

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)
 _____)

AMERITECH RESPONSE TO DISPUTED PERFORMANCE MEASUREMENT ISSUES

I. DISPUTED ISSUES

Disputed Issue 1: PM #55.2, Average Installation Interval for Loop with Local Number Portability ("LNP").

This measure evaluates the interval for the successful installation of the Loop with Local Number Portability. The dispute is regarding what the interval should be that Ameritech offers Loops with LNP.

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

Ameritech Response:

This measurement is based on the process and intervals existing in Texas for migrations of LNP with an Unbundled Loop. Ameritech’s process and intervals for these migrations have

only recently been re-vamped based in a Wisconsin “Hot-Cuts” collaborative. The agreed to processes and intervals in this collaborative are different than those in Texas. Adoption of the Texas measurement as proposed by the CLECs would require the adoption of different processes and intervals for Ameritech than has been agreed to in the collaborative. In this case, where the process and associated intervals have been established through a collaborative in which the CLECs participated, they should not be modified by the introduction of a performance measure. The performance measure should not dictate the process or interval rather it should provide measurement of processes and intervals which have been agreed to by the collaborative. Adoption of the CLEC proposal would dictate a new process and interval and as a result should be rejected. Instead, this measurement should be raised at the six-month review when actual experience based on the process and interval agreed to in the Wisconsin collaborative can be evaluated.

Disputed Issue 2: 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

Ameritech Response:

CLECs have requested that Ameritech re-work the performance measurement that was developed in Texas for call blocking. This measure is nearly identical to that which the

Michigan Commission ordered in U-11830 and which was reviewed and previously adopted in this collaborative. Ameritech proposes that the appropriate measure should be one of call blocking, rather than of trunk group blocking which the CLECs propose, which will assess the percentage of calls processed through the network against a standard allowing <1% of calls blocked.

Therefore Ameritech requests that the Commission adopt Performance Measure #70, Percentage of Call Blocking as approved by the Michigan Public Service Commission in U-11830 and by the FCC in the Texas 271 application.

Disputed Issue 3: PM #91, Percentage of LNP Only Due Dates within Industry Guidelines.

Performance measure 91 assesses the percentage of Local Number Portability (LNP) only orders that are completed within the industry guideline as established by the North American Numbering Council (NANC). The dispute is related to the number of orders that would be defined as a project.

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

Ameritech Response:

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.

The SWBT Texas measure defines a single disaggregated measurement in PM#91 as LNP Only with one to thirty TNs **AND** greater than 30 TNs. The current definition is consistent

with the Texas measurements as developed and recently evaluated in their six-month review. The CLECs have asked that a project be defined as more than 99 lines in a single order. Since Ameritech is reporting all LNP only orders except those excluded as allowed in the business rules, Ameritech believes that there may have been miscommunication of the definition of the business rule and that there is no dispute.

Disputed Issue 4: PM #104.1, Average time to unlock 911 record for ported telephone number

Performance measure #104.1 is proposed as a new measure. It would evaluate the average time it takes to unlock the 911 record to allow the record to be claimed and updated by the CLEC for LNP orders. The dispute is whether to implement the measurement at this time.

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

Ameritech Response:

Ameritech does not disagree that the unlocking of the 911 database is an important issue that may require measurement similarly to PM#104 as CLECs indicate. The process for timely unlocks to occur requires that Ameritech promptly update (complete) CLEC LNP orders, such that updated information can flow downstream to the 911 data base. In conflict with the measurement proposed here, CLECs have requested and Ameritech has implemented processes that require Ameritech to hold orders past the normal completion time, which is the cause for many unlocks to be delayed.

Ameritech will agree to implement 911 unlock measures as proposed in SWBT Texas PM 104.1 (attached) conditioned upon CLEC agreement to allow Ameritech to add an exclusion

allowing Ameritech to exclude CLEC caused delays.

Disputed Issue 5: 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

Ameritech Response:

The measurement that the CLECs propose for Loop Acceptance Testing was first discussed at the Ohio PM Collaborative on September 27, 2000. Although the process for Loop Acceptance Testing was announced as effective in Michigan in May of 2000, it is a process made available to CLECs by virtue of an interconnection agreement amendment. Very few CLECs have signed the interconnection agreement and are utilizing the service. Due to the minimal take-rate, the process has not been fully implemented by Ameritech. As a result, the request by the CLECs is premature, at best.

