

changes in the measurements, the ICAs provide for dispute resolution procedures (such as arbitration). In view of the opportunities available to CLECs for alternation of existing performance measurements, “benchmarking” of AT&T’s performance against that of other ILECs is unnecessary.

54. We understand that Commission orders in earlier merger cases, such as the 1999 *SBC/Ameritech Merger Order*, indicated that benchmarking was necessary to prevent possible “backsliding” by the RBOCs after they received merger authority or Section 271 authority.²⁴ Some opponents make that same point here.²⁵ But even if benchmarking were appropriate for this purpose in 1999, it is clearly unnecessary today. The voluminous performance data that AT&T has maintained and reported since 1999 are more than sufficient to enable regulators to detect any “backsliding” after the proposed merger takes effect – regardless of how any such “backsliding” might be defined.

55. Finally, we understand that the Commission expressed concern in previous merger decisions that AT&T could use parity requirements to hinder competitors (for example, by providing an equally substandard level of service to competitors and to itself). Such a scenario, however, is wholly unrealistic today. First, the emergence of additional facilities-based intramodal and intermodal competition means that AT&T cannot hope to succeed by providing “substandard” service to its own retail customers. Second, AT&T’s established history of reported performance data means that any meaningful decline in its service levels would be readily apparent in those data, which in turn would generate immediate complaints from competitors and increased supervision by regulators. Given these changes since 1999, there is

²⁴ See, e.g., *SBC/Ameritech Merger Order* ¶ 148.

²⁵ See *Access Point Pet.* at 27-28.

simply no need for any additional data points from benchmarking to detect any future attempts to discriminate.

IV. AT&T'S PERFORMANCE DATA SHOW THAT IT RENDERS NONDISCRIMINATORY PERFORMANCE.

56. In any event, there is no evidence of discriminatory or otherwise substandard performance by AT&T that would justify the opponents' concerns. To the contrary, the data that AT&T has maintained on its performance – whether pursuant to performance plans, voluntary offerings, regulatory orders, or tariffs – show that it renders nondiscriminatory, high-quality performance in the provision of UNEs, interconnection, and special access. Given AT&T's actual performance, the opponents' predictions that a merged AT&T/BellSouth would attempt to discriminate have no basis in fact. Similarly, AT&T's performance demonstrates that there is no need for benchmarking (or for any other regulatory requirement) in addition to the regulatory and market mechanisms already in place that have caused AT&T to provide high-quality service.

A. AT&T's UNEs and Interconnection Performance

57. AT&T's data regarding its performance with respect to UNEs and interconnection refute any notion that it has engaged in discrimination against its competitors. Indeed, the data show that AT&T's performance in these areas has substantially *improved* since the SBC/Ameritech merger, and that its performance remains strong.

58. AT&T has calculated the percentage of all the performance measurements in its performance plans (excluding those exclusively for resale) as to which (1) a performance standard – whether a benchmark or a parity requirement – has been established, and (2) AT&T in fact met the applicable performance standard in a given month. This analysis encompassed hundreds of metrics and submetrics which test AT&T's performance in the ordering, provisioning, and maintenance and repair of UNEs and interconnection.

59. The results of this analysis are shown in Attachment 8. On a regionwide basis, AT&T's performance in provisioning UNEs and interconnection has improved substantially since the of SBC-Ameritech merger in 1999. For example, in January 2001, AT&T met the applicable performance standards for 83.7 percent of the total performance measurements in its three regions – Midwest (the former Ameritech region), West (the former Pacific Bell region), and Southwest (the former Southwestern Bell region).²⁶ That percentage increased almost every year thereafter. By March 2006, the percentage was 92.3 percent – almost nine percentage points higher than in January 2001.²⁷

60. Within each of AT&T's three regions — AT&T's performance has similarly improved since January 2001, as reflected in the following table:

Region	Percentage of PMs For Which Performance Standard Was Met – January 2001	Percentage of PMs For Which Performance Standard Was Met – March 2006
Midwest	78.3%	90.7%
West	89.3%	92.1%
Southwest	86.9%	96.9%

61. Not surprisingly, these improvements have occurred on a statewide basis as well. As Attachment 8 shows, in virtually every state the percentage of performance measurements for

²⁶ 2001 was the first full year after the SBC/Ameritech merger for which legacy SBC maintained data for its Midwest region (the former Ameritech region) as well as for its Southwest and West regions.

