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October 25, 1999

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

In Re: Petition of ICG Telecom Group, Inc. for Arbitration with BellSouth Telecommunications, Inc. Pursuant to Section 252 of the Telecommunications Act of 1996
Docket No. 99-00377

Dear David:

On Friday afternoon, ICG filed incomplete testimony and exhibits of ICG witness Gwen Rowling. Please accept, in lieu thereof, the enclosed testimony and exhibits.

The two sets of testimony and exhibits are substantially similar but the second set, filed today, includes corrections and additions Ms. Rowling had intended to file Friday and were not filed because of e-mail transmission problems.

Please note that the parties have earlier agreed to extend the time for filing rebuttal from Friday, November 5 to Wednesday, November 10.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: Henry Walker, attorney for ICG

HW/nl
Attachment
cc: Guy Hicks, attorney for BellSouth

FILE

0592463.01
046885-000 11/01/1999

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

IN RE: PETITION OF ICG TELECOM GROUP, INC FOR ARBITRATION WITH BELLSOUTH TELECOMMUNICATIONS, INC. PURSUANT TO SECTION 252 OF THE TELECOMMUNICATIONS ACT OF 1996	)))))))	DOCKET NO. 99-00377

DIRECT TESTIMONY OF GWEN ROWLING
ON BEHALF OF
ICG TELECOM GROUP, INC.

ICG TELECOM GROUP, INC.

DIRECT TESTIMONY OF GWEN ROWLING

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NOVEMBER 22, 1999

Q. PLEASE STATE YOUR NAME, ADDRESS AND EMPLOYMENT.

A. My name is Gwen Rowling. I am Vice President - State Government Affairs for ICG Communications. My office is located at 11902 Burnett Road, Suite 100, Austin, Texas.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.

A. I received a Bachelor of Science Degree from the University of Texas in Austin. I previously was Vice President, Business/Government Relations for Westel, Inc., a competitive local exchange carrier and interexchange carrier. During my 13 years with Westel, I also served as Director of Business Development, Branch Sales Manager and Account Manager. I have served on the boards of directors of industry associations including the American Carriers Telecommunications Association and Competitive Telecommunication Association ("CompTel"). I currently serve as Vice President of TEXALTEL, an industry association in Texas.

Q. HAVE YOU TESTIFIED IN STATE REGULATORY PROCEEDINGS BEFORE?

. Yes. I provided testimony on behalf of Westel and CompTel before the Texas Public Utility Commission in a Section 271 proceeding.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to discuss the need for performance measures and effective enforcement mechanisms in the ICG-BellSouth Interconnection Agreement. Specifically, I will address Issue 5 and Issues 19-26. All of these issues relate to the establishment of performance measures and liquidated damages. Rather than address each issue piece-meal, ICG early in the proceedings elected instead to recommend that the Tennessee Regulatory Authority adopt, *in toto*, the performance measures and damage provisions adopted by the Texas Public Utility Commission. The Texas plan addresses each of the specific issues raised by ICG.

Q. WHY SHOULD THE AUTHORITY ADOPT PERFORMANCE MEASURES AND EFFECTIVE ENFORCEMENT MECHANISMS IN INTERCONNECTION AGREEMENTS?

A. BellSouth has refused to negotiate with ICG on these important issues. BellSouth has indicated that it is only willing to engage in discussions with the Federal Communications Commission ("FCC") on issues relating to performance measures. Therefore, Authority intervention is needed to resolve this controversy.

Q. WHY ARE PERFORMANCE MEASURES AND ENFORCEMENT MECHANISMS IMPORTANT ISSUES?

A. A facilities-based carrier such as ICG is dependent upon its competitor BellSouth for essential network elements. Preordering, ordering, provisioning, billing, repair and maintenance of these facilities is provided by BellSouth. ICG is similarly dependent upon BellSouth with respect to resold services. If BellSouth's performance on any of these functions falls short, ICG's customer holds ICG responsible. ICG's customer does not care if it was really BellSouth's fault. In the customer's eyes, ICG is responsible. This dependent relationship is what makes this issue so important to the development of local competition. Comprehensive performance standards and effective enforcement mechanisms must be put in place to hold BellSouth accountable. Otherwise, BellSouth has no incentive to perform at a level that will enable ICG to meet the expectations of its customers; indeed, BellSouth's natural incentives are to impede its competitors' efforts to capture a share of the market now dominated by BellSouth.

Q. HAVE OTHER STATE COMMISSIONS ADOPTED PERFORMANCE MEASURES AND ENFORCEMENT MECHANISMS?

A. Yes. State commissions in Pennsylvania and Texas have adopted comprehensive performance standards and enforcement mechanisms. In California, the Commission has adopted comprehensive performance standards and is in the process of adopting enforcement mechanisms.

Q. DO YOU HAVE ANY SPECIFIC SUGGESTIONS REGARDING THE PERFORMANCE MEASURES THAT THIS AUTHORITY SHOULD ADOPT THROUGH THIS ARBITRATION?

A. Yes. This Authority should adopt the same performance measures and enforcement mechanisms embraced by the Public Utility Commission of Texas (the "Texas Commission") in the "mega arbitration" in that jurisdiction. These performance measures (as amended) are attached hereto as Exhibit "1" and the applicable enforcement mechanisms (as amended) are attached hereto as Exhibit "2."

Q. IN WHAT CONTEXT WERE THE TEXAS PERFORMANCE MEASURES ORIGINALLY DEVELOPED?

A. In 1996, AT&T, MCI, MFS, TCG and ACSI filed petitions for arbitration with Southwestern Bell Telephone ("SWBT"). The Texas Commission consolidated these petitions into what became known as the "mega arbitration." One of the issues arbitrated by AT&T and MCI was performance measures along with an associated penalty structure.

Q. DID ANY OTHER GOVERNMENTAL ENTITY PLAY A ROLE IN DEVELOPING THE INITIAL SET OF PERFORMANCE MEASURES AVAILABLE IN TEXAS?

A. Yes. In parallel to the efforts by the Texas Commission, the United States Department of Justice ("DOJ") also played a role. At that time, the DOJ had recommended that SWBT's 271 application in Oklahoma be denied. In part, the DOJ's recommendation was based on the lack of performance measures available from SWBT. Subsequently, the DOJ worked with SWBT in developing a set of measurements that would be in addition to the measures that Texas was in the process of developing.

Q. DID THE TEXAS COMMISSION RESTRICT THE AVAILABILITY OF THE PERFORMANCE MEASUREMENTS AND ASSOCIATED PENALTY PLAN TO AN AWARD OF SECTION 271 RELIEF?

A. No. The measurements were available to any CLEC who wished to incorporate them into an interconnection agreement with SWBT. The Texas Commission will not restrict the implementation of the measurements and penalty plan until such time as SWBT obtains 271 relief. The Texas Commission believes that the measurements and penalty structure will foster the development of local competition by reflecting whether SWBT's Section 251 obligations are being met.

Q. WERE THE MEASUREMENTS OR PENALTY PLAN SUBSEQUENTLY MODIFIED?

A. Yes. After SWBT filed its 271 application in Texas, the Texas Commission heard from a number of CLEC witnesses concerning a variety of issues, including performance measurements. In particular, facilities-based CLECs voiced serious concerns that the measurements were not

capturing critical operational failures of SWBT to provide non-discriminatory treatment. Since the measurements originally had been developed within the context of an arbitration, the broader Texas CLEC industry had been excluded from participating in the formulation of the measurements. In an effort to address valid facilities-based CLECs' concerns, the Texas Commission included performance measurements as one of the issues slated for a series of collaborative meetings. These meetings were an outgrowth of the Texas Commission's preliminary findings regarding SWBT's 271 application.

Q. WHAT ASPECTS OF THE MEASUREMENTS WERE ADDRESSED IN THIS COLLABORATIVE PROCESS?

A. Over the course of a year, numerous collaborative meetings were held to address the addition of new measurements that captured essential facilities-based issues which included the following -- installation of interconnection trunks, trunk blockage, interim and permanent number portability installation, and so-called coordinated "hot cuts," in which the CLEC re-uses the ILEC's loop facilities to a customer in order to conserve plant facilities. Moreover, measures were added which were meant to address other processes that had significant impact on a CLEC's ability to present itself as a viable competitor in the marketplace. For example, the timeliness of updates to directory assistance and LIDB databases were added because these issues impact whether the customer's transition to the new local service provider is transparent. Furthermore, the timeliness of updates to 911 databases was addressed because this matter effects the CLEC's ability to protect the accuracy of the customer's 911 record.

Q. WERE THERE ANY OTHER ADDITIONS OR MODIFICATIONS TO THESE TEXAS MEASUREMENTS DURING THE COLLABORATIVE PROCESS?

A. Yes. Additionally, the CLECs, SWBT, and the Texas Commission's Staff honed the "business rules" which delineate the data collection method to be applied for each measurement.

Q. IS THE COMPLETE SET OF PERFORMANCE MEASUREMENTS AVAILABLE TO ALL CLECS?

A. Yes. In Texas, any CLEC may request that SWBT provide the full set of Texas Measurements.

Q. WHAT ARE THE TYPES OF ACTIVITIES THAT ARE MONITORED BY THE TEXAS PERFORMANCE MEASUREMENTS?

A. The categories of activities monitored by the Texas performance measurements include the following:

1. Pre-ordering and ordering activities such as response times of the ILEC's OSS interfaces; timely return of Firm Order Commitments ("FOCs"), which notify CLECs of the installation due dates for services; and Service Order Completion ("SOCs"), which notify CLECs of the date on which service completion;
2. The accuracy of the ILEC's invoices to CLECs;
3. The ILEC local service centers' responsiveness to CLECs' inquiries;
4. Provisioning timeliness and accuracy for all types of services including resale, unbundled network elements ("UNEs"), interconnection trunks and special access orders;

5. Maintenance and repair activities as captured by trouble tickets submitted by the CLEC;

6. Network blockage on interconnection trunks or common transport trunks;

7. The level of performance of the ILEC's directory assistance and operator services;

8. Interim number portability installation;

9. Permanent number portability installation and maintenance activities stemming from trouble reports;

10. Timeliness of 911 database updates;

11. Processing of requests for access to poles, conduits, and rights-of-way;

12. Processing of collocation projects;

13. Timeliness of directory assistance database updates;

14. Processing of coordinated conversions;

15. Timeliness of uploading new NXXs into the Local Exchange Routing Guide (LERG); and

16. Timeliness of processing bona fide requests submitted by CLECs.

These categories of activities reflect the operational processes necessary to provide competitive local service to customers.

Q. HOW IS EACH MEASUREMENT DELINEATED?

A. Each measurement contains the following information:

1. Clearly Defined Business Rules:

Each measurement lists business rules that define what data is to be collected and to some extent the data collection methodology. For example, for the measurement "Percent Mechanized Completions Returned Within One Day of Work Completion," the business rules define that the "days are calculated by subtracting the date the Service Order Completion was returned to the CLEC minus the order completion date."

2. Exclusions, if Any:

Each measurement also lists "exclusions," which itemizes what information specifically will be excluded from the calculation of a particular performance measurement. For example, maintenance problems caused by customer premise equipment or inside wiring are not included in the data collection for performance measurements capturing trouble report activities.

3. The Method of Calculation:

The mathematical calculation of the data is set out for each measurement.

4. Report Structure:

The ILEC is required to report the performance measurement data for the entities listed in the "report structure." Generally, the data is reported for each individual CLEC, all CLECs, and for the ILEC itself. With this reporting structure, the CLEC can determine how the treatment it is receiving from the ILEC compares with the ILEC's performance with respect to its own retail customers. Additionally, the report structure reveals the ILEC's treatment with respect to the broader base of CLEC wholesale customers.

5. Levels of Desegregation:

Unless measures are desegregated to a level that mirrors operational realities, measurements will not provide a clear reflection of an ILEC's performance. For example, measurements that track the provisioning of UNEs are desegregated for each type of UNE that a CLEC is able to order. Without this level of desegregation, significant inequities in the ILEC's performance can be masked.

6. Benchmarks:

Each measurement has an established benchmark that sets the performance threshold that the ILEC must meet.

Only by clearly articulating each measurement will an "apples-to-apples" comparison be available. And only with this level of articulation will all parties have a clear understanding and reasonable expectations as to what activity is being measured and the data collection methodology.

~~Q. ARE THESE MEASUREMENTS FULLY IMPLEMENTED BY SWBT?~~

~~A. While the bulk of the measurements have been implemented by SWBT, a few measurements currently are in the process of implementation.~~

Q. WERE THERE ANY MODIFICATIONS TO THE REMEDY PLAN DURING THE COLLABORATIVE MEETINGS?

A. Yes. The remedy plan that evolved from the original MCI and AT&T arbitration contained a plan that focused on credits. The credit system would allow SWBT to bank "credits" for good performance and apply these credits against any poor performances. The significant

failure of this type of remedy plan is the opportunity for the ILEC to selectively deliver good performance and thereby avoid consistently delivering non-discriminatory treatment to CLECs.

Q. WHAT IS THE PRESENT REMEDY PLAN IMPLEMENTED WITH THE TEXAS PERFORMANCE MEASUREMENTS?

Damages and penalties are categorized as either a Tier 1 and/or Tier 2. Tier 1 damages are paid to the CLEC. Tier 2 penalties are paid to the state. Each measurement carries a "high," "medium," "low," or "none" designation for Type 1 and Type 2 payments. This designation indicates the amount to be paid by the ILEC. In addition, the amount of the damages and/or penalties is determined by whether the performance measurement was missed for one month or for succeeding months. For example, the performance measure "Percent of Firm Order Confirmations Received within X Hours" is labeled as a Tier 1-Low and Tier 2-Medium measurement. Damages paid for missing this measurement for one month would be $25 per occurrence paid to the CLEC and $300 per occurrence paid as a penalty to the state.

Q. WHAT ARE THE PERFORMANCE LEVELS THAT THE ILEC MUST MEET?

A. For any performance measure to be effective in validating non-discriminatory treatment, we must have the ability to compare the ILEC's performance with respect to CLECs to the ILEC's performance with respect to its own retail customers and its affiliate, if any. In most cases, parity generally would be the appropriate standards. In situations in which there are no comparable retail analogue, then benchmarks would be the appropriate standard.

Q. WHAT TYPE OF STATISTICAL ANALYSIS IS USED?

A. The plan provides a 95% confidence level in the statistical analysis. It also incorporates The use of a modified z-test which accounts for variance in the ILEC data. It also uses a "K" value table that further allows the ILEC to fail a certain number of measures in a given month before having to pay damages.

Q. DOES THE CLEC HAVE ACCESS TO THE RAW DATA POINTS USED TO CALCUALTE THE MEASUREMENTS?

A. Yes. It is important that the CLEC be able to review the performance measurement with the raw data that was used by the ILEC for input. That type of audit capability will help ensure that the measurements truly reflect actual commercial experiences of the CLECs.

Q. DOES THE TRA HAVE THE AUTHORITY TO IMPOSE PENALTIES IN THE AMOUNTS ADOPTED IN TEXAS?

A. If the TRA imposes penalties on a "per day" basis, the TRA would have the authority to impose substantial penalties. But to the extent the Texas penalties exceed the TRA's statutory authority to impose fines, I would assume that the TRA would amend the Texas plan to clarify that the TRA may only impose a fine up to the maximum level fixed by Tennessee law.

Q. ARE THE PENALTIES SUBJECT TO ANY CAP?

A. Yes. Eleven measurements are subject to a monthly cap paid per occurrence. For example, "Average Response Time for OSS Preorder interfaces" is subject to a monthly cap.

This measurement's cap for Month 1 is $5,000 for Tier 1 damages and $20,000 in Tier 2 penalties.

Q. IS THERE AN OVERALL CAP ON THE DAMAGES AND PENALTIES PAYABLE BY THE ILEC?

A. Yes. There are overall annual caps on damages and penalties payable by SWBT. In addition, if SWBT pays $3 million to a single CLEC or $10 million to all CLECs in any one month. The annual cap is $120 million. The ILEC has the opportunity to initiate a show cause proceeding to demonstrate why it should not be liable for payments exceeding the monthly benchmarks of $3 million for a single CLEC and/or $10 million for all CLECs. However, it should be noted that the FCC's Common Carrier Bureau staff has notified SBC Communications, Inc. ("SBC") in a letter dated September 28, 1999 that the staff believes that the annual cap of $120 million is:

> . . . . too low to foster parity performance in a market the size of Texas. In particular, the Bureau believes that the potential liability under such a plan must be high enough that an incumbent could not rationally conclude that making payments under an enforcement plan is an acceptable price to pay for hindering or blocking competition.

See Letter from Lawrence E. Strickly, Chief, Common Carrier Bureau, FCC to Priscilla Hill-Ardoin, Senior Vice President -- FCC, SBC, dated September 28, 1999, attached as Exhibit "3."

Q. IS THE REMEDY PLAN AVAILABLE TO ALL CLECS IN TEXAS?

A. The "remedy plan" is contained in a generic interconnection document approved by the Texas Commission in an open meeting October 6, 1999. On October 13, 1999, the Texas Commission issued its order approving the generic interconnection agreement, which will be provided to the Commission upon request. At this time, any CLEC may adopt the entire agreement or a portion of the agreement, such as the remedy plan.

Q. ARE THE PERFORMANCE MEASUREMENTS OR THE REMEDY PLAN ONLY AVAILABLE TO CLECS IF SWBT'S 271 APPLICATION IS APPROVED?

A. No.

Q. WOULD IT BE CORRECT TO SAY THAT THE TEXAS PERFORMANCE MEASUREMENTS WERE DEVELOPED WITHIN A CONTEXT OF A 271 APPLICATIONS?

A. No. They were refined as a joint ILEC/CLEC industry effort during the collaborative process that originally stemmed from a 271 application. But the need for performance measurements was acknowledged by the Texas Commission long before SWBT's 271 application. Originally, the Texas performance measures were awarded as part of an arbitration between MCI, AT&T and SWBT.

Q. DOES THE TEXAS COMMISSION PLAN ON SUBJECTING THE PERFORMANCE MEASUREMENTS TO FURTHER EVALUATION?

A. Yes. The Texas Commission has planned to review the measurements at a later point in time in order to ensure that the measurements are capturing the intended performance activity. At

that time, measurements might be added, dropped, or modified according to the Texas Commission's evaluation.

Q. ARE YOU AWARE THAT THE TENNESSEE REGULATORY AUTHORITY HAS DECLINED TO SET PERFORMANCE MEASUREMENTS?

A. Yes. I am aware that in another CLEC proceeding the Authority declined to establish remedies for BellSouth's failure to meet performance measures, finding that the evidentiary record did not provide sufficient basis to do so and that a factual inquiry would be necessary to resolve this issue. Order dated May 18, 1999. *In Re: Petition of NEXTLINK Tennessee, L.L.C. for Arbitration of Interconnection With BellSouth Telecommunications, Inc.*, Docket No. 98-00123.

Q. **WHY SHOULD THE AUTHORITY RECONSIDER ITS POSITION?**

A. Performance measures provide an objective reflection of the ILEC's performance with its own retail customers and with its CLEC customers. Unless the CLECs and the regulators have this type of objective barometer, none of us, including the ILEC, truly knows whether the ILEC is providing non-discriminatory treatment to CLECs.

Q DO PERFORMANCE MEASURMENTS SERVE TO PROMOTE AN OVERARCHING POLICY GOAL?

A. Yes. The Telecommunications Act of 1996 was intended specifically to establish local competition. That is the policy goal. Whether robust local service competition can truly be

established will depend on a myriad of operational details. Consumers have to perceive that changing their service to a new provider is a viable alternative. If a change in service providers is accompanied by service installation delays, loss of dial tone, recurring static on the line, the lack of directory assistance listings, and incorrect 911 information, consumers will never perceive a competitor as a viable alternative to the ILEC. Robust competition will florish when the conversion to a new service provider achieves a level of transparency that can only be achieved when a seamless operational flow is established between the CLEC and the ILEC who provided essential facilities. Performance measurements provide an overall picture of whether the goal of establishing local competition ~~by ensuring a seamless operational flow~~ is being achieved. Performance measurements consequently serve the public interest by ensuring that the operational details support and foster the overall policy goal of establishing local competition.

A. WOULD PERFOMANCE MEASUREMENTS ALONE SERVE THAT GOAL?

Q. No. ~~But~~ Pperformance measurements ~~standing~~ alone have only marginal value. Enforcement mechanisms such as those adopted by the Texas Commission are also necessary to act as a deterrent to ~~non~~-sub-standard performance ~~of the performance measurements~~ and to provide incentive to BellSouth to fulfill its contractual and statutory obligations to provide parity of service. As stated previously, BellSouth has every incentive not to live up to these obligations. The system needs teeth to ensure BellSouth's compliance, without which the

Telecommunication Act's policy goal of robust local competition will never be fulfilled. Damages and penalty provisions would provide the enforcement strength necessary.

~~Q.~~ ~~Q.~~ IF THE ILEC WERE FAILING TO PERFORM IN A NON-DISCRIMINATORY MANNER, WHY WOULDN'T THE COMPLAINT PROCESS SERVE AS AN ADEQUATE AVENUE FOR THE CLEC?

A. First, the ILEC's performance to its own retail customers can only be revealed through a complete set of performance measurements that track provisioning issues. Otherwise, how would the CLEC be able to have a reasonable perspective of the ILEC's provisioning performance with respect to the CLEC industry as a whole or with respect with an individual CLEC? In the FCC's NPRM: *In the Matter of Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection and Operator Services and Directory Assistance*, released April 17, 1998, the FCC stated:

Mandating nondiscriminatory access, however, is not the same thing as achieving it in practice. A number of competing carriers have submitted anecdotal evidence suggesting that incumbent

LECs may not be providing nondiscriminatory access to OSS functions and interconnection consistent with the statutory requirements. Many of these carriers also have emphasized that it is frequently difficult to resolve disputes regarding nondiscriminatory access, because the incumbent LECs do not report on the time and manner in which they process orders for their own retail customers.

Q HAS THE FCC ADDRESSED HOW PERFORMANCE MEASURES CAN AUGMENT THE COMPLAINT PROCESS?

A. Yes. ~~Second, p~~Performance measurements take issues out of the "he said/she said" and place them on a objective foundation. Measurements that are carefully crafted along with accurate data collection methodology render objective data. Measurements provide a relief from the tiresome "finger pointing" syndrome that all too often plagues the relationship between a CLEC and ILEC. In the FCC's NPRM: *In the Matter of Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection and Operator Services and Directory Assistance*, released April 17, 1998, Commissioner Gloria Tristani indicated the following in a separate statement,

> In the newly competitive local market, regulators will be called upon to arbitrate disputes between competing carriers. The availability of performance measurements will allow

regulators to resolve complaints quickly. . . . But to get there, we will need state commissions to put performance measurements in place.-

Third, measurements provide a readily available snapshot of whether the critical operational details of provisioning local service are underpinning or undermining the general policy goal of establishing local competition. The consumer's decision to select a CLEC cannot be realized by a flip of the switch. If a simple single task were required, performance measurements would be unnecessary. Instead, a series of operational processes must be set into place before the customer can be converted to the new provider. In this context, the devil is most definitely in the operational details. Without an objective, clear picture of how those operational details are functioning, no one will have a clear perspective of whether we are on the road to achieving the overarching policy objective of setting the foundation for local competition.

Q. WHY WOULD USING THE COMPLAINT PROCESS WOULD BE INSUFFICIENT

R. IN ENSURING GENERAL COMPLIANCE WITH 251 OBLIGATIONS?

A. Using the complaint process as the sole means by which to address whether non =discriminatory treatment has been rendered is a considerably less efficient process than performance measurements. Moreover, the complaint process will never provide an overall view of whether the ILEC is fulfilling its Section 251 obligations. If broad based, non-discriminatory treatment must be established on a complaint-by-complaint basis, the process will be placed in a quagmire of individual anecdotal accusations. The complaint process puts the burden on the CLEC while, in reality, it is the ILEC who bears the responsibility to demonstrate its fulfillment

of its Section 251 obligations. Performance measurements accomplish this demonstration on a broad scale.

Q. IN TERMS OF COMMON BUSINESS PRACTICES, IS PERFORMANCE MEASURMENTS REASONABLE?

A. Yes. ~~Finally, i~~It is commercially reasonable that CLECs, who are wholesale customers of the ILEC, have general expectations regarding the delivery of services ~~from their vendor ILECs~~. Otherwise, the customer-vendor relationship between the CLEC and =ILEC will be replete with misunderstandings and frustrations. As a result, consumer welfare and the vitality of competition will suffer. Due to the essential relationship that exists between the CLEC and the ILEC, it is important to establish a threshold understanding of service delivery expectations. That threshold understanding is embodied in a set of generally available performance measurements. Measurements, therefore, play a critical role in establishing a solid business relationship between the ILEC-vendor and its wholesale CLEC-customer.

The FCC further states in its NPRM on performance measurements:

> We believe that the establishment of model performance measurements and reporting requirements will promote the goal of efficient and effective communication between competing carriers and incumbent LECs, while also reducing the need for regulatory oversight in this area. Performance measurements and reporting requirements should make much more transparent, or observable,

the extent to which an incumbent LEC is providing nondiscriminatory access, because such requirements will permit direct comparisons between the incumbent's performance in serving its own retail customers and its performance in providing service to competing carriers.

