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John W. Kure
Executive Director – Federal Regulatory

Ex Parte

November 20, 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: In the Matter of Performance Measurements and Standards for Interstate Special Access Services, CC Docket No. 01-321

Dear Ms. Dortch:

Yesterday, Qwest met with members of the Wireline Competition Bureau to discuss the above referenced docket. I was present in-person, and also representing Qwest by phone were Greg Smith, Barry Orrel, Nancy Lubamersky, David Phillips, Todd Staebell and Charlet Mahs. Participating from the Wireline Competition Bureau were Henry Thaggert, Michael Engel, Daniel Shiman, Ian Dillner, Rodney McDonald, Julie Veach and Pamela Megna. The items in the attached materials were discussed during the meeting.

Pursuant to FCC Rule 1.49(f), this ex parte is being filed electronically via the Electronic Comment Filing System for the inclusion in the public record of the above referenced docket pursuant to FCC Rule 1.1206(b)(2).

Sincerely,
/s/ John W. Kure

cc:
Henry Thaggert (via e-mail at henry.thaggert@fcc.gov)
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Attachments

NATIONAL PERFORMANCE MEASUREMENTS

Metric Number: Name:

FIRM ORDER CONFIRMATIONS ON TIME (QWEST-SA-1)

Definition:

Monitors the timeliness with which Provider returns Firm Order Confirmation (FOC) to customers in response to ASRs received from customers, focusing on the degree to which FOCs are provided within specified intervals.

Exclusions:

1. ASRs involving individual case basis (ICB) handling based on quantities of lines, as specified in service request types, deemed to be projects.
2. ASR with customer-requested FOC arrangements different from standard FOC arrangements.
3. Hours on weekends and holidays.
4. Records with invalid product codes.
5. Records missing data essential to the calculation of the measurement.
6. Duplicate ASR numbers.
7. Records with invalid application or confirmation dates.
8. Disconnect ASRs.
9. Cancelled ASRs.
10. Records ASRs.
11. Incomplete or erroneous ASRs.

Business Rules:

Measures the percentage of Firm Order Confirmations (FOC) that are provided to customers within the intervals specified.
Includes all ASRs that are submitted through the specified interface or in the specified manner (e.g., facsimile) that receive an FOC during the reporting period.
ASRs are measured only in business days.

Levels of Disaggregation:

1. FOC provided for ASRs requesting Special Access.
2. DS0, DS1 and DS3 + Ocn

Calculation:	Report Structure/Geography:
(Count of ASRs for which the original FOCs [(FOC notification date and time)-(Application date and time)] is within the intervals specified for the service category involved) / (Total number of original FOC notifications transmitted for the service category in the reporting period) x 100.	By state

NATIONAL PERFORMANCE MEASUREMENTS

Metric Number: Name:

INSTALLATION COMMITMENT MET (QWEST-SA-4)

Definition:

Evaluates the extent to which Provider installs services for customers by the scheduled due date.

Exclusions:

1. Disconnect, From (another form of disconnect) and record order types.
2. Due dates missed for standard categories of customer and non-Provider reasons.
3. Records involving official company services.
4. Records with invalid due dates or application dates.
5. Records with invalid completion dates.
6. Records with invalid product codes.
7. Records missing data essential to the calculation of the measurement.

Business Rules:

Measures the percentage of orders for which the scheduled due date is met. All inward orders (Change, New, and Transfer order types) assigned a due date by Provider and which are completed/closed during the reporting period are measured. Change order types consist of all C order with I and T action coded line USOC's. Also, included are orders with customer-requested due dates longer that the standard interval and projects.

Completion date on or before the applicable due date recorded by Provider is counted as a met due date. The applicable due date is the original due date or, if changed or delayed by the customer, the most recently revised due date, subject to the following: If Provider changes a due date for Provider reasons, the applicable due date is the customer initiated due date, if any, that is (a) subsequent to the original due date and (b) prior to a Provider initiated, changed due date, if any.

Levels of Disaggregation:

1. DS0, DS1 and DS3 + Ocn

Calculation:	Report Structure/Geography:
(Total orders completed in the reporting period on or before the applicable due date)/(Total orders completed in the reporting period) x 100.	By state

NATIONAL PERFORMANCE MEASUREMENTS

Metric Number: Name:

DELAY DAYS (QWEST-SA-5)

Definition:

Evaluates the extent Provider is late in installing services for customer, focusing on the average number of days that late orders are completed beyond the committed due date.

