

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 #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 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 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

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.

Dispute Issue 3: PM #60, and #61.

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 60 and 61, since it has proposed exactly the same benchmark as contained in the Texas measurements.

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 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

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 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

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 6: 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 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

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.