

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

Ameritech Michigan’s submission on performance)
 measurements, reporting, and benchmarks in)
 compliance with the October 2, 1998 Order in) Case No. U-11830
 MPSC Case No. U-11654)
 _____)

AT&T AND CORECOMM'S PROPOSED PERFORMANCE MEASUREMENTS

I. INTRODUCTION

AT&T Communications of Michigan, Inc. and TCG Detroit (collectively, “AT&T”), and CoreComm Michigan, Inc. (“CoreComm”) are proposing that the Michigan Public Service Commission (“Commission”) adjudicate certain undecided performance measurement issues. While the parties to the collaborative reached agreement over the vast majority of the disputed issues, limited areas of disagreement remain.

AT&T and CoreComm are proposing that the Commission address particular issues, as is discussed below. It should be noted, however, that to the extent that other competitive local exchange carriers (“CLECs”) raise other performance measurement issues, the fact that AT&T and CoreComm do not affirmatively discuss those here does not constitute disagreement with the position of other CLECs on the appropriateness of particular performance measurements.

In addition to the discussion below of the disputed issues, attached are AT&T and CoreComm’s proposed performance measurements. These attached measures should be part of the joint filing.

II. DISPUTED ISSUES

A. Provisioning Issues

Disputed Issue 1: Performance Measure 55.2, Average Installation Interval for Loop with Local Number Portability ("LNP"). The interval begins when a correct order is received by SBC/Ameritech, and ends with the successful installation of the Loop with Local Number Portability.

The parties have agreed to use Measure 55.2, developed in Texas during their initial six-month review, which concluded during the Michigan collaborative sessions. However, in the context of the Michigan collaborative, SBC/Ameritech has proposed a change from the Texas benchmarks. The Texas benchmarks are reasonable, and Ameritech has provided no good reason to deviate from them in Michigan. The Texas benchmarks for Measure 55.2 are utilized in Missouri, Oklahoma, Kansas, Arkansas, California, and Nevada.

From the very outset of this collaborative process, the participants have used the performance measures ordered by the commission in Case No. U-11830. The collaborative participants agreed to assess the feasibility of using the performance measures developed in Texas as part of the Southwestern Bell Telephone Company ("SWBT") 271 docket in combination with the already ordered Michigan measures. The collaborative participants agreed to a list of Michigan and Texas performance measures.

Consistent with this process, the CLECs have utilized the Southwestern Bell Telephone Company ("SWBT") Texas loop with LNP provisioning ("Hot Cut") process as a template for developing the Hot Cut process for SBC/Ameritech. The Hot Cut process collaborative was initiated in Wisconsin as part of the A-AA issues. During the Hot Cut collaborative negotiations in Wisconsin, SBC/Ameritech determined that it required a 5 day interval to support the Hot Cut process, with the assumption that any order over 24 lines would be treated as a project, necessitating negotiations between the parties to obtain a committed due date for service installation. Importantly, the designation of a particular order as a "project" places it outside the set of orders tracked by the performance measures and subject to penalties.

SBC/Ameritech's proposed intervals are at odds with the intervals contained in the Texas Hot Cut measure. Specifically, the Texas Hot Cut measure provides for 3 days provisioning interval for loop/LNP orders of 1-10 lines, 8 days for 11-20 lines, and 11 days for CLEC orders over 20 lines. Indeed, SBC/Ameritech utilizes a three-day Hot Cut provisioning interval in the other SBC states (California, Nevada, Missouri, Oklahoma, Kansas, and Arkansas).

In addition to attempting to change the interval for smaller loop/LNP orders from three to five days, SBC/Ameritech has also proposed that the CLECs accept a cap of 50 lines for the 11 day interval (i.e., an order with more than 50 lines would be considered a project). The CLECs agreed, provided that SBC/Ameritech would use the three-day interval for orders of 1-10 lines, consistent with their practice in all other SBC states. SBC/Ameritech then withdrew its proposal.

