC Midwest did not implement corrective action at that time for Performance Measure 11. As a result, the performance results for Performance Measure 10 include both auto/auto and auto/man rejects whereas PM 11 includes only auto/auto rejects.</p> <p>Coincident to the implementation of the changes agreed to in the six-month review, SBC Midwest has issued ER 346-0203 that will include a modification to include auto/man rejects for Performance Measure 11. These changes effective with April 2003 data, will bring the denominators for these two performance measures into agreement. No restatements are planned for PM 11 because it is a diagnostic measure with no benchmark. SBC Midwest will implement this modification on a going forward basis.</p> <p>SBC Midwest has addressed the identified issue for PM 10 for August 2002 data going forward and also restated April 2002 through July 2002 data. This issue has no impact to PM 10 reported results for August 2002 data going forward, including the February - April data filed with the FCC.</p> <p>PM 11 is a diagnostic PM with no benchmark; therefore, SBC Midwest does not plan to restate results for this issue.</p> <p>This issue for PM 10 was addressed by E&Y in Section III, #4 and corrective actions have been verified.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 834</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-I)</p>	<p align="center">91</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 91 (“Percent of LNP Only Due Date within Industry Guidelines”) for July, August, and September 2002. In the process of conducting the PMR5 (Metrics Calculations and Reporting) test, BearingPoint determined that SBC Midwest does not exclude “NPAC caused delays” from the published performance metrics results. The published metrics business rules for Performance Measurement 91 list “NPAC caused delays” as an exclusion.</i></p> <p>The criteria to exclude “NPAC caused delays” became effective coincident with ER 250-0203 effective with February 2003 results, reported March 20, 2003. As a result, NPAC caused misses are excluded from the measure effective with the February 2003 report month.</p> <p>While it is correct that SBC Midwest did not exclude NPAC caused misses for July, August, and September 2002, it is immaterial to the performance results since SBC Midwest’s failure to exclude NPAC caused delays resulted in this holding SBC Midwest to a higher standard than the performance measure calls for and no restatements are planned.</p> <p>SBC Midwest has addressed the identified issue with the implementation of ER 250-0203 for February 2003 results going forward. Therefore, this issue has no impact to reported results for February 2003 going forward, including the February – April 2003 data filed with the FCC.</p>
<p align="center">O 835</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-4-I)</p>	<p align="center">91</p>	<p align="center">Closed Not Satisfied</p>	<p><i>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 91 (“Percent of LNP Only Due Date within Industry Guidelines”) for July, August, and September 2002. (CLEC caused or requested delays)). In the process of conducting the PMR5 (Metrics Calculations and Reporting) test, BearingPoint determined that SBC Midwest does not exclude “CLEC caused or requested delays,” from the published performance measurement. The published metrics business rules for Performance Measurement 91 list “CLEC caused or requested delays” as an exclusion.</i></p> <p>The criteria to exclude “CLEC caused or requested delays” became effective coincident with ER 250-0203 effective with February 2003 results, reported March 20, 2003. As a result, CLEC caused or requested delays are excluded from the measure effective with the February 2003 report month.</p> <p>While it is correct that SBC Midwest did not exclude CLEC caused misses for July, August, and September 2002, it is immaterial to the performance results since SBC Midwest’s failure to exclude “CLEC caused or requested delays” for PM 91 resulted in this holding SBC Midwest to a higher standard than the performance measure calls for and no restatements are planned.</p> <p>SBC Midwest has addressed the identified issue with the implementation of ER 250-0203 for February 2003 results going forward. Therefore, this issue has no impact on reported results for February 2003 going forward, including the February – April data filed with the FCC.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 845</p> <p align="center">Interpretation</p> <p align="center">Not Material, Holds SBC Midwest to a Higher Standard</p> <p align="center">PMR 5 (5-4)⁴⁸</p>	<p align="center">18</p>	<p align="center">Closed Not Satisfied</p>	<p><i>In the process of conducting the PMR 5 (Metrics Calculation and Reporting) test, BearingPoint has determined that SBC Midwest did not exclude holidays when calculating the number of bills transmitted on time for the AEBS disaggregation. The published business rules for Performance Measurement 18 specify that holidays should be excluded from the timeliness calculation.</i></p> <p>SBC Midwest agrees with BearingPoint that the business rules for Performance Measure 18 state that SBC Midwest should exclude holidays. SBC Midwest’s current calculation logic, however, does not easily allow for the removal of these occasional exclusions and SBC Midwest has been willing to accept a higher standard of performance (the inclusion of holidays) than that presently stipulated within the business rules. Since this higher standard impacts the CLECs in only a positive way, SBC Midwest does not intend to modify its current calculation methodology. This issue is similar to the issue identified in observation 649v2 with respect to PM 19.</p> <p>SBC Midwest believes its is accurately calculating and reporting results in accordance with the intent of the business rules for PM 18 including the February - April data filed with the FCC. In addition, SBC Midwest will propose clarifications to the business rules at the next 6-month review.</p>

