

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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

**JOINT MOTION TO AMEND JULY 17, 2000 ORDER
AND JOINT PETITION FOR COMMISSION RESOLUTION**

I. INTRODUCTION

Pursuant to the collaborative session held on October 9, 2000 in Case No. U-12320 (See generally, Transcript Vol. 32), the undersigned parties respectfully request the Commission to grant the joint motion set forth in section II below and to act on the joint petition set forth in section III below.

II. JOINT MOTION

Pursuant to the Commission's Order Amending Prior Orders of July 17, 2000 in this docket (July 17 Order), AT&T Communications, Inc., BRE Communications, LLC, CoreComm, Horizon Telecommunications, Inc., MCI WorldCom, McLeodUSA, Z-Tel Communications, IP Communications, Rhythms Netconnections, Rhythms Links, XO Michigan, Inc., the CLEC Association of Michigan (collectively, the "CLEC participants"), the Attorney General ("AG"), the Commission Staff, and Michigan Bell Telephone Company d/b/a Ameritech Michigan ("Ameritech Michigan") respectfully move the Commission to amend the

July 17 Order regarding performance measurements and benchmarks in order to conform to agreements reached during Phase 2 of the collaborative workshop on these measures. In support of their joint motion, the parties further state as follows:

A. Background

In the July 17 Order, the Commission granted the Joint Motion of Ameritech Michigan, Staff, the Attorney General and the CLEC participants to modify the performance measurements and benchmarks set forth in the Commission's orders of May 27 and September 3, 1999. The purpose of those modifications was to conform the measurements to agreements reached during Phase 1 of a collaborative workshop among the parties, and to establish a "baseline" for the third-party operations support systems ("OSS") test.

The parties agreed to continue meeting in "Phase 2" collaborative workshops in Michigan and in other states to discuss potential additional performance measurements for these products and services. In the July 17 Order, the Commission expressly acknowledged "the collaborating parties' ongoing commitment to review and propose additional modifications or measurements, as the need arises." The Commission further noted that "Ameritech Michigan has agreed to develop, propose, and implement additional performance measurements for other new product offerings within the timetables established by the collaborative workshop."

The collaborative met on August 2, 24 and 25 and September 15 of this year as part of its Phase II efforts.

To date, the participants in the collaborative workshop have agreed that several of the performance measures referenced in the July 17 Order should be modified. Ameritech

Michigan has also agreed to produce and report new performance measures. Subject to Commission approval of this Joint Motion, Ameritech Michigan will provide advance notice to CLECs at least one month prior to reporting on these modifications and new measures. In aggregate, Ameritech Michigan projects that all modifications to performance measures proposed in the joint motion portion of this filing can be implemented for reporting February 2001 data.¹ The modifications and new measures are summarized below and in the attached Schedules. Schedule 1 describes each measurement referenced in the July 17 Order, the agreed modifications (if any) to that measure from the July 17 Order, pending issues where resolution is being sought from the Commission in the Petition (see below), and pending issues that are still before the collaborative where resolution will be sought, if needed, at the six-month review. Schedule 2 presents a detailed description of the calculations, definitions, business rules, and agreed benchmarks for all of the performance measures, as modified to reflect the agreements described in this motion.

B. Revisions to July 17 Order Requested By Agreement Of The Parties

Upon agreement reached in the collaborative workshop, the parties respectfully move the Commission to modify the performance measurements referenced in the July 17 Order as follows:

To retain Performance Measures 1 and 2 without change from the July 17 Order;

¹ The only exception may be new measurement #1.2. As the collaborative has recognized, this new measurement is still under development for implementation in the Southwestern Bell region and cannot be imported into Ameritech until that work is completed.

To add Performance Measure 1.2 to assess the accuracy of actual loop make-up information;²

To modify measurement categories to include TCNet, AEMS, EDI, EBTA, EBTA-GUI, ARIS and the BOP-GUI (as it is available in Ameritech) to Performance Measure 4 (Interface Availability);

To add measurement categories for the Common Platform Offering (i.e., UNE Platform) and for CIA Centrex to Performance Measures 5 (Percent FOC Returned within “x” hours) and 6 (Average Time to Return FOC) and to reduce the benchmark for orders that are both electronically submitted and electronically processed to 2 hours;

To modify Performance Measure 5 by adding disaggregations to evaluate FOC response time for Interconnection Trunks and Unbundled Local Transport within “x” days.