Exclusions:

1. Disconnect, From (another form of disconnect) and record order types.
2. Records involving official company services.
3. Records with invalid due dates or application dates.
4. Records with invalid completion dates.
5. Records with invalid product codes.
6. Records missing data essential to the calculation of the measurement.

Business Rules:

Measures the average number of business days that service is delayed beyond the applicable due date for non-facility reasons attributed to Provider.
Measures the average number of business days that service is delayed beyond the applicable due date for facility reasons attributed to Provider.
Includes all inward orders (Change, New, and Transfer order types) assigned a due date by Provider and which are completed/closed during the reporting period are measured. Change order types consist of all C order with I and T action coded line USOC's.
The applicable due date is the original due date or, if changed or delayed by the customer, the most recently revised due date, subject to the following: If Provider changes a due date for Provider reasons, the applicable due date is the customer initiated due date, if any, that is (a) subsequent to the original due date and (b) prior to a Provider initiated, changed due date, if any.

Levels of Disaggregation:

1. DS0, DS1 and DS3 + Ocn

Calculation:	Report Structure/Geography:
((Actual completion date of late order for non-facility reasons)-(Applicable due date of late order)-(time intervals associated with customer initiated due date changes or delays occurring after the applicable due date))/(Total number of late orders for non-facility reasons completed in the reporting period). ((Actual completion date of late order for facility reasons)-(Applicable due date of late order)-(time intervals associated with customer initiated due date changes or delays occurring after the applicable due date)) / (Total number of late orders for facility reasons completed in the reporting period).	By state

NATIONAL PERFORMANCE MEASUREMENTS

Metric Number: Name:

INSTALLATION INTERVALS (QWEST-SA-6)

Definition:

Evaluates the timeliness of Provider's installation of services for customer, focusing on the average time to install service.

Exclusions:

1. Disconnect, From (another form of disconnect) and record order types.
2. Records involving official company services.
3. Records with invalid due dates or application dates.
4. Records with invalid completion dates.
5. Records with invalid product codes.
6. Records missing data essential to the calculation of the measurement.
7. Orders with customer requested original due dates greater than the current standard interval.

Business Rules:

Measures the average interval (in business days) between the application date and the completion date for service orders accepted and implemented.
Includes all inward orders (Change, New, and Transfer order types) assigned a due date by Provider and which are completed/closed during the reporting period are measured. Change order types consist of all C order with I and T action coded line USOC's.
Intervals for each measured event are counted in whole days, the application date is day zero (unless Saturday the application date is the following Monday) the day following the application date is day one. Saturday is counted as a business day when the service order is completed on Saturday.
The applicable due date is the original due date or, if changed or delayed by the customer/non-provider reasons, the most recently revised due date, subject to the following: If Provider changes a due date for Provider reasons, the applicable due date is the customer or non-provider initiated due date, if any, that is (a) subsequent to the original due date and (b) prior to a Provider initiated, changed due date, if any.

Levels of Disaggregation:

1. DS0, DS1 and DS3 + Ocn

Calculation:	Report Structure/Geography:
((Order completion date)-(Order application date)-(Time interval between the original due date and the applicable date)-(Time intervals associated with customer initiated/non-provider due date changes or delays occurring after the applicable due date)) /(total number of orders completed in the reporting period). EXPLANATION: The average installation interval is derived by dividing the sum of installation intervals for all order (in business days) by total number of services orders completed in the reporting period.	By state

NATIONAL PERFORMANCE MEASUREMENTS

Metric Number: Name:

INTERVAL FOR PENDING ORDERS DELAYED PAST DUE DATE (QWEST-SA-7)

Definition:

Evaluates the extent to which Provider's pending orders are late, focusing on the average number of days the pending orders are delayed past the applicable due date as of the end of the reporting period.

Exclusions:

1. Disconnect, From (another form of disconnect) and record order types.
2. Records involving official company services.
3. Records with invalid completion dates.
4. Records with invalid product codes.
5. Records missing data essential to the calculation of the measurement.