⁴⁸ This observation was received after the cut-off date for inclusion in the April 30, 2003, BearingPoint MI report and therefore does not contain a test point reference.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">O 846 No Impact PMR5 (5-4)⁴⁹</p>	<p align="center">19</p>	<p align="center">Closed Not Satisfied</p>	<p><i>In the process of conducting the PMR5 (Metrics Calculation and Reporting) test, BearingPoint has determined that SBC Midwest is excluding Category 11 Daily Usage Feed (DUF) records from its calculation of Performance Measurement 19. The published metrics business rules for Performance Measurement 19 do not allow for this exclusion.</i></p> <p>SBC Midwest agrees with BearingPoint that the business rules for Performance Measure 19 imply that SBC Midwest should include Category 11 DUF records. BearingPoint is not asserting that SBC Midwest failed to deliver category 11 records rather, that SBC Midwest failed to count category 11 records in calculating PM 19. As explained in its response to exception 176, SBC Midwest has implemented new logic to enable SBC Midwest to report Category 11 DUF records in Performance Measure 19. This change was made coincident with ER 1462-1002 for December 2002 results going forward.</p> <p>Due to a programming change regarding data collection, this change was implemented on a going forward basis and will not be restated for data prior to December 2002.</p> <p>SBC Midwest addressed this issue effective with December 2002 data going forward. Therefore, this issue has no impact to reported results for July 2002 data going forward, including the February - April data filed with the FCC.</p> <p>The E&Y work papers indicate that E&Y did not consider Category 11 records to be required for inclusion in this PM and therefore it was not an issue.</p>

⁴⁹ This observation was received after the cut-off date for inclusion in the April 30, 2003, BearingPoint MI report and therefore does not contain a test point reference.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
<p align="center">O 847</p> <p align="center"><u>Under Review Not Material, Holds SBC Midwest to a Higher Standard</u></p> <p align="center">PMR 5 (5-3)⁵⁰</p>	<p align="center">MI 14</p>	<p align="center"><u>Open Retest</u></p>	<p><i>SBC Midwest’s posted results for Performance Measurement MI 14 (“Percent Completion Notifications Returned Within "X" Hours of Completion of Maintenance Trouble Ticket”) do not follow the July, August, or September 2002 published metrics business rules.</i></p> <p><i>SBC Midwest is improperly calculating Performance Measurement MI 14 for July, August, and September 2002 by using the duration from the “Trouble Clear Time” to the “CLEC Notification Time.” The published Metrics business rules indicate that the “trouble ticket Closed Time” – “CLEC Notification Time” interval should be used.</i></p> <p><u>SBC Midwest is currently investigating this Observation.</u></p> <p><u>In reporting trouble clear time to notification time, SBC Midwest is reporting a longer duration than the business rule calls for, and therefore, holding itself to a higher standard. In order to resolve this observation, SBC Midwest is implementing documentation and calculation changes to report the interval from “the time of the close of the trouble in WFA or LMOS to the time that the completion status is made available to the CLEC” as stated in the PM MI 14 business rule. Timing of the implementation of these changes is as follows:</u></p> <ul style="list-style-type: none"> • <u>Manually Submitted Resale and Manually submitted UNE-P disaggregations were reported using the “trouble ticket Closed Time” – “CLEC Notification Time” interval coincident with ER 775-0603. This change was effective with the May2003 report month results posted on June 20, 2003.</u> • <u>Electronically Submitted Resale and Electronically Submitted UNE-P disaggregations are planned to be reported using the “trouble ticket Closed Time” – “CLEC Notification Time” interval concurrent with ER 804-0603. This change is scheduled to take effect with the July 2003 report month results to be posted August 20, 2003.</u> • <u>Manually Submitted UNE Loop disaggregations are planned to be reported using the “trouble ticket Closed Time” – “CLEC Notification Time” interval concurrent with ER 805-0603. This change is scheduled to take effect with July 2003 report month results to be posted August 20, 2003.</u> • <u>Electronically Submitted UNE Loop disaggregations are planned to be reported using the “trouble ticket Closed Time” – “CLEC Notification Time” interval concurrent with ER 805A-0603. This change is scheduled for implementation effective with the August 2003 report month results to be posted September 22, 2003.</u> <p><u>These changes are being implemented on a going forward basis from the targeted schedule dates. Performance results will not be restated for months prior those targeted for change.</u></p> <p><u>The performance results reported for February – April 2003 data include a longer interval than the PM actually calls for and therefore holds SBC Midwest to a higher standard. SBC Midwest results during this time ranged from a low of 87.65% (UNE P Manual disaggregation) to a high of 99.19% (UNE-P Electronic disaggregation) during the three month period, with only 5 of the 18 reported disaggregations below the 95% benchmark, providing an accurate indication of the process to notify CLECs of</u></p>

