

December 20, 2004

Mr. Jeff Carlisle
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Dockets 02-112, 01-321, and 96-149

Dear Mr. Carlisle,

BellSouth, Qwest, SBC, and Verizon are submitting the attached Joint BOC 272(e)(1) Performance Metrics Proposal (Joint Proposal) which the companies have developed to aid the FCC in monitoring BOC compliance with Section 272 (e)(1). We believe that, should the FCC determine that additional safeguards are necessary in anticipation of the sunset of the Section 272 separate affiliate requirement, the proposed metrics plan is the sole safeguard needed. Adopting this tool to measure compliance with 272(e)(1) would immediately render any other supposed safeguard, such as dominant regulation, wholly unnecessary.

The Joint Proposal would establish five metrics to monitor performance in the ordering, provisioning, and maintenance and repair of special access services: FOC Timeliness, Percent Installation Appointments Met, New Installation Trouble Report Rate, Failure Rate/Trouble Report Rate, and Average Repair Interval/Mean Time to Restore. These five metrics would create a simple and consistent framework for monitoring special access performance across the industry. Unlike other joint metrics proposals, the Joint Proposal avoids measuring the same event multiple times and provides meaningful performance standards that are consistent with the statutory requirements of 272(e)(1).

In addition, once formally adopted the results of the proposed 272(e)(1) metrics would be used for the Section 272 Biennial Audits and thus negate any need for the FCC to consider additional enforcement mechanisms.¹ Even after

¹ Any metrics adopted in these proceedings should not require changes to performance metrics for Section 272 Biennial Audits already underway if such changes would jeopardize the BOC's ability to meet audit due dates.

the Biennial Audit requirement has sunset, the FCC could continue to require periodic focused audits of the 272(e)(1) metrics should it determine such review is necessary.

We look forward to discussing the details of the Joint Proposal with you and your staff at your earliest convenience.

Sincerely,



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Vice President
BellSouth



Cronan O'Connell
Vice President
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Service Quality Measurement Plan (SQM)

Joint BOC

Section 272 (e) (1)

Performance Metrics Proposal

Version 1.00

Issue Date: December 20, 2004

Introduction

The Performance Metrics Plan was developed to aid in evaluating the RBOC's performance with regard to Section 272 (e) (1) and to meet any specific new FCC requirements related to the following dockets: Performance Measurements and Standards for Interstate Special Access Services, CC Docket No. 01-321; Non-Accounting Safeguards of Sections 271 and 272, CC Docket No. 96-149; Accounting Safeguards under the Telecommunications Act, CC Docket No. 96-150; Section 272 (f) (1) Sunset of BOC Separate Affiliate and Related Requirements, WC Docket No. 02-112; and for use in the RBOC Section 272 Biennial Audits.

The Service Quality Measurement Plan (SQM) describes in detail the measurements produced to help evaluate the service delivered by an RBOC. The SQM was developed in response to the requirements of Section 272(e)(1) of the Telecommunications Act of 1996. The reports, produced according to this SQM, provide regulators and the RBOC information to aid in monitoring compliance with Section 272 (e) (1).¹

The RBOC shall retain the performance measurement data for an appropriate period in accordance with its Records Retention policy, but for a period of not less than one year.

This document is intended for use by someone with knowledge of the telecommunications industry, information technologies and a functional knowledge of the subject areas covered by the Performance Measurements and the reports that flow from them.

¹ These measures are intended to apply only to the former Bell Operating Companies – i.e., not GTE, SNET, Cincinnati Bell, Woodbury Telephone, etc.

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Section 1: Ordering

FOCT: Firm Order Confirmation (FOC) Timeliness

Definition

Firm Order Confirmation (FOC) Timeliness measures the percentage of FOCs returned within the Company-specified standard interval.

Exclusions

- Service requests identified as “Projects” or “ICBs”
- Service requests cancelled by the originator
- Weekends and designated holidays of the service center
- Unsolicited FOCs
- Administrative or test service requests
- Service requests that indicate that no confirmation/response should be sent
- Other exclusions as defined by each RBOC to reflect system and operational differences

Business Rules

Counts are based on the first instance of a FOC being sent in response to an ASR. Activity starting on a weekend or holiday will reflect a start date of the next business day. Activity ending on a weekend or holiday will be calculated with an end date of the last previous business day. Requests received after the company’s stated cutoff time will be counted as a “zero” day interval if the FOC is sent by close of business on the next business day. The standard interval will be that which is specified in the company-specific ordering guide.