~~In a separate statement, FCC Commissioner Gloria Tristani stated:~~

~~In the newly competitive local market, regulators will be called upon to arbitrate disputes between competing carriers. The availability of performance measurements will allow regulators to resolve complaints quickly. . . . But to get there, we will need state commissions to put performance measurements in place.~~

This Authority should alter its past thinking on this issue and adopt the Texas performance measures and damages and penalty provisions in their entirety so that BellSouth's service can be measured from a solid, objective foundational base of performance data.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

TABLE OF CONTENTS
PERFORMANCE MEASURES

APPENDIX
PERFORMANCE MEASUREMENT BUSINESS RULES (VERSION 1.6)
RESALE POTS, RESALE SPECIALS AND UNES

Pre-Ordering/Ordering

1. Measurement	
Average Response Time For OSS Pre-Order Interfaces	
Definition:	
The average response time in seconds from the SWBT side of the Remote Access Facility (RAF) and return for pre-order interfaces (Verigate, DataGate and EDI where the pre-order functionality is integrated) by function.	
Exclusions:	
None	
Business Rules:	
The clock starts on the date/time when the request is received by SWBT, and the clock stops on the date/time when SWBT has completed the transmission of the response to the CLEC. Timestamps are taken at the DataGate and Verigate servers and do not include transmission time through the LRAF. Response time is accumulated for each major query type, consistent with the specified reporting dimension, and then divided by the associated total number of queries received by SWBT during the reporting period. The response time is measured only within the published hours of interface availability. Published hours of interface availability are documented on the CLEC web site. (SWBT will not schedule system maintenance during normal business hours (8:00 a.m. to 5:30 p.m. Monday through Friday).	
Levels of Disaggregation:	
• Address Verification • Request For Telephone Number • Request For Summary Customer Service Record (CSR) < = 30 WTNs (Also broken down for Lines as required for DIDs). • Request For Summary Customer Service Record (CSR) > 30 WTNs (Also broken down for Lines as required for DIDs). • Request for Detailed Customer Service Request (CSR) • Service Availability • Service Appointment Scheduling (Due Date) • Dispatch Required • PIC	
Calculation:	**Report Structure:**
Σ[(Query Response Date & Time) - (Query Submission Date & Time)] ÷ (Number of Queries Submitted in Reporting Period)	Reported on a CLEC and all CLECs basis by interface for DATAGATE and VERIGATE.

Measurement Type:		
Tier 1 – Low Tier 2 – Medium		
Benchmark:		
Benchmarks for summary CSR applies to < = 30 WTNs. Benchmarks for diagnostic measurements will be evaluated at the six months review.		
Measurement	**EDI/Datagate**	**Verigate**
Address Verification	4.7 seconds	4.7 seconds
Request For Telephone Number	4.5 seconds	4.5 seconds
Request For Customer Service Record (CSR)	6.6 seconds	6.6 seconds
Service Availability	6.6 seconds	6.6 seconds
Service Appointment Scheduling (Due Date)	1.0 second	1.0 second
Dispatch Required	12.6 seconds	12.6 seconds
PIC	28.0 seconds	To be determined at six month revision period

2. Measurement

Percent Responses Received within "X" seconds – OSS Interfaces

Definition:

The percent of responses completed in "x" seconds for pre-order interfaces (Verigate, DataGate, and EDI where the pre-order functionality is integrated) by function.

Exclusions:

See Measurement No. 1

Business Rules:

See Measurement No. 1

Levels of Disaggregation:

See Measurement No. 1

Calculation:	**Report Structure:**
(# of responses within each time interval ÷ total responses) * 100	Reported on a company basis by interface for DATAGATE and VERIGATE.

Measurement Type:

Tier 1 – Low
Tier 2 – Medium

Benchmark:

Measurement	EDI/Datagate	Verigate
Address Verification	90% in = 8.0 seconds 95% in = 12.0 seconds	80% in = 5.0 seconds 90% in = 7.0 seconds
Request For Telephone Number	90% in = 7.0 seconds 95% in = 9.5 seconds	80% in = 4.0 seconds 90% in = 6.0 seconds
Request For Customer Service Record (CSR)	90% in = 8.0 seconds 95% in = 13 seconds	80% in = 7.0 seconds 90% in = 10.0 seconds
Service Availability	90% in = 12.0 seconds 95% in = 16.0 seconds	80% in = 11.0 seconds 90% in = 13.0 seconds
Service Appointment Scheduling (Due Date)	90% in = 1 seconds 95% in = 2.0 seconds	80% in = 2.0 seconds 90% in = 3.0 seconds
Dispatch Required	90% in = 15.0 seconds 95% in = 25.0 seconds	80% in = 17.0 seconds 90% in = 19.0 seconds
PIC	90% in = 39 seconds 95% in = 60 seconds	To be determined at six month revision period

3. Measurement	
EASE Average Response Time	
Definition:	
Average screen to screen response from the SWBT side of the Remote Access Facility (RAF) and return.	
Exclusions:	
None	
Business Rules:	
The response time for a query is measured from the point in time when the CLEC customer service agent submits the query for information through a function key option on their keyboard into the OSS until the time when the OSS releases the information to the CLEC customer service agent by unlocking the keyboard for a new transaction. Response time is a combination of Network time, Host time and Fasterm time. Response time is accumulated for each query and then divided by the associated total number of queries received by SWBT during the reporting period.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Σ[(Query Response Date & Time) - (Query Submission Date & Time)] ÷ (Number of Queries Submitted in Reporting Period)	Reported for all CLECs and SWBT by division name (CPU platform).
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Parity. However, a Benchmark will be used until such time that SWBT has the ability to calculate sum of the squares in order to provide the parity comparison. The benchmark will be SWBT performance for the given month plus .05 seconds, and no z-test or modified z-test will be applied.	

4. Measurement	
OSS Interface Availability	
Definition:	
Percent of time OSS interface is available compared to scheduled availability.	
Exclusions:	
None	
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 SWBT plans to offer and support CLEC access to SWBT'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 SWBT interface is capable of accepting or receiving CLEC transactions or data files for processing through the interface and supporting operational support systems (OSS). The actual time available is divided by the scheduled time available and then multiplied by 100 to produce the "Percent system availability" measure. SWBT 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 SWBT's Availability Team on a case by case basis. SWBT's availability team shall provide to CLECs the information supporting the use of any availability factor multiplier used in reporting this measurement. SWBT shall calculate the availability time rounded to the nearest minute.	
Levels of Disaggregation:	
• EASE reported for Geographic Regions • EDI reported by protocol	
Calculation:	**Report Structure:**
[(Hours functionality is available during the scheduled available hours) ÷ Scheduled system available hours)] * 100	Reported on an aggregate CLEC basis by interface, e.g. EASE, DATAGATE, VERIGATE, LEX, EDI and TOOLBAR. The RAF will be reported on an individual CLECs basis.
Measurement Type:	
Tier 1 – None Tier 2 – High	
Benchmark:	
99.5%. The critical Z allowance does not apply on this measurement.	

5. Measurement:

Percent Firm Order Confirmations (FOCs) Returned

Definition:

Percent of FOCs returned within a specified time frame from receipt of a complete and accurate service request to return of confirmation to CLEC.

Exclusions:

- Rejected (manual and electronic) orders.
- SWBT only Disconnect orders.
- Orders involving major projects mutually agreed upon by CLECs and SWBT.
- Upon implementation of Performance Measurement 94, LNP and LNP With Loop will be excluded from this measure.

Business Rules:

FOC business rules are established to reflect the Local Service Center (LSC) normal hours of operation, which include Monday through Friday, 8:00 a.m.-5:30p.m, excluding holidays and weekends. If the start time is outside of normal business hours, then the start date/time is set to 8:00 a.m. on the next business day. Example: If the request is received Monday through Friday between 8:00 a.m. to 5:30 p.m.; the valid start time will be Monday through Friday between 8:00 a.m. to 5:30 p.m. If the actual request is received Monday through Thursday after 5:00 p.m. and before 8:00 a.m. the next day; the valid start time will be the next business day at 8:00 a.m. If the actual request is received Friday after 5:30 p.m. and before 8:00 a.m. Monday; the valid start time will be at 8:00 a.m. Monday. If the request is received on a holiday (anytime); the valid start time will be the next business day at 8:00 a.m. The returned confirmation to the CLEC will establish the actual end date/time. Provisions are established within the DSS reporting systems to accommodate situations when the LSC works holidays, weekends, and when requests are received outside normal working hours. For UNE Loop and Port combinations, orders requiring N, C, and D orders; the FOC is sent back at the time the last order that establishes service is distributed In the event of a post-FOC reject, the originally recorded duration to return the first FOC will not be included in the Measurement No. 5 reported date.

LEX/EDI

For LEX and EDI originated LSRs, the start date and time is the receive date and time that is automatically populated by the interface (EDI or LEX) with the system date and time.. The end date and time is recorded by both LEX and EDI and reflect the actual date and time the FOC is **available** to the CLEC. This data is extracted daily from LEX and EDI and passed to the DSS (Decision Support System), where the end date and time are populated and are used to calculate the FOC measurements. For LSRs where FOC times are negotiated with the CLEC, the ITRAK entry on the SORD service order is used in the calculation. The request type from the LSR and the Class of Service tables are used to report the LSRs in the various levels of disaggregation. The Class of Service tables are based on the Universal Service Order practice.

VERBAL or MANUAL REQUESTS

Manual service order requests are those initiated by the CLEC either by telephone, fax, or other manual methods (i.e. courier). The receive date and times are recorded and input on the SM-FID on each service order in SORD for each FOC opportunity. The end times are the actual dates and times the paper faxes are sent back to the CLEC. Fax end times are recorded and input into the DSS systems via an internal Web application. Each FOC opportunity is dynamically established on the Web application via our interface to SORD. The LSC must provide an end date and time for each entry, which depicts the date and time the FOC was actually faxed back to the CLEC. If a CLEC elects to accept an on line FOC and does not require a paper fax the FOC information is provided over the phone. In these instances, the order distribution time is used in the FOC calculation on the related SORD service order to the appropriate SM-FID entry. These scenarios are identified by data populated on the ITRAK-FID of the service order. The ITRAK-FID is also used when FOC times are negotiated with the CLEC. The LSC will populate the ITRAK-FID with certain pre-established data entries that are used in the FOC calculation.

Levels of Disaggregation:

Manually submitted:

- Simple Res. And Bus. < 24 Hours
- Complex Business (1-200 Lines) < 24 Hours
- Complex Business (>200 Lines) < 48 Hours
- UNE Loop (1-49 Loops) < 24 Hours
- UNE Loop (> 50 Loops) < 48 Hours
- Switch Ports < 24 Hours

Electronically submitted via LEX or EDI:

- Simple Res. And Bus. < 5 Hours
- Complex Business (1-200 Lines) < 24 Hours
- Complex Business (>200 Lines) < 48 Hours
- UNE Loop (1-49 Loops) < 5 Hours
- UNE Loop (> 50 Loops) < 48 Hours
- Switch Ports < 5 Hours

Calculation:	Report Structure:
(# FOCs returned within "x" hours ÷ total FOCs sent) * 100	Reported for CLEC and all CLECs. This includes mechanized from EDI and LEX and manual (FAX or phone orders).

Measurement Type:

Tier 1 – Low
Tier 2 – Medium

Benchmark:

All Res and Bus 95% / Complex Bus 94% / UNE Loop (1-49) 95% / UNE Loop (>50) 94% / Switch Ports 95%, the Average for the remainder of each measure disaggregated shall not exceed 20% of the established benchmark.

6. Measurement:	
Average Time To Return FOC	
Definition:	
The average time to return FOC from receipt of complete and accurate service request to return of confirmation to CLEC.	
Exclusions:	
• Rejected Orders. • SWBT only Disconnect orders. • Orders involving major projects. • Upon implementation of Performance Measurement 94, LNP and LNP Without Loop will be excluded from this measure.	
Business Rules:	
See Measurement No. 5	
Levels of Disaggregation:	
• All Res. And Bus. < 24 Hours • Complex Business (1-200 Lines) < 24 Hours • Complex Business (>200 Lines) < 48 Hours • UNE Loop (1-49 Loops) < 24 Hours • UNE Loop (> 50 Loops) < 48 Hours • Switch Ports < 24 Hours	
Calculation:	**Report Structure:**
Σ[(Date and Time of FOC) - (Date and Time of Order Received by SWBT)]/(# of FOCs)	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
No Benchmark	

7. Measurement	
Percent Mechanized Completions Available Within one hour of Completion in SORD	
Definition:	
Percent mechanized completions Available within one hour for EDI and LEX.	
Exclusions:	
None	
Business Rules:	
The elapsed time for an LSR is calculated based on the time of the last service order, which establishes service, being completed in SORD to the actual time LEX or EDI received the SOC notification and it is available to the client. For example, if a multi-line, LSR has 10 lines, the stop time would be when the last of the 10 orders is completed in SORD.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(# mechanized completions available to CLEC within 1 hour of completion on SORD ÷ total mechanized completions) * 100	Reported for CLEC and all CLECs for the electronic interfaces (EDI and LEX).
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
97%	

7.1 Measurement	
Percent Mechanized Completions Available Within one Day of Work Completion	
Definition:	
Percent Mechanized Completions Available Within one Day	
Exclusions:	
None	
Business Rules:	
Days are calculated by subtracting the date the SOC was Available to the CLEC minus the order completion date.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(# mechanized completions returned to the CLEC within 1 day of work completion ÷ total mechanized completions) * 100	Reported for CLEC and all CLECs for the electronic interfaces (EDI and LEX).
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
97%	

8. Measurement	
Average Time to Return Mechanized Completions	
Definition:	
Average time required to return a mechanized completion.	
Exclusions:	
See Measurement No. 7	
Business Rules:	
See Measurement No. 7	
Levels of Disaggregation:	
See Measurement No. 7	
Calculation:	**Report Structure:**
Σ[(Date and Time of Notice Of Completion Issued to the CLEC) - (Date and Time of Work Completion)] ÷ Total Mechanized Completions)	Reported on CLEC and all CLECs for the electronic interfaces (EDI and LEX).
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
No Benchmark	

9. Measurement	
Percent Rejects	
Definition:	
The number of rejects compared to the issued unique LSRs and SUPPs for the electronic interfaces (EDI and LEX).	
Exclusions:	
None	
Business Rules:	
A reject is anything that is received via LEX or EDI that does not pass LASR edit checks or other edits prior to the order being distributed and is returned electronically to the CLEC.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(# of rejects ÷ total unique LSRs and SUPPs) * 100	Reported on CLEC and all CLECs for the electronic interfaces (EDI and LEX).
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Measurement is diagnostic. No benchmark required.	

10. Measurement	
Percent Mechanized Rejects Returned Within one hour of receipt of reject in LASR	
Definition:	
Percent mechanized rejects returned within one hour of the receipt of the reject in LASR.	
Exclusions:	
None	
Business Rules:	
The start time used is the date and time the reject is available to LASR; and the end time is the date and time the reject notice is provided to EDI or LEX and is available to the CLEC. A mechanized reject is any reject returned electronically (without manual intervention) to the CLEC via LASR.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(# mechanized rejects returned within 1 hour ÷ total rejects) * 100	Reported for CLEC and all CLECs for the electronic interfaces (EDI and LEX).
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
97% within 1 hour of the receipt of a reject in LASR	

10.1 Measurement:	
Percent Manual Rejects Received Electronically and Returned Within Five Hours	
Definition:	
Percentage of manual rejects received electronically and returned within five hours of the receipt of LSR from CLEC.	
Exclusions:	
• Manual rejects received through manual process i.e. via mail, fax or courier	
Business Rules:	
The start time is the time the LSR is received electronically via EDI or LEX and logged in LASR. The end time is the date and time the reject notice is available to the CLEC. A manual reject is a reject of an electronic LSR. The rejected order is any reject that errors out of SORD and is returned to the CLEC via LASR GUI.	
Levels of Disaggregation:	
• By State	
Calculation:	**Report Structure:**
(# electronic manual rejects returned within 5 hours of receipt of LSR ÷ total electronic manual rejects) * 100	Reported for CLEC and all CLECs
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
97% within 5 Hours.	

11. Measurement	
Mean Time to Return Mechanized Rejects	
Definition:	
Average time required to return a mechanized reject.	
Exclusions:	
See Measurement No. 10	
Business Rules:	
The start time is the time the LSR is received electronically via EDI or LEX. The end time is the date and time the reject notice is available to the CLEC. A mechanized reject is any reject returned electronically (without manual intervention) to the CLEC.	
Levels of Disaggregation:	
See Measurement No. 10	
Calculation:	**Report Structure:**
Σ[(Date and Time of Order Rejection) - (Date and Time of Order Acknowledgment)] ÷ (# of unique LSR's and Supps Rejected)	Reported on CLEC and all CLECs for the electronic interfaces (EDI and LEX).
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
See Measurement No. 10	

11.1 Measurement:	
Mean Time to Return Manual Rejects that are Received Electronically via LEX or EDI	
Definition:	
Average time to return manual rejects received electronically via LEX or EDI; receipt to return.	
Exclusions:	
• See Measurement 10.1	
Business Rules:	
See Measurement 10.1	
Levels of Disaggregation:	
• By State	
Calculation:	**Report Structure:**
{∑(receipt to CLEC of electronic manual rejects – receipt of electronic manual reject) ÷ total electronic manual rejects}	Reported for CLEC and all CLECs
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Five Hours	

12. Measurement	
Mechanized Provisioning Accuracy	
Definition:	
Percent of mechanized orders completed as ordered.	
Exclusions:	
None	
Business Rules:	
This measurement compares the features ordered on a mechanized order, to that which is provisioned on the switch.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(# of orders completed as ordered ÷ total orders) * 100	Reported by individual CLEC, CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – Low	
Benchmark:	
Parity	

13. Measurement	
Order Process Percent Flow Through	
Definition:	
Percent of orders or LSRs from entry to distribution that progress through SWBT ordering systems.	
Exclusions:	
LEX/EDI excludes orders both electronically generated and rejected if error is caused by CLEC.	
Business Rules:	
The number of orders that flow through SWBT's ordering systems and are distributed in SORD without manual intervention, divided by the total number of MOG Eligible orders and orders that would flow through EASE within the reporting period. Orders that fall out after LASR, that are worked by SWBT and not rejected back to CLEC due to CLEC caused errors, will be included as failed pass-through occurrences.	
Levels of Disaggregation:	
• For CLEC typed orders by UNE loops, Resale, UNE Combos, and other.	
Calculation:	**Report Structure:**
(# of orders that flow through ÷ total MOG-eligible orders and orders that flow through EASE) * 100	Reported by individual CLEC, CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – High	
Benchmark:	
Parity	

Billing

14. Measurement	
Billing Accuracy	
Definition:	
SWBT performs three bill audits to ensure the accuracy of the bills rendered to its customers: CRIS, CABS and toll/usage.	
Exclusions:	
Non-recurring charges are not part of the CRIS audit process, as SWBT has developed a test order process to ensure the accuracy of CRIS non-recurring charges.	
Business Rules:	
The purpose of the CRIS Bill Audit is to review and recalculate each service billed for each of the seven bill processing centers in the five states. Wholesale accounts are included in each processing center for every billing period. In the toll/usage bill audit, a sample of customer accounts is selected using an appropriate mix of USOCs and Classes of Service. The purpose of this audit is to ensure that monthly bills sent to the CLECs, whether it is for resale or unbundled services, and retail customers are rated accurately according to tariffs and CLEC contracts. For all accounts that are audited, the number of bills that have been released prior to correction (bills are audited for complete information, accurate calculations and are properly formatted) are counted as an error against the total bills audited.	
Levels of Disaggregation:	
CLEC and non-CLEC	
Calculation:	**Report Structure:**
(# of bills not corrected prior to bill release ÷ total bills audited) * 100	Reported for aggregate of all CLECs and SWBT for the CRIS, CABS and Usage bill audits.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Parity	

15. Measurement	
Percent of Accurate and Complete Formatted Mechanized Bills	
Definition:	
The percent of monthly bills sent to the CLECs via the mechanized EDI process that are accurate and complete.	
Exclusions:	
None	
Business Rules:	
EDI Billing accuracy is based upon three factors: totaling, formatting, and syntax. In other words, does the bill total up correctly, does the EDI Billing data conform to the format outlined in the SWB Electronic Commerce Guide for EDI Billing, and is the EDI Billing data syntactically correct? For completeness, EDI checks that the sum of all itemized calls equals the total for the itemized calls bill section, and the sum of all OC&C charges should equal the total for the OC&C section. Similar audits are performed for total current charges and the amount due.	
Levels of Disaggregation:	
• None	
Calculation:	**Report Structure:**
(Count of accurate and complete formatted mechanized bills via EDI ÷ total # of mechanized bills via EDI.) * 100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – Low Tier 2 – High	
Benchmark:	
99%	

16. Measurement:	
Percent of Usage Records Transmitted Correctly	
Definition:	
The percent of usage records transmitted correctly on the Daily Usage extract feed.	
Exclusions:	
None	
Business Rules:	
Controls and edits within the billing system uncover certain types of errors that are likely to appear on the usage records. When these errors are uncovered, a new release of the program is written to ensure that the error does not occur again. Thus, an error that is reported in one month should not occur the next month because the billing program error would have been fixed by the next month. The usage record data and the cycle date (when the bill was sent out) are used in the calculation of this measurement.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Count of usage records transmitted correctly ÷ total usage records transmitted) * 100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
95% within 6th workday	

17. Measurement
Billing Completeness
Definition:
Percent of service orders completed within the billing cycle that post in the CRIS or CABS billing systems prior to the customer's bill period.
Exclusions:
Access Service Orders billed through CABS.
Business Rules:
The Billing Completeness Measure includes all orders and is created from the Posted Service Order Database (PSOD). PSOD includes copies of all posted service orders for both the CRIS and CABS. PSOD includes the Bill Period, Completion Date, and Post Date for each Service Order as well as an On-Time/Late indicator created based on these dates. This On-Time/Late indicator is calculated as follows: 1. Determine the Bill Date, Completion Date, and Post Date for any order that has an OCN number regardless of order type. 2. Calculate the Bill Date minus one month by subtracting one month from the Bill Date. 3. Determine the Bill Render Date by using the Bill Date to look up the Bill Render Date on the Bill Period Calendar. 4. Compare the Completion Date, Bill Date, Bill Date Minus one month, Bill Render Date, and Post Date of the service order to determine if order is on-time or late: • If the Completion Date of the service order is prior to the Bill Date minus one month, then the order is late. • Compare the Post Date to the Bill Render Date. If the Post Date is earlier than or equal to the Bill Render Date and the Completion Date of the service order is equal to or greater than the Bill Date minus one month, then the order is on-time. • In all other cases, the order is late. • The Billing Completeness Measure for each month is based on all orders that post within that given month. The denominator of the measure is all orders within a month. The numerator is the total number of on-time orders for that same month. The Billing Completeness Measure calculation is completed for each CLEC, for all CLECs, and for all retail service orders. The CLEC orders for both CRIS and CABS are defined as all service orders that include the AECN or OCN FID. The retail orders are all CRIS orders that do not include an AECN.
Levels of Disaggregation:
CLEC and non-CLEC

Calculation:	Report Structure:
(Count of on-time service orders included in current applicable bill period ÷ total service orders in current applicable billing period) *100	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – Medium	
Benchmark:	
Parity with SWBT Retail.	

18. Measurement	
Billing Timeliness (Wholesale Bill)	
Definition:	
Billing Timeliness measures the length of time from the billing date to the time it is sent or transmitted (made available) to the CLECs.	
Exclusions:	
Excludes Weekends and Holidays.	
Business Rules:	
The transmission date is used to gather the data for the reporting period. The measure counts the number of workdays between the bill day and transmission date for each bill.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Count of bills transmitted on time ÷ total number of bills released) * 100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – Low Tier 2 – High	
Benchmark:	
95% within 6th workday	

19. Measurement	
Daily Usage Feed Timeliness	
Definition:	
Usage information is sent to the CLECs on a daily basis. This usage data must be sent to the CLEC within 6 work days in order to be considered timely.	
Exclusions:	
Excludes Weekends and Holidays.	
Business Rules:	
The measure uses the actual EMI usage records that are sent to the CLECs. Data date is the recording date of the usage and is part of the EMI usage record. Cycle date is the day the Daily Usage file is sent to the CLEC. Cycle date is found on the pack header record of the Daily Usage file.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Number of usage feeds transmitted on time ÷ total number of usage feeds) * 100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
95% within 6th workday	

20. Measurement	
Unbillable Usage	
Definition:	
The percent usage data that is unbillable.	
Exclusions:	
None	
Business Rules:	
For CRIS billing, the total dollars for A.M.A/ECS written off is divided by the total CRIS A.M.A/ECS billing. For CABS, the total CABS uncollectible dollars is divided by total CABS billing. The end of the month cycle date is used as the start/stop time for the reporting period.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Total unbillable usage ÷ total billed usage) * 100	Reported for the aggregate of SWBT and CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Aggregate measurement. No benchmark required.	