Despite the limited use and implementation of Loop Acceptance Testing the CLECs have proposed significant penalties associated with Loop Acceptance Testing and an expansion of the types of loops on which this option would be measured. Currently Ameritech only offers Loop Acceptance Testing on xDSL loops. The measurements that CLECs propose prescribe that testing should occur for standard 2 wire POTS loops, BRI (ISDN) Loops, and for Line Sharing. Yet, there are no processes or intervals for Loop Acceptance Testing in place for these loops.

Measurements for Loop Acceptance Testing should be deferred so that historical data can

be collected and the process can be fully implemented with CLECs. Ameritech Michigan will agree to implement a performance measure for this function, after further discussions at the initial six-month review. This would provide appropriate time to collect the data required to determine the most appropriate measurement and the associated remedy.

Disputed Issue 6: DSL Loop Qualification – Information Update Process

CLECs have asked SBC/Ameritech to develop and implement Performance Measure 1.2 from the Texas Version 1.7. This measure would measure the percentage of time that the loop make-up information provided to CLECs accurately reflects the loop being qualified. The dispute is whether to implement the measurement at this time.

CLEC(s) Active In Dispute: IP Communications

Ameritech Response:

In accordance with the UNE Remand Order, Ameritech provides CLECs all available loop make-up information contained in Ameritech's internal records, whether the records are electronic or manual. This same information is provided to all CLECs including Ameritech's advanced service affiliate.

There will be instances where Ameritech's internal records do not accurately reflect actual network plant. However, Ameritech provides the same information contained in its databases to CLECs, Ameritech's affiliates and its retail organizations. No requirement exists to conduct a physical inspection of loops prior to providing the information or to create a perfect database of information. In addition, since the network is constantly changing, loop make-up

information is also changing. A loop information view is a snapshot of the loop plant at the time the information was retrieved. In many instances, new services are installed and other services are disconnected between the time of the loop qualification and the time that the loop is actually provisioned. Because of this, the actual loop assigned may be somewhat different than what was indicated in the loop qualification.

Ameritech will agree to implement performance measure 1.2 with a parity benchmark, but otherwise consistent with the Texas version 1.7 business rules and the successful development of the SWBT measurement. This agreement is conditioned on agreement from the CLECs that the timing for introducing this measurement will not delay the commencement of OSS third party testing in Michigan. Ameritech requires this agreement based on the uncertain nature of the method to be used in implementing and evaluating this measurement in SWBT.

Disputed Issue 7: PM #5.1 Percent Firm Order Confirmations (FOCs) for XDSL –capable loops & Line Sharing Returned Within “X” Hours

Performance measure 5.1 assesses the percentage of FOCs for XDSL capable loops and Line Sharing sent within the agreed upon time frame. The dispute is on the category of remedy payments proposed for these services.

CLEC(s) Active In Dispute: IP Communications

Ameritech Response:

Ameritech Michigan has agreed to implement the benchmarks as approved in SWBT Texas and the omission from the Ameritech list was an oversight.

Ameritech will also agree to implement the remedy plan measurement types associated with PM 5.1 as listed in SWBT Texas. The SWBT Texas PM lists Line Sharing measurement type as Diagnostic, (new product, no historical data). Ameritech will propose appropriate measurement types for Line Sharing at the six-month review. In this evaluation, the data from Texas as well as the Ameritech states will be considered.

Dispute Issue 8: PM # 55.1, #58, #59, #60, #61, #65,#67, #69 and Wisconsin #8.

The dispute is regarding the proposed benchmarks for these measurements regarding DSL services.

CLEC(s) Active In Dispute: IP Communications

Ameritech Response:

Ameritech believes there should be no dispute on the issue of benchmarks in its Business Rules for PMs 55.1, 58, 59, 60, 61, 65, 67, and 69 since it has proposed exactly the same benchmark as contained in the Texas measurements (see attachments #2 and #3). For WI#8 – Ameritech utilized the appropriate benchmark from DSL measures of missed due dates, PM#58. As for the differences in other details of the business rules, Ameritech has discussed these differences between Texas 1.7 and Ameritech baseline (Texas 1.6 – 7/99) in several collaborative sessions. CLECs in attendance in the collaboratives have never raised this as an unresolved issue nor did they oppose the definition of Ameritech business rules in the collaboratives sessions.

