BellSouth's Harmonized Section 272(e)(1) Performance Measurements Proposal

April 28, 2004

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>> Introduction – Adopt a Single Set of "Harmonized" Section 272(e)(1) Performance Measurements

History

- **Commission has been considering metrics for some time**
  - **Non-Accounting Safeguards (Dkt 96-149) – Switched/Special Access**
    - FCC proposed 272(e)(1) metrics in 1996 Non-Structural Safeguards NPRM; Order never issued
  - **Special Access (Dkt 01-321) – Special Access**
    - In 2001, FCC sought comment on the benefits and standards for adopting special access performance metrics; rulemaking still open
  - **Dom/Non-Dom (Dkt 02-112) – Special Access**
    - In 2002, Section 272 Dom/Non-Dom proceeding asked whether additional safeguards are necessary before allowing integration of long distance into BOC
  - **BellSouth 272 Biennial Audit (Dkt 03-197) – Switched/Special Access**
    - Six BOC biennial audits have been conducted without codified metrics; metrics continue to be contentious and inconsistent
- **Recent Commission action has prompted renewed interest in adopting a set of metrics and standards (272 Sunsets, OI&M)**

>> Introduction – Adopt a Single Set of "Harmonized" Section 272(e)(1) Performance Measurements (cont.)

Why a Single Set of Measurements?

- **Adopting a single select group of 272 performance metrics would enable the Commission to:**
  - Ensure compliance with 272(e)(1) post sunset
  - Provide industry-wide consistency in 272 biennial audits
  - Monitor special access performance
- **A single set of industry-wide performance metrics would:**
  - Assist Commission in exercising traditional enforcement authority
  - Facilitate benchmarking and trend analysis
  - Assist in defining safe harbor
  - Offer certainty to the industry
  - Promote efficiency and accuracy

Introduction – Adopt a Single Set of "Harmonized" Section 272(e)(1) Performance Measurements (cont.)

Why BellSouth's Plan?

- **BellSouth has a proposal that provides:**
  - Simple, more manageable measurements that are
    - Clear
    - Not open to interpretation
    - Focused on key service events
  - Meaningful and realistic performance standards
    - Analog standards instead of arbitrary benchmarks
    - Available monthly
    - Currently audited under biennial audit

BellSouth's Harmonized Section 272(e)(1) Performance Measurements Proposal

General

- **BellSouth's Proposal**
  - Builds on BellSouth's previous Special Access Proposal
  - Includes key measurements of Ordering, Provisioning, Maintenance and Repair
  - Addresses Switched as well as Special Access as required in 272 Audit
    - Adds Average PIC Change Interval under Provisioning
  - Avoids multiple measurements of the same event

>> BellSouth's Harmonized Section 272(e)(1) Performance Measurements Proposal (cont.)

Specific - Summary

- **Ordering**
  - Percent of Orders with Timely FOC Return
- **Provisioning**
  - Percent Installations Appointments Met
  - New Installation Trouble Report Rate
  - Average PIC Change Interval
- **Maintenance and Repair**
  - Failure Rate/Trouble Report Rate
  - Average Repair Interval

>> BellSouth's Harmonized Section 272(e)(1) Performance Measurements Proposal (cont.)

- **Disaggregation**
  - DSO
  - DS1
  - DS3 (Optical)
  - DS3 (Non-Optical)
  - Switched Access FGD
- **Performance standards are parity with BellSouth and its Affiliates (BellSouth Aggregate)**
  - "BSLD" will be reported separately from "Other Affiliates" for Section 272 Audit purposes only
- **BellSouth's detailed proposal is included in BellSouth's Service Quality Measurement Plan (SQM)**

BellSouth's Harmonized Section 272(e)(1) Performance Measurements Proposal (cont.)