⁵⁰ This observation was received after the cut-off date for inclusion in the April 30, 2003, BearingPoint MI report and therefore does not contain a test point reference.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
			<p><u>maintenance completions.</u></p> <p><u>This issue does not materially impact the accuracy or reliability of the data provided to the FCC and holds SBC Midwest to a higher standard.</u></p>
<p align="center">O 848</p> <p align="center"><u>Under Review</u> <u>No Impact</u></p> <p align="center">PMR 5 (5-3)⁵¹</p>	<p align="center">MI 14</p>	<p align="center"><u>Open</u> <u>Closed, Not</u> <u>Satisfied</u></p>	<p><i>SBC Midwest’s posted results for Performance Measurement MI 14 (“Percent Completion Notifications Returned Within "X" Hours of Completion of Maintenance Trouble Ticket”) do not follow the July, August, or September 2002 published metrics business rules.</i></p> <p><i>SBC Midwest is improperly calculating the Resale Electronic and UNE P Electronic disaggregations by including the UNE P Electronic values in the Resale Electronic results for July, August, and September 2002.</i></p> <p><u>SBC Midwest is currently investigating this Observation. A draft response based on E&Y findings is as follows:</u></p> <p><u>On June 13, 2003, SBC Midwest responded to BearingPoint.</u></p> <p>Effective with February 2003 results reported in March 2003, implemented computer program code to identify electronic UNE-P transactions and report them as a UNE-P level of disaggregation for electronically processed completion notifications. This change was successful in properly disaggregating over 96% of the transactions. Although this issue is immaterial, SBC Midwest will continue to review the computer program code for further enhancements to ensure that the transactions are reported in the appropriate disaggregation.</p> <p>SBC Midwest does not consider a restatement necessary since (1) all orders are compared to the same benchmark, (2) the reported results for the resale electronic disaggregation, which includes UNE-P, exceeded the 95% benchmark for each of the last six months before the correction was made, and (3) the reported results for February 2003 and March 2003 using the new logic continues to reflect that SBC Michigan exceeded the 95% benchmark for both Resale and UNE-P disaggregations.</p> <p><u>SBC Midwest addressed this issue effective with February 2003 data going forward. Therefore, this issue has no adverse impact on the February – April 2003 data filed with the FCC.</u></p> <p>This issue was addressed by E&Y in Section IV, #28 and corrective actions have been verified.</p>

⁵¹ This observation was received after the cut-off date for inclusion in the April 30, 2003, BearingPoint MI report and therefore does not contain a test point reference.