Ameritech proposes to adopt benchmarks as identified in its business rules, which are the

same as those identified in SWBT Texas 1.7.

Disputed Issue 9: 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

Ameritech Response:

Ameritech Michigan is working to improve its LSC and LOC call answer intervals. Ameritech recommends that this matter be further addressed in the six-month review. If LSC and LOC improvements are achieved and maintained, Ameritech would recommend not implementing these measurements. The comparable Texas measurement was withdrawn by the CLECs after SWBT improved performance after a period of time. The CLECs seek to impose the same measurement on Ameritech without providing a reasonable opportunity to improve performance before consideration of the adoption of a measurement.

Data CLECs did proposed additional LSC measurements to address Hold Time in the Ohio PM collaborative session in July. Investigation into this issue at that time indicated that the LSC (specifically the service center handling UNEs that Data CLECs interface with) was experiencing large volume increases and was in the midst of training new service representatives brought in to handle these new volumes. Per week call volumes during this period ranged from:

- an average of 3703 calls answered per week in Jan-April

- an average of 4931 calls answered per week in May-July
- an average of 6935 calls answered per week in Aug-Sept

In the same periods, average hold times in the Unbundled Service Center ranged from:

- a weekly low of 62 seconds and a high of 83 seconds in Jan-April
- a weekly low of 112 seconds and a high of 195 seconds in May-July
- a weekly low of 113 seconds and a high of 135 seconds in Aug-Sep

Ameritech believes that it has taken steps to improve its call hold time performance under strain of very quickly increasing call volumes. Current data suggests that CLECs claims that hold wait time is “outrageous” is false, as it currently ranges from one minute 53 seconds to two minutes 15 seconds in August and September. The data indicates that hold time is also trending downward in the face of ever increasing volumes. Ameritech should be given the same consideration to improve as CLECs allowed for Texas and that CLECs should similarly withdraw this request to measure hold time, as was done in Texas.

Disputed Issue 10: Texas PM #5.2 – Percent Firm Order Confirmations (FOCs) returned within “X” days for ASR requests

Performance measure 5.2 from Texas assesses the percentage of FOCs for Unbundled Local Transport (called Unbundled Dedicated Transport) sent within the agreed upon time frame. The dispute is whether to implement this measurement at this time and to re-number the performance measures to be consistent with the numbering scheme in Texas.

CLECs Active in Dispute: IP Communications

Ameritech Response:

Ameritech documentation of PM 5.2 originally included disaggregations for Unbundled Local Transport (ULT). In the process of developing the final business rules, the disaggregation was mistakenly deleted. Ameritech will address this issue consistent with its measurement of Interconnection Trunks as proposed in its current measurement and consistent with the disaggregations established in the Texas measure and therefore believes there is no dispute on this issue.

The issue of numbering was discussed in several meetings at which the Data CLECs were not present. Ameritech understood that the CLECs agreed that re-numbering of all measurements would occur once the identification of baseline measures was complete and could reasonably number measures. Since Ameritech has committed to implement a greater number of measurements than Texas, and the collaborative discussions have extended over a long period of time, the numbering schemes are currently different. To the extent the same measurements are used in Michigan and in Texas, Ameritech will agree to make every effort to label each measure with the same number once the final set of measurements is agreed upon.

Disputed Issue 11: 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

Ameritech Response:

Ameritech believes that it has implemented the requirements of SWBT PM 55.3 in its implementation of the DSL disaggregations for the measure defined as WI#9, Percent Facility Modification orders. Ameritech would also note that the WI#9 measure is not limited to the assessment of the removal of coils and repeaters as it includes all conditioning required to provision the loop as defined in the Ameritech facility modification policy. Ameritech is willing, however, to discuss implementation of PM 55.3 in the six month review if CLECs would prefer that much more narrow measure based on actual experience with Wisconsin PM# 9.