Ordering

- **FOCT2: Firm Order Confirmation (FOC) Timeliness**
  - Firm Order Confirmation (FOC) Timeliness measures the percentage of FOCs returned to the IXC/CLEC in response to its Access Service Request (ASR) within the standard interval. The percentage of requests receiving a FOC or reject is also calculated.
  - FOCT2 measures the timeliness of BellSouth's response with a committed due date and issuance of a service order to a request for service. This measure answers the question, "Did BellSouth process the ASR and return a committed due date to the customer in a timely manner?"

>> BellSouth's Harmonized Section 272(e)(1) Performance Measurements Proposal (cont.)

Provisioning

- **PIAM2: Percent Installation Appointments Met**
  - Percent Installation Appointments Met measures the percentage of installation commitments completed on/before the current committed due date.
  - PIAM2 measures the timeliness of BellSouth's provisioning of a service order. It answers the question, "Did BellSouth meet the committed due date?"

>> BellSouth's Harmonized Section 272(e)(1) Performance Measurements Proposal (cont.)

Provisioning (cont.)

- **NITR2: New Installation Trouble Report Rate**
  - New Installation Trouble Report Rate measures the quality of the installation work by capturing the rate of trouble reports on new circuits within 5 calendar days of the installation.
  - NITR2 measures the quality of BellSouth's provisioning process. It answers the question, "Did BellSouth provision the service correctly and trouble free?"

BellSouth's Harmonized Section 272(e)(1) Performance Measurements Proposal (cont.)

Provisioning (cont.)

- **PIC2: Average PIC Change Interval**
  - Average PIC Change Interval is defined as the average interval of time between the date/time the Preferred Interstate Carrier (PIC) change request is received and the date/time the PIC change is completed.
  - PIC2 measures the timeliness of requests for a change of PIC. It answers the question, "Did BellSouth change or add the PIC designation for customer in a timely manner?"

>> BellSouth's Harmonized Section 272(e)(1) Performance Measurements Proposal (cont.)

Maintenance and Repair

- **CTRR2: Failure Rate/Trouble Report Rate**
  - Failure Rate/Trouble Report Rate measures the percentage of initial and repeated circuit specific trouble reports completed per 100 in-service circuits for the reporting period.
  - CTRR2 measures the quality of service provided to the IXC. It answers the question, "Did BellSouth provide service reliability for its customers' installed circuit base?"

>> BellSouth's Harmonized Section 272(e)(1) Performance Measurements Proposal (cont.)

Maintenance and Repair (cont.)

- **MAD2: Average Repair Interval**
  - Average Repair Interval measures the length of time a trouble condition exists on an access line. The average outage duration is expressed in hours for completed circuit-specific trouble reports.
  - MAD2 measures the timeliness of BellSouth's repair of access lines in trouble. It answers the question, "Does BellSouth clear trouble reports in a timely manner?"

>> BellSouth's Proposal Overcomes Shortcomings of the JCIG Proposed Metrics

- **BellSouth's proposal avoids measuring the same event in multiple measurements**
  - BellSouth proposes a single metric for measuring ILEC provisioning performance; JCIG proposes 3 metrics to measure the same thing.
  - BellSouth proposes one metric to measure subsequent/repeat troubles; JCIG captures subsequent troubles in two separate measures and repeat troubles also are included in a third definition.
- **BellSouth's proposal provides meaningful performance standards**
  - JCIG proposes benchmarks as performance standards that are burdensome, unrealistic and unachievable. They are arbitrary and have no commercial basis and no justification.
- **JCIG proposal requires changes in operations or processes**
  - JCIG business rules for Customer Not Ready require ILEC techs to sit idly while waiting for CLEC to correct the situation.
  - Mean Time to Restore metric requires verification of "No Access" before this customer caused delay can be excluded.

Summary

- **BellSouth's Proposal Enables the Commission to:**
  - Ensure compliance with 272(e)(1) pre/post sunset
  - Monitor special access performance
- **BellSouth's Proposed Plan Provides:**
  - A single, consistent measurement set
  - Streamlined, clear and comprehensive measures
  - Concentration on Key Service Performance events
  - Meaningful instead of arbitrary standards

BellSouth's Proposal (SQM)

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