As SBC/Ameritech has offered no alternative proposal, AT&T and CoreComm request that the Commission order SBC/Ameritech to implement Texas measure 55.2 as currently in place in Texas. The interval contained in this measure represents an SBC/Ameritech "best practice" that should inure to the benefit of Michigan CLECs and their customers

D. Trunking Issues

Disputed Issue 213: PM 70 Percentage of Trunk Blockage

Measure 70 measures the total number of calls blocked in the state of Michigan. The benchmark for this measure is less than 1% of calls blocked per month.

Measure 70 is the Trunk Blocking measure used in Texas. The business rules in this measure add all of the calls traveling over all of the trunks in the state of Michigan, then divides that number by the total number of blocked calls. The result is the percent of calls blocked. However, the benchmark is based on an industry standard that requires less than 1% blocking on

any given trunk group. The Texas measure controverts the intent of the industry standard by lumping all trunk groups and all traffic together. This process is not appropriate, nor is it an informative method to measure blocked call traffic.

AT&T and CoreComm propose altering the measure to more accurately reflect trunk group blocking. AT&T and CoreComm's proposed measure calculates the number of trunk groups with more than 1% call blocking. AT&T and CoreComm request that the Commission approve its recommended measure #70.

E. LNP Issues

Disputed Issue 314: Performance Measure 91, Percentage of LNP Only Due Dates within Industry Guidelines.

Measure 91 measures the percentage of Local Number Portability (LNP) only orders that are completed within the industry guideline (set by NANC) of 3 business days for central offices where LNP has been implemented (which is all in the SBC/Ameritech offices).

The Texas measure defines a "project" as an LNP Only order greater than 30 lines (and therefore is not subject to the three day interval). AT&T and CoreComm ask that a project be defined as more than 99 lines in a single order.

AT&T and CoreComm have asked SBC/Ameritech to change the definition of a project in Measure 91 to orders with greater than 99 lines, instead of the current Texas definition of orders with greater than 30 lines. As noted, Measure 91 relates to LNP-only orders. These orders are related to instances where a CLEC is providing service to a customer entirely through its own facilities. Thus, the CLEC is only requesting that the customer's telephone number be transferred from SBC/Ameritech to the CLEC. At this time, LNP-only orders generally involve larger business customers. For these large customers, it may make economic sense for the CLEC to provide service to those customers entirely through its own facilities. Thus, these types of orders usually include a large number of phone lines, many times over 30 lines.

SBC/Ameritech's proposal would lessen the strength of this measure as it would drop all LNP orders to over 30 lines outside this performance measure. All orders over 30 lines would be considered a "project" necessitating that the CLEC negotiate with SBC/Ameritech to retain a committed provisioning date. Obviously, to the extent SBC/Ameritech is able to remove large quantities of LNP orders outside of this performance measure and its associated damages, its incentive to service these orders on an expedited basis greatly diminishes. Moreover, LNP-only orders are not difficult for SBC/Ameritech to process in large quantities since they are processed entirely electronically (they only necessitate a computer change to reflect that the customer's phone number is being provided by the CLEC as opposed to Ameritech). This fact makes the AT&T and CoreComm proposal of a 99 line "project" threshold all the more reasonable. Indeed, SBC's subsidiary Pacific Bell uses a 99 line threshold to define a "project." SBC/Ameritech has failed to provide any reason why it should not use the PAC Bell threshold in Michigan. This is a "best practice" that should be imported to Michigan.

F. E911 Issues

Disputed Issue 415: Measurement 104.1 (Average time to unlock 911 record for ported telephone number)

Measurement 104.1 would measure the average time it takes to unlock the 911 record to allow the NENA record to be claimed and updated by the CLEC for LNP orders.

AT&T and CoreComm believe that this measurement should be implemented as soon as possible, while Ameritech agrees that 911 record unlock is an important process, it does not want to include this measurement at this time due to process issues and timing. Ameritech is willing to continue to examine the issue.