Miscellaneous Administrative

21. Measurement	
Local Service Center (LSC) Average Speed Of Answer	
Definition:	
The average time a customer is in queue.	
Exclusions:	
Weekends and Holidays	
Business Rules:	
The clock starts when the customer enters the queue and the clock stops when a SWBT representative answers the call. The speed of answer is determined by measuring and accumulating the elapsed time from the entry of a CLEC customer call into the SWBT call management system queue until the CLEC customer call is transferred to SWBT personnel assigned to handling CLEC calls for assistance. Data is accumulated from 12:00 a.m. on the first calendar day to 11:59 p.m. on the last calendar day of the month for the reporting period. Hours of operation are 8:00 a.m. to 5:30 p.m. Monday through Friday.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Total queue time ÷ total calls	Reported for all calls to the LSC by operational separation and SWBT.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Parity with SWBT RSC / BSC	

22. Measurement	
Local Service Center (LSC) Grade Of Service (GOS)	
Definition:	
Percent of calls answered by the Local Service Center (LSC) within 20 seconds.	
Exclusions:	
Excludes Weekends and Holidays.	
Business Rules:	
See Measurement No. 21	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Total number of calls answered by the LSC within a specified period of time ÷ Total number of calls answered by the LSC	Reported for all calls to the LSC by operational separation and SWBT.
Measurement Type:	
Tier 1 – None Tier 2 – High	
Benchmark:	
Parity with SWBT RSC / BSC	

23. Measurement	
Percent Busy in the Local Service Center (LSC)	
Definition:	
Percent of calls which are unable to reach the Local Service Center (LSC) due to a busy condition in the ACD.	
Exclusions:	
See Measurement No. 22	
Business Rules:	
See Measurement No. 21	
Levels of Disaggregation:	
See Measurement No. 21	
Calculation:	**Report Structure:**
(Count of blocked calls ÷ total calls offered) * 100	Reported for all CLECs and SWBT.
Measurement Type:	
Tier 1 – None Tier 2 – Low	
Benchmark:	
Parity with SWBT RSC / BSC	

24. Measurement	
Local Operations Center (LOC) Average Speed Of Answer	
Definition:	
The average time a customer is in queue.	
Exclusions:	
None	
Business Rules:	
The clock starts when the customer enters the queue and the clock stops when the SWBT representative answers the call. The speed of answer is determined by measuring and accumulating the elapsed time from the entry of a CLEC customer call into the SWBT call management system queue until the CLEC customer call is transferred to SWBT personnel assigned to handling CLEC calls for assistance. Data is accumulated from 12:00 a.m. on the first calendar day to 11:59 p.m. on the last calendar day of the month for the reporting period. The Measure includes calls to the LOC related to provisioning activities, e.g., coordinated conversions, as well as maintenance activities.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Total queue time ÷ total calls	Reported for all calls to the LOC for all CLECs and SWBT.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Parity with SWBT CSB	

25. Measurement	
Local Operations Center (LOC) Grade Of Service (GOS)	
Definition:	
Percent of calls answered by the Local Operations Center (LOC) within a specified period of time.	
Exclusions:	
See Measurement No. 24	
Business Rules:	
See Measurement No. 24 – Calls answered within 20 seconds.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Total number of calls answered by the LOC within a specified period of time ÷ total number of calls answered by the LOC	Reported for all calls to the LOC by operational separation and SWBT Retail (Repair Bureau).
Measurement Type:	
Tier 1 – None Tier 2 – High	
Benchmark:	
Parity with SWBT CSB	

26. Measurement	
Percent Busy in the Local Operations Center (LOC)	
Definition:	
Percent of calls which are unable to reach the Local Operations Center (LOC) due to a busy condition in the ACD.	
Exclusions:	
None	
Business Rules:	
See Measurement No. 24	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Count of blocked calls ÷ total calls offered) * 100	Reported for all CLECs and SWBT.
Measurement Type:	
Tier 1 – None Tier 2 – Low	
Benchmark:	
Parity with SWBT CSB	

RESALE POTS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT

Provisioning

27. Measurement
Mean Installation Interval
Definition:
Average business days from application date to completion date.
Exclusions:
• Excludes customer-caused misses. • Field Work orders – excludes customer requested due dates greater than 5 business days. • No Field Work orders – excluded if order applied for before 3:00 p.m.; and the due date requested is not same day; and if order applied for after 3:00 p.m.; and the due date requested is beyond the next business day. • Excludes all orders except N, T, and C orders. • Excludes Weekends and Holidays.
Business Rules:
The clock starts on the Application Date, which is the day that SWBT receives a correct Service Order. The clock stops on the Completion Date, which is the day that SWBT personnel complete the service order activity. Orders are included in the month they are completed. There are 2 types of orders in the measurement. Same Day Due orders (defined as distribution time EQUAL or BEFORE 3:00 p.m. and Application Date = Distribution Date = Due Date. Next Day Due orders (defined as distribution time AFTER 3:00 p.m. and Application Date = Distribution Date and Due Date is one business day after Application Date. If the order is Same Day Due, then (Completion – Application Date), if the order is Next Day Due, then [(Completion – Next Business Day) + 1]. UNE Combos, are reported at order level.
Levels of Disaggregation:
POTS • Field Work (FW) • No Field Work (NFW) • Business class of service • Residence class of service UNE Combo • Field Work (FW) • No Field Work (NFW)

Calculation:	Report Structure:
[Σ(completion date – application date)]/(Total number of orders completed)	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Resale POTS parity between Field Work compared to SWBT Field Work (N, T, C order types) and No Field Work compared to SWBT No Retail Field Work (N, T, C order types). UNE Combo Parity between Field Work compared to SWBT Field Work (N, T, C order types) and No Field Work compared to SWBT No Retail Field Work. (N, T, C order types).	

28. Measurement
Percent Installations Completed Within "X" Business Days (POTS)
Definition:
Measure of orders completed within five business days for Field Work (FW) orders and three business days for No Field Work (NFW) orders, of application date.
Exclusions:
• Excludes customer caused misses. • Field Work orders – excludes customer requested due dates greater than five business days. • No Field Work orders – excluded if order applied for before 3:00 p.m.; and the due date requested is not same day; and if order applied for after 3:00 p.m.; and the due date requested is beyond the next business day. • Excludes all orders except N, T, and C orders. • Excludes Weekends and Holidays.
Business Rules:
The clock starts on the Application Date, which is the day that SWBT receives a correct Service Order. The clock stops on the Completion Date which is the day that SWBT personnel complete the service order activity. Orders are included in the month they are completed. There are 2 types of orders in the measurement. Same Day Due orders (defined as distribution time EQUAL or BEFORE 3:00 p.m. and Application Date = Distribution Date = Due Date. Next Day Due orders (defined as distribution time AFTER 3:00 p.m. and Application Date = Distribution Date and Due Date is one business day after Application Date. If the order is Same Day Due, then (Completion – Application Date), if the order is Next Day Due, then [(Completion – Next Business Day) + 1]. UNE Combos, are reported at order level.
Levels of Disaggregation:
POTS • Field Work (FW) • No Field Work (NFW) • Business class of service • Residence class of service UNE Combo • Field Work (FW) • No Field Work (NFW)

Calculation:	Report Structure:
FW: (Count of orders installed within 5 business days ÷ total number of orders) * 100 NFW: (Count of orders installed within 3 business days ÷ total number of orders) * 100	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Resale POTS parity between Field Work compared to SWBT Field Work (N, T, C order types) and No Field Work compared to SWBT Retail No Field Work (N, T, C order types). UNE Combo Parity between Field Work compared to SWBT Field Work (N, T, C order types) and No Field Work compared to SWBT Retail No Field Work. (N, T, C order types).	

29. Measurement	
Percent SWBT Caused Missed Due Dates	
Definition:	
Percent of N, T, and C orders where installation was not completed by the due date as a result of a SWBT caused missed due date.	
Exclusions:	
Excludes orders that are not N, T, or C.	
Business Rules:	
The due date is the negotiated date by the customer and the SWBT representative for service activation. For CLEC orders, the due date is the due date reflected on the FOC. The Completion Date is the day that SWBT personnel complete the UNE Combos, are reported at order level.	
Levels of Disaggregation:	
POTS • Field Work (FW) • No Field Work (NFW) • Business class of service • Residence class of service UNE Combo • Field Work (FW) • No Field Work (NFW)	
Calculation:	**Report Structure:**
(Count of N, T, C orders not completed by the due date as a result of a SWBT caused missed due date ÷ total number of orders) * 100	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Resale POTS parity between Field Work compared to SWBT Field Work (N, T, and C order types) and No Field Work compared to SWBT Retail No Field Work (N, T, and C order types). UNE Combo Parity between Field Work compared to SWBT Field Work (N, T, and C order types) and No Field Work compared to SWBT Retail No Field Work. (N, T, and C order types).	

30. Measurement	
Percent Company Missed Due Dates Due To Lack Of Facilities	
Definition:	
Percent N, T, and C orders with missed committed due dates due to lack of facilities.	
Exclusions:	
Excludes orders that are not N, T, or C.	
Business Rules:	
The due date is the negotiated date by the customer and the SWBT representative for service activation. CLEC orders, the due date is the due date reflected on the FOC. The Completion Date is the day that SWBT personnel complete the service order activity. UNE Combos are reported at order level. The lack of facilities is selected based on the missed reason code.	
Levels of Disaggregation:	
POTS • Business class of service • Residence class of service POTS / UNE Combo • > 30 calendar days • > 90 calendar days	
Calculation:	**Report Structure:**
(Count of orders with missed due dates due to lack of facilities ÷ total orders completed) * 100 (Calculated monthly based on posted orders)	Reported for CLEC, all CLECs and SWBT Retail for POTS.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
Resale POTS parity compared to SWBT (N, T, and C order types). UNE Combo Parity compared to SWBT (N, T, C order types).	

31. Measurement	
Average Delay Days For Missed Due Dates Due To Lack Of Facilities	
Definition:	
Average calendar days from due date to completion date on company missed orders due to lack of facilities.	
Exclusions:	
• Excludes orders that are not N, T, or C. • Excludes No Field Work (NFW).	
Business Rules:	
The due date is the negotiated date by the customer and the SWBT representative for service activation. CLEC orders, the due date is the due date reflected on the FOC. The Completion Date is the day that SWBT personnel complete the service order activity. UNE Combos, are reported at order level. The lack of facilities is based on the missed reason code.	
Levels of Disaggregation:	
POTS • Business class of service • Residence class of service UNE Combo - None	
Calculation:	**Report Structure:**
Σ(Completion date – due date) ÷ (total # of completed orders with a SWBT caused missed due date due to lack of facilities)	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Resale POTS parity between compared to SWBT (N, T, and C order types). UNE Combo Parity between compared to SWBT (N, T, and C order types).	

32. Measurement	
Average Delay Days For SWBT Caused Missed Due Dates.	
Definition:	
Average calendar days from due date to completion date on company missed orders.	
Exclusions:	
• Excludes orders that are not N, T, or C. • Excludes company delayed orders as a result of lack of facilities.	
Business Rules:	
The Due Date is the negotiated date by the customer and the SWBT representative for service activation. CLEC orders, the due date is the due date reflected on the FOC. The Completion Date is the day that SWBT personnel complete the service order activity. Combos are reported at the order level.	
Levels of Disaggregation:	
POTS • Business class of service • Residence class of service UNE Combo – None	
Calculation:	**Report Structure:**
Σ(Completion date – due date) ÷ (total # of completed orders with a SWBT caused missed due date)	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – Medium Tier 2 – None	
Benchmark:	
Resale POTS parity between Field Work compared to SWBT Field Work (N, T, and C order types) and No Field Work compared to SWBT Retail No Field Work (N, T, and C order types). UNE Combo Parity between Field Work compared to SWBT Field Work (N, T, and C order types) and No Field Work compared to SWBT Retail No Field Work (N, T, and C order types).	

33. Measurement	
Percent SWBT Caused Missed Due Dates > 30 days	
Definition:	
Percent of orders where installation was completed greater than 30 days following the due date.	
Exclusions:	
Excludes orders that are not N, T, or C.	
Business Rules:	
The Due Date is the negotiated date by the customer and the SWBT representative for service activation. CLEC orders, the due date is the due date reflected on the FOC. The Completion Date is the day that SWBT personnel complete the service order activity. UNE Combos, are reported at order level.	
Levels of Disaggregation:	
POTS • Field Work (FW) • No Field Work (NFW) • Business class of service • Residence class of service UNE Combo • Field Work (FW) • No Field Work (NFW)	
Calculation:	**Report Structure:**
(Count of orders completed greater than 30 calendar days following the due date ÷ total # of orders completed) * 100	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
Resale POTS parity between Field Work compared to SWBT Field Work (N, T, and C order types) and No Field Work compared to SWBT Retail No Field Work (N, T, and C order types). UNE Combo Parity between Field Work compared to SWBT Business and Residence Field Work (N, T, and C order types) and No Field Work compared to SWBT Retail No Field Work (N, T, and C order types).	

34. Measurement	
Count of Orders Canceled After the Due Date Which Were Caused by SWBT	
Definition:	
A count of the total number of orders that were canceled after the order became due. Only orders canceled with SWBT missed codes are included.	
Exclusions:	
Customer delayed orders.	
Business Rules:	
Orders that are cancelled by the customer after the negotiated due date and prior to completion.	
Levels of Disaggregation:	
POTS • Business class of service • Residence class of service UNE Combinations	
Calculation:	**Report Structure:**
The count of orders cancelled where Cancel Date is > Due Date	Reported for individual CLECs and the aggregate of all CLECs and SWBT. Count is divided into 1-30 delay days / 31-90 delay days / > 90 delay days.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Diagnostic. No benchmark required.	

35. Measurement	
Percent Trouble Report Within 10 Days (I-10) of Installation	
Definition:	
Percent of N, T, C orders that receive an electronic or manual trouble report on or within 10 calendar days of service order completion.	
Exclusions:	
• Excludes subsequent reports. A subsequent report is a repair report that is received while an existing repair report is open on the same number. • 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. • Excludes reports caused by customer provided equipment (CPE) or wiring. • Excludes trouble report received on the due date before service order completion.	
Business Rules:	
Includes reports received the day after SWBT personnel complete the service order through 10 calendar days after completion	
Levels of Disaggregation:	
N, T and C Orders POTS • Field Work (FW) • No Field Work (NFW) • Business class of service • Residence class of service UNE Combo • Field Work (FW) • No Field Work (NFW)	
Calculation:	**Report Structure:**
(Count of orders that receive a network customer trouble report within 10 calendar days of service order completion ÷ total # of orders) * 100	Reported for POTS Resale by CLEC, total CLECs and SWBT.

Measurement Type:
Tier 1 – High Tier 2 – High
Benchmark:
Resale POTS parity between Field Work compared to SWBT Field Work (N, T, and C order types) and No Field Work compared to SWBT Retail No Field Work (N, T, and C order types). UNE Combo Parity between Field Work compared to SWBT Field Work (N, T, and C order types) and No Field Work compared to SWBT Retail No Field Work (N, T, and C order types).

36. Measurement	
Percent No Access (Service Orders With No Access)	
Definition:	
Percent of Field Work (FW) orders with a status of "No Access."	
Exclusions:	
• Excludes customer caused misses. (SL – customer requests later date, SO – other customer reasons, SR - customer not ready). • Excludes all orders that are not N, T, or C. • No Field Work.	
Business Rules:	
SWBT personnel set the "No Access" flag when access cannot be obtained to the customer's premises.	
Levels of Disaggregation:	
POTS • Business class of service • Residence class of service UNE Combo - None	
Calculation:	**Report Structure:**
Count of orders that are No Access ÷ Total Field Work orders	Reported for CLEC, total CLECs and SWBT.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Resale POTS parity between Field Work compared to SWBT Field Work (N, T, and C order types). UNE Combo Parity between Field Work compared to SWBT Field Work (N, T, and C order types). .	

Maintenance

37. Measurement	
Trouble Report Rate	
Definition:	
The number of electronic or manual customer trouble reports per 100 lines.	
Exclusions:	
• Excludes reports caused by customer provided equipment (CPE) or wiring. • Excludes all disposition "13" reports (excludable reports), with the exception of code 1316, unless the report is taken prior to the completion of the service order	
Business Rules:	
CLEC and SWBT repair reports are entered into and tracked via WFA. They are downloaded nightly into LMOS. Reports are counted in the month they post to LMOS.	
Levels of Disaggregation:	
POTS • Business class of service • Residence class of service UNE Combo - None	
Calculation:	**Report Structure:**
[Total number of customer trouble reports ÷ (total lines ÷100)]	Reported for POTS Resale trouble reports by CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
POTS – Parity with SWBT Retail. UNE Combo – Parity with SWBT Business and Residence combined.	

38. Measurement	
Percent Missed Repair Commitments	
Definition:	
Percent of trouble reports not cleared by the commitment time.	
Exclusions:	
• Excludes all 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.	
Business Rules:	
The negotiated commitment date and time is established when the repair report is received. The cleared time is the date and time that SWBT personnel clear the repair activity and complete the trouble report. If this is after the commitment time, the report is flagged as a "Missed Commitment."	
Levels of Disaggregation:	
POTS • Business class of service • Residence class of service • Dispatch • No Dispatch UNE Combo • Dispatch • No Dispatch	
Calculation:	**Report Structure:**
(Count of trouble reports not cleared by the commitment time ÷ total trouble reports) * 100	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
POTS – Parity with SWBT Retail. UNE Combo – Parity with SWBT Business and Residence combined.	

39. Measurement

Receipt To Clear Duration

Definition:

Average duration of customer trouble reports from the receipt of the customer trouble report to the time the trouble report is cleared.

Exclusions:

- Excludes subsequent reports. A subsequent report is one that is received while an existing repair report is open.
- 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.

Business Rules:

The clock starts on the date and time SWBT receives a trouble report. The clock stops on the date and time that SWBT personnel clear the repair activity and complete the trouble report in WFA.

Levels of Disaggregation:

POTS

- Business class of service
- Residence class of service
- Dispatch
- No Dispatch
- Affecting Service
- Out of Service

UNE Combo

- Dispatch
- No Dispatch
- Affecting Service
- Out of Service

Calculation:	Report Structure:
Σ[(Date and time SWBT clears ticket with the CLEC) - (Date and time ticket received)] ÷ Total customer trouble reports	Reported for POTS Resale trouble reports by CLEC, all CLECs and SWBT.

Measurement Type:

Tier 1 – High
Tier 2 – High

Benchmark:

POTS – Parity with SWBT Retail.
UNE Combo – Parity with SWBT Business and Residence combined.

40. Measurement

Percent Out Of Service (OOS) < 24 Hours

Definition:

Percent of OOS trouble reports cleared in less than 24 hours.

Exclusions:

- Excludes subsequent reports. A subsequent report is one that is received while an existing repair report is open.
- 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.
- Excludes reports marked as "No Access" to customer premises.
- Excludes Affecting Service reports.

Business Rules:

Customer trouble reports are cleared within 24 hours when:

- The customer report is received Monday through Friday cleared within 24 hours.
- The customer report is received Saturday and cleared within 48 hours.
- The customer report is received Sunday and cleared before midnight Monday.
- Holidays are excluded.

Levels of Disaggregation:

POTS

- Business class of service
- Residence class of service

UNE Combo - None

Calculation:	**Report Structure:**
(Count of OOS trouble reports < 24 hours ÷ total number of OOS trouble reports) * 100	Reported for CLEC, all CLECs and SWBT.

Measurement Type:

Tier 1 – Medium
Tier 2 – None

Benchmark:

POTS – Parity with SWBT Retail.
UNE Combo – Parity with SWBT Business and Residence combined.

41. Measurement	
Percent Repeat Reports	
Definition:	
Percent of customer trouble reports received within 10 calendar days of a previous customer report.	
Exclusions:	
• Excludes subsequent reports. A subsequent report is one that is received while an existing repair report is open. • 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. • Excludes reports caused by customer provided equipment (CPE) or wiring.	
Business Rules:	
Includes customer trouble reports received within 10 calendar days of an original customer report. When the second report is received in 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.	
Levels of Disaggregation:	
POTS • Business class of service • Residence class of service UNE Combo - None	
Calculation:	**Report Structure:**
Count of customer trouble reports, not caused by CPE or wiring and excluding subsequent reports, received within 10 calendar days of a previous customer report ÷ total customer trouble reports not caused by CPE or wiring and excluding subsequent reports) * 100	Reported by CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
POTS – Parity with SWBT Retail. UNE Combo – Parity with SWBT Business and Residence combined.	

42. Measurement	
Percent No Access (Percent of Trouble Reports with No Access)	
Definition:	
Percentage of dispatched customer trouble reports with a status of "No Access."	
Exclusions:	
• Excludes subsequent reports. A subsequent report is one that is received while an existing repair report is open. • 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. • Excludes reports that are not dispatched.	
Business Rules:	
SWBT personnel set the "No Access" flag when access cannot be obtained at the customer's premises.	
Levels of Disaggregation:	
POTS • Business class of service • Residence class of service UNE Combo - None	
Calculation:	**Report Structure:**
Count of trouble reports with a status of "No Access" to customer's premises ÷ Total dispatched customer trouble reports	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
POTS – Parity with SWBT Retail. UNE Combo – Parity with SWBT Business and Residence combined.	

RESALE SPECIALS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT (EXCLUDES "ACCESS" ORDERS)

Provisioning

43. Measurement	
Average Installation Interval	
Definition:	
Average business days from application date to completion date for N, T, and C orders by item or circuit.	
Exclusions:	
• UNE and Interconnection Trunks. • Excludes orders that are not N, T, or C. • Excludes circuits that have a customer requested Due Date greater than 20 business days. • Excludes Weekends and Holidays.	
Business Rules:	
The Application Date is the day that the customer initiated the service request. The Completion Date is the day that SWBT personnel complete the service order activity by circuit. The base of items is out of WFA (Work Force Administration) and it is reported at an item or circuit level.	
Levels of Disaggregation:	
• Resold Specials - DDS, DS1, DS3, Voice Grade Private Line (VGPL), ISDN, and any other services available for resale. • UNE Loop and Port - ISDN and other combinations.	
Calculation:	**Report Structure:**
[Σ(completion date - application date)] ÷ (Total number of circuits completed)	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Parity with SWBT Retail.	

44. Measurement	
Percent Installations Completed Within 20 Calendar Days.	
Definition:	
Percent installations completed within 20 calendar days.	
Exclusions:	
See Measurement No. 43	
Business Rules:	
See Measurement No. 43	
Levels of Disaggregation:	
See Measurement No. 43	
Calculation:	**Report Structure:**
(Count of circuits installed within 20 calendar days ÷ total circuits) * 100	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Parity with SWBT Retail.	

45. Measurement	
Percent SWBT Caused Missed Due Dates	
Definition:	
Percentage of N, T, and C orders by circuit where installations were not completed by the due date.	
Exclusions:	
• UNE and Interconnection Trunks. • Excludes orders that are not N, T, or C.	
Business Rules:	
The Due Date is the negotiated date that is returned on the FOC by SWBT for service activation. The Completion Date is the day that SWBT personnel complete the service order activity. The source is WFA (Work Force Administration) and is at an item or circuit level. Specials are selected based on a specific service code off of the circuit ID.	
Levels of Disaggregation:	
See Measurement No. 43	
Calculation:	**Report Structure:**
(Count of circuits with missed due dates excluding customer caused misses ÷ total number of circuits) * 100	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Parity with SWBT Retail.	

46. Measurement	
Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) of Installation	
Definition:	
Percent of N, T, and C orders by circuit that receive a network customer trouble report within 30 calendar days of service order completion.	
Exclusions:	
• UNE and Interconnection Trunks. • Excludes orders that are not N, T, or C. • Excludes trouble report received on the due date before service order completion.	
Business Rules:	
A trouble report is counted if it is flagged on WFA (Work Force Administration) as a trouble report that had a service order completion within 30 days. It cannot be a repeat report and must be a measured report. The order flagged against must be an addition in order for the trouble report to be counted. Specials are selected based on a specific service code off of the circuit ID.	
Levels of Disaggregation:	
See Measurement No. 43	
Calculation:	**Report Structure:**
[Count of circuits that receive a network customer trouble report within 30 calendar days of service order completion ÷ total circuits (excludes trouble reports received on the due date)]* 100	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Parity with SWBT Retail.	

47. Measurement	
Percent Missed Due Dates Due To Lack Of Facilities	
Definition:	
Percentage of N, T, and C orders by circuit with missed committed due dates due to lack of facilities.	
Exclusions:	
• UNE and Interconnection Trunks. • Excludes orders that are not N, T, or C.	
Business Rules:	
The Due Date starts the clock. The Completion Date is the day that SWBT personnel complete the service order activity, which stops the clock. The source is WFA (Work Force Administration) and is at an item or circuit level. Specials are selected based on a specific service code off of the circuit ID and by selected center names that indicate resale. The lack of facilities is selected based on the missed reason code.	
Levels of Disaggregation:	
• See Measurement No. 43 • Reported for > 30 calendar days & > 90 calendar days.	
Calculation:	**Report Structure:**
(Count of circuits with missed committed due dates due to lack of facilities ÷ total circuits) * 100	Reported for Specials Resale by CLEC, all CLECs and SWBT Retail.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
Parity with SWBT Retail.	

48. Measurement	
Delay Days for Missed Due Dates Due to Lack Of Facilities	
Definition:	
Average calendar days from due date to completion date on company missed circuit orders due to lack of facilities.	
Exclusions:	
• UNE and Interconnection Trunks. • Excludes orders that are not N, T, or C.	
Business Rules:	
The calculation is the difference in calendar days between the completion date and the due date. The source is WFA (Work Force Administration) and is at an item or circuit level. Specials are selected based on a specific service code off of the circuit ID and by selected center names that indicate resale. The lack of facilities is based on the missed reason code.	
Levels of Disaggregation:	
See Measurement No. 43	
Calculation:	**Report Structure:**
Σ(Completion date - Committed circuit due date) ÷ (# of completed circuits with SWBT caused missed due dates due to lack of facilities)	Reported for CLEC, all CLECs and SWBT Retail Specials.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Parity with SWBT Retail.	

49. Measurement	
Delay Days For SWBT Caused Missed Due Dates	
Definition:	
Average calendar days from due date to completion date on company missed circuit orders.	
Exclusions:	
• UNE and Interconnection Trunks. • Excludes orders that are not N, T, or C.	
Business Rules:	
The calculation is the difference in calendar days between the completion date and the due date. The source is WFA (Work Force Administration) and is at an item or circuit level. Specials are selected based on a specific service code off of the circuit ID.	
Levels of Disaggregation:	
See Measurement No. 43	
Calculation:	**Report Structure:**
Σ(Completion date – committed circuit due date) ÷ (# of posted – circuits with a SWBT caused missed due date)	Reported for CLEC, all CLECs and SWBT Retail Specials.
Measurement Type:	
Tier 1 – Medium Tier 2 – None	
Benchmark:	
Parity with SWBT Retail.	