²⁷ The data from which the percentages described in this section were computed do not include data for SNET (Southern New England Telephone). SNET has not been subject to performance plans, because such plans were developed in the various states in connection with applications of the Bell Operating Companies for Section 271 authority. SNET, however, is not a BOC, and therefore was not subject to the requirements of Section 271. In fact, SNET was already providing in-region, interLATA service at the time it was acquired by SBC. Consequently, legacy SBC has not "tracked" SNET's performance for metrics like those in performance plans adopted in the other 12 states in AT&T's regions.

which AT&T met the applicable performance standard was higher in March 2006 than in January 2001.²⁸

62. As these data indicate, AT&T routinely satisfies or exceeds between 90 and 95 percent of the demanding performance standards that were adopted to ensure nondiscriminatory provisioning of UNEs and interconnection. In some states, such as Texas, AT&T has in the aggregate satisfied more than 97 percent of those measures.²⁹

63. AT&T's data also show that there has been no "backsliding" in its performance in providing UNEs and interconnection to wholesale customers since this Commission approved its applications for Section 271 authority. The Commission approved the first such application (for Texas) in June 2000, and the last such application (for Illinois, Indiana, Ohio, and Wisconsin) in October 2003.³⁰ In approving these applications, the Commission found that AT&T was

²⁸ Beginning with December 2005 data, and pursuant to collaborative agreement with the CLECs, AT&T discontinued reporting of certain metrics in the Midwest region on a disaggregated basis at the "market area" level, and instead has reported the results for that region only at the statewide level. Because performance among market areas can differ, the aggregation of market area data can result in a reduced number of performance measurements for which the performance standard has been met. The reporting of market data only at a statewide level has therefore affected, for the states in the Midwest region, the percentage of metrics for which AT&T has met the applicable standard since last December. Even with this reporting change, however, the percentages in the Midwest states generally have exceeded 90 percent. See Attachment 8.

²⁹ Even as to the very small percentage of performance measurements for which AT&T has not met the applicable performance standard, the fact that a performance standard has not been met for a particular performance measurement does not mean that AT&T is engaging in discrimination or other anticompetitive conduct in the activity which is the subject of that metric. For example, even if it appears from the reported data for a metric that performance for CLECs was "not as good" as that for AT&T, such differences could be the result of a number of factors unrelated to discrimination (for example, adverse weather conditions in the areas of a state where CLECs choose to serve customers, the sophistication of the plant in those areas, and difficulties incurred in repairs or provisioning in those areas).

³⁰ The Commission approved SBC's other Section 271 applications in January 2001 (for Kansas and Oklahoma), November 2001 (for Arkansas and Missouri), December 2002 (for California), April 2003 (for Nevada), and September 2003 (for Michigan).

providing UNEs and interconnection on a nondiscriminatory basis (which, we understand, is required by the “competitive checklist” of Section 271). As previously stated, in January 2001 AT&T met the applicable performance standards for 83.7 percent of the total performance measurements in its three regions. In October 2003, when its last Section 271 application was approved, that percentage was 93.6 percent – nearly ten percentage points higher. *See* Attachment 8 hereto. Just over two years later, in November 2005, the percentage had increased further – to 94.7 percent. *Id.*³¹

64. The data that AT&T voluntarily maintains on its Local Wholesale Complete offering provide additional confirmation that AT&T’s performance with respect to UNEs is nondiscriminatory and strong. As previously discussed, LWC is a commercial replacement for, but functionally equivalent to, the former UNE platform.

65. Attachment 9 hereto is a table that describes the percentage of all metrics in AT&T’s Service Assurance Plan for LWC for which AT&T satisfied the applicable performance standard for each metric during a given month for the time period from April 2005 through March 2006. The metrics include the six metrics under the “generic” Service Assistance Plan (OSS Interface Availability, Order Completion Notifier Timeliness, Percent Missed Due Dates, Installation Quality, Trouble Report Rate, and Out of Service Notification Within 48 Hours) and any additional metrics that were negotiated between AT&T and individual LWC customers. All of these metrics have demanding performance standards.