Business Rules:

Measures the average number of business days that pending orders are delayed beyond the applicable due date for reasons attributed to Provider. Includes all inward orders (Change, New, and Transfer order types) for which the applicable due date recorded by Provider has been missed. Change order types consist of all C order with I and T action coded line USOC's.
Reports the number of pending orders that were delayed for Provider facility reasons.
The applicable due date is the original due date or, if changed or delayed by the customer, the most recently revised due date, subject to the following: If Provider changes a due date for Provider reasons, the applicable due date is the customer initiated due date, if any, that is (a) subsequent to the original due date and (b) prior to a Provider initiated, changed due date, if any.

Levels of Disaggregation:

1. Statewide level
2. DS0, DS1 and DS3 + OCn

Calculation:	Report Structure/Geography:
((Last day of reporting period)-(Applicable due date of late pending order)-(Time intervals associated with customer initiated due date changes or delays occurring after the applicable due date))/(Total number of pending orders delayed for Provider reasons as of the last day of reporting period). *Note*: Count of pending orders that were delayed for Provider facility reasons.	By state

NATIONAL PERFORMANCE MEASUREMENTS

Metric Number: Name:

NEW SERVICE INSTALLATION QUALITY (QWEST-SA-8)

Definition:

Evaluates the quality of installing new services, focusing on the percentage of monthly new order installations that report trouble within thirty (30) calendar days following installation, including the percentage of new service installations that experienced a trouble report on the installation date after the order is reported as work completed.

Exclusions:

1. Trouble reports coded as TOK or NTF
2. Trouble reports coded to trouble codes for Carrier Action (IEC), Customer Provided Equipment (CPE) and non-Provider reasons.
3. Repair reports coded to disposition codes for referral to another department (i.e., for non-repair ticket resolutions of non-installation-related problems, except cable cuts, which are not excluded).
4. Subsequent trouble reports of any trouble on the installed service before the original trouble report is closed.
5. Information tickets generated for internal Provider system/network monitoring purposes.
6. Trouble reports on the day of installation before the installation work is reported as completed.
7. Disconnect, From (another form of disconnect) and Record order types.
8. Records involving official company services.
9. Records with invalid due dates, application dates, or start dates
10. Records with invalid completion, cleared, or closed dates.
11. Records with invalid product codes.
12. Records missing data essential to the calculation of the measurement.

Business Rules:

Measures the monthly percentage of new installations reporting repair troubles within 30 calendar days of initial installation. New installation orders used in calculating this performance indicator are all inward orders completed in the reporting period.

Repair trouble reports are defined as CLEC/customer notifications to the Provider of out-of-service and other service affecting conditions for which the Provider opens repair tickets in its maintenance and repair management and tracking systems that are closed in the reporting period or the following month, subject to exclusions shown above.

- The "following month" also includes the period of a few business days (typically four or five) afterward, up to the time when the Provider pulls the repair data to begin processing results for this measurement.

Results are, reported in arrears (i.e., results first appear in reports one month later than results for measurements that are not reported in arrears), in order to cover the 30-day period following installation.

Levels of Disaggregation:

1. Statewide level
2. DS0, DS1 and DS3 + Ocn

Calculation:	Report Structure/Geography:
(Number of inward line service orders completed in the reporting period with repair trouble reports within 30 days of installation) / (Number of inward line service orders completed in the reporting period) x 100	By state

NATIONAL PERFORMANCE MEASUREMENTS

Metric Number: Name:

TROUBE RATE (QWEST-SA-9)

Definition:

Evaluates the overall rate of trouble reports as a percentage of the total installed base of the service or element.

Exclusions:

1. Trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE).
2. Subsequent trouble reports of any trouble, on the installed service before the original trouble report is closed.
3. Information tickets generated for internal Provider system/network monitoring purposes.
4. Trouble reports on the day of installation before the installation work is reported as completed.
5. Records involving official company services.
6. Records with invalid trouble receipt dates.
7. Records with invalid cleared, or closed dates.
8. Records with invalid product codes.
9. Records missing data essential to the calculation of the measurement.

Business Rules:

Measures trouble reports by product and compares them to the number of lines in service.
Includes all trouble reports closed during the reporting period.
Includes all applicable trouble reports, including those that are out of service and those that are only service-affecting.

