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Fm: Jay Reidy – AT&T
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Date: August 9, 2002

Re: AT&T Responses to the replies by Ameritech Michigan, KPMG, and WorldCom to the MPSC Staff's Questions on Exceptions 112 and 113

Pursuant to your request, below are AT&T's comments on the responses to several of the Staff's questions regarding Exceptions 112 & 113. AT&T would request that this document be posted consistent with the procedures outlined in the Master Test Plan.

3. KPMG, in several OSS Final Reports which KPMG has issued in other states, evaluation criteria for POP Volume tests include both functionality and timeliness criteria and are generally applied separately to each interface utilized in the test (in Michigan's case this would include EDI, GUI and CORBA interfaces). Assuming that similar evaluation criteria will be utilized by KPMG in the Michigan volume test, please indicate whether the volume tests performed by KPMG for the Ameritech region would result in any unsatisfied determinations for the functionality criteria which KPMG will apply to these test. To the extent that unsatisfied evaluations will apply, please specify the affected interface and evaluation criteria.

AT&T points out that KPMG's response "There are presently no unsatisfied determinations for the Functionality evaluation criteria." indicates some confusion, (either ours or theirs) relative to the status of Exception 50. Exception 50, which arose as a result of Functionality testing, provides: "Ameritech CORBA systems returned late Dispatch Required pre-order responses" and is presently in open status. By its nature, an Exception establishes that an unsatisfied test criterion has been found.

5. KPMG indicates in version 2 of Exception 112 that, “Although results varied, the most consistent problems occurred in the area of EDI pre-order timeliness.” Is KPMG able to assess whether Ameritech would have passed the volume tests if it had successfully met the pre-order EDI timeliness benchmarks but all other test results remained unchanged?

Ameritech’s comment on this question contends that “The data from the TVV1 and TVV2 testing (discussed further below) demonstrates that pre-order transaction timeliness for all interfaces (EDI, CORBA and GUI) is acceptable and not a volume-related issue.” This is inconsistent with the number of Observations and Exceptions that have been issued by KPMG for non-timely pre-order query responses in TVV1 testing. While some have been closed in the course of testing and retesting, the fact remains that forty-three (43) Os and Es have been issued to identify non-timely pre-order query responses, to date. Under any analysis model, the volumes of queries within the TVV1 suite are modest, and the fact that Ameritech’s OSS response times do not meet the benchmarks indicates system deficiencies that need to be remedied.

B. Question related to Business Rule of Performance Measure 2

The present business rule for PM 2 was approved by the Michigan Commission on July 17, 2000 in Case No. U-11830 as a result of a Joint Motion by Ameritech and CLECs. Is there information beyond that already included in Exceptions 112 and 113 and the responses thereto which you would like to present which supports either KPMG's or Ameritech's interpretation of this business rule.

Ameritech appears to view the “proposed” PM-2 measurement that was advanced by it in the second 6-month review (“2nd 6MR”) as its preferred way for pre-order query timeliness to be measured for the third party test. This is wrong. The MTP calls for the use of the MPSC-approved business rules for TVV, PPR, and PMR testing, which, for PM-2 requires Ameritech-Michigan to return 90% of the queries within the first tier benchmark for each query type and 95% within the second tier benchmark. The process point at which the “clock” starts is when the query transaction reaches the Ameritech firewall (i.e., immediately after it is sent by the CLEC) and it ends when the query has been processed and is sent from the firewall (i.e., immediately before it is sent to the CLEC.) The PM-2 business rule approved by the MPSC is the required testing standard and is the one that KPMG Consulting is using in its analysis and evaluation of Ameritech’s OSS performance. The parties established this business rule in collaborative sessions under the 1st six-month review of the Ameritech- Michigan business rules.

Ameritech apparently wants KPMG to ignore the MTP and use an alternate business rule for PM-2 – one which has been rejected by the CLECs in the 2nd 6MR. If this is Ameritech’s desire, the mechanism to make that wish come true is the Change Request process associated with the MTP which has been in place since the MTP Version 2.0 August, 2000 and recently re-published in Version 3.0 in April 2002. Ameritech has sought no such change to the MTP.