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center"><u>O-854</u></p> <p align="center"><u>No Impact</u></p> <p align="center"><u>PMR5</u> <u>(5-4-B)</u></p>	<p align="center">7</p>	<p align="center"><u>Retest</u></p>	<p><u>SBC Midwest is improperly applying exclusions in the calculation of Performance Measurement 7 (Percent Mechanized Completions Returned Within One Hour of Completion in Ordering System) performance measures for July, August and September 2002. In the process of conducting the PMR5 (Metrics Calculations and Reporting) test, BearingPoint has found that SBC Midwest is excluding orders with particular order class codes from the calculation of Performance Measurement 7. The order class code is used to identify the type of order to which a product relates. Performance Measurement 7 tracks all mechanized completions returned within one hour of completion, and the business rules do not allow for the exclusion of class codes “89”, “90”, “92”, “93” and “95”.</u></p> <p><u>The SBC Midwest posted results for Performance Measurement 7 include class codes 89,” “90,” “92,” “93,” and “95” for July, August, and September 2002. SBC Midwest determined that the technical documentation that BearingPoint relied upon to issue this finding erroneously did not include these class codes as appropriate to include in the performance measurement. SBC Midwest provided BearingPoint with corrected documentation on June 24, 2003.</u></p> <p><u>This is a documentation issue and does not represent a data calculation or reporting issue. Therefore, this issue has no adverse impact on the February – April 2003 data filed with the FCC.</u></p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points ²⁰	PMs ²¹	Status ²²	BearingPoint Issue Description & SBC Midwest Comments ²³
<p align="center"><u>O-856</u></p> <p align="center"><u>No Material Impact</u></p> <p align="center"><u>PMR5</u> <u>(5-3-A)</u></p>	<p align="center">1.2</p>	<p align="center">Retest</p>	<p><u>SBC Midwest’s posted results for Performance Measurement 1.2 (“Accuracy of Actual Loop Makeup Information Provided for DSL Orders”) do not follow the July, August, or September 2002 published metrics business rules. The technical documentation for Performance Measurement 1.2 includes a technical error that results in improper calculation of the performance measurement. Two of the data sources for this performance measurement are 1) the Facilities Modification (FMOD) database, and 2) WFA reports that include all installation related trouble tickets closed in the reporting month. The current implementation of the performance measurement attempts to count Loop Makeup Information responses provided manually by comparing the FMOD records with the WFA reports. The comparison is made by matching “Report Number” in the WFA reports with the “Order Number” in the FMOD database.</u></p> <p><u>This comparison is inappropriate given that the WFA “Report Number” is the trouble ticket number generated when the trouble was called in, and the FMOD “Order Number” is the Service Order Number generated when the provisioning order was accepted. These data elements result from different underlying business processes and are listed in different formats; therefore the values of the two for a given order will never be the same. As a result, SBC Midwest is effectively not reporting its performance on Loop Makeup information provided manually, which is one of the specified disaggregations.</u></p> <p><u>SBC Midwest has updated the technical requirements for PM 1.2 correcting the technical error that excluded Manual Loop Makeup orders in the PM 1.2 performance measurement calculation. After reviewing the data for January, February, and March 2003, SBC Midwest has determined that there was either no change in the results (0 misses and 100% result) or no Manual Loop Makeup orders in Michigan during these three months. Therefore, the posted results for these months would not be materially affected and there is no need for a restatement.</u></p> <p><u>Additionally SBC Midwest and CLECs have agreed that the “Reporting of (the current) PM 1.2 (is to be) Suspended Upon Implementation of PM 1.3”. PM 1.2 was thus modified in the 6-month review collaborative, and this change was approved by the MPSC. The new PM 1.3 was implemented with April results, posted May 20, 2003 and at that point, PM 1.2 will no longer be reported.</u></p> <p><u>SBC Midwest’s materiality review indicated that there is no material change to posted results for the months of January, February, or March for the Manual Loop Make-Up disaggregation. Since this measurement was suspended with the implementation of PM 1.3, beginning with April data reported in May 2003, there is no material impact to the February-April 2003 data provided to the FCC.</u></p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

REVISED

MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center"><u>O-859</u> <u>No Material Impact</u> <u>PMR5</u> <u>(5-3-R)</u></p>	<p align="center"><u>MI 14</u></p>	<p align="center"><u>Retest</u></p>	<p><u>SBC Midwest’s posted results for Performance Measurement MI 14 (“Percent Completion Notifications Returned Within “X” Hours of Completion of Maintenance Trouble Ticket”) do not follow the July, August, or September 2002 published metrics business rules. SBC Midwest is improperly calculating the Manual UNE disaggregation of Performance Measurement MI 14 by counting tickets with blank notification dates as being returned by the next day. As there is no notification date present on these tickets, there is no way to determine if or when a notification was sent; thus, SBC Midwest cannot determine whether the timeliness of these transactions meets the standard identified within Performance Measurement MI 14.</u></p> <p><u>SBC Midwest agreed with BearingPoint that the published metric Business Rule states to measure the interval “from the time from the close of the trouble in WFA or LMOS to the time that the completion status is made available to the CLEC” SBC Midwest currently defaults closed UNE Loop trouble reports not having a clearly defined Customer Advised or notification date as being included in the numerator and denominator of PM MI 14 and therefore counting it as a “Make”. As a result of this and Observation 849, SBC Midwest will change the default indicator to a “Miss” and exclude the record from the numerator calculation of the measure. This change will be implemented coincident with ER 759-0503 effective with June, 2003 data reported July 21, 2003.</u></p> <p><u>In its analysis of July, August, and September data months, SBC Midwest identified that this modification would change the results reported by less than 0.3% in any of the three months and thus deemed it as not material. Although not material based on SBC Midwest guidelines, SBC Midwest restated this measure for the July, August and September 2002 data months only coincident with ER 759-0503R on July 7, 2003 in order to satisfy BearingPoint test requirements.</u></p> <p><u>SBC Midwest’s materiality analysis identified this modification as not material and therefore would not impact the February – April 2003 data filed with the FCC. The issue related to Observation 859 has been fixed going forward with June 2003 data.</u></p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