Levels of Disaggregation:

1. Statewide level
2. DS0, DS1 and DS3 + OCn

Calculation:	Report Structure/Geography:
(Total number of trouble reports closed in the reporting period involving the specified service grouping) / (Total number of the specified services that are in service in the reporting period) x 100	By state

NATIONAL PERFORMANCE MEASUREMENTS

Metric Number: Name:

MEAN TIME TO RESTORE (QWEST-SA-10)

Definition:

Evaluates timeliness or repair, focusing ON how long it takes to restore services to proper operation.

Exclusions:

1. Trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE).
2. Subsequent trouble reports of any trouble, on the installed service before the original trouble report is closed.
3. Information tickets generated for internal Provider system/network monitoring purposes.
4. Trouble reports on the day of installation before the installation work is reported as completed.
5. Records involving official company services.
6. Records with invalid trouble receipt dates.
7. Records with invalid cleared, or closed dates.
8. Records with invalid product codes.
9. Records missing data essential to the calculation of the measurement.
10. Time delay due to no access.

Business Rules:

Measures the time actually taken to clear trouble reports.
Includes all trouble reports closed during the reporting period.
Includes customer direct reports, customer-delayed reports, and test assist reports that result in a trouble report.
Time measured is from date and time of receipt to date and time trouble is cleared.

Levels of Disaggregation:

1. DS0, DS1 and DS3 + Ocn

Calculation:	Report Structure/Geography:
((Date and time trouble report cleared)-(Date and time trouble report opened))/(Total number of trouble reports closed in the reporting period)	By state

NATIONAL PERFORMANCE MEASUREMENTS

Metric Number: Name:

REPAIR REPEAT REPORT RATE (QWEST-SA-11)

Definition:

Evaluates the accuracy of repair actions, focusing on the number of repeated trouble reports received for the same trouble within a specified period (30 calendar days).

Exclusions:

1. Trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE).
2. Subsequent trouble reports of any trouble, on the installed service before the original trouble report is closed.
3. Information tickets generated for internal Provider system/network monitoring purposes.
4. Trouble reports on the day of installation before the installation work is reported as completed.
5. Records involving official company services.
6. Records with invalid trouble receipt dates.
7. Records with invalid cleared, or closed dates.
8. Records with invalid product codes.
9. Records missing data essential to the calculation of the measurement.

Business Rules:

Measures the percentage of trouble reports that are repeated within 30 days on end user circuits.
Includes all trouble reports closed during the reporting period that are received within thirty days of the previous trouble report for the same service (regardless of whether the report is about the same type of trouble for that service).
In determining same service Provider will compare the end user circuit number of the trouble reports with reports received in the prior 30 days.
Includes report due to Provider network or system causes, customer-direct and custom-relayed reports.
The 30 days is from the date and time that the immediately-preceding trouble report is closed to the date and time that the next, or repeat trouble report is received (*i.e.*, opened).

Levels of Disaggregation:

1. Statewide level
2. DS0, DS1 and DS3 + Ocn

Calculation:	Report Structure/Geography:
(Total repeated trouble reports closed within the reporting period that were received within 30 calendar days of when the preceding initial trouble report closed) / (Total number of trouble reports closed in the reporting period) x 100	By state

JCIG Proposed Measurement	Qwest Proposed Comparable Measurement	Differences:
• **ORDER STATUS MEASUREMENTS:**		
1. FOC Receipt (JCIG SA-1)	(Qwest SA-1) Firm Order Confirmations (FOCs) On Time	• JCIG proposes facilities check before FOC. Qwest would only provide facility checks on specified loop types (i.e., DS1) with a 72-hour FOC interval. DS0 facilities are usually available; a facility check is not required. DS3 and OCN facilities are typically part of a project requiring investigation before an FOC can be assigned. • JCIG proposes to include projects. Qwest would exclude projects and Individual Case Basis (ICBs) orders because they require varying intervals based on the complexity of the project or ICB and facility availability. • JCIG proposed 3 variations on the measurement: Percent Received within Standard, and two diagnostics providing FOC receipt distribution and ASRs withdrawn due to ILEC causes. Qwest would report Percent on Time. Qwest cannot currently measure FOC receipt distribution. Qwest's ASR process does not have the data available to determine "ASRs withdrawn due to ILEC causes". • JCIG measures from ASR sent date to FOC receipt date. Qwest would measure Application date to notification date. If the Application is received after 3 p.m. the start date should be the next day. The stop date is date FOC sent back. • Recognizing the problems associated with Qwest using the "FOC Sent" date in Minnesota, Qwest received a letter from one of the JCIG members allowing Qwest to utilize the "Application Date" for reporting purposes.
2. FOC Receipt Past Due (JCIG-SA-2)		• Duplicative. When FOC is issued it will be counted as provided on time or missed. If the FOC interval is greater than standard, it should count as a miss. If not, even if received after the end of the reporting period it should not be counted against performance. Double counted if held to standard on this measure as well as JCIG-SA-1. • Qwest system does not have the functionality to track this measure.
3. Offered Versus Requested Due Date (JCIG-SA-3)		• Qwest system does not measure this. Would require a manual process or expensive and time consuming system development.