66. The data in Attachment 9 show that AT&T’s performance for competitors who purchase LWC has been outstanding. Between April 2005 and March 2006, the percentage of

³¹ Although the monthly percentages have been slightly lower since last November, the decrease does not reflect “backsliding,” but is primarily the result of a change in the method of reporting data in the Midwest region effective with the reporting of December 2005 data. *See* n. 28.

performance measurements that satisfied the performance standards for the metrics in the Service Assurance Plan was between 96.7 percent and 98.2 percent in any given month.

B. The Section 272 Audit of AT&T Also Shows That AT&T Does Not Discriminate in the Provision of Special Access.

67. As previously stated, the most recent biennial audit to evaluate AT&T's compliance with the requirements of Section 272 was conducted in 2005 by Ernst & Young. That audit, like the two previous audits conducted of AT&T, confirms that AT&T is in substantial compliance with the nondiscrimination requirements of Section 272(e)(1), including the requirement that it provide parity in the provision of special access.

68. Pursuant to the agreed-upon procedures for Section 272 audits, Ernst & Young's audit included a review of whether AT&T and any affiliate subject to Section 251(c) of the Act "have fulfilled requests from unaffiliated entities for telephone exchange service and exchange access within a period no longer than the period in which they provide such telephone exchange service and exchange access to themselves or their affiliates," which is the requirement set forth in Section 272(e)(1).³² In conducting that review, Ernst & Young examined AT&T's practices and procedures relating to special access, the methodology that AT&T used to document time intervals for processing of special access orders, the data that AT&T maintained on such time intervals, and the procedures AT&T has established for making information regarding such time intervals available to nonaffiliated entities.³³

69. An important part of Ernst & Young's analysis was a review of the monthly data that AT&T maintained for the audit period for the seven performance measurements proposed in the *Non-Accounting Safeguards Order*. As Ernst & Young stated in its report, these data showed

³² See *2005 Biennial Audit Report*, Appendix A, at 42-47.

³³ *Id.*

“time intervals for processing of orders (for initial installation requests, subsequent requests for improvement, upgrades or modifications of service or repair and maintenance), provisioning of service, and performance of repair and maintenance services for the section 272 affiliates, BOC and other BOC affiliates (labeled as Other Affiliates) and nonaffiliates for exchange access services and PIC change orders.”³⁴

70. These data showed that AT&T provided parity to nonaffiliates in the provision of special access. As discussed below, any apparent lack of parity shown in a limited number of submetrics were statistically insignificant, the result of random variations, or the product of factors unrelated to discrimination.

71. The audit report also demonstrated that the data provided by AT&T had been accurately calculated, with only limited exceptions. As previously indicated, using the agreed-upon procedures, the auditors (using three randomly selected months of data) applied AT&T’s business rules to its underlying raw data, compared the results to the data reported by AT&T for the seven metrics, and noted any differences. Most of the differences between the recalculated data and the original data that the auditors noted were minor.³⁵

³⁴ *Id.* at 45.

³⁵ *See id.* at 46 & Attachment A-4. The differences between the performance data originally calculated by AT&T and those recalculated by the auditors were primarily due to the differences in the documentation procedures among AT&T’s regions for pulling the data and to the rounding of calculations during the preparations of the results. *Id.*, Appendix B at 3-5.

Furthermore, as AT&T advised the auditors, the limited number of instances where its data showed that fulfillment of requests for nonaffiliates took longer than for its Section 272 affiliates were due to factors unrelated to discrimination. As Ernst & Young stated in its report on the audit:

[AT&T’s] [m]anagement represented that their internal statistical analyses indicate that the differences noted [in the data] were either not statistically significant or were merely the result of random variations (*i.e.*, isolated occurrences not indicative of a systemic

(Continued)

72. In addition to reviewing AT&T's data, Ernst & Young documented AT&T's ordering practices and procedures for tariffed access services, noting AT&T's representation that these practices and procedures were the same for both affiliates and nonaffiliates. The auditors also "noted no differences" in AT&T's procedures for providing information regarding the availability of facilities used in the provision of special access service to its Section 272 affiliates, BOC and other BOC affiliates, and nonaffiliates.³⁶

73. Ernst & Young filed its report on the biennial audit with this Commission on December 15, 2005. On January 26, 2006, the Commission issued a notice which invited interested parties to file comments on the audit report by March 27, 2006.³⁷ Any such comments could have addressed any aspects of the report, including Ernst & Young's audit results that demonstrate the accuracy of the data maintained by AT&T and AT&T's explanation for the few external chronic out-of-parity situations indicated by its reported data. However, *no* party filed

(Continued from previous page)

problem), except as discussed below. Management evaluated the section 272(e)(1) performance measurement results for each chronic out-of-parity situation (*i.e.*, the difference is statistically significant by Management's definition) other than merely random variations. This evaluation includes a more extensive root-cause analysis and associated corrective action plan.