To add a new measure, Performance Measure 5.1, for the percentage of firm order confirmations on xDSL-capable loops and line sharing returned within “x” hours;

To add a new diagnostic measure, Performance Measure 5.2, for unsolicited 865 transactions;

To add a new measure, Performance Measure 6.1, for average time to return firm order confirmations on DSL service;

To remove the exclusion for “projects” from Performance Measures 7 and 7.1;

To retain Performance Measures 8, 9, 10, 10.1, 10.2, 10.3, 11, 11.1, 11.2, 12, 13, 13.1, 14 through 19, and 21 through 26 without change from the July 17 Order;

² The collaborative has agreed that the implementation of this measure will not delay the OSS test.

To clarify the report structure for Performance Measure 20 (Unbillable Usage) to be based on aggregate of CLEC and retail results;

To further disaggregate the measurement categories for UNE combinations between residence and business, for Performance Measures 27 through 42;

To exclude expedited orders that are paid for, from Performance Measures 27, 43 and 55;

To add a new measurement category for CIA Centrex to Performance Measure 27 and 28;

To modify Performance Measures 27, 43, 55 and 55.1 so that the calculation of business days will include Saturdays, Sundays, and holidays if the order is completed on those days;

To clarify the definition of delay days for Performance Measures 34.1, 51.1 and 64.1 such that the “complete date” will be the “due date”;

To add measurement categories by geographic area to Performance Measure 36 (Percent No Access);

To use Michigan business rules on clock calculations on Performance Measure 40 (Percent Out of Service > 24 hours);

To modify Performance Measure 41 such that a 30-day window is to be used for defining a trouble report as a “repeat” report;

To modify the business rule language on Performance Measure 43 as indicated on Schedule 2;

To remove the exclusion of orders with negotiated due dates from Performance Measure 45 (Percent Ameritech Missed Due Dates);

To retain Performance Measures 44, 46 through 51, and 52 through 54 without change from the July 17 Order;

To modify the business rules for Performance Measure 55 to clarify exclusions and calendar day calculation.;

To add new Performance Measure 55.2 to calculate LNP with Loop interval;

To add measurement categories for geographic area, and for line sharing, as indicated on Schedule 2, to Performance Measures 55.1, 58 through 64, 65 through 67, and 69;

To add measurement categories for geographic area and to modify the business rules for Performance Measure 56 as indicated on Schedule 2;

To retain Performance Measure 57 without change from the July 17 Order;

To adjust the benchmark for Performance Measures 55, 58, 65, and 66 as indicated in Schedule 2;

To add categories for geographic area to Performance Measure 68;

To add categories for 911, operator services/directory assistance, SS7, and interconnection trunks to Performance Measures 73 through 78;

To retain Performance Measures 71, 72, and 79 through 83 without change from the July 17 Order;

To eliminate Performance Measures 84 through 86;

To modify Performance Measure 91 to add language to indicate standard due date intervals.

To retain Performance Measures 92 through 93 without change from the July 17 Order; To reduce the benchmark for Performance Measure 94 for orders that are both electronically submitted and electronically processed to 2 hours;

To add a new measure, Performance Measure 94.1, for the Average Time to Return FOC for LNP orders;

To remove the “project” exclusion from Performance Measure 95;

To retain Performance Measures 96 through 104 without change from the July 17 Order;

To add Performance Measure 104.1 to identify the average time to unlock the 911 record on LNP conversions.

To retain Performance Measures 105 through 111 without change from the July 17 Order;

To clarify the business rules for Performance Measures 112, 113, 114.1, and 117 through 119 as indicated on Schedule 2;

To retain Performance Measures 114 and 115 through 116 without change from the July 17 Order;

To retain Performance Measures 120 through 121 without change from the July 17 Order;

To add a category for Loop with LNP to Performance Measure MI-1;

To retain Performance Measures MI-2 through MI-14 without change from the July 17 Order;

To modify the business rules for Performance Measure MI-15 as described on Schedule 2;

To add categories by pre-order interface to Performance Measure MI-16; and

To add Performance Measures WI-1 through WI-9 for facilities modification, as further described on Schedule 2.

III. JOINT PETITION

Pursuant to Paragraph 5 of the Commission's February 9, 2000 Order in Case No. U-12320, certain parties hereby submit this joint petition and request that the Commission resolve the following issues:

A. Disputed Issue 1: PM #70, Percentage of Trunk Blockage

Performance measure #70 computes the percentage of calls blocked in the state of Michigan. The benchmark for this measure is less than 1% of calls blocked per month. The dispute is regarding the definition of the measurement and the associated benchmark.