• **PROVISIONING MEASUREMENTS:**		
4. On Time Performance To FOC Due Date (JCIG-SA-4)	(Qwest SA –4) Installation Commitments Met	• JCIG uses last due date. Qwest would use the applicable due date (applicable due date is the original due date or, if changed or delayed by the customer, the most recently revised due date) on the order (Otherwise system development is required). • JCIG request that the percentage of ASRs that are filled by the FOC due date be reported. Qwest would evaluate the extent to which orders are installed by the scheduled due date on the order. • JCIG proposes two measures one that counts CNR as met and a diagnostic measure that doesn't consider CNR, or reports CNR as miss. Qwest would exclude orders with applicable due dates missed for standard categories of customer and non-provider reasons but, CNRs should not be counted as a miss and there should not be a separate measurement for CNR. CNR is not a measurement of Qwest, only a measurement of the customer. • Qwest would include OCn in the DS3 measure.
5. Average Delay Days on Missed Installation Orders (JCIG SA-5)	(Qwest-SA-5) Delay Days	• JCIG suggests that the average day's late (difference between FOC due date and circuit completion date) be measured, both in the aggregate and in a distributed manner. Qwest would measure applicable average days late for non-facility reasons attributed to providers. Qwest would also measure applicable due date (applicable due date is the original due date or, if changed or delayed by the customer, the most recently revised due date) on the order for average days late for facility reasons attributed to providers. • Qwest would include OCn in with the DS3 measure. • JCIG proposes measuring circuits. Qwest would measure based on orders.

6. Average Intervals – Requested/Offered/Installed (JCIG SA-6)	(Qwest-SA-6) – Installation Interval	• JCIG suggest three different measures for the provisioning process 1. Average Requested Interval. Qwest does not currently measure this nor is the information available. 2. Average Offered Interval. This is a redundant measurement information is included in the "Average Installation Interval" below. 3. Average Installation Interval. Qwest would evaluate the timeliness of installation of orders rather than ASRs for customers focusing on the average time to install service. • JCIG measures between ASR sent date and ASR completion date. Qwest would measure between the application date and completion date of the service orders accepted and implemented. • JCIG would count Intervals for each measured event in whole days. Qwest agrees but would use the application date as day zero (unless on Saturday in which case the following Monday is day zero) the day following the application date is day one. • JCIG includes all orders including projects. Qwest would exclude orders with customer requested original due dates greater than the current standard interval. • Qwest would include OCn in with the DS3 measure. • JCIG measures on ASRs. Qwest would measure based on orders.

7. Past Due Circuits (JCIG-SA-7)	(Qwest-SA-7) – Interval for Pending Orders Delayed Past Due Date	• JCIG takes a snapshot view of circuits not completed (more than 5 days past the FOC due date) as of the end of the reporting period. JCIG proposes breakout for ILEC reasons, ILEC facility reasons, and for customer reasons. Qwest agrees but would not report on customer reasons, it is not a measurement of the ILEC and would only add to the cost of reporting for Qwest. • JCIG recommends reporting cancellations for orders delayed past the FOC Due Date. Cancellations and orders missed for Customer reasons should be excluded. Cancellations may be removed from the system at any time and may have been removed at the time of the report. This measurement would not provide a true picture. • JCIG proposes measuring circuits on an ASR basis. If not all circuits on the ASR are complete, the ASR is not complete; leaving all circuits on the ASR counted as not complete. Qwest recommends the measurement be based on completion of orders. A true count of circuit provisioning may then be obtained. • Qwest would include OCn in with the DS3 measure.
8. New Installation Trouble Report Rate (JCIG-SA-8)	(Qwest-SA-8) – New Service Installation Quality	• JCIG proposes measuring circuits. Qwest would use orders. • OCn should be included with the DS3 measure. • Qwest would report in arrears rather than the two-month averaging.
MAINTENANCE & REPAIR MEASURMENTS:		
9. Failure Rate (JCIG-SA-9)	(Qwest-SA-9) – Trouble Rate	• JCIG proposes measuring the annualized number of trouble reports times the number of circuits. Qwest would measure closed monthly trouble reports including trouble reports that are out of service and those that are only service-affecting and compare them to the number of lines in services. • JCIG proposes two levels below DS3 and DS3 and above including OCn. Qwest would measure DSO and DS1 separately and include OCn in DS3 in one measurement.