50. Measurement	
Percent SWBT Caused Missed Due Dates > 30 days	
Definition:	
Percentage of circuits where installation was completed greater than 30 days following the due date, excluding customer caused misses.	
Exclusions:	
• UNE and Interconnection Trunks. • Excludes orders that are not N, T, or C.	
Business Rules:	
See Measurement No. 49	
Levels of Disaggregation:	
See Measurement No. 43	
Calculation:	**Report Structure:**
Count of circuits completed greater than 30 days following the due date, excluding customer caused misses ÷ total number of circuits) * 100	Reported for CLEC, all CLECs and SWBT for Retail Specials.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
Parity with SWBT Retail.	

51. Measurement	
Count of Orders Canceled After the Due Date That Were Caused by SWBT – SPECIALS – Provisioning	
Definition:	
A count of the total number of orders that were canceled by the CLEC after the order became due. Only orders cancelled with SWBT missed codes are included.	
Exclusions:	
• UNE, and Interconnection Trunk • Excludes orders that are not N, T, or C	
Business Rules:	
Orders that are cancelled by the customer after the negotiated due date and prior to completion.	
Levels of Disaggregation:	
• See Measurement No. 43. • The count will be divided into 1-30, 31-90 and > 90.	
Calculation:	**Report Structure:**
The count of orders cancelled where Cancel Date > Due Date	Reported for individual CLECs, the aggregate of all CLECs and SWBT.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Diagnostic. No benchmark required.	

Maintenance

Specials are all treated as Out of Service repair reports. There is no classification or disaggregation of Affecting Service.

52. Measurement	
Mean Time To Restore	
Definition:	
Average duration of network customer trouble reports from the receipt of the customer trouble report to the time the trouble report is cleared.	
Exclusions:	
• UNE and Interconnection Trunk. • No Access Time. • Delayed Maintenance Time.	
Business Rules:	
The start time is when the customer report is received and the stop time is when the report is closed in WFA. Specials are selected based on a specific service code off of the circuit ID.	
Levels of Disaggregation:	
See Measurement No. 43 • Dispatch In • Dispatch Out	
Calculation:	**Report Structure:**
Σ[(Date and time trouble report is cleared with the customer) - (date and time trouble report is received)] ÷ total network customer trouble reports	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Parity with SWBT Retail.	

53. Measurement	
Percent Repeat Reports	
Definition:	
Percentage of network customer trouble reports received within 30 calendar days of a previous customer report.	
Exclusions:	
UNE and Interconnection Trunk	
Business Rules:	
Includes customer trouble reports received within 30 calendar days of an original customer report. When the second report is received in 30 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 30 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.	
Levels of Disaggregation:	
See Measurement No. 43	
Calculation:	**Report Structure:**
Count of network customer trouble reports received within 30 calendar days of a previous customer report ÷ total network customer trouble reports) * 100	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Parity with SWBT Retail.	

54. Measurement	
Failure Frequency	
Definition:	
The number of network customer trouble reports within a calendar month per 100 circuits.	
Exclusions:	
UNE and Interconnection Trunks	
Business Rules:	
CLEC and SWBT repair reports are entered into and tracked via WFA. Reports are counted in the month they post.	
Levels of Disaggregation:	
See Measurement No. 43	
Calculation:	**Report Structure:**
[Count of network trouble reports ÷ (Total Resold circuits ÷100)]	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
Parity with SWBT Retail.	

UNBUNDLED NETWORK ELEMENTS (UNES)

Provisioning

55. Measurement	
Average Installation Interval	
Definition:	
Average business days from application date to completion date for N, T, and C orders excluding customer caused misses and customer requested due date greater than "X" business days. The "X" business days is determined based on quantity of UNE loops ordered and the associated standard interval.	
Exclusions:	
• Specials and Interconnection Trunks. • Excludes UNE Combos captured in the POTS or Specials measurements. • Exclude orders that are not N, T, or C. • Excludes customer requested due dates greater than "X" business days as set out in Measurement No. 56. • Excludes customer caused misses. • Excludes Weekends and Holidays.	
Business Rules:	
The Application Date is the day that the customer initiated the service request. The Completion Date is the day that SWBT personnel complete the service order activity. The base of items is out of WFA (Work Force Administration) and it is reported at an order level to account for different measurement standards based on the number of circuits per order.	
Levels of Disaggregation:	
UNEs contained in the UNE price schedule, and/or agreed to by parties.	
Calculation:	**Report Structure:**
[Σ(completion date - application date)] ÷ (Total number of orders completed)	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
See Measurement No. 56	

55.1 Measurement	
Average Installation Interval - DSL	
Definition:	
Average calendar days from application date to completion date for N, T, and C orders excluding customer caused misses and customer requested due date greater than the offered interval.	
Exclusions:	
• Exclude orders that are not N, T, or C. • Excludes customer requested due dates greater than the offered interval. • Excludes customer caused misses. • Excludes Weekends and Holidays.	
Business Rules:	
The Application Date is the day that the customer authorizes SWBT to provision the DSL based on the loop qualification. If the loop qualification determines that no conditioning is required, SWBT will initiate the service order when the loop qualification is returned from SWBT engineering and this date will be the application date. If conditioning is required, SWBT will reject the LSR back to the CLEC and wait for a supplement from the CLEC notifying SWBT of the appropriate action to take. If the CLEC supplements the LSR to order the DSL, SWBT will issue the order and the application date will be the date that SWBT receives the supplement. The Completion Date is the day that SWBT personnel complete the service order activity. The base of items is out of WFA (Work Force Administration) and it is reported at a circuit level.	
Levels of Disaggregation:	
Loops requiring conditioning and loops requiring no conditioning.	
Calculation:	**Report Structure:**
[Σ(completion date - application date)] ÷ (Total number of orders completed)	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – Yes Tier 2 – Yes	
Benchmark:	
Parity with SWBT	

55.2 Measurement
Average Installation Interval for Loop With LNP
Definition:
Average business days from FOC return date to completion date for N, T, and C orders excluding customer caused misses and customer requested due date greater than "X" business days. The "X" business days is determined based on quantity of UNE loops ordered and the associated standard interval.
Exclusions:
• Specials and Interconnection Trunks. • Excludes UNE Combos captured in the POTS or Specials measurements. • Excludes orders that are not N, T, or C. • Excludes customer requested due dates greater than "X" business days as set out in Measurement No. 56.1. • Excludes customer caused misses. • Excludes Weekends and Holidays.
Business Rules:
The FOC return date is the day that SWBT returns the FOC to the CLEC. The Completion Date is the day that SWBT personnel complete the service order activity. If the CLEC submits the LSR prior to 3:00 p.m. the CLEC may request a 3 day interval. If the LSR is submitted after 3:00 p.m. the CLEC can request a 4 day interval. The base of items is out of WFA (Work Force Administration) and it is reported at an order level to account for different measurement standards based on the number of circuits per order. Industry guidelines for due dates for LNP are as follows: • For Offices in which NXXs are previously opened – 3 Business Days. • New NXX – 5 Business days on LNP capable NXX. The above-noted due dates are from the date of the FOC receipt. For partial LNP conversions that require restructuring of customer account: • 1-30 TNs: Add one additional day to the FOC interval. The LNP due date intervals will continue to be three business days and five business days from the receipt of the FOC depending on whether the NXX has been previously opened or is new. • >30 TNs, including entire NXX: The due dates are negotiated.
Levels of Disaggregation:
UNEs contained in the UNE price schedule, and/or agreed to by parties. See Benchmark below.

Calculation:	Report Structure:
[Σ(completion date - application date)] ÷ (Total number of orders completed)	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
See Measurement No. 56.1	

56. Measurement	
Percent Installations Completed Within "X" Days	
Definition:	
Percent installations completed within "X" business days excluding customer caused misses and customer requested due date greater than "X" business days.	
Exclusions:	
• Specials and Interconnection Trunks. • Excludes UNE Combos captured in the POTS or Specials measurements. • Exclude orders that are not N, T, or C. • Excludes customer requested due dates greater than "X" business days as set out below. • Excludes customer caused misses.	
Business Rules:	
See Measurement No. 55	
Levels of Disaggregation:	
UNEs contained in the UNE price schedule, and/or agreed to by parties.	
Calculation:	**Report Structure:**
Count of N, T, C orders installed within business "x" business days ÷ total N, T, C orders) * 100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – High Tier 2 – High	

Benchmark:

95% within "X" days

- 2 Wire Analog and Digital and INP (1-10) – 3 Days
- 2 Wire Analog and Digital and INP (11-20) – 7 Days
- 2 Wire Analog and Digital and INP (20+) – 10 Days
- DS1 loop(includes PRI) (1-10) – 3 Days
- DS1 loop(includes PRI) (11-20) – 7 Days
- DS1 loop(includes PRI) (20+) – 10 Days
- XDSL loop (1-10) – 3 Days
- XDSL loop (11-20) – 7 Days
- XDSL loop (20+) – 10 Days
- Switch Ports – Analog Port – 2 Days
- Switch Ports – BRI Port (1-50) – 3 Days
- Switch Ports – BRI Port (50+) – 5 Days
- Switch Ports – PRI Port (1-20) – 5 Days
- Switch Ports – PRI Port (20+) – 10 Days
- DS1 Trunk Port (1 to 10) – 3 Days
- DS1 Trunk Port (11 to 20) – 5 Days
- DS1 Trunk Port (20+) – ICB
- Dedicated Transport (DS0, DS1, and DS3) (1 to 10) – 3 Days
- Dedicated Transport (DS0, DS1, and DS3) (11 to 20) – 5 Days
- Dedicated Transport (DS0, DS1, and DS3) (20+) and all other types – ICB

56. 1 Measurement	
Percent Installations Completed Within Industry Guidelines for LNP With Loop	
Definition:	
Percent installations completed within "X" business days excluding customer caused misses and customer requested due date greater than "X" business days.	
Exclusions:	
• Specials and Interconnection Trunks. • Excludes UNE Combos captured in the POTS or Specials measurements. • Exclude orders that are not N, T, or C. • Excludes customer requested due dates greater than "X" business days as set out below. • Excludes customer caused misses. • CLEC or Customer caused or requested delays. • NPAC caused delays unless caused by SWBT.	
Business Rules:	
See Measurement No. 55.2	
Levels of Disaggregation:	
UNEs contained in the UNE price schedule, and/or agreed to by parties.	
Calculation:	**Report Structure:**
Count of N, T, C orders installed within business "x" business days ÷ total N, T, C orders) * 100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
95% within "X" days • 2 Wire Analog and Digital and INP (1-10) – 3 Days from receipt of FOC • DS1 loop(includes PRI) – 3 Days from receipt of FOC	

57. Measurement	
Average Response Time for Loop Make-Up Information	
Definition:	
The average time required to provide loop qualification for ADSL.	
Exclusions:	
None	
Business Rules:	
The time starts when a request is received by the CLEC and ends when the information on the loop qualification has been made available to the CLEC.	
Levels of Disaggregation:	
ADSL or other DSL as determined by the Public Utility Commission of Texas.	
Calculation:	**Report Structure:**
Σ(Date and Time the Loop Qualification is made available to CLEC – Date and Time the CLEC request is received)/Total number of loop qualifications	CCLEC, All CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – Medium	
Benchmark:	
Parity	

58. Measurement	
Percent SWBT Caused Missed Due Dates	
Definition:	
Percentage of UNEs (8db loops are measured at an order level) where installations are not completed by the negotiated due date.	
Exclusions:	
• Specials and Interconnection Trunks. • Excludes UNE Combos captured in the POTS or Specials measurements. • Exclude orders that are not N, T, or C. • Excludes customer caused misses.	
Business Rules:	
The Due Date starts the clock. The Completion Date is the day that SWBT personnel complete the service order activity, which stops the clock. If the completion date is after the Due Date, the order is flagged as a miss. This measurement is reported at a circuit level for all UNEs with the exception of 8db loops, which are reported at an order level to facilitate comparison with POTS retail.	
Levels of Disaggregation:	
UNEs contained in the UNE price schedule, and/or agreed to by parties (Field Work and No Field Work) .	
Calculation:	**Report Structure:**
Count of UNEs (8dB loops are measured at an order level)with missed due dates excluding customer caused misses ÷ total number of UNEs (total orders for 8db loops) *100	Reported for CLEC and all CLECs.

Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Parity:	Retail Comparison
1. 8.0 dB Loop with Test Access and 8.0 dB Loop without Test Access (FW)	POTS (Res/Bus FW)
1a. 8.0 dB Loop with Test Access and 8.0 dB Loop without Test Access (NFW)	POTS (Res/Bus NFW)
2. 5.0 dB Loop with Test Access and 5.0 dB Loop without Test Access	VGPL
3. BRI Loop with Test Access	ISDN
4. ISDN BRI Port	ISDN
5. DS1 Loop with Test Access	DS1
6. DS1 Dedicated Transport	DS1
7. Subtending Channel (23B)	DDS
8. Subtending Channel (1D)	DDS
9. Analog Trunk Port	VGPL
10. Subtending Digital Direct Combination Trunks	VGPL
11. DS3 Dedicated Transport	DS3
12. Dark Fiber	DS3
13. DSL Loops	DS1

59. Measurement	
Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) of Installation	
Definition:	
Percentage of UNEs (8db loops are measured at an order level) that receive a network customer trouble report within 30 calendar days of service order completion.	
Exclusions:	
• Specials and Interconnection Trunks. • Excludes Non-measured reports (CPE, Interexchange, and Information reports). • Excludes UNE Combos captured in the POTS or Specials measurements. • Excludes trouble report received on the due date before service order completion. • Excludes orders that are not N, T, or C.	
Business Rules:	
A trouble report is counted if it is received within 30 days of a service order completion. The service order which generated the report must be an add in order for the trouble report to be counted. UNEs are selected based on a specific service code off of the circuit ID. This measurement is reported at a circuit level for all UNEs with the exception of 8db loops, which are reported at an order level to facilitate comparison with POTS retail.	
Levels of Disaggregation:	
UNEs contained in the UNE price schedule, and/or agreed to by parties.	
Calculation:	**Report Structure:**
(Count of UNEs (8db loops are measured at an order level) that receive a network customer trouble report within 30 calendar days of service order completion ÷ total UNEs (total orders for 8db loops)) * 100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
See Measurement 58	

60. Measurement	
Percent Missed Due Dates Due To Lack Of Facilities	
Definition:	
Percentage of UNEs (8db loops are measured at an order level) with missed committed due dates due to lack of facilities.	
Exclusions:	
• Specials and Interconnection Trunks. • Excludes UNE Combos captured in the POTS or Specials measurements. • Excludes orders that are not N, T, or C.	
Business Rules:	
Any completion date that is greater than the due date with a SWBT lack of facilities missed reason code. This measurement is reported at a circuit level for all UNEs with the exception of 8db loops, which are reported at an order level to facilitate comparison with POTS retail.	
Levels of Disaggregation:	
UNEs contained in the UNE price schedule, and/or agreed to by parties.	
Calculation:	**Report Structure:**
Count of UNEs (8db loops are measured at an order level) with missed committed due dates due to lack of facilities ÷ total UNEs (total orders for 8db loops) * 100	Reported by CLEC, all CLECs Reported for > 30 calendar days & > 90 calendar days.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
See Measurement No. 58	

61. Measurement	
Average Delay Days for Missed Due Dates Due To Lack Of Facilities	
Definition:	
Average calendar days from due date to completion date on company missed UNEs (8db loops are measured at an order level) orders due to lack of facilities.	
Exclusions:	
• Specials and Interconnection Trunks. • Excludes UNE Combos captured in the POTS or Specials measurements. • Excludes orders that are not N, T, or C.	
Business Rules:	
The calculation is the difference in calendar days between the completion date and the due date. The source is WFA (Work Force Administration) and is at an item or circuit level. UNEs are selected based on a specific service code off of the circuit ID. The lack of facilities is selected based on the missed reason code. This measurement is reported at a circuit level for all UNEs with the exception of 8db loops, which are reported at an order level to facilitate comparison with POTS retail.	
Levels of Disaggregation:	
• UNEs contained in the UNE price schedule, and/or agreed to by parties.	
Calculation:	**Report Structure:**
Σ(Completion date - committed UNE (8db loops are measured at the order level) due date) ÷ (# of completed UNEs (total completed orders for 8db loops) with SWBT caused missed due dates due to lack of facilities)	Reported for CLEC and all CLECs for UNEs contained in the UNE price schedule.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
See Measurement No. 58	

62. Measurement	
Average Delay Days For SWBT Caused Missed Due Dates	
Definition:	
Average calendar days from due date to completion date on company missed UNEs (8db loops are measured at an order level).	
Exclusions:	
• Specials and Interconnection Trunks. • Excludes UNE Combos captured in the POTS or Specials measurements. • Excludes orders that are not N, T, or C.	
Business Rules:	
The calculation is the difference in calendar days between the completion date and the due date. The source is WFA (Work Force Administration) and is at an item or circuit level. UNEs are selected based on a specific service code off of the circuit ID. This measurement is reported at a circuit level for all UNEs with the exception of 8db loops, which are reported at an order level to facilitate comparison with POTS retail.	
Levels of Disaggregation:	
See Measurement 58	
Calculation:	**Report Structure:**
∑(Completion date – committed UNE (8db loops are measured at the order level) due date) ÷ (# of posted UNEs (total completed orders for 8db loops) with SWBT caused missed due dates)	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – Medium Tier 2 – None	
Benchmark:	
See Measurement No. 58	

63. Measurement	
Percent SWBT Caused Missed Due Dates > 30 days	
Definition:	
Percentage of UNEs (8db loops are measured at an order level)where installation was completed greater than 30 days following the due date, excluding customer caused misses.	
Exclusions:	
Specials and Interconnection Trunks	
Business Rules:	
See Measurement No. 58	
Levels of Disaggregation:	
UNEs contained in the UNE price schedule, and/or agreed to by parties.	
Calculation:	**Report Structure:**
(Count of UNEs (8db loops are measured at an order level) completed greater than 30 days following the due date, excluding customer caused misses ÷ total number of total UNEs (total orders for 8db loops)) * 100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
See Measurement No. 58	

64. Measurement	
Count of Orders Canceled After the Due Date Which Were Caused by SWBT – UNE – Provisioning	
Definition:	
A count of the total number of orders that were canceled after the order became due. Only orders canceled with SWBT missed codes are included.	
Exclusions:	
None	
Business Rules:	
Orders that are cancelled by the customer after the negotiated due date and prior to completion.	
Levels of Disaggregation:	
UNEs contained in the UNE price schedule, and/or agreed to by parties.	
Calculation:	**Report Structure:**
The count of orders cancelled where Cancel Date is > Due Date	The count will be divided into 1-30, 31-90 and > 90. Reported for individual CLECs and the aggregate of all CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Diagnostic. No benchmark required.	

Maintenance

65. Measurement	
Trouble Report Rate	
Definition:	
The number of network customer trouble reports within a calendar month per 100 UNEs.	
Exclusions:	
• Specials and Interconnection Trunks. • Excludes Non-measured reports (CPE, Interexchange, and Information reports). • Excludes UNE Combos captured in the POTS or Specials measurements.	
Business Rules:	
Repair reports are entered into and tracked via WFA. Reports are counted in the month they post.	
Levels of Disaggregation:	
UNEs contained in the UNE price schedule, and/or agreed to by parties.	
Calculation:	**Report Structure:**
[Count of network trouble reports ÷ (Total UNEs ÷ 100)]	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
See Measurement No. 58	

66. Measurement	
Percent Missed Repair Commitments	
Definition:	
Percentage of trouble reports not cleared by the commitment time for SWBT reasons.	
Exclusions:	
• Specials and Interconnection Trunks. • Excludes all UNE Combos other than 8db loops with test access.	
Business Rules:	
The commitment time is defined as 24 hours. If the cleared date and time minus the receive date and time > 24 hours, it counts as a trouble report that missed the repair commitment. UNEs are selected based on a specific service code off of the circuit ID.	
Levels of Disaggregation:	
"POTS type" loops (2-Wire Analog 8dB Loop) with test access.	
Calculation:	**Report Structure:**
(Count of trouble reports not cleared by the commitment time for company reasons ÷ total trouble reports) * 100	Reported for each CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Parity with SWBT POTS Business and Residence combined.	

67. Measurement	
Mean Time To Restore	
Definition:	
Average duration of network customer trouble reports from the receipt of the customer trouble report to the time the trouble report is cleared excluding no access and delayed maintenance.	
Exclusions:	
See Measurement No. 65	
Business Rules:	
The start time is when the report is received. The stop time is the stop time is when the report is cleared in WFA.	
Levels of Disaggregation:	
UNEs contained in the UNE price schedule, and/or agreed to by parties. Also disaggregated by Dispatch/No Dispatch.	
Calculation:	**Report Structure:**
Σ[(Date and time trouble report is cleared with the customer) - (date and time trouble report is received)] ÷ total network customer trouble reports	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
See Measurement No. 58	

68. Measurement	
Percent Out Of Service (OOS) < "X" Hours	
Definition:	
Percentage of OOS trouble reports cleared in less than 24 hours.	
Exclusions:	
See Measurement No. 65	
Business Rules:	
The close date and time minus the receive date and time must be greater than 0 and less than 24 hours for it to count as a trouble report that was cleared in less than 24 hours. All WFA specials trouble tickets are considered to be OSS.	
Levels of Disaggregation:	
By "POTS like" loop (2-Wire Analog 8dB Loop) with test access.	
Calculation:	**Report Structure:**
(Count of UNE OOS trouble reports < 24 hours ÷ total number of UNE OOS trouble reports) * 100	Reported for CLEC, CLECs and SWBT.
Measurement Type:	
Tier 1 – Medium Tier 2 – None	
Benchmark:	
Parity with SWBT POTS Business and Residence combined.	

69. Measurement	
Percent Repeat Reports	
Definition:	
Percentage of network customer trouble reports received within 30 calendar days of a previous customer report.	
Exclusions:	
See Measurement No. 65	
Business Rules:	
Includes customer trouble reports received within 30 calendar days of an original customer report. When the second report is received in 30 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 30 days is a measured report, then the second report counts as a Repeat report.	
Levels of Disaggregation:	
UNEs contained in the UNE price schedule, and/or agreed to by parties.	
Calculation:	**Report Structure:**
Count of network customer trouble reports received within 30 calendar days of a previous customer report ÷ total network customer trouble reports) * 100	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
See Measurement No. 58	

INTERCONNECTION TRUNKS

70. Measurement:

Percentage of Trunk Blockage

Definition:

Percentage of calls blocked on outgoing traffic from SWBT end office to CLEC end office and from SWBT tandem to CLEC end office.

Exclusions:

No penalties or liquidated damages apply:

- If CLECs have trunks busied-out for maintenance at their end, or if they have other network problems which are under their control.
- SWBT is ready for turn-up on Due Date and CLEC is not ready or not available for turn-up of trunks.
- If CLEC does not take action upon receipt of Trunk Group Service Request (TGSR) or ASR within 3 days when a Call Blocking situation is identified by SWBT or in the timeframe specified in the ICA.
- If CLEC fails to provide a forecast.
- If CLEC's actual trunk usage, as shown by SWBT from traffic usage studies, is more than 25% above CLEC's most recent forecast, which must have been provided within the last six-months unless a different timeframe is specified in an interconnection agreement.

The exclusions do not apply if SWBT fails to timely provide CLEC with traffic utilization data reasonably required for CLEC to develop its forecast or if SWBT refuses to accept CLEC trunk orders (ASRs or TGSRs) that are within the CLEC's reasonable forecast regardless of what the current usage data is.

Business Rules:

Blocked calls and total calls are gathered during the official study week each month. This week is chosen from a pre-determined schedule.

Levels of Disaggregation:

- The SWBT end office to CLEC end office and SWBT tandem to CLEC end office trunk blockage will be reported separately.
- By Market Region.

Calculation:	Report Structure:
(Count of blocked calls ÷ total calls offered) * 100	Reported for CLEC, all CLECs and SWBT.

Measurement Type:

Tier-1 High
Tier-2 High

Benchmark:

Dedicated Trunk Groups not to exceed blocking standard of B.01.

70. 1 Measurement:	
Count of Blocked calls Excluded from Measurement No. 70	
Definition:	
Count of Blocked calls excluded from the numerator of measurement No. 70	
Exclusions:	
None	
Business Rules:	
Blocked calls and total calls are gathered during the official study week each month. This week is chosen from a pre-determined schedule.	
Levels of Disaggregation:	
• The SWBT end office to CLEC end office and SWBT tandem to CLEC end office trunk blockage will be reported separately. • By Market Region. • Count of Blocked calls excluded because of the following reasons reported on a disaggregated basis and the total count of excluded calls; • CLECs had trunks busied-out for maintenance at their end, or if they had other network problems which are under their control. • SWBT was ready for turn-up on Due Date and CLEC was not ready or not available for turn-up of trunks. • CLEC did not take action upon receipt of Trunk Group Service Request (TGSR) or ASR within 3 days when a Call Blocking situation was identified by SWBT or in the timeframe specified in the ICA. • CLEC failed to provide a forecast. • CLEC's actual trunk usage, as shown by SWBT from traffic usage studies, was more than 25% above CLEC's most recent forecast, which must have been provided within the last six-months unless a different timeframe is specified in an interconnection agreement.	
Calculation:	Report Structure:
Count of Blocked Calls	Reported for CLEC, all CLECs
Measurement Type:	
Tier-1 None Tier-2 None	
Benchmark:	
Diagnostic Measurement	

71. Measurement:	
Common Transport Trunk Blockage	
Definition:	
Percentage of local common transport trunk groups exceeding 2%, 1% blockage.	
Exclusions:	
No data is collected on weekends	
Business Rules:	
Blocked calls and total calls are gathered during the official study week each month. This week is chosen from a pre-determined schedule. The busy hour of the study week is used for comparison.	
Levels of Disaggregation:	
• Common trunk groups where CLECs share ILEC trunks, and Common trunk groups for CLECs not shared by ILEC. • By Market Region.	
Calculation:	**Report Structure:**
(Number of common transport trunk groups exceeding 2%, 1% blocking ÷ total common transport trunk groups) * 100.	Reported on local common transport trunk groups.
Measurement Type:	
Tier-1 None Tier-2 High	
Benchmark:	
PUC Subst. R. 23.61(e)(5)(A) or parity, whichever allows less blocking in a given month. SWBT shall compare common trunk groups exceeding 1% blockage, reported for switch based CLECs, be compared to SWBT's dedicated trunk groups designed for B.01 standard for parity compliance.	