Id., Appendix A, at 46. The "exceptions" to which the auditors referred consisted of five isolated "external chronic out-of-parity situations," which AT&T defined as situations where the data showed AT&T's performance for nonaffiliates had been out-of-parity for three consecutive months during a calendar quarter, and such differences were statistically significant by AT&T's definition and could not be regarded as the mere result of random variations. These five situations were due not to discrimination, but to: (1) improper inclusion of projects in AT&T's reported data on FOC timeliness; (2) inclusion of data for customers who purchased under AT&T's volume tariffs (which imposed more stringent performance standards); and (3) severe weather conditions in California. *Id.*

³⁶ *Id.* at 42-44.

³⁷ See *Enforcement Bureau Seeks Comments on AT&T, Inc. Section 272 Biennial Audit Report in EB Docket No. 03-199*, Public Notice, DA 06-126, dated January 24, 2006.

comments on the 2005 Biennial Audit Report.³⁸ Furthermore, to date, no regulatory commission, state or federal, has taken any action to date with respect to the results of the 2005 Biennial Audit Report.³⁹

74. The nondiscriminatory performance reflected in the data reviewed in the recent biennial report should not be surprising. Special access services are mature services, with established methods of provisioning. AT&T has designed automated special access provisioning systems that are consistent with industry-established (OBF) standards, and that treat all requests the same, regardless of whether the request comes from an affiliate or a nonaffiliate. In addition, AT&T conducts rigorous training of its personnel to ensure that they adhere to its existing standards and procedures, which make no distinction between affiliate and nonaffiliate customers.

75. AT&T also provides services and assistance to nonaffiliates that are intended to protect them from discrimination. Such services and assistance (which are the same as those provided to AT&T's affiliates) can be accessed via AT&T's Prime Access web site, which is located at <https://www.primeaccess.att.com>. For example, nonaffiliate customers using this web site have access to detailed training materials, as well as other materials explaining AT&T's policies and procedures. In the event that wholesale customers should experience a perceived

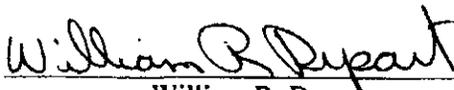
³⁸ As part of its commitment to maintain data for the seven metrics proposed in the *Non-Accounting Safeguards Order*, AT&T agreed to provide to any unaffiliated carrier, upon request, a report showing monthly data for each of the seven metrics, disaggregated by "BOC and Affiliates" and "Section 272 Affiliate." AT&T's internal procedures require that AT&T respond to such a request no later than seven days after the request has been received. However, no CLEC has made such a request since AT&T first offered to make data available for these two "buckets" of data.

³⁹ Similarly, no state or federal regulatory commission took any action with result to the results of the two previous biennial audits of AT&T, other than mere follow-up questions and requests for information.

lack of parity, AT&T provides account team support to such customers as needed to rectify such problems.

I hereby declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

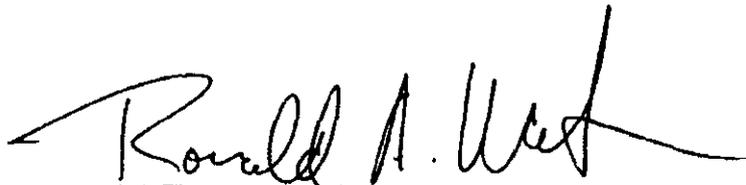
Executed on June 15, 2006



William R. Dysart

I hereby declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on June 15, 2006


Ronald A. Watkins

I hereby declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on June 15, 2006