10. Mean Time to Restore JCIG-SA-10	(Qwest-SA-10) – Mean Time to Restore	• JCIG proposes two levels: below DS3 and DS3 and above including Ocn. Qwest would report DSO and DS1 separately and include OCN in with the DS3 measurement. • JCIG recommends measuring the mean time between submission of a trouble report and resolution of the trouble by the ILEC. Qwest would measure the time taken to clear trouble reports between the date and time of receipt to date and time trouble is cleared.
11. Repeat Trouble Report (JCIG-SA-11)	(Qwest-SA-11) – Repair Repeat Report Rate	• JCIG proposes a measurement of the percentage of trouble reports for circuits, which had a previous trouble report within the previous thirty days. Qwest would measure the percentage of trouble reports that are repeated within 30 days on end user lines and circuits. • Qwest would exclude trouble reports coded to Carrier action (IEC) and Customer Provided Equipment (CPE). Also, exclude subsequent trouble reports of any trouble before the original trouble report is closed and trouble reports on the day of installation before the installation work is reported complete. • Qwest would include OCn in the DS3 measurement.

QWEST

EX PARTE

PERFORMANCE MEASUREMENTS
FOR INTERSTATE SPECIAL ACCESS SERVICES

CC DOCKET NO. 01-321

NOVEMBER 19, 2003

QWEST

- Mandatory special access performance measurements are not needed.
- What is needed is a standard set of measurement definitions whereby a customer may compare carriers' claims of performance.
- If the FCC does deem measurements to be necessary and mandatory, Qwest proposed a set of measurements very close to those proposed by JCIG, only modified to allow Qwest to utilize existing PID/PAP performance measurement systems.
- Qwest's proposal could be implemented with only a minimal amount of cost.
- The Staff's proposed JCIG modifications will require expensive and time consuming system changes and changes to programming that Qwest does not own and control exclusively.

QWEST PROPOSED SPECIAL ACCESS MEASUREMENTS, DEFINITIONS AND BUSINESS RULES

(See Attachment A)

Note: In this document, Qwest has changed its previous SA-8 New Service Installation Quality to be more consistent with JCIG's proposed SA-8 New Installation Trouble Report.

DIFFERENCES BETWEEN JCIG PROPOSED MEASUREMENTS AND QWEST'S PROPOSAL

(See Attachment B)

Note: In this document, Qwest has changed its previous SA-8 New Service Installation Quality to be more consistent with JCIG's proposed SA-8 New Installation Trouble Report .

QWEST RESPONSE TO STAFF QUESTIONS

GENERAL OBSERVATIONS

Staff has made a proposal to base the Special Access measurements (ordering , provisioning and repair) on the application date to eliminate the opportunity for double counting. Reporting would be provided as a snapshot at the end of the month and include completed and pending activity. Transactions would be marked met/missed based on completion information or where the transaction stands relative to committed dates.

•While meaning well, the Staff's proposal would require a significant change in the way services are tracked by Qwest.

QWEST RESPONSE TO STAFF QUESTIONS

GENERAL OBSERVATIONS (cont'd)

- **Reporting services based on pending orders would:**
  - Require a major development of Qwest's existing measurement system to measure pending ASRs and Repairs. An ability that does not exist today;
  - Require development by a 3rd party vendor and would be:
    - subject to the vendor's costs, subject to the vendor's time frames, could cost in the $ millions, and take years to complete.
  - Create an entirely new measurement system that is not aligned with the current 251 (PID/PAP) / 272 measurement system;
  - End up including cancellations in the measurement;
  - Require complex analysis of pending transactions;
  - Make data reconciliation and auditing impossible.