CLEC(s) Active In Dispute: AT&T and CoreComm

B. Disputed Issue 2: Loop Acceptance Testing (LAT) Completed

CLECs have asked SBC/Ameritech to develop and implement a performance measure to test the completion of Loop Acceptance Testing. The dispute is whether to implement the measurement at this time.

CLEC(s) Active In Dispute: IP Communications, Rhythms

C. Disputed Issue 3: PM #60 and #61.

The dispute is regarding the proposed benchmarks for these measurements regarding DSL services. All other areas for these measures are agreed upon.

CLEC(s) Active In Dispute: IP Communications, Rhythms

D. Disputed Issue 4: New measures relating to response times from the Local Service Center ("LSC") and the Local Operations Center ("LOC")

CLECs have proposed new measures that would measure LSC and LOC hold times. The dispute is whether to implement the measurement at this time.

CLEC(s) Active In Dispute: IP Communications, Rhythms

E. Disputed Issue 5: Texas PM #55.3 Percent xDSL-capable loop orders requiring the removal of load coils and or repeaters.

CLECs have proposed new measures that would evaluate the percentage of xDSL-capable loop orders requiring the removal of load coils and or repeaters. The dispute is whether to implement the measurement at this time.

CLECs Active in Dispute: IP Communications, Rhythms

F. Disputed Issue 6: PM# WI-5 through WI-9, Clarification Regarding "Complex Modifications"

“Wisconsin Measures 5 through 9” measure performance relating to Ameritech’s Facility Modification Process. These measures contain disaggregations relating to xDSL loops and line sharing. The dispute is whether or not to include xDSL loops and line sharing in these measurements.

CLEC(s) Active In Dispute: IP Communications, Rhythms

G. Disputed Issue 7: Process for Updating Measures to Include Expedited Incorporation of Disaggregations Relating to Project Pronto and Line Splitting Once the Substantive Issues are Litigated.

The dispute is in regarding whether or not an expedited process regarding these DSL-related issues should be adopted for incorporating these services into the Performance Measures rather than addressing them at the regular six-month review period.

CLEC(s) Active In Dispute: IP Communications, Rhythms

Accordingly, incorporated herein and attached as Appendix A through C are the respective positions of the parties who have submitted positions on the disputed issues, specifically including the parties' respective positions on areas of agreement related to the issues, as well as the specific areas of disagreement. Rhythms also concurs in the position set forth in Appendix C by IP Communications. Additionally, the disputed business rules are included in Schedule 3.

IV. FURTHER ACTIVITIES

Going forward, the parties will continue to meet in collaborative workshops (that may occur in Michigan or other states) to discuss potential additional performance measurements for these products and services. Further, the parties contemplate ongoing reviews, once every six months, to discuss the existing measurements and any proposed modifications or new measurements. Any further modifications, including any additions or deletions, will be sought from the Commission at the conclusion of the six-month review and is anticipated to occur in the May 2001 timeframe. The parties agree to file a joint motion to reflect any agreed to modifications or new measurements, and to seek Commission resolution where the parties do not agree to modifications or new measurements. Additionally, Ameritech Michigan will propose new diagnostic performance measures for new products or interfaces, as appropriate, within approximately six to eight weeks after product introduction as designated in the Collaborative's July 17, 2000 Joint Motion; these new measures will then be evaluated at the next six month review following introduction.

WHEREFORE, the Parties respectfully request that the Commission act on this joint motion and joint petition.

Respectfully submitted,

By: _____
MICHIGAN PUBLIC SERVICE
COMMISSION STAFF

Date: _____

By: _____
ATTORNEY GENERAL

Date: _____

By: _____
AMERITECH MICHIGAN

Date: _____

By: _____
AT&T COMMUNICATIONS

Date: _____

By: _____
BRE COMMUNICATIONS, LLC

Date: _____

By: _____
CORECOMM

Date: _____

By: _____
HORIZON
TELECOMMUNICATIONS, INC.

Date: _____

By: _____
MCI WORLDCOM

Date: _____

By: _____
MCLEODUSA

Date: _____

By: _____
CLEC ASSOCIATION OF
MICHIGAN

Date: _____

By: _____
Z-TEL COMMUNICATIONS

Date: _____

By: _____
IP COMMUNICATIONS

Date: _____

By: _____
RHYTHMS NETCONNECTIONS
RHYTHMS LINKS

Date: _____

By: _____
XO MICHIGAN INC.

Date: _____

APPENDIX A

AT&T AND CORECOMM

APPENDIX B

AMERITECH MICHIGAN

APPENDIX C

IP COMMUNICATIONS