72. Measurement	
Distribution Of Common Transport Trunk Groups > 2%/1%.	
Definition:	
A distribution of trunk groups exceeding 2% reflecting the various levels of blocking.	
Exclusions:	
None	
Business Rules:	
See Measurement No. 71	
Levels of Disaggregation:	
By Market Region.	
Calculation:	**Report Structure:**
The number of trunk groups exceeding 2%/1% will be shown in histogram form based on the levels of blocking	Reported on local common transport trunk groups.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Aggregate measurement. No benchmark required.	

73. Measurement	
Percentage Missed Due Dates – Interconnection Trunks	
Definition:	
Percentage of trunk order due dates missed on interconnection trunks.	
Exclusions:	
Customer Caused Misses	
Business Rules:	
The Due Date starts the clock. The Completion Date is the day that SWBT personnel complete the service order activity and it is accepted by the CLEC, which stops the clock. The source is WFA (Work Force Administration) and is at an item or circuit level. Interconnection trunks are selected based on a specific service code off of the circuit ID.	
Levels of Disaggregation:	
By Market Region.	
Calculation:	**Report Structure:**
(Count trunk circuits missed ÷ total trunk circuits) * 100	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – Medium Tier 2 – None	
Benchmark:	
Parity with SWBT interconnection trunks.	

74. Measurement	
Average Delay Days For Missed Due Dates – Interconnection Trunks	
Definition:	
Average calendar days from due date to completion date on company missed interconnection trunk orders.	
Exclusions:	
Customer Caused Misses	
Business Rules:	
The calculation is the difference in calendar days between the completion date (the date the CLEC accepts the circuit) and the due date. The source is WFA (Work Force Administration) and is at an item or circuit level. Interconnection Trunks are selected based on a specific service code off of the circuit ID.	
Levels of Disaggregation:	
By Market Region.	
Calculation:	**Report Structure:**
Σ (Completion date – committed circuit due date) ÷ (# of completed trunk circuits with missed Due Dates)	Reported for CLEC, all CLECs and SWBT for interconnection trunks.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
Parity	

75. Measurement:	
Percentage SWBT Caused Missed Due Dates > 30 Days – Interconnection Trunks	
Definition:	
Percentage of Interconnection Trunk Circuits where installation was completed greater than 30 days following the due date.	
Exclusions:	
Excludes Customer Caused Misses.	
Business Rules:	
See Measurement No. 74	
Levels of Disaggregation:	
By Market Region.	
Calculation:	**Report Structure:**
(Count of SWBT caused interconnection trunk circuits completed greater than 30 days following the due date, ÷ total number of interconnection trunk circuits) * 100.	Reported for CLEC, all CLECs and SWBT for interconnection trunks.
Measurement Type:	
Tier-1 Low Tier-2 None	
Benchmark:	
No more than 2% interconnection trunk orders completed > 30 days.	

76. Measurement	
Average Trunk Restoration Interval – Interconnection Trunks	
Definition:	
Average time to repair interconnection trunks. This measure is based on calendar days.	
Exclusions:	
• Excludes non-measured tickets (CPE, Interexchange, or Information). • No access delayed maintenance.	
Business Rules:	
The source is WFA (Work Force Administration) and is at an item or circuit level. Interconnection Trunks are selected based on the circuit being identified as a message type circuit.	
Levels of Disaggregation:	
By Market Region.	
Calculation:	**Report Structure:**
Total trunk outage duration ÷ total trunk trouble reports	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
Parity	

77. Measurement	
Average Trunk Restoration Interval for Service Affecting Trunk Groups	
Definition:	
The average time to restore service affecting trunk groups.	
Exclusions:	
Customer Caused Outages	
Business Rules:	
Service affecting is defined as 20% of a trunk group out-of-service that causes trunk group blockage. The clock starts on receipt of a trouble ticket from the CLEC that identifies a service affecting condition. The clock stops after completion of work by SWBT.	
Levels of Disaggregation:	
• Tandem trunk groups. • Non-Tandem trunk groups. • By Market Region.	
Calculation:	**Report Structure:**
Total trunk group outage time / total trunk group trouble reports	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Tandem trunk groups – 1 hour / Non-Tandem – 2 hours.	

78. Measurement:	
Average Interconnection Trunk Installation Interval	
Definition:	
The average time from receipt of a complete and accurate ASR until the completion of the trunk order.	
Exclusions:	
• Excludes customer requested due dates greater than 20 business days as set out below.	
Business Rules:	
The clock starts on the receipt of a complete and accurate ASR and the clock stops on the date the work is completed and accepted by the CLEC. The measurement is taken for all ASRs that complete in the reporting period.	
Levels of Disaggregation:	
Interconnection Trunks, SS7 links, OS/DA and 911 trunks.	
Calculation:	**Report Structure:**
Σ(completion date of the trunk order - receipt of complete and accurate ASR) ÷ total trunk orders	Reported by CLEC and all CLECs. (SWBT does not currently have comparable data to report. SWBT will continue to work on methods to collect comparable data).
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
20 Business days.	

DIRECTORY ASSISTANCE (DA) AND OPERATOR SERVICES (OS)

79. Measurement	
Directory Assistance Grade Of Service	
Definition:	
Percentage of directory assistance calls answered < 1.5, < 2.5, > 7.5, > 10.0, > 15.0, > 20.0, and > 25.0 seconds.	
Exclusions:	
None	
Business Rules:	
The clock starts when the customer enters the queue and the clock stops when a SWBT representative answers the call or the customer abandons the call. The length of each call is determined by measuring and accumulating the elapsed time from the entry of a CLEC customer call into the SWBT call management system queue until the CLEC customer call is transferred to SWBT personnel assigned to handling CLEC calls for assistance during hours of operation. Calls are categorized into the above bands to determine the percentage of calls that were answered within "x" seconds.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Calls answered within "x" seconds ÷ total calls answered	Reported for the aggregate of SWBT and CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Aggregate measurement. No benchmark required.	

80. Measurement	
Directory Assistance Average Speed Of Answer	
Definition:	
The average time a customer is in queue.	
Exclusions:	
None	
Business Rules:	
The clock starts when the customer enters the queue and the clock stops when a SWBT representative answers the call or the customer abandons the call. The length of each call is determined by measuring and accumulating the elapsed time from the entry of a CLEC customer call into the SWBT call management system queue until the CLEC customer call is transferred to SWBT personnel assigned to handling CLEC calls for assistance during hours of operation.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Total queue time ÷ total calls answered	Reported for the aggregate of SWBT and CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – Low	
Benchmark:	
PUC Subst. Rule 23.61.e (3)(A)(iii)	

81. Measurement	
Operator Services Grade Of Service	
Definition:	
Percentage of operator services calls answered < 1.5, < 2.5, > 7.5, > 10.0, > 15.0, > 20.0, and > 25.0 seconds.	
Exclusions:	
None	
Business Rules:	
The clock starts when the customer enters the queue and the clock stops when a SWBT representative answers the call or the customer abandons the call. The length of each call is determined by measuring and accumulating the elapsed time from the entry of a CLEC customer call into the SWBT call management system queue until the CLEC customer call is transferred to SWBT personnel assigned to handling CLEC calls for assistance during hours of operation. Calls are categorized into the above bands to determine the percentage of calls that were answered within "x" seconds.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Calls answered within "x" seconds ÷ total calls answered	Reported for the aggregate of SWBT and CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Aggregate measurement. No benchmark required.	

82. Measurement	
Operator Services Speed Of Answer	
Definition:	
The average time a customer is in queue.	
Exclusions:	
None	
Business Rules:	
The clock starts when the customer enters the queue and the clock stops when a SWBT representative answers the call or the customer abandons the call. The length of each call is determined by measuring and accumulating the elapsed time from the entry of a CLEC customer call into the SWBT call management system queue until the CLEC customer call is transferred to SWBT personnel assigned to handling CLEC calls for assistance during hours of operation.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Total queue time ÷ total calls answered.	Reported for the aggregate of SWBT and CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – Low	
Benchmark:	
PUC Subst. Rule 23.61.e (3)(A)(1)	

83. Measurement	
Percentage of Calls Abandoned	
Definition:	
The percentage of calls where the customer hangs up while the call is in queue.	
Exclusions:	
SWBT generated test calls.	
Business Rules:	
The clock runs on a 24 hour cycle starting at 6:00 a.m. and ending at 6:00 a.m. This measurement determines the amount of calls that were abandoned against the number of operator positions available during the reporting period in quarter hour intervals.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Number of calls abandoned ÷ number of operator positions available) * 100	Reported for CLEC and SWBT in the aggregate.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Aggregate measurement. No benchmark required.	

84. Measurement	
Percentage of Calls Deflected	
Definition:	
The percentage of calls that are received and are unable to be placed in queue	
Exclusions:	
SWBT generated test calls.	
Business Rules:	
The clock runs on a 24 hour cycle starting at 6:00a.m. and ending at 6:00a.m. This measurement determines the amount of calls that are received and deflected to a recording rather than being placed in queue against the number of operator positions available during the reporting period in quarter hour intervals.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Number of calls deflected ÷ number of operator positions available) * 100	Reported for CLEC and SWBT in the aggregate.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Aggregate measurement. No benchmark required.	

85. Measurement	
Average Work Time	
Definition:	
The average number of seconds an operator spends handling a customer's request for assistance in obtaining a telephone number, placing a call at the customer's request or in a position busy state.	
Exclusions:	
SWBT generated test calls.	
Business Rules:	
The clock starts when a customer connects to an operator position and stops when the operator position releases the customer after serving his/her request.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Σ (Time operator position releases customer – time customer connects to an operator position) ÷ calls	Reported for CLEC and SWBT in the aggregate.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Aggregate measurement. No benchmark required.	

86. Measurement	
Non-Call Busy Work Volumes	
Definition:	
The amount of time in CCS (Centum Call Second) that an operator has placed their position in make busy or in a position busy state.	
Exclusions:	
• SWBT generated test calls. • When an operator is talking to a customer and places the position in a busy state to gather information is excluded from this measurement.	
Business Rules:	
The clock starts when the operator's last customer hangs up (position is placed in busy state) and the clock stops when a call is answered (position is removed from busy state).	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Σ(Time operator placed position in busy state - time operator removed position from busy state)	Reported for CLEC and SWBT in the aggregate.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Aggregate measurement. No benchmark required.	

INTERIM NUMBER PORTABILITY (INP)

87. Measurement	
Percentage Installation Completed Within "X" (3, 7, 10) Days	
Definition:	
Percentage of installations completed within "x" (3, 7, 10) business days.	
Exclusions:	
• Excludes customer caused misses. • Excludes customer requested due dates greater than "x" (3, 7, 10) business days. • Excludes Weekends and Holidays.	
Business Rules:	
The Application Date is the day that the customer initiated the service request. The Completion Date is the day that SWBT personnel complete the service order activity. The orders are flagged as INP by USOC codes on the order.	
Levels of Disaggregation:	
• 1-10 numbers • 11-20 numbers • > 20	
Calculation:	**Report Structure:**
Total INP orders installed within "x" (3, 7, 10) business days ÷ total INP orders within "x" (3, 7, 10) business days.	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
90% within "X" business days • 1-10 numbers (3 days) • 11-20 numbers (7 days) • > 20 (10 days)	

88. Measurement	
Average INP Installation Interval	
Definition:	
Average business days from application date to completion date for INP orders.	
Exclusions:	
Excludes customer requested due dates greater than the SWBT standard interval.	
Business Rules:	
See Measurement No. 87	
Levels of Disaggregation:	
See Measurement No. 87	
Calculation:	**Report Structure:**
(Total business days from application to completion date for INP orders ÷ total INP orders) * 100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
For calculation of Tier 1 damages, see Measurement No. 87. The benchmark will be established during the 6 month review.	

89. Measurement	
Percentage INP Only I-Reports Within 30 Days	
Definition:	
Percentage of INP N, T, C orders that receive a network customer trouble report.	
Exclusions:	
• Excludes customer provided equipment (CPE) or wiring within 30 calendar days of service order completion. • Excludes subsequent reports and all disposition "13" reports (excludable reports), with the exception of 1316, unless the trouble report is taken prior to completion of the service order.	
Business Rules:	
A trouble report is counted if it is mechanically flagged in LMOS as a trouble report that had a service completion within 30 days. The tickets are flagged as INP by matching the telephone number and order number against an order that is marked as INP based on the USOC codes on the order.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Count of INP N, T, C orders that receive a network customer trouble report within 30 calendar days of service order completion ÷ total INP N, T, C orders (excludes trouble reports received on the due date)) * 100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – Medium Tier 2 – None	
Benchmark:	
Parity with SWBT POTS NFW I reports within 30 days.	

90. Measurement	
Percentage Missed Due Dates (INP Only)	
Definition:	
Percentage of INP N, T, and C orders where installations are not completed by the negotiated due date.	
Exclusions:	
Excludes customer caused misses.	
Business Rules:	
The Due Date starts the clock. The Completion Date is the day that SWBT personnel complete the service order activity, which stops the clock.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Count of INP N, T, C orders with missed due dates excluding customer caused misses ÷ total number of INP N, T, C orders) *100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – Medium Tier 2 – None	
Benchmark:	
Parity with SWBT POTS – NFW percent missed due dates.	

LOCAL NUMBER PORTABILITY (LNP)

91. Measurement:	
Percentage of LNP Only Due Dates within Industry Guidelines	
Definition:	
Percentage of LNP Due date interval that meets the industry standard established by the North American Numbering Council (NANC).	
Exclusions:	
• CLEC or Customer caused or requested delays. • NPAC caused delays unless caused by SWBT.	
Business Rules:	
Industry guidelines for due dates for LNP are as follows: • For Offices in which NXXs are previously opened – 3 Business Days. • New NXX – 5 Business days on LNP capable NXX. The above-noted due dates are from the date of the FOC receipt. For partial LNP conversions that require restructuring of customer account: • 1-30 TNs: Add one additional day to the FOC interval. The LNP due date intervals will continue to be three business days and five business days from the receipt of the FOC depending on whether the NXX has been previously opened or is new. • >30 TNs, including entire NXX: The due dates are negotiated.	
Levels of Disaggregation:	
NXXs previously opened and NXX new (1-30 TNs and greater than 30 TNs)	
Calculation:	**Report Structure:**
(Count of LNP TNs implemented within Industry guidelines ÷ total number of LNP TNs) *100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
96.5%. The benchmark will be revised either up or down if industry guidelines are established that are different than the objective stated here.	

92. Measurement:	
Percentage of Time the Old Service Provider Releases the Subscription Prior to the Expiration of the Second 9 Hour (T2) Timer	
Definition:	
Percentage of time the old service provider releases subscription(s) to NPAC within the first (T1) or the second (T2) 9-hour timers.	
Exclusions:	
• Customer caused or requested delays. • NPAC caused delays unless caused by SWBT. • Cases where SWBT did the release but the New Service Provider did not respond prior to the expiration of the T2 timer. This sequence of events causes the NPAC to send a cancel of SWBT's release request. In these cases, SWBT may have to re-work to release the TN so it can be ported to meet the due date.	
Business Rules:	
Number of LNP TNs for which subscription to NPAC was released prior to the expiration of the second 9-hour (T2) timer.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Number of LNP TNs for which subscription to NPAC was released prior to the expiration of the second 9-hour (T2) timer ÷ total number of LNP TNs for which the subscription was released) *100	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
96.5%. The benchmark will be revised either up or down if industry guidelines are established that are different than the objective stated here.	

93. Measurement:	
Percentage of Customer Account Restructured Prior to LNP Due Date	
Definition:	
Percentage of accounts restructured within the LNP order due date established in Measurement No. 91, and/or negotiated due date for orders that contain more than 30 TNs.	
Exclusions:	
None	
Business Rules:	
See Measurement No. 91	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Number of LNP orders for which customer accounts were restructured prior to LNP due date) ÷ (total number of LNP orders that require customer accounts to be restructured) *100	Reported for CLEC and all CLECs.
Measurement Type	
Tier 1 – Low Tier 2 – None	
Benchmark:	
96.5%	

94. Measurement:

Percentage FOCs Received Within "X" Hours

Definition:

Percentage of FOCs returned within a specified time frame from receipt of complete and accurate LNP or LNP with Loop service request to return of confirmation to CLEC.

Exclusions:

- Rejected orders.
- SWBT only Disconnect orders.
- Orders involving major projects.

Business Rules:

See Business Rule for FOCs

Levels of Disaggregation:

Manually submitted:

- Simple Residence and Business LNP Only (1-19 Lines)< 24 Clock Hours
- LNP with Loop (1-19 Loops) < 24 Clock Hours
- Simple Residence and Business LNP Only (20+ Loops) < 48 Clock Hours
- LNP with Loop (20+ Loops) < 48 Clock Hours
- LNP Complex Business (1-19 Lines) < 24 Clock Hours
- LNP Complex Business (20-50 Lines) < 48 Clock Hours
- LNP Complex Business (50+ Lines) < Negotiated with Notification of Timeframe within 24 Clock Hours

Electronically submitted via LEX or EDI:

- Simple Residence and Business LNP Only (1-19 Lines) < 5 Business Hours
- LNP with Loop (1-19 Loops) < 5 Business Hours
- Simple Residence and Business LNP Only (20+ Loops) < 48 Clock Hours
- LNP with Loop (20+ Loops) < 48 Clock Hours
- LNP Complex Business (1-19 Lines) < 24 Clock Hours
- LNP Complex Business (20-50 Lines) < 48 Clock Hours
- LNP Complex Business (50+ Lines) < Negotiated with Notification of Timeframe within 24 Clock Hours

Calculation:	Report Structure:
(# FOCs returned within "x" hours ÷ total FOCs sent) * 100	Reported for CLEC and all CLECs This includes mechanized from EDI and LEX and manual (FAX or phone orders).

Measurement Type:

Tier 1 – Low
Tier 2 – Medium

Benchmark:

95%

95. Measurement:	
Average Response Time for Non-Mechanized Rejects Returned With Complete and Accurate Codes.	
Definition:	
Average Response time for returning rejected non-mechanized LNP orders with complete and accurate identification of CLEC caused errors in the order.	
Exclusions:	
None	
Business Rules:	
For each non-mechanized order track, the Start time is the Receipt date/time of non-mechanized order; and the End time is the transmittal time of rejection notification of the order due to CLEC-caused errors. The difference between the two is the duration in hours. Obtain cumulative total for all non-mechanized LNP/LNP with Loop orders for the month. SWBT will track the performance for this measurement until its EDI interfaces are tested and approved as satisfactory by the Commission. Subsequent to the above finding, a CLEC that continues to use manual process should track the performance delivered by SWBT and report to SWBT any sub-standard performance. The CLEC has the burden to prove any dispute regarding sub-standard performance.	
Levels of Disaggregation:	
LNP only and LNP with Loop	
Calculation:	**Report Structure:**
Σ(Date & Time of LNP Order – Date and Time LNP Order Acknowledgement) ÷ Total Number of non-mechanized LNP Orders Rejected	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
5 Business Hours.	

96. Measurement:	
Percentage Pre-mature Disconnects for LNP Orders	
Definition:	
Percentage of LNP cutovers where SWBT prematurely removes the translations, including the 10 digit trigger, prior to the scheduled conversion time.	
Exclusions:	
Coordinated Conversions	
Business Rules:	
The count of incidents, on a TN basis, where the translations are removed prior to the scheduled conversion. Count the number of cutovers that are prematurely disconnected (10 minutes before scheduled conversion time).	
Levels of Disaggregation:	
LNP only and LNP with Loop.	
Calculation:	**Report Structure:**
Count of premature disconnects ÷ total LNP conversions * 100	Reported by CLEC and all CLECs disaggregated by LNP and LNP with UNE loop.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
2% or Less premature disconnects starting 10 minutes before scheduled due time.	

97. Measurement:	
Percentage of Time SWBT Applies the 10-digit Trigger Prior to the LNP Order Due Date	
Definition:	
Percentage of time SWBT applies 10-digit trigger, where technically feasible, for LNP or LNP with loop TNs on the day prior to the due date.	
Exclusions:	
Excludes Remote Call Forwarding in DMS 100s, DID in all offices and ISDN Data TNs."	
Business Rules:	
Obtain number of LNP or LNP with loop TNs where the 10-digit trigger was applied on the day prior to due date, and the total number of LNP or LNP with Loop TNs where the 10-digit trigger was applied, where technically feasible.	
Levels of Disaggregation:	
LNP only, and LNP with Loop.	
Calculation:	**Report Structure:**
(Count of LNP TNs for which 10-digit trigger was applied 24 hours prior to due date ÷ total LNP TNs for which 10-digit triggers were applied) * 100.	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
96.5%	

98. Measurement:	
Percentage LNP I-Reports in 10 Days	
Definition:	
Percentage of LNP and LNP with Loop Orders that receive a LNP related network customer trouble report within 10 calendar days of service order completion.	
Exclusions:	
• Excluding subsequent reports and all disposition code "13" reports (excludable reports) with the exception of 1316 unless the trouble report is taken prior to completion of the service order. • Trouble reports caused by CPE or inside wiring.	
Business Rules:	
The Start time is the date/time of completion; and the End time is the date/time of receipt of trouble report. Count the number of LNP and LNP with loop Orders which receive an LNP related trouble report within 10 calendar days of completion.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Count of LNP and LNP with loop Orders that receive a network customer trouble report within 10 calendar days of service order completion ÷ total LNP and LNP with loop Orders) * 100.	Reported for CLEC and all CLECs, and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Parity with SWBT Retail POTS – No Field Work.	

99. Measurement:	
Average Delay Days for SWBT Missed Due Dates	
Definition:	
Average calendar days from due date to completion date on company missed orders.	
Exclusions:	
On time or early completions	
Business Rules:	
The clock starts on the due date and the clock ends on the completion date based on posted LNP orders.	
Levels of Disaggregation:	
LNP Only	
Calculation:	**Report Structure:**
Σ(LNP Port Out Completion Date– LNP Order due date) ÷ # total port out orders where there was a SWBT caused missed due date* 100	Reported for CLEC and all CLECs and SWBT.
Measurement Type:	
Tier 1 – Medium Tier 2 – Medium	
Benchmark:	
Parity with SWBT Retail POTS – No Field Work.	

100. Measurement:	
Average Time of Out of Service for LNP Conversions	
Definition:	
Average time to facilitate the activation request in SWBT's network.	
Exclusions:	
• CLEC-caused errors. • NPAC-caused errors unless caused by SWBT. • Large ports greater than 500 ports.	
Business Rules:	
The Start time is the Receipt of NPAC broadcast activation message in SWBT's LSMS; and the End time is when the Provisioning event is done in SWBT's LSMS. Calculate the total difference between the start time and end time in minutes for LNP activations during the reporting period.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Σ(LNP start time – LNP stop time) ÷ # total LNP activated messages	Reported for CLEC and all CLECs
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
60 Minutes unless a different industry guideline is established that will override the benchmark referenced here.	

101. Measurement:	
Percent Out of Service < 60 minutes	
Definition:	
The Number of LNP related conversions where the time required to facilitate the activation of the port in SWBT's network is less than 60, expressed as a percentage of total number of activations that took place.	
Exclusions:	
• CLEC-caused errors. • NPAC-caused errors unless caused by SWBT. • Large ports greater than 500 ports.	
Business Rules:	
The Start time is the Time that an "activate NPAC" broadcast is received in SWBT's LSMS. The End time is the Time the provisioning event is complete in SWBT's LSMS. Count the number of conversions that took place in less than 60 minutes.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Number of activation events provisioned in less than 60minutes) ÷ (total LNP provisioning events) * 100.	Reported for CLEC and all CLECs.
Measurement Type:	
Tier 1 – Medium Tier 2 – Medium	
Benchmark:	
96.5%	

911

102. Measurement	
Average Time To Clear Errors	
Definition:	
The average time it takes to clear an error after it is detected during the processing of the 911 database file. This is only on resale or UNE loop and port combination orders that SWBT installs.	
Exclusions:	
None	
Business Rules:	
The clock starts upon the receipt of the error file and the clock stops when the error is corrected.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Σ(Date and time error detected – date and time error cleared) ÷ total number of errors	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
Parity	

103. Measurement	
Percent Accuracy for 911 Database Updates	
Definition:	
The percentage of 911 records that were updated by SWBT in error.	
Exclusions:	
CLEC caused errors.	
Business Rules:	
The data required to calculate this measurement will be provided by the CLEC based on the compare file. The CLEC will provide the number of records transmitted and the errors found. SWBT will verify the records determined to be in error to validate that the records were input by SWBT incorrectly. An update is completed without error if the database completely and accurately reflects the activity specified on the order submitted by the CLEC.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Number of SWBT caused update errors ÷ Total number of updates) * 100	CLEC, All CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
Parity	

104. Measurement	
Average Time Required to Update 911 Database (Facility Based Providers)	
Definition:	
The average time it takes to update the 911 database file.	
Exclusions:	
None	
Business Rules:	
The clock starts on the date/time when the data processing starts and the clock stops on the date/time when the data processing is complete.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Σ(Date and time data processing begins - date and time data processing ends) ÷ total number of files	Reported for individual CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
Parity	

POLES, CONDUIT AND RIGHTS OF WAY

105. Measurement	
Percentage of requests processed within 35 Days	
Definition:	
The percentage of requests for access to poles, conduits, and right-of-ways processed within 35 days.	
Exclusions:	
None	
Business Rules:	
The clock starts upon the receipt date of the application for access to poles, conduits and right-of-ways and the clock stops upon response date of the application granting or denying access to poles, conduits and right-of-ways.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(count of number of requests processed within 35 days ÷ total number of requests) * 100	Reported for individual CLEC and all CLECs.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
90% within 35 days.	