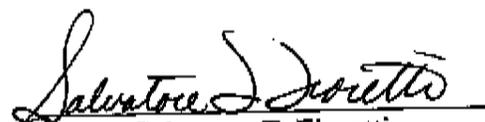
MI OE# Impact Test Points²⁰	PMs²¹	Status²²	BearingPoint Issue Description & SBC Midwest Comments²³
<p align="center">E 111</p> <p align="center">Interpretation</p> <p align="center">No Impact</p> <p align="center">PMR 5 (5-3-D)</p>	<p align="center">67</p>	<p align="center">Closed Not Satisfied</p>	<p><i>Timeliness measures (PMs 66, 67, and 68) of Unbundled Network Element (UNE) loop repairs, excluding UNE Loop and Port combinations, are compared to retail results using dissimilar data points creating incorrect comparison results relative to the timeliness of services provided.</i></p> <p><i>BearingPoint evaluated the timeliness of maintenance and repair results and found that SBC Midwest calculated wholesale results for both performance measures 67 and 68 by subtracting “no access” and “delayed maintenance” from the total duration (received to cleared times). The business rules for performance measure 68 do not allow for these exclusions. Additionally, BearingPoint found that “no access” or delayed maintenance” was not removed from the retail results.</i></p> <p>SBC Midwest believes it has fully addressed the issues raised in this Exception through a combination of process enhancements and clarifications to the business rules for PMs 66-68. For example, SBC Midwest implemented modifications to both its operational and performance measurement processes.</p> <ul style="list-style-type: none"> ▪ SBC Midwest modified its process for application of No Access Time for the 8db loop measured in WFA/C. No Access Time for customer reasons now includes only those instances when an SBC Midwest technician requires access to the end user premises and is denied access for CLEC or end user customer caused reasons. ▪ SBC Midwest discontinued its process of applying “Delayed Maintenance” time for 8db loops, where the parity comparison does not include a similar process effective in December 2002. Additionally, SBC Midwest modified its calculation process whereby SBC Midwest programmatically (vs. the current manual implementation) removes Delayed Maintenance time, effective with February 2003 data. ▪ SBC Midwest gained agreement of CLECs and Regulators to implement “documentation only” business rule changes in the six-month review session to document the applicability of No-Access and Delayed Maintenance for both wholesale and retail trouble tickets as the performance measure is currently implemented. No opposition to these changes was expressed by CLECs during the collaborative. SBC Midwest has requested that the MPSC staff direct BearingPoint to utilize business rules that incorporate these “documentation only” clarifications. This issue is based on BearingPoint’s literal interpretation of the business rules and becomes moot once BearingPoint utilizes this clarified set of business rules. ▪ SBC Midwest has also enhanced its trouble reporting process as defined in the CLEC Handbook, LOC Maintenance Trouble Reporting Responsibilities, Section 4.1.3 to make clear the responsibility of the CLEC to sectionalize trouble prior to reporting a trouble to the SBC Midwest LOC. This section was updated to include notice that “time taken to test and isolate the trouble will not count against the duration of the ticket, but rather will be stasured as No Access Time”. The exclusion of time to sectionalize is consistent with the POTS retail equivalent. ▪ SBC Midwest made changes to its Job Aid JA-000-000-092 and the CLEC Handbook (EB/TA User Guide) further define authorized occurrences when No Access Time may apply. <p>SBC Midwest has implemented changes to the underlying practices, systems, data and/or calculations that are being made for Performance Measures 66 – 68. BearingPoint has closed this Exception as “Not Satisfied” as these modifications were made on a going forward basis only and did not occur during its three month test evaluation period.</p>

**PMR5-3 and 5-4 Analysis
From the BearingPoint PMR5 Status Matrix (Attachment D)**

<i>MI OE# Impact Test Points</i> ²⁰	<i>PMs</i> ²¹	<i>Status</i> ²²	<i>BearingPoint Issue Description & SBC Midwest Comments</i> ²³
			Therefore, this issue does not affect the performance reported during the February – April period that is filed with the FCC. E&Y considered the “no access” issue for PM 68 as a reasonable interpretation. See E&Y Attachment B, Interpretation #23.

I hereby declare, under penalty of perjury, that the foregoing attachment is true and correct.

Executed on July 10, 2003.


Salvatore T. Fioretti