QWEST RESPONSE TO STAFF QUESTIONS (cont'd)

- **Double counting in the following measures:**

  - **FOC Receipt (SA-1) and FOC Past Due (SA-2)**

    - When an FOC is issued it will be counted in SA-1. If it is late it will be counted in SA-2 as well.

    - As proposed by Qwest elimination of SA-2 will eliminate the double counting.

  - **On Time Performance to FOC Due (SA-4) , Past Due Circuits (SA-7) and Average Delay Days On Missed Installation Orders (SA-5)**

    - Qwest recognizes that in its and JCIG's measures there is some amount of duplication. But, as long as the measurements are only informational the duplications are not critical.

QWEST RESPONSE TO STAFF QUESTIONS (cont'd)

- **New Installation Failures (SA-8); Maintenance Failure Rate (SA-9); New Installation Repeat Failures and Repeated Troubles (SA-11)**
  - Qwest recognizes that in its and JCIG's measures there is some amount of duplication. But, as long as the measurements are only informational the duplications are not critical.

- **Handling of projects, CNR's, TOK/FOK and no facilities :**
  - **Projects**
    - By their nature, are complex, require multiple events or circuits, sometimes in the hundreds, and require non-standard intervals for scheduling. As such, projects should be excluded from any measurements that count or compare services based on standard intervals as identified by Qwest in Attachment B.

QWEST RESPONSE TO STAFF QUESTIONS (cont'd)

- **Handling of Projects, CNR's, TOK/FOK and No Facilities (cont'd)**
  - **Test OK (TOK) and No Trouble Found (NTF)**
    - TOK and NTF can be manipulated by the customer reporting troubles when either no trouble exists or when the trouble report is used as a means of determining the location of the trouble by the customer without using their own forces. They can also be manipulated by the provider. As such TOK and NTF should be excluded in measurements as identified by Qwest in Attachment B
  - **No Facilities**
    - Where no facilities are available and special steps such as construction or grooming are required to obtain the facilities for the customer, the orders require nonstandard scheduling and should be and excluded from standard interval type counts or counts that don't reflect their unique nature.

QWEST RESPONSE TO STAFF QUESTIONS (cont'd)

•Modification of reporting to be nondiscrimination reports rather than reports measured against benchmarks (i.e., the use of Section 272(e) (1) of the Communications Act as a basis.)

- If the Commission does deem that performance measurement reporting for Special Access Services is necessary to determine the quality and performance of Special Access Services in the United States, the goal can only be achieved if all providers of Special Access Services are measured. This would include ILECS, CLECs and IXCs.

- Section 272(e)(1) of the Communications Act deals with the Bell operating companies and their affiliates and the provision of requests for exchange and exchange access service within a period no longer than it provides that service to itself or its affiliate. If the Commission utilized this provision of the Act for the basis of the special access measurements, the Commission would not be able to get a true picture of the industry because it would only pertain to the BOCs and would miss major providers of the service.

- If Section 272(e) (1) is the basis, a parity comparison based on what the BOC provides itself or its affiliate can be the only point of reference.

QWEST RESPONSE TO STAFF QUESTIONS (cont'd)

- **Cost, time and transition plans to implement new measures.**

  - FCC should utilize existing PID/PAP processes and measurements that have taken years to develop and millions of dollars to implement. With only minimal modifications to JCIG, the existing process could be used. Measurements could a reality at relatively low cost.

  - If the FCC adopts Qwest's proposed modifications to the JCIG measurement plan, Qwest can start generating the necessary reports with in 3 to 4 months, because the Qwest plan is based on its existing PAP/PID process and existing measurement system.

QWEST RESPONSE TO STAFF QUESTIONS (cont'd)

•Major programming changes and investment are required if the JCIG proposal or the FCC's proposed modifications to the JCIG proposal are established.

•Implementing the necessary programming modifications would require development by a 3rd party vendor and would be subject to the vendor's costs and the vendor's time frames. The modifications could cost millions of dollars and take years to complete.

•Exact measurements of cost and time cannot be determined until a detailed plan is provided.