Brett Kissel

ATTACHMENT 1

Attachment 1

**Metrics in the "Generic" Service Assurance Plan
for AT&T's Local Wholesale Complete Offering**

Metric	Definition	Benchmark/Parity Performance Standard
OSS Interface Availability	Time during which AT&T's 13-state electronic OSS interfaces are actually available, as a percentage of scheduled availability	Interface available 95% of scheduled hour for the reporting month
Mechanized Order Completion Notification Timeliness	Percent of mechanized order completion notifications available within 5 business days of work completion	95% of mechanized service order completion notifications sent with 5 business days of work completion.
Percent AT&T-Caused Missed Due Dates	Percentage of orders/circuits completed after the committed due date	For Wholesale Complete POTS, no more than 5% missed due dates
Installation Quality	Percentage of lines/circuits installed where a reported trouble was found in the network within 10 calendar days	For Wholesale Complete POTS, trouble reports within 10 days of installation not to exceed 8% of orders/circuits
Repeat Trouble Report Rate	Percentage of additional reported/cleared network trouble that had a network trouble cleared within the previous 10 days	For Wholesale Complete POTS, no more than 10% repeat trouble reports in the reporting month
Out of Service Within 48 Hours	Average trouble duration interval from trouble receipt to trouble clearance	For Wholesale Complete POTS, 90% out-of-service trouble reports cleared within 48 hours

ATTACHMENT 2

**ATTACHMENT 1 - SERVICE ASSURANCE
BUSINESS RULES
to
APPENDIX LWC SERVICE ASSURANCE PLAN**

TABLE OF CONTENTS
SERVICE ASSURANCE

1. OSS INTERFACE AVAILABILITY	3
2. MECHANIZED ORDER COMPLETION NOTIFIER TIMELINESS	4
3. PERCENT SBC-13STATE CAUSED MISSED DUE DATES	5
4. INSTALLATION QUALITY	6
5. REPEAT TROUBLE REPORT RATE	7
6. OUT OF SERVICE WITHIN 48 HOURS.....	8

Metric Number:	Name:
1	OSS Interface Availability
Definition:	
This measures the time during which SBC-13STATE electronic OSS interfaces for CLECs are actually available, as a percentage of scheduled availability. Because SBC-13STATE and CLEC service representatives obtain information from the same underlying legacy OSS, if a particular OSS is down, it is equally unavailable to both SBC-13STATE and CLEC employees.	
Exclusions:	
<ul style="list-style-type: none"> ▪ Interface outages outside of prime time hours (as published or defined on a state-by-state basis) ▪ Interface outages reported by a CLEC, but not found to be in SBC-13STATE's systems ▪ Undetected interface outages reported by a CLEC that were not reported to SBC-13STATE's designated trouble reporting center ▪ Scheduled interface outages for major system releases or system maintenance where CLECs were provided with advanced notification of the downtime in compliance with SBC-13STATE's change management process 	
Business Rules:	
The total "number of hours functionality to be available" is the cumulative number of hours (by date and time on a 24 hour clock) over which SBC-13STATE plans to offer and support CLEC access to SBC-13STATE's operational support systems (OSS) functionality during the reporting period. "Hours Functionality is Available" is the actual number of hours, during scheduled available time, that the SBC-13STATE interface is capable of accepting or receiving CLEC transactions or data files. The actual time available is divided by the scheduled time available and then multiplied by 100 to produce the "Percent system availability" measure. SBC-13STATE will not schedule normal maintenance during OSS Hours of availability as posted on the CLEC web site unless otherwise notified via an accessible letter. SBC-13STATE will not schedule normal maintenance during business hours (8:00 a.m. to 5:30 p.m. Monday through Friday). When interfaces experience partial unavailability, an availability factor is applied to the calculation of downtime. This factor is stated as a percentage and represents the impact to the CLEC. Determination of the availability factor is governed by SBC-13STATE's Availability Team on a case by case basis. Disputes related to application of the availability factor may be presented to the Commission. Whenever an interface experiences complete unavailability, the full duration of the unavailability will be counted, to the nearest minute, and no availability factor will be applied. SBC-13STATE shall calculate the availability time rounded to the nearest minute.	
Levels of Disaggregation:	
<ul style="list-style-type: none"> • Verigate • LEX • EDI ordering • EDI pre-ordering • EBTA • EBTA GUI • CORBA 	
Calculation:	Report Structure/Geography:
$[(\text{Hours functionality is available during the scheduled available hours}) \div \text{Scheduled system available hours}] * 100$	By interface geography. If an interface serves more than one state, the same performance will be reported for all states served by this interface.
Benchmark/Parity Performance Standard:	
Interface available 95% of scheduled hour for the reporting month - Diagnostic – No Penalty to be Paid	