When a CLEC migrates a new customer onto its system and obtains that customer's previous telephone number through local number portability (LNP), the CLEC is responsible for updating the customer's record in the NENA database, which is used to provide accurate E-911

information to the relevant 911 system administrators. The NENA database contains a "lock" on its records that must be removed before a CLEC can submit updated information concerning a customer's 911 information. It is the responsibility of the LEC surrendering the ported telephone number to send a request to the NENA to "unlock" that customer's record so that the new carrier (the carrier to which the number has been ported) may update the information contained in that record. Once a CLEC wins a customer from an ILEC, that customer's 911 information becomes the responsibility of the CLEC. Accurate 911 records are critical to the operation of the 911 system.

CLECs have experienced problems with Ameritech lifting the lock on the NENA records in a timely manner. Often, it requires a substantial amount of additional manual intervention with both Ameritech and the NENA to obtain a release of the lock. This adds considerable additional time and expense to the provisioning process overall.

The attached Measurement 104.1 measures the average time it takes Ameritech to submit an initial unlock message from the time at which an LNP order is completed.

AT&T and CoreComm believe that this is a critical measure due to the critical importance of accurate 911 database information to customers. AT&T and CoreComm request that the Commission order Ameritech to implement this measure in Michigan.

55.2 Measurement (<u>New Measure</u>)
Average Installation Interval for Loop With LNP
Definition:
Average business days from the receipt of an accurate LSR 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:
<ul style="list-style-type: none"> • Specials and Interconnection Trunks • Excludes UNE Combinations 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. X is defined as follows: <ul style="list-style-type: none"> Loop with LNP (1-10) – 4 business days Loop with LNP (11-20) – 8 business days Loop with LNP (21-50) – 11 business days • Excludes customer caused misses • NPAC caused delays unless caused by Ameritech • <u>Orders where CLECs are charged expedite charges</u>
Business Rules:
The start time is the date of the receipt of an accurate LSR. The Completion Date is the day that Ameritech 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.
For partial LNP conversions that require restructuring of customer account:
<ul style="list-style-type: none"> • 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:

Geographic, per State agreements CHC <ul style="list-style-type: none"> • Loop with LNP (1-10) • Loop with LNP (11-20) • Loop with LNP (21-50) Non CHC <ul style="list-style-type: none"> • <u>Loop with LNP (1-10)</u> • <u>Loop with LNP (11-20)</u> • <u>Loop with LNP (21-50)</u> 	
Calculation:	Report Structure:
$\frac{[\sum(\text{completion date} - \text{application date})]}{(\text{Total number of orders completed})}$	Reported for CLEC, all CLECs, and Ameritech Affiliate.
Measurement Type:	
Tier 1 – None Tier 2 – None	
Benchmark:	
Diagnostic	

<p>70. Measurement</p> <p>Percentage of Trunk Blockage (Call Blockage)</p>
<p>Definition:</p> <p>Percentage of trunk groups (TGs) with calls blocked on outgoing traffic from Ameritech end office to CLEC end office, and from Ameritech tandem office to CLEC end office. This measure is evaluated using a three month rolling average of trunk group blockage. (This measure is only valid if a CLEC has 20 or more trunk groups.)</p>
<p>Exclusions:</p> <p>If CLECs have more than 10% of the trunks of a particular TG busied-out for maintenance at their end, that TG will be excluded from that months calculations.</p> <p>A TG may be excluded from the calculations for a particular month if AT&T is found to be not ready for turn-up on the negotiated Due Date in 3 consecutive instances within the month.</p> <p>If CLEC does not take action upon receipt of Trunk Group Service Request (TGSR) or ASR within 3 business days when a Call Blocking situation is identified in a Final Trunk Group by Ameritech or in the timeframe specified in the ICA, (Article 4.3.13) the TG in question may be excluded from the calculations for that particular month.</p> <p>If CLEC fails to provide a forecast for a particular TG, that TG will be excluded from calculations until a forecast is provided.</p> <p>If CLECs actual “trunks required” calculation, as shown by Ameritech from traffic usage studies, is more than 150% of CLEC's forecast for the TG in question, which was delivered to Ameritech 6 months prior, unless a different timeframe is specified in an interconnection agreement., that particular TG may be excluded from the calculations for that particular month.</p> <p>New trunk groups that have not been in service for six months may be excluded from calculations for that 6 month period. Nevertheless, utilization data will be gathered upon turn-up of the TG.</p> <ul style="list-style-type: none"> • The exclusions do not apply if Ameritech fails to timely provide the CLEC with traffic utilization data reasonably required for CLEC to develop its forecast or if Ameritech refused to accept CLEC trunk orders (ASRs or TGSRs) that are within the CLEC’s forecast regardless of what the current usage data is.
<p>Business Rules:</p> <ul style="list-style-type: none"> • Blocked calls and total calls are gathered on all reportable trunk groups during the official 20 day study month. Busy hour statistics are determined for reporting purposes.