Calculation

Firm Order Confirmation (FOC) Interval = (a - b)

- a = Date and time FOC is returned
- b = Date and time valid access service request is received

Percent within Standard Interval = (c / d) X 100

- c = Number of service requests confirmed within the designated interval
- d = Total number of service requests confirmed in the reporting period

Performance Standard

See Glossary

Report Structure

- Non-Affiliates Aggregate
- RBOC Affiliates Aggregate
 - RBOC 272 Affiliate Aggregate

Geographic Scope

- State

SQM Disaggregation (Percent FOCs returned within Standard Interval)

- Special Access – DS0
- Special Access - DS1
- Special Access - DS3 and above²

² DS3 and above may be disaggregated further

Section 2: Provisioning

PIAM: Percent Installation Appointments Met

Definition

Percent Installation Appointments Met measures the percentage of installations completed on or before the confirmed due date.

Exclusions

- Orders issued and subsequently cancelled
- Orders associated with internal or administrative (including test) activities
- Disconnect Orders
- Other exclusions as defined by each RBOC to reflect system and operational differences.

Business Rules

This measurement is calculated by dividing the number of service orders completed during the reporting period, on or before the confirmed due date, by the total number of orders completed during the same reporting period. Installation appointments missed because of customer caused reasons shall be counted as met and included in both the numerator and denominator. Where there are multiple missed appointment codes, each RBOC will determine whether an order is considered missed.

Calculation

Percent Installation Appointments Met = $(a / b) \times 100$

- a = Number of orders completed on or before the RBOC confirmed due date during the reporting period
- b = Total number of orders where completion has been confirmed during the reporting period

Performance Standard

See Glossary

Report Structure

- Non-Affiliates Aggregate
- RBOC Affiliates Aggregate
 - RBOC 272 Affiliates Aggregate

Geographic Scope

- State

SQM Disaggregation

- Special Access – DS0
- Special Access - DS1
- Special Access - DS3 and above³

³ DS3 and above may be disaggregated further

NITR: New Installation Trouble Report Rate

Definition

New Installation Trouble Report Rate measures the percentage of circuits or orders where a trouble was found in RBOC facilities or equipment within thirty days of order completion.

Exclusions

- Trouble tickets issued and subsequently cancelled
- Customer Provided Equipment (CPE) or customer caused troubles
- Troubles closed by the technician to disposition codes for Inter-exchange Carrier or Information
- RBOC troubles associated with administrative service
- No Trouble Found and Test OK
- Other exclusions defined by each RBOC to reflect system and operational differences
- Subsequent trouble reports

Business Rules

Only the first customer direct trouble report received within thirty calendar days of a completed service order is counted in this measure. Only customer direct trouble reports that required the RBOC to repair a portion of the RBOC network will be counted in this measure. The RBOC completion date is when the RBOC completes installation of the circuit or order.

Calculation

Trouble Report Rate within 30 Calendar Days of Installation = $(a / b) \times 100$

- a = Count of circuits/orders with trouble reports within 30 calendar days of installation
- b = Total number of circuits/orders installed in the reporting period

Performance Standard

See Glossary

Report Structure

- Non-Affiliates Aggregate
- RBOC Affiliates Aggregate
 - RBOC 272 Affiliates Aggregate

Geographic Scope

- State

SQM Disaggregation

- Special Access – DS0
- Special Access - DS1
- Special Access - DS3 and above⁴

⁴ DS3 and above may be disaggregated further

Section 3: Maintenance & Repair

CTRR: Failure Rate/Trouble Report Rate

Definition

The percentage of initial and repeated circuit-specific trouble reports completed per 100 in-service circuits for the reporting period

Exclusions

- Trouble reports issued and subsequently cancelled
- Employee initiated trouble reports
- Trouble reports/circuits associated with internal or administrative activities
- Customer Provided Equipment (CPE) or customer caused troubles
- Troubles closed by the technician to disposition codes for Inter-exchange Carrier or Information
- Tie Circuits
- No Trouble Found and Test OK
- Other exclusions as defined by each RBOC to reflect system and operational differences

Business Rules

Only customer direct trouble reports that require the RBOC to repair a portion of the RBOC network will be counted in this report. The trouble report rate is computed by dividing the number of completed trouble reports handled during the reporting period by the total number of in-service circuits for the same period.