Metric Number:	Name:
2	Mechanized Order Completion Notification Timeliness
Definition:	
The percent of Mechanized Order Completion Notifications available within five business days of work completion.	
Exclusions:	
<ul style="list-style-type: none"> • Test and Administrative Orders • Canceled service orders • Orders received manually, e.g. fax or e-mail • SBC-13STATE Affiliate (or separate division) Orders • Weekends and published holidays 	
Business Rules:	
Days are calculated by subtracting the date the SOC was available to the CLEC via EDI/LEX minus the order completion date. Business Days is determined based on Local Service Center (LSC) published business hours. If the CLEC accesses SBC-13STATE systems using a Service Bureau Provider, the measurement of SBC-13STATE's performance does not include Service Bureau Provider processing, availability or response time.	
Levels of Disaggregation:	
<ul style="list-style-type: none"> • None 	
Calculation:	Report Structure/Geography:
(# mechanized completions notifications returned to the CLEC within 5 business days of work completion ÷ total mechanized completions notifications sent) * 100	By CLEC
Benchmark/Parity Performance Standard:	
95% of mechanized service order completion notifications sent within 5 business days of work completion. Diagnostic - No penalty to be paid	

Metric Number:	Name:
3	Percent SBC-13STATE Caused Missed Due Dates
Definition:	
This measures the percentage of orders/circuits completed after the committed due date. Includes only orders/circuits with inward activity that have an assigned due date.	
Exclusions:	
<ul style="list-style-type: none"> • Canceled service orders • Test Orders • Orders that are not N, T, C. • Administrative Orders • Orders missed for facility reasons • Due dates missed solely due to CLEC or customer reasons will be excluded from the numerator. • Excludes Interconnection Trunks 	
Business Rules:	
The due date is the date negotiated by the customer and the SBC-13STATE representative for service activation. For CLEC orders, this is the due date reflected on the FOC. The Completion Date is the day that SBC-13STATE personnel complete the service order provisioning activity. Wholesale Complete is measured at the order level.	
Levels of Disaggregation:	
See Benchmarks.	
Calculation:	Report Structure/Geography:
(Number of orders/circuits where the order completion date is greater than the FOC due date due to SBC-13STATE reasons) + (Total number of orders/circuits)	By state
Benchmark/Parity Performance Standard:	
Wholesale Complete POTS - No more than 5% missed due dates	

Metric Number:	Name:
4	Installation Quality
Definition:	
This measures the percentage of lines/circuits installed where a reported trouble was found in the network within 10 calendar days	
Exclusions:	
<ul style="list-style-type: none"> ▪ Exclude pre-existing trouble ▪ SBC-13STATE Test and Administrative Orders ▪ Subsequent reports (additional customer calls while the trouble is pending) ▪ Troubles beyond SBC-13STATE's control (e.g., CPE troubles, troubles closed due to customer action, inside wire troubles, Interexchange Carrier/Competitive Access Provider, Informational, etc.) ▪ Troubles reported on the Order Completion Date, or trouble reported prior to service order completion in SBC-13STATE Southwest systems (except as noted in the Business Rules section). ▪ Troubles reported but not found (Found OK, Test OK, Came Clear) ▪ Troubles reported by SBC-13STATE employees in the course of performing preventative maintenance, where no customer has reported a trouble ▪ Excludes disposition code "13" reports (excludable reports), with the exception of code 1316, unless the trouble report is taken prior to completion of the service order. (Refer to Appendix 2 for list of Excluded "13" disposition codes). In SBC-13STATE Midwest excludes disposition code "11", "12" and "13" reports. 	
Business Rules:	
<p><u>Wholesale Complete</u> Includes reports received the day after SBC-13STATE personnel complete the service order through 10 calendar days after completion. The denominator for this measure is the total count of orders posted within the reporting month. (However, the denominator will at a minimum equal the numerator). The numerator is the number of trouble reports received during the reporting month within 10 days of service order completion. These will be reported the month that they are closed. This will include troubles taken on the day of completion found to be as a result of a Local Wholesale Complete conversion.</p>	
Levels of Disaggregation:	
See Benchmarks	
Calculation:	Report Structure/Geography:
Number of trouble reports submitted within 10 days of installation activity with trouble found in the network + orders/circuits installed in the calendar month	By state
Benchmark/Party Performance Standard:	
Wholesale Complete POTS - trouble reports within 10 days of installation not to exceed 8% of orders/circuits installed in the reporting month	