106. Measurement	
Average Days Required to Process a Request	
Definition:	
The average time it takes to process a request for access to poles, conduits, and right-of-ways.	
Exclusions:	
None	
Business Rules:	
See Measurement No. 105	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Σ(Date request returned to CLEC – date request received from CLEC) ÷ total number of requests	Reported for individual CLEC and all CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
See Measurement No. 105. Benchmark will be established during the 6 month review.	

COLLOCATION

107. Measurement
Percentage Missed Collocation Due Dates
Definition:
The percentage of SWBT caused missed due dates for collocation projects.
Exclusions:
None
Business Rules:
The clock starts when SWBT receives, in compliance with the approved tariff, payment and return of proposed layout for space as specified in the application form from the CLEC and the clock stops when the collocation arrangement is complete and ready for CLEC occupancy. Due Date Extensions will be extended when mutually agreed to by SWBT and the CLEC, or when a CLEC fails to complete work items for which they are responsible in the allotted time frame. The extended due date will be calculated by adding to the original due date the number of calendar days that the CLEC was late in performing said work items. Work items include but are not limited to: • CLEC return to SWBT corrected and complete floor plan drawings. • CLEC placement of required component(s). If the business rules and tariff are inconsistent, the terms of the tariff will apply.
Levels of Disaggregation:
Physical • Caged • Shared Caged • Caged Common • Cageless • Adjacent On-site • Adjacent Off-site • Augments to Physical Collocation Virtual • Virtual • Augments to Virtual.

Calculation:	Report Structure:
(count of number of SWBT caused missed due dates for physical collocation facilities ÷ total number of physical collocation projects) * 100	Reported for individual CLEC and all CLECs.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
95% within the due date. Damages and Assessments will be calculated based on the number of days late.	

108. Measurement	
Average Delay Days for SWBT Missed Due Dates	
Definition:	
The average delay days caused by SWBT to complete collocation facilities.	
Exclusions:	
None	
Business Rules:	
See Measurement No. 107	
Levels of Disaggregation:	
Physical, • Caged • Shared Caged • Caged Common • Cageless • Adjacent On-site • Adjacent Off-site • Augments to Physical Collocation Virtual • Augments to Virtual.	
Calculation:	**Report Structure:**
Σ(Date collocation work completed - collocation due date) ÷ total number of SWBT caused missed collocation projects	Reported for individual CLEC and all CLECs by active and non-active as defined in the tariff
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
10% of the tariffed intervals.	

109. Measurement	
Percent of Requests Processed Within the Tariffed Timelines	
Definition:	
The percent of requests for collocation facilities processed within the Tariffed timelines.	
Exclusions:	
Excludes Weekends & Holidays.	
Business Rules:	
The clock starts when SWBT (ICSC) receives the application. The clock stops when SWBT responds back to the application request with a quote.	
Levels of Disaggregation:	
Physical, • Caged • Shared Caged • Caged Common • Cageless • Adjacent On-site • Adjacent Off-site • Augments to Physical Collocation Virtual • Augments to Virtual. .	
Calculation:	**Report Structure:**
(count of number of requests processed within the tariff timeline ÷ total number of requests) * 100	Reported for individual CLEC and all CLECs.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
90% within the tariff timeline	

DIRECTORY ASSISTANCE DATABASE

110. Measurement	
Percentage of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs	
Definition:	
The percentage of DA database updates completed within 72 hours of receipt of the update from the CLEC for directory change only and within 72 hours of the completion date on the provisioning service order where a provisioning order is required.	
Exclusions:	
Excludes Weekends and Holidays.	
Business Rules:	
The date and time stamp on fax updates starts the clock and the date and time when the listing is updated stops the clock. For directory changes that also have a provisioning order, the clock starts when the provisioning order completes and ends when the listing is updated. The update clerks work hours are 6:30 a.m. to 3:00 p.m. Monday through Friday. On requests received after 3:00 p.m. the clock will start at 6:30 a.m. the following day.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Count of updates completed within 72 hours ÷ total updates) * 100	Reported by CLEC and all CLECs for facility based providers.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
95% updated within 72 hours.	

111. Measurement	
Average Update Interval for DA Database for Facility Based CLECs	
Definition:	
The average update interval for DA database changes for facility based CLECs.	
Exclusions:	
None	
Business Rules:	
See Measurement No. 110	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
Σ (8:00 a.m. of the day following the input into the LSS database – Time update received from CLEC) ÷ total updates	Reported by CLEC and all CLECs for facility based providers.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
48 Hours. This benchmark will be re-evaluated in 6 months.	

112. Measurement	
Percentage DA Database Accuracy For Manual Updates	
Definition:	
The percentage of DA records that were updated by SWBT in error. The data required to calculate this measurement will be provided by the CLEC. The CLEC will provide the number of records transmitted and the errors found. SWBT will verify the records determined to be in error to validate that the records were input by SWBT incorrectly.	
Exclusions:	
None	
Business Rules:	
See Measurement No. 110	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Number of SWBT caused update errors ÷ Total number of updates) *100	Reported by CLEC and all CLECs for facility based providers.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
97%	

113. Measurement	
Percentage of Electronic Updates that Flow Through the DSR process Without Manual Intervention	
Definition:	
Percentage of DSRs from entry to distribution that progress through SWBT ordering systems to ALPS/LIRA.	
Exclusions:	
Rejected DSRs due to CLEC error.	
Business Rules:	
The number of DSRs, that flow through SWBT's ordering systems and are passed to ALPS/LIRA without manual intervention, divided by the total number of DSRs issued within the reporting period.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Number of DSRs that flow through to ALPS/LIRA ÷ Total DSRs) * 100	CLEC and All CLECs.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
97%	

COORDINATED CONVERSIONS

114. Measurement	
Percentage of Premature Disconnects (Coordinated Cutovers)	
Definition:	
Percentage of coordinated cutovers where SWBT prematurely disconnects the customer prior to the scheduled conversion.	
Exclusions:	
None	
Business Rules:	
A premature disconnect occurs any time SWBT disconnects the CLEC customer prior to the CLEC authorization.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Count of prematurely disconnected customers ÷ total coordinated conversion customers) * 100	Reported by CLEC and all CLECs disaggregated by INP and INP with loop, LNP and LNP with loop.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
2% or less premature disconnects starting 10 minutes before scheduled time.	

115. Measurement	
Percentage of SWBT caused delayed Coordinated Cutovers	
Definition:	
Percentage of SWBT caused late coordinated cutovers in excess of "x" (30, 60 and 120) minutes.	
Exclusions:	
None	
Business Rules:	
A coordinated cutover is delayed if SWBT is not ready within "x" (30, 60, and 120) minutes after the frame due time.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Count of SWBT caused late coordinated cutovers in excess of "x" (30, 60 and 120) minutes ÷ total coordinated cutovers) * 100	Reported by CLEC and all CLECs disaggregated by INP and INP with loop, LNP and LNP with loop.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
8% or less of SWB coordinated conversions beyond 30 minutes, 2% beyond 1 hour from scheduled time or 1% beyond 2 hours.	

116. Measurement	
Percentage of Missed Mechanized INP Conversions	
Definition:	
Percentage of mechanized INP conversions not loaded in the switch within 10 minutes prior to or 30 minutes after the scheduled due time.	
Exclusions:	
None	
Business Rules:	
The clock starts on the Due Date and Frame Due Time and the clock stops on the Switch Date and Time.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Count of mechanized INP conversions not loaded in the switch within 10 minutes prior to or 30 minutes after scheduled due time (Frame Due Time)) ÷ total mechanized INP conversions) * 100	Reported by CLEC and all CLECs.
Measurement Type:	
Tier 1 – Medium Tier 2 – None	
Benchmark:	
See Measurements No. 114 and No. 115	

NXX

117. Measurement	
Percent NXXs loaded and tested prior to the LERG effective date	
Definition:	
The percent of NXXs loaded and tested prior to the LERG effective date.	
Exclusions:	
None	
Business Rules:	
Data for the initial NXX(s) in a local calling area will be based on the LERG effective date or completion of the initial interconnection trunk group(s), whichever is longer. Data for additional NXXs in the local calling area will be based on the LERG effective date.	
Levels of Disaggregation:	
By Market Region	
Calculation:	**Report Structure:**
(Count of NXXs loaded and tested by LERG date ÷ total NXXs loaded and tested) * 100	Reported by CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Parity	

118. Measurement	
Average Delay Days for NXX Loading and Testing	
Definition:	
Average calendar days from due date to completion date on company missed NXX orders.	
Exclusions:	
None	
Business Rules:	
See Measurement No. 117	
Levels of Disaggregation:	
By Market Region	
Calculation:	**Report Structure:**
Σ(Completion Date - LERG date) ÷ (number of SWBT caused late orders)	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – Low Tier 2 – None	
Benchmark:	
Parity	

119. Measurement	
Mean Time to Repair	
Definition:	
Average duration of NXX trouble reports from the receipt of the customer trouble report to the time that the trouble report is cleared.	
Exclusions:	
None	
Business Rules:	
The start time is when the report is received. The stop time is when the report is cleared.	
Levels of Disaggregation:	
By Market Region.	
Calculation:	**Report Structure:**
Σ(Date and time trouble report is cleared with the customer – Date and time trouble report is received) ÷ (number of NXX trouble reports)	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Parity	

BONA FIDE/SPECIAL REQUEST PROCESS (BFRs)

120. Measurement	
Percentage of Requests Processed Within 30 Business Days	
Definition:	
Percentage of Bona fide/Special requests processed within 30 business days.	
Exclusions:	
Excludes weekends and holidays.	
Business Rules:	
The clock starts when SWBT receives a complete and accurate application. The clock stops when SWBT completes application processing for Network Elements that are not operational at the time of the request.	
Levels of Disaggregation:	
• None	
Calculation:	**Report Structure:**
(Count of number of requests processed within 30 days ÷ total number of requests) * 100	Reported by CLEC and all CLECs.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
90% within 30 business days.	

121. Measurement	
Percentage of Quotes Provided for Authorized BFRs/Special Requests Within X (10,30,90) Days	
Definition:	
Percentage of quotes provided in response to bona fide/Special requests for within X (10,30,90) days.	
Exclusions:	
Requests that are subject to pending arbitration.	
Business Rules:	
The clock starts when SWBT receives a complete and accurate application. The clock stops when SWBT responds back to the application request with a quote.	
Levels of Disaggregation:	
• New Network Elements that are operational at the time of the request. • New Network Elements that are ordered by the FCC. • New Network Elements that are not operational at the time of the Request.	
Calculation:	**Report Structure:**
(Count of number of requests processed within X (10, 30, 90) days ÷ total number (10, 30, 90 Days) of requests) * 100	Reported by CLEC and all CLECs.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
90% within 10, 30, 90 business days. • Network Elements that are operational at the time of the request – 10 days • Network Elements that are Ordered by the FCC– 30 days • New Network Elements 90 days	

PERFORMANCE MEASUREMENTS

Appendix One

Subsequent Due Date Indicator	
Added to the service order whenever the due date is changed. Order can carry multiple codes. Company delay code overrides subscriber delay code.	
Subscriber(customer) Reasons:	
SA	No Access
SL	Subscriber requests later date
SO	Subscriber – Other
SP	Subscriber requests earlier date
SR	Subscriber not ready
Company (SWBT) Reasons:	
CA	Assignment office
CB	Residence/Business office
CE	Back order / unavailability of equipment or supplies from vendors
CF	Lack of Facilities (outside plant or buried service wires)
CL	Work Load
CO	Other company reasons
CS	Lack of Central Office facilities
CU	Uncontrollable circumstances

PERFORMANCE MEASUREMENTS

Appendix Two

Disposition Codes
The following is a list of Excluded (13) disposition codes.
1301 Request for directories 1302 Reports received as a result of dual service 1303 Request for information revertive dialing codes – muliparty line (no longer applicable) 1304 CVAS Disconnect or hang up 1305 Request for information provided by another department – Business office, claims, etc. 1306 Request for SWBT to locate buried facilities 1307 Request to lower or raise wire 1308 Report on phone number which is properly disconnected, unassigned or suspended with disconnect recording on line. 1309 Report on feature customer is not being billed for 1310 Request to verify busy condition of line 1311 Report of non-SWBT plant or facilities 1313 Reports due to incorrect network administration records 1314 Request that SWBT ground be connected to electric company ground 1316 Report on service order activity prior to midnight of completion date 1317 Report on incorrect number; Regenerate report on correct number 1320 Request from Business Office 1321 Customer unable to reach business office 1322 Request from vendor for testing 1323 Changes in network structure (i.e. 10 digit dialing) 1324 Miscellaneous (Commendations, callback request for information only) 1335 Customer request service guarantee (tech gave credit) 1336 Customer request service guarantee (tech did not give credit) 1380 CNA Report Cancel by customer

PERFORMANCE MEASUREMENTS

Appendix Three

Percentage of Missed Collocation Due Dates Damages and Assessments Methodology

The following methodology will apply in calculating Tier 1 liquidated damages and Tier 2 assessments for the percentage of missed collocation due dates measurement.

Tier 1:

1. The benchmark will be 95% of Collocations completed within the due date. For example, if a CLEC has 30 collocations complete in the study month, SWBT can miss two due dates and still be in compliance. In this case no damages would apply. If, three due dates out of 30, SWBT would be out of compliance. In this case, damages would be payable on the number of collocations required to be back within the 95% benchmark.
2. Damages are calculated based on the number of days that SWBT misses the due date using the per occurrence values in the MOU, multiplied by the number of days from completion to due date.
3. In order to determine which collocations to use in the damage calculation, the missed collocation due dates will be ranked based on the number of days missed from highest to lowest. SWBT will pay damages on the highest number of days missed until the number of collocations missed is within the benchmark. For example, in the example above, if the three misses had missed days of 20, 10 and three, SWBT would pay damages on 20 missed days.
4. The collocation measurement will be used in the determination of the "K" number of allowances. In addition, it may also be excluded as defined in the MOU in the order of progression also contained there. The number of underlying data points used for the purposes of determining the order of exclusion will be the total days late for collocation projects.
5. All collocation completions in a month will be considered for the calculation of liquidated damages.
6. The critical Z-value will not be subtracted from the benchmark to determine compliance.

Tier 2:

1. Assessments will be applicable, as described in the MOU, when the measurement has been out of compliance for three consecutive months for the aggregate of all CLEC collocations.
2. Compliance will be defined as described in the Tier 1 damages above.
3. If assessments are applicable, the rolling three month average for days missed will be used to calculate the total assessments payable to the Texas State Treasury.

ATTACHMENT 17: Performance Remedy Plan

This Attachment 17: Performance Remedy Plan sets forth the terms and conditions under which SWBT will report performance to CLEC and compare that performance to SWBT's own performance or benchmark criteria, whichever is applicable. This Attachment further provides for enforcement through liquidated damages and assessments.

1.0 SWBT agrees to provide CLEC a monthly report of performance for the performance measures listed in Appendix 1. SWBT will collect, analyze, and report performance data for these measures in accordance with SWBT's Performance Measurement Business Rules, as approved by the Texas Commission. Both the performance measures and the business rules are subject to modification in accordance with section 6.4 below regarding six month reviews. SWBT and CLEC further agree to use this two-tiered enforcement structure for performance measurements provided for in this Attachment. The Commission approved performance measurements shown in Appendix 1 hereto identify the measurements that belong to Tier-1 or Tier-2 categories, which are further, identified as the High, Low and Medium groups as those terms are used below.

1.1 SWBT will not levy a separate charge for provision of the data to CLEC called for under this Attachment. Upon CLEC's request, data files of CLEC's raw data, or any subset thereof, will be transmitted to CLEC. If CLEC's request is transmitted to SWBT on or before the last day of the month for which data is sought, SWBT shall provide the data to CLEC on or before 20th day of the month pursuant to mutually acceptable format, protocol, and transmission media. If CLEC's request is transmitted to SWBT after the last day of the month for which data is sought, SWBT shall provide the data to CLEC within 20 days of receipt pursuant to mutually acceptable format, protocol, and transmission media. Notwithstanding other provisions of this Agreement, the Parties agree that such records will be deemed Proprietary Information.

2.0 SWBT and CLEC agree to use a statistical test, namely the modified "Z-test," for evaluating the difference between two means (SWBT and CLEC) or percentages, or the difference in the two proportions for purposes of this Attachment. SWBT agrees to use the modified Z-tests as outlined below as the statistical tests for the determination of parity when the result for SWBT and the CLEC are compared. The modified Z-tests are applicable if the number of data points are greater than 30 for a given measurement. In cases where benchmarks are established, the determination of compliance is through the comparison of the measured performance delivered to the CLEC and the applicable benchmark. For testing compliance for measures for which the number of data points are 29 or less, although the use of permutation tests as outlined below is appropriate comparison of performance delivered to CLECs with SWBT performance as described in Alternative-1 under the "Qualifications to use Z-Test" heading below is preferred.

3.0 SWBT and CLEC concur that, for purposes of this Attachment, performance for the CLEC on a particular measure will be considered in compliance with the parity

requirement when the measured results in a single month (whether in the form of means, percents, or proportions) for the same measurement, at equivalent disaggregation, for both SWBT and CLEC are used to calculate a Z-test statistic and the resulting value is no greater than the critical Z-value as reflected in the Critical Z-statistic table shown below.

Z-Test:

SWBT agrees with the following formulae for determining parity using Z-Test:

For Measurement results that are expressed as Averages or Means: $z = (DIFF) / \delta_{DIFF}$

Where;
$DIFF = M_{ILEC} - M_{CLEC}$
M_{ILEC} = ILEC Average
M_{CLEC} = CLEC Average
$\delta_{DIFF} = SQRT [\delta^2_{ILEC} (1/ n_{CLEC} + 1/ n_{ILEC})]$
δ^2_{ILEC} = Calculated variance for ILEC.
n_{ILEC} = number of observations or samples used in ILEC measurement
n_{CLEC} = number of observations or samples used in CLEC measurement

For Measurement results that are expressed as Percentages or Proportions:

Step 1:

$$\rho = \frac{(n_{ILEC}P_{ILEC} + n_{CLEC}P_{CLEC})}{n_{ILEC} + n_{CLEC}}$$

Step 2:

$$\sigma_{PILEC-PCLEC} = sqrt[[\rho(1-\rho)]/n_{ILEC} + [\rho(1-\rho)]/n_{CLEC}]$$

Step 3:

$$Z = (P_{ILEC} - P_{CLEC})/\sigma_{PILEC-PCLEC}$$

Where: n = Number of Observations
P = Percentage or Proportion

For Measurement results that are expressed as Rates or Ratio:

$$z = (DIFF) / \delta_{DIFF}$$

Where;
$DIFF = R_{ILEC} - R_{CLEC}$
$R_{ILEC} = num_{ILEC}/denom_{ILEC}$
$R_{CLEC} = num_{CLEC}/denom_{CLEC}$
$\delta_{DIFF} = SQRT [R_{ILEC} (1/denom_{CLEC} + 1/ denom_{ILEC})]$

4.0 Qualifications to use Z-Test:

The proposed Z- tests are applicable to reported measurements that contain 30 or more data points.

In calculating the difference between the performances the formula proposed above applies when a larger CLEC value indicates a higher quality of performance. In cases where a smaller CLEC value indicates a higher quality of performance the order of subtraction should be reversed (i.e., $M_{CLEC} - M_{ILEC}$, $P_{CLEC} - P_{ILEC}$, $R_{CLEC} - R_{ILEC}$).
For measurements where the applicable performance criterion is a benchmark rather than parity performance compliance will be determined by setting the denominator of the Z-test formula as one in calculating the Z-statistic.

For measurements where the performance delivered to CLEC is compared to SWBT performance and for which the number of data points are 29 or less, SWBT agrees to application of the following alternatives for compliance.

4.1 Alternative 1:

For measurements that are expressed as averages, performance delivered to a CLEC for each observation shall not exceed the ILEC averages plus the applicable critical Z-value. If the CLEC's performance is outside the ILEC average plus the critical Z-value and it is the second consecutive month, SWBT can utilize the Z-test as applicable for data sets of 30 or greater data points or the permutation test to provide evidence of parity. If SWBT uses the Z-test for data sets under 30, the CLEC can independently perform the permutation test to validate SWBT's results. SWBT will supply all data required to perform the permutation test, including the complete ILEC and CLEC data sets for the measure, to CLEC upon request. The results of the permutation test will control over the results of the Z-test analysis as applicable for data sets 30 or greater.

For measurements that are expressed as percentages, the percentage for CLEC shall not exceed ILEC percentage plus the applicable critical Z-value. If the CLEC's performance is outside the ILEC percentage plus the critical Z-value and it is the second consecutive month, SWBT can utilize the Z-test as applicable for data sets of 30or greater data points or the permutation test to provide evidence of parity. If SWBT uses the Z-test for data sets under 30, the CLEC can independently perform the permutation test to validate SWBT's results. SWBT will supply all data required to perform the permutation test, including the complete ILEC and CLEC data sets for the measure, to CLEC upon request. The results of the permutation test will control over the results of the Z-test analysis as applicable for data sets 30 or greater.

4.2 Alternative 2:

Permutation analysis will be applied to calculate the z-statistic using the following logic:

Choose a sufficiently large number T.

Pool and mix the CLEC and ILEC data sets

Randomly subdivide the pooled data sets into two pools, one the same size as the original CLEC data set (n_{CLEC}) and one reflecting the remaining data points, (which is equal to the size of the original ILEC data set or n_{ILEC}).

Compute and store the Z-test score (Z_S) for this sample.

Repeat steps 3 and 4 for the remaining T-1 sample pairs to be analyzed. (If the number of possibilities is less than 1 million, include a programmatic check to prevent drawing the same pair of samples more than once).

Order the Z_S results computed and stored in step 4 from lowest to highest.

Compute the Z-test score for the original two data sets and find its rank in the ordering determined in step 6.

Repeat the steps 2-7 ten times and combine the results to determine P = (Summation of ranks in each of the 10 runs divided by 10T)

Using a cumulative standard normal distribution table, find the value Z_A such that the probability (or cumulative area under the standard normal curve) is equal to P calculated in step 8.

Compare Z_A with the desired critical value as determined from the critical Z table. If $Z_A >$ the designated critical Z-value in the table, then the performance is non-compliant.

4.3 SWBT and CLEC will provide software and technical support as needed by Commission Staff for purposes of utilizing the permutation analysis. Any CLEC who opts into this Attachment 17 agrees to share in providing such support to Commission Staff.

5.0 Overview of Enforcement Structure

5.1 SWBT agrees with the following methodology for developing the liquidated damages and penalty assessment structure for tier-1 liquidated damages and tier-2 assessments:

5.2 SWBT will pay Liquidated Damages to the CLEC according to the terms set forth in this Attachment.

5.3 Liquidated damages apply to Tier-1 measurements identified as High, Medium, or Low on Appendix - 1.

5.4 Assessments are applicable to Tier-2 measures identified as High, Medium, or Low on Appendix - 1 and are payable to the Texas State Treasury.

5.5 SWBT will not be liable for the payment of either Tier 1 damages or Tier 2 assessments until the Commission approves an Interconnection Agreement between a CLEC and SWBT containing the terms of Attachment 17 of this Agreement. Tier 2 assessments will be paid only on the aggregate performance for CLECs that have adopted this Attachment (Performance Remedy Plan) and are operating in Texas.

6.0 Procedural Safeguards and Exclusions

6.1 SWBT agrees that the application of the assessments and damages provided for herein is not intended to foreclose other noncontractual legal and regulatory claims and remedies that may be available to a CLEC. By incorporating these liquidated damages terms into an interconnection agreement, SWBT and CLEC agree that proof of damages from any "noncompliant" performance measure would be difficult to ascertain and, therefore, liquidated damages are a reasonable approximation of any contractual damage resulting from a non-compliant performance measure. SWBT and CLEC further agree that liquidated damages payable under this provision are not intended to be a penalty.

6.2 SWBT's agreement to implement these enforcement terms, and specifically its agreement to pay any "liquidated damages" or "assessments" hereunder, will not be considered as an admission against interest or an admission of liability in any legal, regulatory, or other proceeding relating to the same performance. SWBT and CLEC agree that CLEC may not use: (1) the existence of this enforcement plan; or (2) SWBT's payment of Tier-1 "liquidated damages" or Tier-2 "assessments" as evidence that SWBT has discriminated in the provision of any facilities or services under Sections 251 or 252, or has violated any state or federal law or regulation. SWBT's conduct underlying its performance measures, and the performance data provided under the performance measures, however, are not made inadmissible by these terms. Any CLEC accepting this performance remedy plan agrees that SWBT's performance with respect to this remedy plan may not be used as an admission of liability or culpability for a violation of any state or federal law or regulation. Further, any liquidated damages payment by SWBT under these provisions is not hereby made inadmissible in any proceeding relating to the same conduct where SWBT seeks to offset the payment against any other damages a CLEC might recover; whether or not the nature of damages sought by the CLEC is such that an offset is appropriate will be determined in the related proceeding. The terms of this paragraph do not apply to any proceeding before the Commission or the FCC to determine whether SWBT has met or continues to meet the requirements of section 271 of the Act.

6.3 SWBT shall not be liable for both Tier-2 "assessments" and any other assessments or sanctions under PURA or the Commission's service quality rules relating to the same performance.