Levels of Disaggregation:	
Ameritech end office to CLEC end office. Ameritech tandem to CLEC end office.	
Calculation:	Report Structure:
(# of trunk groups exceeding 1% blocking for each of three consecutive months / total # trunk groups in service).	Reported for CLEC, all CLECs, Ameritech, and Ameritech Affiliates.
Measurement Type:	
Tier-1	High
Tier-2	High
Benchmark:	
99% of trunk groups not exceeding 1% blocking for three consecutive months with no single TG exceeding 1% blocking for more than 1 month.	

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:	
<ul style="list-style-type: none"> • CLEC caused or requested delays. • NPAC caused delays unless caused by Ameritech. • CLEC requested Due Dates outside industry guidelines. 	
Business Rules:	
<p>Industry guidelines for due dates for LNP are as follows:</p> <ul style="list-style-type: none"> • For Offices in which NXXs are previously opened – 3 Business Days. • New NXX – 5 Business days on LNP capable NXX. • Day after new NXX is opened – 4 Business days. <p>The above-noted due dates are from the date of the FOC issuance.</p> <p>For partial LNP conversions that require restructuring of a customer account:</p> <ul style="list-style-type: none"> • 1-30 TNs: The LNP due date intervals will continue to be three business days and five business days from the issuance 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:	
<ul style="list-style-type: none"> • NXXs Complete (1-99 TNs and greater than 99 TNs). • NXXs Partial (1-99 TNs and greater than 99 TNs). 	
Calculation:	Report Structure:
(# of LNP TNs implemented within Industry guidelines ÷ total LNP TNs) *100	Reported for CLEC, all CLECs, and Ameritech Affiliate.
Measurement Type:	
<p>Tier 1 – None</p> <p>Tier 2 – None</p>	
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.

104.1 Measurement (New Measure)	
The average time it takes to unlock the 911 record for an LNPed TN.	
Definition:	
The average time it takes to unlock the 911 record to allow the NENA record to be claimed and updated by the CLEC for LNP orders..	
Exclusions:	
Do not count TNs on the service order that are being disconnected or those remaining with the ILEC. CLEC caused errors or delays	
Business Rules:	
The clock starts on the date of order completion and the clock stops on the date/time when each LNPed TN is sent on the initial 911 unlock message/transaction to the SCC. The clock starts on an order level basis. The clock stops on a LNPed TN basis. The average is based on the number of LNPed telephone numbers where the initial message to unlock the TN is sent to the SCC divided by the total number of LNPed TNs with a completed order.	
Levels of Disaggregation:	
None	
Calculation:	Report Structure:
Sum (SOC Date – date the LNPed only TN’s E911 unlock initial transaction is sent to the SCC) divided by the number of LNPed TNs whose service order has been completed.	Reported for individual CLEC, and all CLECs and SWBT affiliates
Measurement Type:	
Tier 1 – high Tier 2 – high	
Benchmark:	
99% within 5 days of order completion	