Calculation

Percent Trouble Report Rate = $(a / b) \times 100$

- a = Number of completed circuit-specific trouble reports received during the reporting period
- b = Total number of in-service circuits during the reporting period

Performance Standard

See Glossary

Report Structure

- Non-Affiliates Aggregate
- RBOC Affiliates Aggregate
 - RBOC 272 Affiliates Aggregate

Geographic Scope

- State

SQM Disaggregation

- Special Access – DS0
- Special Access - DS1
- Special Access - DS3 and above⁵

⁵ DS3 and above may be disaggregated further

MAD: Average Repair Interval/Mean Time to Restore

Definition

The Average Repair Interval/Mean Time to Restore is the average time between the receipt of a customer trouble report and the time the service is restored. The average outage duration is only calculated for completed circuit-specific trouble reports.

Exclusions

- Trouble reports issued and subsequently cancelled
- Employee initiated trouble reports
- Trouble reports associated with internal or administrative activities
- Customer Provided Equipment (CPE) or customer caused troubles
- Troubles closed by the technician to disposition codes for Inter-exchange Carrier or Information
- Tie Circuits
- No Trouble Found and Test OK
- Other exclusions as defined by each RBOC to reflect system and operational differences

Business Rules

Only customer direct trouble reports that require the RBOC to repair a portion of the RBOC network will be counted in this measure. The average outage duration is calculated for each restored circuit with a trouble report. The start time begins with the receipt of the trouble report and ends when the service is restored. This is reported in a manner such that customer hold time or delay maintenance time resulting from verifiable situations of no access to the end user premise, other CLEC/IXC or RBOC retail customer caused delays, such as holding the ticket open for monitoring, is deducted from the total resolution interval ("stop clock" basis).

Calculation

Repair Interval = (a – b)

- a = Date and time trouble report was restored
- b = Date and time trouble report was received

Average Repair Interval = (c / d)

- c = Total of all repair intervals (in hours/days) for the reporting period
- d = Total number of trouble reports closed during the reporting period

Performance Standard

See Glossary

Report Structure

- Non-Affiliates Aggregate
- RBOC Affiliates Aggregate
 - RBOC 272 Affiliates Aggregate

Geographic Scope

- State

SQM Disaggregation

- Special Access – DS0
- Special Access - DS1
- Special Access - DS3 and above⁶

⁶ DS3 and above may be disaggregated further

GLOSSARY

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|--------------------------------------|--|
| Access Service Request (ASR) | An industry form submitted to the RBOC to order new access service, or request a change to existing service, which provides access to the local exchange company's network under terms specified in the local exchange company's special or switched access tariffs |
| RBOC 272 Affiliate Aggregate | RBOC Affiliate(s) authorized to provide long distance service as a result of the Section 271 approval process |
| RBOC Affiliates Aggregate | RBOC Telecommunications and all RBOC Affiliates (including the 272 Affiliate). Post sunset, comparable line of business (e.g., 272 line of business) will be included in this category. |
| Business Days | Monday thru Friday (8AM to 5PM) excluding holidays |
| CPE | Customer Provided or Premises Equipment |
| Customer Not Ready (CNR) | A verifiable situation beyond the normal control of the RBOC that prevents the RBOC from completing an order, including the following: CLEC or IXC is not ready to receive service; end user is not ready to receive service; connecting company or CPE supplier, is not ready |
| Firm Order Confirmation (FOC) | The notice returned from the RBOC, in response to an Access Service Request from a CLEC, IXC or affiliate, that confirms receipt of the request and creation of a service order with an assigned due date |
| Unsolicited FOC | An Unsolicited FOC is a supplemental FOC issued by the RBOC to change the due date or for other reasons, e.g., request for a second copy from the CLEC/IXC, although no change to the ASR was requested by the CLEC or IXC. |
| Performance Standard | For purposes of this plan, the RBOC's performance in providing service to its non-affiliate carrier customers shall be substantially similar to that which it provides to its affiliates. Performance shall be measured by comparing, for each of these measures, the service received by the Non-Affiliate Aggregate (IXC/CLEC) with the service received by the RBOC Affiliates Aggregate. |
| Project or ICB | Service requests that exceed the line size and/or level of complexity that would allow the use of standard ordering and provisioning interval and processes. Service requests requiring special handling. |
| Repeat Trouble | Trouble that reoccurs on the same telephone number/circuit ID within 30 calendar days |
| Service Orders | Refers to all orders for new or additional lines/circuits. For change order types, additional lines/circuits consist of all C order types with "I" and "T" action coded line/circuit USOCs that represent new or additional lines/circuits, including conversions for RBOC to Carrier and Carrier to Carrier. |