6.4 Every six months, CLEC may participate with SWBT, other CLECs, and Commission representatives to review the performance measures to determine whether measurements should be added, deleted, or modified; whether the applicable benchmark standards should be modified or replaced by parity standards; and whether to move a classification of a measure to High, Medium, Low, Diagnostic, Tier-1 or Tier-2. The criterion for reclassification of a measure shall be whether the actual volume of data points was lesser or greater than anticipated. Criteria for review of performance measures, other than for possible reclassification, shall be whether there exists an omission or failure to capture intended performance, and whether there is duplication of another measurement. Performance measures for 911 may be examined at any six month review to determine whether they should be reclassified. The first six-month period will begin when an interconnection agreement including this remedy plan is adopted by a CLEC and approved by the Commission. Any changes to existing performance measures and this remedy plan shall be by mutual agreement of the parties and, if necessary, with respect to new measures and their appropriate classification, by arbitration. The current measurements and benchmarks will be in effect until modified hereunder or expiration of the interconnection agreement.

6.5 SWBT and CLEC acknowledge that no later than two years after SWBT or its affiliate receives Section 271 relief, the Commission's intention is to reduce the number of performance measures subject to damages and assessments by 50% to the extent there is a smaller number of measures that truly do capture all of the issues that are competition-affecting and customer-affecting

6.6 CLEC and SWBT will consult with one another and attempt in good faith to resolve any issues regarding the accuracy or integrity of data collected, generated, and reported pursuant to this Attachment. In the event that CLEC requests such consultation and the issues raised by CLEC have not been resolved within 45 days after CLEC's request for consultation, then SWBT will allow CLEC to have an independent audit conducted, at CLEC's expense, of SWBT's performance measurement data collection, computing, and reporting processes. In the event the subsequent audit reinforces the problem identified during the 45 days of consultation period or if any new problem is identified, SWBT shall reimburse a CLEC any expense incurred by the CLEC for such audit. CLEC may not request more than one audit per twelve calendar months under this section. This section does not modify CLEC's audit rights under other provisions of this Agreement. SWBT agrees to inform all CLECs of any problem identified during the audit initiated by any CLEC.

7.0 Exclusions Limited

7.1 SWBT shall not be obligated to pay liquidated damages or assessments for noncompliance with a performance measurement if, but only to the extent that, such noncompliance was the result of any of the following: a Force Majeure event; an act or omission by a CLEC that is contrary to any of its obligations under its interconnection agreement with SWBT or under the Act or Texas law; or non-SWBT problems associated with third-party systems or equipment, which could not have been avoided by SWBT in the exercise of reasonable diligence. Provided, however, the third party exclusion will not be raised more than three times within a calendar year. SWBT will not be excused from payment of liquidated damages or assessments on any other grounds, except by application of the procedural threshold provided for below. Any dispute regarding whether a SWBT performance failure is excused under this paragraph will be resolved with the Commission through a dispute resolution proceeding under Subchapter Q of its Procedural Rules or, if the parties agree, through commercial arbitration with the American Arbitration Association. SWBT will have the burden in any such proceeding to demonstrate that its noncompliance with the performance measurement was excused on one of the grounds set forth in this paragraph. If a Force Majeure event or other excusing event recognized in the first sentence of this section 7.1 only suspends SWBT's ability to timely perform an activity subject to performance measurement, the applicable time frame in which SWBT's compliance with the parity or benchmark criterion is measured will be extended on an hour-for-hour or day-for-day basis, as applicable, equal to the duration of the excusing event.

7.2 In addition to the provisions set forth herein, SWBT shall not be obligated to pay liquidated damages or assessments for noncompliance with a performance measure if the Commission finds such noncompliance was the result of an act or omission by a CLEC that is in bad faith, for example, unreasonably holding orders and/or applications and "dumping" such orders or applications in unreasonably large batches, at or near the close of a business day, on a Friday evening or prior to a holiday, or unreasonably failing to timely provide forecasts to SWBT for services or facilities when such forecasts are required to reasonably provide such services or facilities; or non-SWBT Y2K problems.

7.3 CLEC acknowledges that an overall cap of $120 million per year for Tier-1 liquidated damages and Tier-2 Assessments will apply to payments by SWBT under all SWBT interconnection agreements that include Attachment 17 in the form set forth herein. CLEC further acknowledges that a monthly cap of $10 million for Tier-1 liquidated damages will apply to payments by SWBT under all SWBT interconnection agreements that include Attachment 17 in the form set forth herein. To the extent in any given month the $10 million cap is not reached, the subsequent month's cap will be increased by an amount equal to the unpaid portion of the previous month's cap. At the end of the year, if total Tier-1 liquidated damages and Tier-2 Assessments equal or exceed $120 million but SWBT has paid less than $120 million because of the $10 million per month cap, SWBT shall be required to pay the total $120 million. In such event, Tier-1 liquidated damages

shall be paid first on a pro rata basis to CLECs, and any remainder within the overall cap of $120 million, shall be paid as a Tier-2 Assessment. In the event the total calculated amount of damages and assessments for the year is less than $120 million, SWBT shall be obligated to pay ONLY the actual calculated amount of damages and assessments. The cap will be based upon a calendar year beginning the first day of the month following Commission approval of the Texas 271 Agreement.

7.3.1 Whenever SWBT Tier-1 payments to an individual CLEC in a month exceed $ 3 million, or for all CLECs Tier-1 payments (in a month) exceed $ 10 million, then SWBT may commence a show cause proceeding as provided for below. Upon timely commencement of the show cause proceeding, SWBT must pay the balance of damages owed in excess of the threshold amount into escrow, to be held by a third party pending the outcome of the show cause proceeding. To invoke these escrow provisions, SWBT must file with the Commission, not later than the due date of the affected damages payments, an application to show cause why it should not be required to pay any amount in excess of the procedural threshold. SWBT's application will be processed in an expedited manner under Subchapter Q of the Commission's Procedural Rules. SWBT will have the burden of proof to demonstrate why, under the circumstances, it would be unjust to require it to pay liquidated damages in excess of the applicable threshold amount. If SWBT reports non-compliant performance to a CLEC for three consecutive months on 20% or more of the measures reported to the CLEC, but SWBT has incurred no more than $ 1 million in liquidated damages obligations to the CLEC for that period under the enforcement terms set out here, then the CLEC may commence an expedited dispute resolution under this paragraph pursuant to Subchapter Q of the Commission's Procedural Rules. In any such proceeding the CLEC will have the burden of proof to demonstrate why, under the circumstances, justice requires SWBT to pay damages in excess of the amount calculated under these enforcement terms.

7.3.2 SWBT should post on its Internet website the aggregate payments of any liquidated damages or assessments.

7.4 With respect to any interconnection agreement, SWBT and any CLEC may request two expedited dispute resolution proceedings pursuant to the two preceding paragraphs before the Commission or, if the parties agree, through commercial arbitration with the American Arbitration Association (AAA); during the term of the contract without having to pay attorneys fees to the winning company. For the third proceeding and thereafter, the requesting party must pay attorneys fees, as determined by the Commission or AAA, if that party loses.

7.5 In the event the aggregate amount of Tier-1 damages and Tier-2 assessments reach the $120 million cap within a year and SWBT continues to deliver non-compliant performance during the same year to any CLEC or all CLECs, the Commission may recommend to the FCC that SWBT should cease offering in-region interLATA services to new customers.

8.0 Tier-1 Damages:

Tier-1 liquidated damages apply to measures designated in Attachment–1 as High, Medium, or Low when SWBT delivers "non-compliant" performance as defined above.

8.1 Under the damages for Tier-1 measures, the number of measures that may be classified as "non-compliant" before a liquidated damage is applicable is limited to the K values shown below. The applicable K value is determined based upon the total number of measures with a sample size of 10 or greater that are required to be reported to a CLEC where a sufficient number of observations exist in the month to permit parity conclusions regarding a compliant or non-compliant condition. For any performance measurement, each disaggregated category for which there are a minimum of 10 data points constitutes one "measure" for purposes of calculating K value. The designated K value and the critical Z-value seek to balance random variation, Type-1 and Type-2 errors. Type-1 error is the mistake of charging an ILEC with a violation when it may not be acting in a discriminatory manner (that is, providing non-compliant performance). Type-2 error is the mistake of not identifying a violation when the ILEC is providing discriminatory or non-compliant performance.

8.2 Liquidated damages in the amount specified in the table below apply to all "non-compliant" measures in excess of the applicable "K" number of exempt measures. Liquidated damages apply on a per occurrence basis, using the amount per occurrence taken from the table below, based on the designation of the measure as High, Medium, or Low in Appendix-1 and the number of consecutive months for which SWBT has reported noncompliance for the measure. For those measures listed on Appendix-2 as "Measurements that are subject to per occurrence damages or assessments with a cap," the amount of liquidated damages in a single month shall not exceed the amount listed in the table below for the "Per measurement" category. For those measures listed on Appendix -2 as "Measurements that are subject to per measure damages or assessment," liquidated damages will apply on a per measure basis, at the amounts set forth in the table below. The methodology for determining the order of exclusion, and the number of occurrences is addressed in "Methods of calculating the liquidated damages and penalty amounts," below.

LIQUIDATED DAMAGES TABLE FOR TIER-1 MEASURES

Per occurrence						
Measurement Group	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6 and each following month
High	$150	$250	$500	$600	$700	$800
Medium	$75	$150	$300	$400	$500	$600
Low	$25	$50	$100	$200	$300	$400

Per Measure/Cap*						
Measurement Group	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6 and each following month
High	$25,000	$50,000	$75,000	$100,000	$125,000	$150,000
Medium	$10,000	$20,000	$30,000	$40,000	$50,000	$60,000
Low	$5,000	$10,000	$15,000	$20,000	$25,000	$30,000

ASSESSMENT TABLE FOR TIER-2 MEASURES

Per occurrence

Measurement Group	
High	$500
Medium	$300
Low	$200

Per Measure/Cap*

Measurement Group	
High	$75,000
Medium	$30,000
Low	$20,000

* **For per occurrence with cap measures, the occurrence value is taken from the per occurrence table, subject to the per measure with cap amount.**

9.0 Tier-2 Assessments to the State:

9.1 Assessments payable to the Texas State Treasury apply to the Tier-2 measures designated on Appendix -1 as High, Medium, or Low when SWBT performance is out of parity or does not meet the benchmarks for the aggregate of all CLEC data. Specifically, if the Z-

test value is greater than the Critical Z, the performance for the reporting category is out of parity or below standard.

9.2 For those Measurements where a per occurrence assessment applies, an assessment as specified in the Assessment Table; for each occurrence is payable to the Texas State Treasury for each measure that exceeds the Critical Z-value, shown in the table below, for three consecutive months. For those Measurements listed in Appendix-2 as measurements subject to per occurrence with a cap, an assessment as shown in the Assessment Table above for each occurrence with the applicable cap is payable to the Texas State Treasury for each measure that exceeds the Critical Z-value, shown in the table below, for three consecutive months. For those Tier-2 Measurements listed in Appendix-2 as subject to a per measurement assessment an assessment amount as shown in the Assessment Table above is payable to the Texas State Treasury for each measure that exceeds the Critical Z-value, shown in the table below, for three consecutive months.

9.3 The following table will be used for determining the Critical Z-value for each measure , as well as the K values referred to below based on the total number of measures that are applicable to a CLEC in a particular month. The table can be extended to include CLECs with fewer performance measures. The Critical Z-value for Tier 2 will be calculated in the same manner as for Tier 1.[1]

Critical Z - Statistic Table

Number of Performance Measures	K Values	Critical Z-value
1	0	1.65
2	0	1.96
3	0	2.12
4	0	2.23
5	0	2.32
6	0	2.39
7	0	2.44
8	1	1.69
9	1	1.74
10-19	1	1.79
20-29	2	1.73
30-39	3	1.68
40-49	3	1.81
50-59	4	1.75
60-69	5	1.7
70 -79	6	1.68

[1] This sentence is added to clarify the manner in which Critical-Z value is calculated.

80 – 89	6	1.74
90 – 99	7	1.71
100 – 109	8	1.68
110 –119	9	1.7
120 – 139	10	1.72
140 – 159	12	1.68
160 – 179	13	1.69
180 – 199	14	1.7
200 – 249	17	1.7
250 – 299	20	1.7
300 – 399	26	1.7
400 – 499	32	1.7
500 – 599	38	1.72
600 – 699	44	1.72
700 – 799	49	1.73
800 – 899	55	1.75
900 – 999	60	1.77
1000 and above	Calculated for Type-1 Error Probability of 5%	Calculated for Type-1 Error Probability of 5%

10.0 General Assessments:

10.1 If SWBT fails to submit performance reports by the 20th day of the month, the following assessments apply unless excused for good cause by the Commission:

If no reports are filed, $5,000 per day past due;
If incomplete reports are filed, $1,000 per day for each missing performance results.

10.2 If SWBT alters previously reported data to a CLEC, and after discussions with SWBT the CLEC disputes such alterations, then the CLEC may ask the Commission to review the submissions and the Commission may take appropriate action. This does not apply to the limitation stated under the section titled "Exclusions Limited."

10.3 When SWBT performance creates an obligation to pay liquidated damages to a CLEC or an assessment to the State under the terms set forth herein, SWBT shall make payment in the required amount on or before the 30th day following the due date of the performance measurement report for the month in which the obligation arose (e.g., if SWBT performance through March is such that SWBT owes liquidated damages to CLECs for March performance, or assessments to the State for January – March performance, then those payments will be due May 15, 30 days after the April 15 due date for reporting March data). For each day after the due date that SWBT fails to pay the required amount, SWBT will pay interest to the CLEC at the maximum rate permitted by law for a past due

liquidated damages obligation and will pay an additional $3,000 per day to the Texas State Treasury for a past due assessment.

10.4 SWBT may not withhold payment of liquidated damages to a CLEC, for any amount up to $3,000,000 a month, unless SWBT had commenced an expedited dispute resolution proceeding on or before the payment due date, asserting one of the three permitted grounds for excusing a damages payment below the procedural threshold (Force Majeure, CLEC fault, and non-SWBT problems associated with third-party systems or equipment). In order to invoke the procedural threshold provisions allowing for escrow of damages obligations in excess of $ 3,000,000 to a single CLEC (or $ 10,000,000 to all CLECs), SWBT must pay the threshold amount to the CLEC(s), pay the balance into escrow, and commence the show cause proceeding on or before the payment due date.

10.5 CLEC will have access to monthly reports on performance measures and business rules through an Internet website that includes individual CLEC data, aggregate CLEC data, and SWBT's data.

10.6 The cap provided in Section 7.3 does not apply to assessments under Section 10 of this Attachment.

11.0 Methods of Calculating the Liquidated Damage and Assessment Amounts

The following methods apply in calculating per occurrence liquidated damage and assessments:

11.1 Tier-1 Liquidated Damages

11.1.1 *Application of K Value Exclusions*

Determine the number and type of measures with a sample size greater than 10 that are "non-compliant" for the individual CLEC for the month, applying the parity test and bench mark provisions provided for above. Sort all measures having non-compliant classification with a sample size greater than 10 in ascending order based on the number of data points or transactions used to develop the performance measurement result (e.g., service orders, collocation requests, installations, trouble reports). Exclude the first "K" measures designated Low on Appendix-1, starting with the measurement results having the fewest number of underlying data points greater than 10. If all Low measurement results with a non-compliant designation are excluded before "K" is exceeded, then the exclusion process proceeds with the Medium measurement results and thereafter the High measurement results. If all Low, Medium and High measurements are excluded, then those measurements with sample sizes less than 10 may be excluded until "K" measures are reached. In each category measurement results with non-compliant designation having the fewest underlying data point are then excluded until either all non-compliant measurement results are excluded or "K" measures are excluded, whichever occurs first. For the

remaining non-compliant measures that are above the K number of measures, the liquidated damages per occurrence are calculated as described further below. (Application of the K value may be illustrated by an example, if the K value is 6, and there are 7 Low measures and 1 Medium and 1 High which exceed the Critical Z-value, the 6 Low measures with the lowest number of service orders used to develop the performance measure are not used to calculate the liquidated damages, while the remaining 1 Low measure, 1 Medium measure, and 1 High measure which exceed the critical Z-value are used.) In applying the K value, the following qualifications apply to the general rule for excluding measures by progression from measures with lower transaction volumes to higher. A measure for which liquidated damages are calculated on a per measure basis will not be excluded in applying the K value unless the amount of liquidated damages payable for that measure is less than the amount of liquidated damages payable for each remaining measure. A measure for which liquidated damages are calculated on a per occurrence basis subject to a cap will be excluded in applying the K value whenever the cap is reached and the liquidated damages payable for the remaining non-compliant measures are greater than the amount of the cap.

11.1.2 Calculating Tier-1 Liquidated Damages

11.1.2.1 Measures for Which the Reporting Dimensions are Averages or Means.

Step 1: Calculate the average or the mean for the measure for the CLEC that would yield the Critical Z-value. Use the same denominator as the one used in calculating the Z-statistic for the measure. (For benchmark measures, calculate the value that would yield the critical Z-value by adding or subtracting the critical Z-value to the benchmark as appropriate, subject to 4.0 and the Business Rules.).

Step 2: Calculate the percentage difference the between the actual average and the calculated average.

Step 3: Multiply the total number of data points by the percentage calculated in the previous step and the per occurrence dollar amount taken from the Liquidated Damages Table to determine the applicable liquidated damages for the given month for that measure.

11.1.2.2 Measures for Which the Reporting Dimensions are Percentages.

Step 1: Calculate the percentage for the measure for the CLEC that would yield the Critical Z-value. Use the same denominator as the one used in calculating the Z-statistic for the measure. (For benchmark measures, calculate the value that would yield the critical Z-value by adding or subtracting the critical Z-value to the benchmark as appropriate, subject to 4.0 and the Business Rules.).

Step 2: Calculate the difference between the actual percentage for the CLEC and the calculated percentage.

Step 3: Multiply the total number of data points by the difference in percentage calculated in the previous step and the per occurrence dollar amount taken from the Liquidated Damages Table to determine the applicable liquidated damages for the given month for that measure.

11.1.2.3 Measures for Which the Reporting Dimensions are Ratios or Proportions.

Step 1: Calculate the ratio for the measure for the CLEC that would yield the Critical Z-value. Use the same denominator as the one used in calculating the Z-statistic for the measure.

Step 2: Calculate the percentage difference between the actual ratio for the CLEC and the calculated ratio.

Step 3: Multiply the total number of data points by the percentage calculated in the previous step and the per occurrence dollar amount taken from the Liquidated Damages Table to determine the applicable liquidated damages for the given month for that measure.

12.2 Tier Two Liquidated Damages

12.2.1 Determine the Tier-2 measurement results, such as High, Medium, or Low that are non-compliant for three consecutive months for all CLECs, or individual CLEC if the measure is not reported for all CLECs.

If the non-compliant classification continues for three consecutive months, an additional assessment will apply in the third month and in each succeeding month as calculated below, until SWBT reports performance that meets the applicable criterion. That is, Tier-2 assessments will apply on a "rolling three month" basis, one assessment for the average number of occurrences for months 1-3, one assessment for the average number of occurrences for months 2-4, one assessment for the average number of occurrences for months 3-5, and so forth, until satisfactory performance is established.

12.2.2 Measures for Which the Reporting Dimensions are Averages or Means.

Step 1: Calculate the average or the mean for the measure for the CLEC that would yield the Critical Z-value for the third consecutive month. Use the same denominator as the one used in calculating the Z-statistic for the measure. (For benchmark measures, calculate the value that would yield the Critical Z-value by adding or subtracting the Critical Z-value to the benchmark as appropriate, subject to 4.0 and the Business Rules.).

Step 2: Calculate the percentage difference between the actual average and the calculated average for the third consecutive month.

Step 3: Multiply the total number of data points by the percentage calculated in the previous step. Calculate the average for three months and multiply the result by $500, $300, and $200 for Measures that are designated as High, Medium, and Low respectively; to determine the applicable assessment payable to the Texas State Treasury for that measure.

12.2.3 Measures for Which the Reporting Dimensions are Percentages.

Step 1: Calculate the percentage for the measure for the CLEC that would yield the Critical Z-value for the third consecutive month. Use the same denominator as the one used in calculating the Z-statistic for the measure. (For benchmark measures, calculate the value that would yield the critical Z-value by adding or subtracting the Critical Z-value to the benchmark as appropriate, subject to 4.0 and the Business Rules.).

Step 2: Calculate the difference between the actual percentage for the CLEC and the calculated percentage for each of the three non-compliant months.

Step 3: Multiply the total number of data points for each month by the difference in percentage calculated in the previous step. Calculate the average for three months and multiply the result by $500, $300, and $200 for measures that are designated as High, Medium, and Low respectively; to determine the applicable assessment for that measure.

12.2.4 Measures for Which the Reporting Dimensions are Ratios or Proportions.

Step 1: Calculate the ratio for the measure for the CLEC that would yield the Critical Z-value for the third consecutive month. Use the same denominator as the one used in calculating the Z-statistic for the measure. (For benchmark measures, calculate the value that would yield the Critical Z-value by adding or subtracting the Critical Z-value to the benchmark as appropriate, subject to 4.0 and the Business Rules.).

Step 2: Calculate the percentage difference between the actual ratio for the CLEC and the calculated ratio for each month of the non-compliant three-month period.

Step 3: Multiply the total number of service orders by the percentage calculated in the previous step for each month. Calculate the average for three months and multiply the result by $500, $300, and $200 for measures that are designated as High, Medium, and Low respectively; to determine the applicable assessment for that measure.

13.0 **This Section Intentionally Left Blank**

14.0 Attached hereto, and incorporated herein by reference, are the following Appendices:

Appendix 1: Measurements Subject to Per Occurrence Damages or Assessment with a Cap and Measurements Subject to Per Measure Damages or Assessment

Appendix 2: Performance Measures Subject to Tier-1 and Tier-2 Damages Identified as High, Medium and Low

Appendix 3: Performance Measurement Business Rules (Version 1.6)

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
I. RESALE POTS, RESALE SPECIALS AND UNES						
A. Pre-Ordering/Ordering						
1. Average Response Time For OSS Pre-Order Interfaces.	✓	-	-	-	X	-
2. Percent Response recived within "X" Seconds	✓	-	-	-	X	-
3. EASE Average Response Time	-	-	-	-	-	-
4. OSS Interface Availability	-	-	-			X
5. % Firm Order Confirmations (FOCs) Received Within "X" Hours	✓	-	-		X	-
6. Average Time To Return FOC	-	-	-			-
7. Percent Mechanized Completions Returned Within 1 Hour	✓	-	-			-
8. Average Time to Return Mechanized Completions	✓	-	-			-
9. Percent Rejects	-	-	-			-
10. Percent Mechanized Rejects Returned Within 1 Hour of EDI/LASR	✓	-	-			-
11. Mean Time to Return Mechanized Rejects	-	-	-			-
12. Mechanized Provisioning Accuracy	✓	-	-	X		-
13. Order Process Percent Flow Through	✓	-	-			X
B. Billing						
14. Billing Accuracy	-	-	-	-	-	-
15. Percent of Accurate And Complete Formatted Mechanized Bills	✓	-	-	-	-	X
16. Percent Of Billing Records Transmitted Correctly	✓	-	-	-	-	-
17. Billing Completeness	✓	-	-	-	X	-
18. Billing Timeliness (Wholesale Bill)	✓	-	-	-	-	X
19. Daily Usage Feed Timeliness	-	-	-	-	-	-
20. Unbillable Usage	-	-	-	-	-	-
C. Miscellaneous Administrative						
21. LSC Average Speed Of Answer	-	-	-	-	-	-
22. LSC Grade Of Service (GOS)	-	-	-	-	-	X
23. Percent Busy in the Local Service Center	-	-	-	X	-	-
24. LOC Average Speed Of Answer	-	-	-	-	-	-

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
25. LOC Grade Of Service (GOS)	-	-	-	-	-	X
26. Percent Busy in the LOC	-	-	-	X	-	-
II. RESALE POTS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT						
A. Provisioning						
27. Mean Installation Interval	-	-	✓	-	-	X
28. Percent Installations Completed Within "X" Business Days (POTS)	-	-	-	-	-	-
29. Percent SWBT Caused Missed Due Dates	-	-	✓	-	-	X
30. Percent Company Missed Due Dates Due To Lack Of Facilities	✓	-	-	-	-	-
31. Average Delay Days For Missed Due Dates Due To Lack Of Facilities	-	-	-	-	-	-
32. Average Delay Days For SWBT Missed Due Dates	-	✓	-	-	-	-
33. Percent SWBT Caused Missed Due Dates greater than 30 days	✓	-	-	-	-	-
34. Count of orders canceled after the due date which were caused by SWBT	-	-	-	-	-	-
35. Percent Trouble Reports Within 10 Days (I-10) Of Installation	-	-	✓	-	-	X
36. Percent No Access (Trouble Reports With no Access)	-	-	-	-	-	-
B. Maintenance						
37. Trouble Report Rate	-	-	✓	-	-	X
38. Percent Missed Repair Commitments	-	-	✓	-	-	X
39. Receipt To Clear Duration	-	-	✓	-	-	X
40. Percent Out Of Service (OOS) < 24 Hours	-	✓	-	-	-	-
41. Percent Repeat Reports	-	-	✓	-	-	X
42. Percent No Access (% of Trouble reports with No Access)	-	-	-	-	-	-

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
III. RESALE SPECIALS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT						
A. Provisioning						
43. Average Installation Interval	-	-	✓	-	-	X
44. Percent Installations Completed Within "X" Business Days	-	-	-	-	-	-
45. Percent SWBT Caused Missed Due Dates	-	-	✓	-	-	X
46. Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) Of Installation	-	-	✓	-	-	X
47. Percent Missed Due Dates Due To Lack Of Facilities	✓	-	-	-	-	-
48. Delay Days For Missed Due Dates Due To Lack Of Facilities	-	-	-	-	-	-
49. Delay Days For SWBT Missed Due Dates	-	✓	-	-	-	-
50. Percent SWBT Caused Missed Due Dates greater than 30 days	✓	-	-	-	-	-
51. Count of orders canceled after the due date which were caused by SWBT	-	-	-	-	-	-
B. Maintenance						
52. Mean Time To Restore	-	-	✓	-	-	X
53. Percent Repeat Reports	-	-	✓	-	-	X
54. Failure Frequency	✓	-	-	-	-	-
IV. UNBUNDLED NETWORK ELEMENTS (UNES)						
A. Provisioning						
55. Average Installation Interval	-	-	-	-	-	-
56. Percent Installations Completed Within "X" Business Days	-	-	✓	-	-	X
57. Average Respones time for Loop Make-up Information	✓	-	-	-	X	-
58. Percent SWBT Caused Missed Due Dates	-	-	✓	-	-	X
59. Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) Of Installation	-	-	✓	-	-	X
60. Percent Missed Due Dates Due To Lack Of Facilities	✓	-	-	-	-	-
61. Average Delay Days For Missed Due Dates Due To Lack Of Facilities	-	-	-	-	-	-
62. Average Delay Days For SWBT Missed Due Dates	-	✓	-	-	-	-