Metric Number:	Name:
5	Repeat Trouble Report Rate
Definition:	
Percentage of additional reported/cleared Network trouble that had a Network trouble cleared within the previous 10 days.	
Exclusions:	
<ul style="list-style-type: none"> ▪ Disposition code "13" reports (excludable reports), with the exception of code 1316, unless the report is taken prior to the completion of the service order. In SBC-13STATE Midwest excludes disposition code "11", "12" and "13" reports. ▪ Reports submitted by SBC-13STATE employees in the course of performing preventative maintenance, where no customer has reported a trouble ▪ Troubles beyond SBC-13STATE's control (e.g., CPE troubles, troubles closed due to customer action, inside wire troubles, Interexchange Carrier/Competitive Access Provider, Informational, etc.) ▪ Troubles reported on the Order Completion Date, or, trouble reported prior to service order completion in SBC-13STATE systems ▪ Subsequent reports (additional customer calls while the trouble is pending) ▪ Troubles reported but not found (e.g. Found OK, Test OK, Came Clear) ▪ SBC-13STATE official or administrative orders 	
Business Rules:	
A repeat trouble report is defined as a trouble on the same line/circuit as a previous trouble report that occurred within the last 10 calendar days of the previous trouble. When the second report is received within 10 days, the original report is marked as an Original of a Repeat, and the second report is marked as a Repeat. If a third report is received within 10 days, the second report is marked as an Original of a Repeat as well as being a Repeat, and the third report is marked as a Repeat. In this case there would be two repeat reports. If either the original or the second report within 10 days is a measured report, then the second report counts as a Repeat report.	
Levels of Disaggregation:	
See Benchmarks	
Calculation:	Report Structure/Geography:
Number of qualifying network trouble reports ÷ total network trouble reports found within the reporting month	By state
Benchmark/Parity Performance Standard:	
Wholesale Complete POTS – No more than 10% repeat trouble reports in the reporting month	

Metric Number:	Name:
6	Out of Service Within 48 Hours
Definition:	
This measures the average trouble duration interval from trouble receipt to trouble clearance.	
Exclusions:	
<ul style="list-style-type: none"> ▪ Affecting service problems ▪ Subsequent reports (additional customer calls while the trouble is pending) ▪ Troubles beyond SBC-13STATE's control (e.g., CPE troubles, troubles closed due to customer action, inside wire troubles, Interexchange Carrier/Competitive Access Provider, Informational, etc.) ▪ Troubles reported by SBC-13STATE employees in the course of performing preventative maintenance, where no customer reported a trouble ▪ For troubles where the stop clock is used, the time period from when the stop clock is initiated until the time when the clock resumes ▪ Excludes disposition code "13" reports (excludable reports), with the exception of code 1316, unless the report is taken prior to the completion of the service order. In SBC-13STATE Midwest excludes disposition code "11", "12" and "13" reports. ▪ No access ▪ Delayed maintenance 	
Business Rules:	
<p>Trouble duration intervals may be measured on a running clock or limited stop-clock basis. Running clock includes weekends and holidays. A stop clock excludes time when SBC-13STATE does not have access to the customer premise. For example, if the customer premises access is not available on a weekend, the clock stops at 5:00 p.m. Friday, and resumes at 8:00 a.m. Monday. This applies to dispatched out tickets only.</p> <p>The clock starts on the date and time SBC-13STATE receives a trouble report. The clock stops on the date and time that SBC-13STATE personnel clear the repair activity and complete the trouble report.</p>	
Levels of Disaggregation:	
See Benchmarks	
Calculation:	Report Structure/Geography:
$\frac{\sum[(\text{Date and time trouble report is cleared with the customer}) - (\text{date and time trouble report is received})]}{\text{total network customer trouble reports in the reporting month}}$	By state
Benchmark/Parity Performance Standard:	
Wholesale Complete POTS - 90% OOS trouble reports cleared within 48 hours	

ATTACHMENT 3