Disputed Issue 12: PM #MI 1, MI 2, MI 3, and MI 9 as related to xDSL Loops and Line Sharing

The dispute is whether the Michigan performance measures identified as PM# MI 1, Percentage of Orders Given Jeopardy Notices, PM# MI 2, Percentage of Orders Given Jeopardy Notices within 24 hours of the Due Date, PM# MI 3, Coordinated Conversions Outside of Interval, and PM# MI 9 Percent Missing FOCs require disaggregation down to the level of product type, specifically for xDSL Loops and Line Sharing.

CLEC(s) Active In Dispute: IP Communications

Ameritech Response:

The incorporation of the Michigan specific measurements into the 271 measurements set was a compromise reached in the Michigan Performance Measurement collaborative. This collaborative was working to reconcile measurements defined by the Michigan Public Service

Commission in their May 1999 order on performance measurements with the SWBT Texas measurements assumed in other states (Ohio and Illinois) merger agreements. In this compromise, Ameritech agreed to implement these measurements in each state since no corresponding measurement existed at that time in the SWBT Texas measurements. Also included in the set of Michigan measures are performance measurements specifically designed to address other areas not covered in either the Texas or Michigan ordered measures.

For most of these performance measures, to state that Line Sharing will be measured is incorrect and inaccurate. For example:

- MI#4 relates to Collocation, therefore inclusion of Line Sharing does not apply.
- MI#5 relates to Structure/Access Requests and therefore the inclusion of Line Sharing does not apply
- MI#6,7, and 8 are the Michigan ordered measurements of the E911 database, for which other states will utilize the SWBT Texas measures, and therefore the inclusion of Line Sharing does not apply
- MI#10 and 16 relate to pre-order responses, and therefore the inclusion of Line Sharing does not apply
- MI #11 and 15 relate to OSS Interface Outages and Change Management, and therefore the inclusion of Line Sharing does not apply
- MI#12 was specifically designed in Michigan to address Resale and UNE-P orders that fall into error condition before being updated into the billing systems, and therefore the inclusion of Line Sharing does not apply

The CLECs reasons for inclusion of DSL Line Sharing or the disaggregation of DSL Line Sharing for the remaining measurements #1,2, 3, 9, and 12 are unclear and should be deferred

until the six-month review. For example:

- For MI# 1 and 2, CLECs who have asked that the measure be disaggregated in Ameritech are not consistent with other arguments that they make throughout this filing, where they require that Ameritech measurements be consistent with those ordered or agreed to in Texas. The SWBT version 1.7 business rules include a measure for Jeopardy notices which contains no product specific disaggregations as compared to the Ameritech Michigan measure that does.
- For MI#3, Coordinated Conversions Outside the Interval, the measurement is based on those orders identified as Coordinated Conversions. Whether or not the conversion includes DSL line sharing is not pertinent to the measurement.
- For MI#9 and 13, these measurements were designed to be measured on a higher, more aggregated basis and therefore a disaggregation for Line Sharing may not apply.

These specific CLEC requests are new, first discussed in general on a conference call October 4, 2000, and next by this request on October 10, 2000. These measurements should be deferred until the six-month review, as it is not clear how the CLECs would propose to include Line Sharing and/or Line Sharing disaggregations in the measurements.

Disputed Issue 13: PM# WI 5 – 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

Ameritech Response:

From the description that Ameritech has provided to all carriers and as posted on its web sites, loop conditioning is considered a complex modification. Ameritech recognizes that PM#58 and the Wisconsin performance measures #5-9 may appear to include some duplication, but in fact do not. Ameritech's implementation PM#58 includes an exclusion for those orders requiring facility modification (including conditioning) as outlined in the facility modification plan. Ameritech will report DSL related intervals requiring facility modification with the facility modification measurements (WI#5-9) and those that do not require modification with PM# 58 as outlined. This was the overwhelming preference of CLEC participants who provided input these measurements during the collaborative sessions. This specific issue was not raised in the collaboratives and as a result there has been no opportunity for the parties to discuss this proposal in detail.

Disputed Issue 14: 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

Ameritech Response:

Ameritech believes that it is premature to address this issue in Michigan as these offerings and services have not yet been addressed by the Michigan Public Service Commission. The six-month review period does provide a view based on the “early” months especially for these offerings since no Commission decision on these products has been issued.