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
63. Percent SWBT Caused Missed Due Dates greater than 30 days	✓	-	-	-	-	-
64. Count of orders canceled after the due date which were caused by SWBT	-	-	-	-	-	-
B. Maintenance						
65. Trouble Report Rate	-	-	✓	-	-	X
66. Percent Missed Repair Commitments	-	-	✓	-	-	X
67. Mean Time To Restore	-	-	✓	-	-	X
68. Percent Out Of Service (OOS) < "X" Hours	-	✓	-	-	-	-
69. Percent Repeat Reports	-	-	✓	-	-	X
V. INTERCONNECTION TRUNKS						
70. Percent Trunk Blockage	-	-	✓	-	-	X
71. Common Transport Trunk Blockage	-	-	-	-	-	X
72. Distribution Of Common Transport Trunk Groups Exceeding 2%	-	-	-	-	-	-
73. Percent Missed Due Dates	-	✓	-	-	-	-
74. AverageDelay Days For Missed Due Dates	✓	-	-	-	-	-
75. Percent SWBT Caused Missed Due Dates greater than 30 days	✓	-	-	-	-	-
76. Average Trunk Restoration Interval	✓	-	-	-	-	-
77. Average Trunk Restoration Interval for Service Affecting Trunk Groups	-	-	✓	-	-	X
78. Average Interconnection Trunk Installation Interval	-	-	✓	-	-	X
VI. DIRECTORY ASSISTANCE (DA) AND OPERATOR SERVICES (OS)						
79. Directory Assistance Grade Of Service	-	-	-	-	-	-
80. Directory Assistance Average Speed Of Answer	-	-	-	X	-	-
81. Operator Services Grade Of Service	-	-	-	-	-	-
82. Operator Services Average Speed Of Answer	-	-	-	X	-	-
83. Percent Calls Abandoned	-	-	-	-	-	-
84. Percent Calls Deflected	-	-	-	-	-	-
85. Average Work Time	-	-	-	-	-	-

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
86. Non-Call Busy Work Volumes	-	-	-	-	-	-
VII. INTERIM NUMBER PORTABILITY (INP)						
87. % Installation Completed Within "x" (3, 7, 10) Business Days		-	-	-	-	-
88. Average INP Installation Interval	✓	-	-	-	-	-
89. Percent INP I-Reports Within 30 Days	-	✓	-	-	-	-
90. Percent Missed Due Dates	-	✓	-	-	-	-
Vii LOCAL NUMBER PORTABILITY (LNP)						
91. Percent LNP Due Dates within Industry Guide Lines	-	-	-	-	-	-
92. Percent of time the old service Provider Releases Subscription prior to the expiration of the second 9 hour timer	-	-	-	-	-	-
93. Percent of customer account restructured prior to LNP Due Dates	✓	-	-	-	-	-
94. Percent FOCs received within "X": hours	✓	-	-	-	X	-
95. Average Response time for Non-mechanized Rejects returned with complete and accurate codes	✓	-	-	-	-	-
96. Percent premature Disconnects for LNP Orders	✓	-	-	-	-	-
97. Percent of Time SWBT applies the 10-digit trigger prior to the LNP Order Due date.	-	-	✓	-	-	X
98. Percent LNP I-Reports in 10 days	-	-	✓	-	-	X
99. Average Delay Days for SWBT Missed Due Dates.	-	✓	-	-	X	-
100. Average Time of out of service for LNP conversions	-	-	✓	-	-	X
101. Percent Out of Service < 60 Minutes	-	✓	-	-	X	-

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
VIII. 911						
102. Average Time To Clear Errors	✓	-	-	-	-	-
103. % accuracy for 911 database updates	✓	-	-	-	-	-
104. Average Time Required to Update 911 Database (Facility Based Providers)	✓	-	-	-	-	-
IX. POLES, CONDUIT AND RIGHTS OF WAY						
105. % of requests processed within 35 days	✓	-	-	-	-	-
106. Average Days Required to Process a Request	-	-	-	-	-	-
X. COLLOCATION						
107. % Missed Collocation Due Dates	-	-	✓	-	-	X
108. Average Delay Days For SWBT Missed Due Dates	✓	-	-	-	-	-
109. % of requests processed within ***the tariffed timelines***	✓	-	-	-	-	-
XI. DIRECTORY ASSISTANCE DATABASE						
110. % of updates completed into the DA Database within 72 Hours for facility based CLECs	✓	-	-	-	-	-
111. Average Update Interval for DA database for facility based CLECs	✓	-	-	-	-	-
112. % DA Database Accuracy For Manual Updates	✓	-	-	-	-	-
113. % of electronic updates that flow through the DSR process without manual intervention	✓	-	-	-	-	-

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
XII. COORDINATED CONVERSIONS						
114. % Pre-mature disconnects (Coordinated Cutovers)	-	-	✓	-	-	X
115. % SWBT caused delayed Coordinated Cutovers	✓	-	-	-	-	-
116. % Missed mechanized INP conversions	-	✓	-	-	-	-
XIII. NXX						
117. % NXXs loaded and tested prior to the LERG effective date	-	-	✓	-	-	X
118. Average Delay Days for NXX loading and testing	✓	-	-	-	-	-
119. Mean Time to Repair	-	-	✓	-	-	X
XIV. BONA FIDE REQUEST PROCESS (BFRs)						
120. % of requests processed within 45 business days	-	-	-	-	-	-
121. % Quotes Provided for Authorized BFRs within 30 business days	-	-	✓	-	-	X
Total	**40**	**11**	**30**	**5**	**8**	**37**

September 28, 1999

Priscilla Hill-Ardoin
Senior Vice President-FCC
SBC Telecommunications, Inc.
1401 I Street, N.W.
Suite 1100
Washington, D.C. 20005

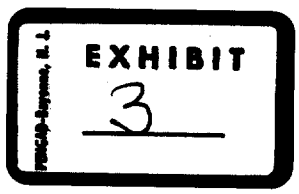
Dear Ms. Hill-Ardoin:

On August 31, 1999, members of the Common Carrier Bureau staff met with representatives from Southwestern Bell Telephone ("SWBT") to discuss SWBT's proposed voluntary enforcement mechanism, the "Performance Remedy Plan" (the "Plan"), which is designed to deter poor performance in the provision of resale services and unbundled network elements to competitors. The Plan was developed through a collaborative process in Texas in conjunction with a proceeding addressing SWBT's application for authority to provide in-region, interLATA services under section 271 of the Telecommunications Act. We appreciate and commend the work of the Texas Public Utilities Commission, in conjunction with SWBT and other participating parties, in developing the Plan. We share the Texas Public Utilities Commission's goal of ensuring that SWBT's performance will not deteriorate after the company receives section 271 authorization, and believe the Plan represents a critical step in this direction.

I would like to take this opportunity to summarize the Bureau's concerns, as expressed by the staff at the August 31st meeting. These views represent the current thinking of the Common Carrier Bureau and are in no way binding on the Commission. Any final determination concerning the merits of this performance plan will be made based on the record in the section 271 application for Texas. It is my hope, however, that the Bureau's views on these issues will provide useful guidance to you and other Bell Operating Companies in formulating successful section 271 applications.

1. Exclusion Of CLECs From The Plan's Tier 2 Mechanisms

The Bureau is concerned that the Plan's "Tier 2" mechanism will address SWBT's performance only with respect to a sub-set of competitive local exchange carriers ("CLECs") operating in Texas, rather than all CLECs, and thus will inadequately protect the competitive marketplace as a whole. The Plan contains two levels of incentive mechanisms. First, Tier 1 addresses SWBT performance with respect to individual CLECs, providing for SWBT payments to a particular CLEC when an out-of-



parity result occurs. Tier 1 would replace any existing liquidated damages provisions in a CLEC's interconnection agreement with SWBT. Second, Tier 2 addresses SWBT performance with respect to all CLECs in the aggregate, providing for SWBT payments to the Texas state treasury when an out-of-parity result occurs. SWBT has proposed making the Plan available to CLECs in Texas as an attachment to its Proposed Interconnection Agreement. A CLEC wishing to participate in the Plan would be required to "opt into" this attachment. As currently proposed, only performance data associated with those CLECs that decide to opt into the Plan (and thereby agree to replace their negotiated liquidated damages provisions with the Tier 1 remedies) would be included in the Tier 2 mechanism.

The Bureau is seriously concerned that the exclusion from the Tier 2 performance mechanism of CLECs that choose not to opt into the Plan could substantially weaken the important deterrent effect of this aspect of the Plan. Indeed, if several CLECs decide not to opt into the new enforcement plan, then the protections offered to competition by Tier 2 on paper may not be realized in practice. Specifically, excluding any CLEC from Tier 2 would necessarily decrease the number of data observations. Because the payments under Tier 2 for most measurements are calculated on a "per-occurrence" basis, the exclusion of CLECs not opting into the Plan, and their corresponding "occurrences," could substantially reduce the amounts at stake under Tier 2 in the event SWBT fails to achieve the performance standards. Accordingly, staff suggested that Tier 2 should address SWBT's performance with respect to all CLECs operating in the state. The Bureau is aware of no operational reason for excluding from the Tier 2 incentive structure those CLECs that choose to retain their own negotiated liquidated damages provisions. In fact, SWBT indicated to Bureau staff that it already collects performance data for all CLECs, and will continue to do so after receiving section 271 authorization, regardless of whether certain CLECs decide not to opt into the Plan.

2. Caps on Liability for Poor Performance

The Bureau is also concerned that the $120 million annual cap on SWBT's potential payments for poor performance under the Plan may be too low to foster parity performance in a market the size of Texas. In particular, the Bureau believes that the potential liability under such a plan must be high enough that an incumbent could not rationally conclude that making payments under an enforcement plan is an acceptable price to pay for hindering or blocking competition.

As a first step, the Bureau urges SWBT to consider increasing the $120 million cap on payments under its plan. When viewed as a percentage of SWBT's in-state gross local revenues (approximately 2.19%), this amount of potential liability may be insufficient to provide the assurances discussed above. As a second step, we emphasize that SWBT must justify whatever cap is finally proposed. The Bureau is open to considering whether there is a reasoned basis for concluding that the proposed annual cap of $120 million would provide adequate incentives for maintaining performance levels. Finally, SWBT may wish to consider adding some form of a "procedural cap" to its Plan, under which an administrative proceeding to identify and correct performance problems

would be instituted automatically after payments under the Plan reach a pre-determined amount during the course of a year.

3. Adequate Incentive Payments Associated With Low-Volume Services

The Bureau is concerned that the Plan may not offer adequate protection for nascent, low-volume services (particularly, innovative "advanced services"), as opposed to services with higher CLEC volumes. The reason for this is imbedded in the design of the plan. The vast majority of performance measurements under the current plan provide for payments calculated on a per-occurrence basis. For such measurements, payments would reach substantial and meaningful levels when the number of out-of-parity occurrences is high – that is, when a measurement is considerably out-of-parity for a service with high volumes, such as Resale POTS service. The converse also is true: payments necessarily will be small for low-volume services because the number of occurrences will be low, even if a CLEC suffers seriously degraded service. Competition could be significantly affected by poor incumbent LEC performance in providing specialty services used by small CLECs, or nascent services (particularly, innovative "advanced services") that have not yet achieved high commercial volumes.

We hope that this letter will be useful to your company in preparing a successful section 271 application. We emphasize, however, that, while this letter sets forth the Bureau's major existing concerns about SWBT's performance assurance plan, it is likely that additional concerns will arise in the context of other section 271 proceedings. Also, any final determinations regarding this proposed Plan will be made by the Commission based on the record of SWBT's 271 application for the State of Texas.

For information purposes, a copy of this letter will be placed in CC Docket No. 98-121[1] and CC Docket No. 98-56.[2]

Sincerely,

Lawrence E. Strickling, Chief
Common Carrier Bureau
Federal Communications Commission

cc: Ms. Magalie Roman Salas
Secretary
Federal Communications Commission

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[1] Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121, Memorandum Opinion and Order, 13 FCC Rcd 20599 (1998).

[2] Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998).

APPENDIX

MEASUREMENTS SUBJECT TO PER OCCURRENCE DAMAGES OR ASSESSMENT WITH A CAP

MEASUREMENTS SUBJECT TO PER MEASURE DAMAGES OR ASSESSMENT

Measurements That Are Subject To Per Occurrence Damages Or Assessment With A Cap

1 Average Responses time for OSS Preorder Interfaces (1) (Tier-1 - Low, Tier-2 - Med.)
2 Percent Response received within "X" Seconds (2) (Tier-1 - Low, Tier-2 - Med.)
3 % Firm Order Confirmations (FOCs) Received Within "X" Hours (5) (Tier-1 - Low, Tier-2 – Med.)
4 Order Process Percent Flow Through (13) (Tier-1 - Low, Tier-2 - High)
5 Percent Mechanized Completions Returned Within 1 Hour (7) (Tier-1 - Low, Tier-2 - Low)
6 Mechanized Provisioning Accuracy (12) (Tier-1 - Low, Tier-2 - Low)
7 Percent of Accurate And Complete Formatted Mechanized Bills (15) (Tier-1 - Low, Tier-2 – High)
8 Percent Of Billing Records Transmitted Correctly (16) (Tier-1 - Low, Tier-2 - Low)
9 Billing Completeness (17) (Tier-1 – Low, Tier-2 - Med.)
10 Billing Timeliness (Wholesale Bill) (18) (Tier-1 - Low, Tier-2 - Low)
11 Percent Trunk Blockage (70) (Tier-1 – High, Tier-2 - High)

Measurements That Are Subject To Per Measure Damages Or Assessment

1 % NXXs loaded and tested prior to the LERG effective date (117) (Tier-1 - High, Tier-2 - High)
2 % Quotes Provided for Authorized BFRs within 30 business days (121) (Tier-1 - High, Tier-2 - High)
3 LSC Grade Of Service (GOS) (22)) (Tier-2 – High)
4 Percent Busy in the Local Service Center (23) (Tier-2 - Low)
5 LOC Grade Of Service (GOS) (25) (Tier-2 – High)
6 Percent Busy in the LOC (26) (Assessment Only) (Tier-2 - Low)
7 Common Transport Trunk Blockage (71) (Tier-2 - High)
8 OSS Interface Availability (4) (Tier-2 – High)

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
I. RESALE POTS, RESALE SPECIALS AND UNES						
A. Pre-Ordering/Ordering						
1. Average Response Time For OSS Pre-Order Interfaces.	✓	-	-	-	X	-
2. Percent Response recived within "X" Seconds	✓	-	-	-	X	-
3. EASE Average Response Time	-	-	-	-	-	-
4. OSS Interface Availability	-	-	-			X
5. % Firm Order Confirmations (FOCs) Received Within "X" Hours	✓	-	-		X	-
6. Average Time To Return FOC	-	-	-			-
7. Percent Mechanized Completions Returned Within 1 Hour	✓	-	-			-
8. Average Time to Return Mechanized Completions	✓	-	-			-
9. Percent Rejects	-	-	-			-
10. Percent Mechanized Rejects Returned Within 1 Hour of EDI/LASR	✓	-	-			-
11. Mean Time to Return Mechanized Rejects	-	-	-			-
12. Mechanized Provisioning Accuracy	✓	-	-	X		-
13. Order Process Percent Flow Through	✓	-	-			X
B. Billing						
14. Billing Accuracy	-	-	-	-	-	-
15. Percent of Accurate And Complete Formatted Mechanized Bills	✓	-	-	-	-	X
16. Percent Of Billing Records Transmitted Correctly	✓	-	-	-	-	-
17. Billing Completeness	✓	-	-	-	X	-
18. Billing Timeliness (Wholesale Bill)	✓	-	-	-	-	X
19. Daily Usage Feed Timeliness	-	-	-	-	-	-
20. Unbillable Usage	-	-	-	-	-	-
C. Miscellaneous Administrative						
21. LSC Average Speed Of Answer	-	-	-	-	-	-
22. LSC Grade Of Service (GOS)	-	-	-	-	-	X
23. Percent Busy in the Local Service Center	-	-	-	X	-	-
24. LOC Average Speed Of Answer	-	-	-	-	-	-

EXHIBIT 5

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
25. LOC Grade Of Service (GOS)	-	-	-	-	-	X
26. Percent Busy in the LOC	-	-	-	X	-	-
II. RESALE POTS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT						
A. Provisioning						
27. Mean Installation Interval	-	-	✓	-	-	X
28. Percent Installations Completed Within "X" Business Days (POTS)	-	-	-	-	-	-
29. Percent SWBT Caused Missed Due Dates	-	-	✓	-	-	X
30. Percent Company Missed Due Dates Due To Lack Of Facilities	✓	-	-	-	-	-
31. Average Delay Days For Missed Due Dates Due To Lack Of Facilities	-	-	-	-	-	-
32. Average Delay Days For SWBT Missed Due Dates	-	✓	-	-	-	-
33. Percent SWBT Caused Missed Due Dates greater than 30 days	✓	-	-	-	-	-
34. Count of orders canceled after the due date which were caused by SWBT	-	-	-	-	-	-
35. Percent Trouble Reports Within 10 Days (I-10) Of Installation	-	-	✓	-	-	X
36. Percent No Access (Trouble Reports With no Access)	-	-	-	-	-	-
B. Maintenance						
37. Trouble Report Rate	-	-	✓	-	-	X
38. Percent Missed Repair Commitments	-	-	✓	-	-	X
39. Receipt To Clear Duration	-	-	✓	-	-	X
40. Percent Out Of Service (OOS) < 24 Hours	-	✓	-	-	-	-
41. Percent Repeat Reports	-	-	✓	-	-	X
42. Percent No Access (% of Trouble reports with No Access)	-	-	-	-	-	-

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
III. RESALE SPECIALS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT						
A. Provisioning						
43. Average Installation Interval	-	-	✓	-	-	X
44. Percent Installations Completed Within "X" Business Days	-	-	-	-	-	-
45. Percent SWBT Caused Missed Due Dates	-	-	✓	-	-	X
46. Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) Of Installation	-	-	✓	-	-	X
47. Percent Missed Due Dates Due To Lack Of Facilities	✓	-	-	-	-	-
48. Delay Days For Missed Due Dates Due To Lack Of Facilities	-	-	-	-	-	-
49. Delay Days For SWBT Missed Due Dates	-	✓	-	-	-	-
50. Percent SWBT Caused Missed Due Dates greater than 30 days	✓	-	-	-	-	-
51. Count of orders canceled after the due date which were caused by SWBT	-	-	-	-	-	-
B. Maintenance						
52. Mean Time To Restore	-	-	✓	-	-	X
53. Percent Repeat Reports	-	-	✓	-	-	X
54. Failure Frequency	✓	-	-	-	-	-
IV. UNBUNDLED NETWORK ELEMENTS (UNES)						
A. Provisioning						
55. Average Installation Interval	-	-	-	-	-	-
56. Percent Installations Completed Within "X" Business Days	-	-	✓	-	-	X
57. Average Respones time for Loop Make-up Information	✓	-	-	-	X	-
58. Percent SWBT Caused Missed Due Dates	-	-	✓	-	-	X
59. Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) Of Installation	-	-	✓	-	-	X
60. Percent Missed Due Dates Due To Lack Of Facilities	✓	-	-	-	-	-
61. Average Delay Days For Missed Due Dates Due To Lack Of Facilities	-	-	-	-	-	-
62. Average Delay Days For SWBT Missed Due Dates	-	✓	-	-	-	-

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
63. Percent SWBT Caused Missed Due Dates greater than 30 days	✓	-	-	-	-	-
64. Count of orders canceled after the due date which were caused by SWBT	-	-	-	-	-	-
B. Maintenance						
65. Trouble Report Rate	-	-	✓	-	-	X
66. Percent Missed Repair Commitments	-	-	✓	-	-	X
67. Mean Time To Restore	-	-	✓	-	-	X
68. Percent Out Of Service (OOS) < "X" Hours	-	✓	-	-	-	-
69. Percent Repeat Reports	-	-	✓	-	-	X
V. INTERCONNECTION TRUNKS						
70. Percent Trunk Blockage	-	-	✓	-	-	X
71. Common Transport Trunk Blockage	-	-	-	-	-	X
72. Distribution Of Common Transport Trunk Groups Exceeding 2%	-	-	-	-	-	-
73. Percent Missed Due Dates	-	✓	-	-	-	-
74. AverageDelay Days For Missed Due Dates	✓	-	-	-	-	-
75. Percent SWBT Caused Missed Due Dates greater than 30 days	✓	-	-	-	-	-
76. Average Trunk Restoration Interval	✓	-	-	-	-	-
77. Average Trunk Restoration Interval for Service Affecting Trunk Groups	-	-	✓	-	-	X
78. Average Interconnection Trunk Installation Interval	-	-	✓	-	-	X
VI. DIRECTORY ASSISTANCE (DA) AND OPERATOR SERVICES (OS)						
79. Directory Assistance Grade Of Service	-	-	-	-	-	-
80. Directory Assistance Average Speed Of Answer	-	-	-	X	-	-
81. Operator Services Grade Of Service	-	-	-	-	-	-
82. Operator Services Average Speed Of Answer	-	-	-	X	-	-
83. Percent Calls Abandoned	-	-	-	-	-	-
84. Percent Calls Deflected	-	-	-	-	-	-
85. Average Work Time	-	-	-	-	-	-

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
86. Non-Call Busy Work Volumes	-	-	-	-	-	-
VII. INTERIM NUMBER PORTABILITY (INP)						
87. % Installation Completed Within "x" (3, 7, 10) Business Days		-	-	-	-	-
88. Average INP Installation Interval	✓	-	-	-	-	-
89. Percent INP I-Reports Within 30 Days	-	✓	-	-	-	-
90. Percent Missed Due Dates	-	✓	-	-	-	-
Vii LOCAL NUMBER PORTABILITY (LNP)						
91. Percent LNP Due Dates within Industry Guide Lines	-	-	-	-	-	-
92. Percent of time the old service Provider Releases Subscription prior to the expiration of the second 9 hour timer	-	-	-	-	-	-
93. Percent of customer account restructured prior to LNP Due Dates	✓	-	-	-	-	-
94. Percent FOCs received within "X": hours	✓	-	-	-	X	-
95. Average Response time for Non-mechanized Rejects returned with complete and accurate codes	✓	-	-	-	-	-
96. Percent premature Disconnects for LNP Orders	✓	-	-	-	-	-
97. Percent of Time SWBT applies the 10-digit trigger prior to the LNP Order Due date.	-	-	✓	-	-	X
98. Percent LNP I-Reports in 10 days	-	-	✓	-	-	X
99. Average Delay Days for SWBT Missed Due Dates.	-	✓	-	-	X	-
100. Average Time of out of service for LNP conversions	-	-	✓	-	-	X
101. Percent Out of Service < 60 Minutes	-	✓	-	-	X	-

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
VIII. 911						
102. Average Time To Clear Errors	✓	-	-	-	-	-
103. % accuracy for 911 database updates	✓	-	-	-	-	-
104. Average Time Required to Update 911 Database (Facility Based Providers)	✓	-	-	-	-	-
IX. POLES, CONDUIT AND RIGHTS OF WAY						
105. % of requests processed within 35 days	✓	-	-	-	-	-
106. Average Days Required to Process a Request	-	-	-	-	-	-
X. COLLOCATION						
107. % Missed Collocation Due Dates	-	-	✓	-	-	X
108. Average Delay Days For SWBT Missed Due Dates	✓	-	-	-	-	-
109. % of requests processed within ***the tariffed timelines***	✓	-	-	-	-	-
XI. DIRECTORY ASSISTANCE DATABASE						
110. % of updates completed into the DA Database within 72 Hours for facility based CLECs	✓	-	-	-	-	-
111. Average Update Interval for DA database for facility based CLECs	✓	-	-	-	-	-
112. % DA Database Accuracy For Manual Updates	✓	-	-	-	-	-
113. % of electronic updates that flow through the DSR process without manual intervention	✓	-	-	-	-	-

APPENDIX

PERFORMANCE MEASURES SUBJECT TO TIER-1 AND TIER-2 DAMAGES IDENTIFIED AS HIGH, MEDIUM AND LOW

Performance Measures	Measurement Groups Subject to Tier-1 Damages			Measurement Groups Subject to Tier-2 Assessments		
	Low	Med	High	Low	Med	High
XII. COORDINATED CONVERSIONS						
114. % Pre-mature disconnects (Coordinated Cutovers)	-	-	✓	-	-	X
115. % SWBT caused delayed Coordinated Cutovers	✓	-	-	-	-	-
116. % Missed mechanized INP conversions	-	✓	-	-	-	-
XIII. NXX						
117. % NXXs loaded and tested prior to the LERG effective date	-	-	✓	-	-	X
118. Average Delay Days for NXX loading and testing	✓	-	-	-	-	-
119. Mean Time to Repair	-	-	✓	-	-	X
XIV. BONA FIDE REQUEST PROCESS (BFRs)						
120. % of requests processed within 45 business days	-	-	-	-	-	-
121. % Quotes Provided for Authorized BFRs within 30 business days	-	-	✓	-	-	X
Total	**40**	**11**	**30**	**5**	**8**	**37**