In Ameritech’s response to KPMG Consulting’s June 7 additional questions, some of its statements merit comment:

A. “First, at the time the existing PM2 business rules were implemented by SBC Ameritech, Southwestern Bell did not separately measure protocol translation.”

AT&T agrees that the existing PM-2 business rules do not call for a separate protocol translation function and the PM-2 measurement benchmark represents an end-to-end cycle of the query being received, processed, and then delivered to the CLEC, *including* the amount of translation processing required within that cycle. The benchmarks per query type were set on this basis.

B. “Second, after the merger closing in SBC Southwestern Bell, and after the implementation of LSOG4 in SBC Ameritech, SBC recommended changes to both the business rule and the performance disaggregations for PM2 to separately measure protocol translation time.”

AT&T agrees that this is true, but we point out that the recommendation from SBC-Ameritech did not arise until the 2nd 6MR was underway. The recommendation was not before the parties any earlier than that.

AT&T does not contend that the protocol translation is not necessary; it is and it has been being done for pre-order queries measured by PM-2 all along. AT&T objects to the SBC position that the protocol translation benchmark should be additive to the established benchmark for each query type. This amounts to double counting the protocol translation process within the PM-2 calculations. AT&T asked SBC to make a corresponding reduction to the query benchmarks for the protocol translation. SBC refused.

D. Pre-Order Inquiry Benchmarks

In soliciting input in regard to pre-ordering performance measurements, the FCC in its 1998 NPRM (FCC 98-72) and more recently in its 2001 NPRM (FCC 01-331) stated the importance of timely access to pre-ordering information. “Because many competing carriers retrieve pre-ordering information from the incumbent LEC’s databases while a customer is on the line (as an incumbent LEC does), timely access to pre-ordering information is critical to a competing carrier’s ability to interact with its customers.” The goal of pre-ordering metrics according to the FCC will “permit us to determine whether an incumbent LEC provides requesting carriers with nondiscriminatory access to pre-ordering functionality.” The following questions are meant to elicit information regarding these determinations of nondiscrimination.

3. To the extent that information is available to KPMG or others, please compare EDI LSOG 4 benchmarks in PM 2 for the Ameritech region to pre-order timeliness metrics in other regions. Identify the point at which timestamps are taken in each example.

Qwest’s OSS Pre-order Response Time Metric is “PO-1” and it is equivalent to that of Ameritech’s PM-2, although it relies on a simulation system (IRTM) to generate the queries and does not use the actual CLEC queries for calculations. It is a measure of the amount of time between when the query is sent and the query is received via the gateway interface. The benchmarks are unique to each query type and were set on the basis of collaborative negotiations.

Measures the time interval between query and response for specified pre-order/order transactions through the electronic interface.

- Measurements are made using a system that simulates the transactions of requesting pre-ordering/ordering information from the underlying existing OSS. These simulated transactions are made through the operational production interfaces and existing systems in a manner that reflects, in a statistically-valid manner, the transaction response times experienced by CLEC service representatives in the reporting period.
- The time interval between query and response consists of the *period from the time the transaction request was "sent" to the time it is "received"* via the gateway interface.

Verizon (Former Bell Atlantic including NY) Carrier-to-Carrier metric is PO-1 and it is equivalent to that of Ameritech’s PM-2, although it also uses a simulator (EnView) to generate

the queries. It is a measure of “ the amount of time, rounded to the nearest 1/100 th of a second between the issuance of a pre-ordering query and the successful receipt of the requested information in a specific field and screen.” The performance benchmark for each query type is parity plus 4 seconds where the “4-Second difference allows for variations in functionality and additional security requirements of interface.”

The data provided by KPMG in its response to this question show a disappointing pattern for Ameritech-Michigan’s EDI response time, as compared to the response times available from other RBOCs. The Feature/Service Availability query is the only one of the seven that Ameritech provides more quickly than the other four companies. Telephone Number Inquiry could be considered near equivalent to the two Verizon units that KPMG reports on, but the other five show that Ameritech’s OSS is very sluggish in comparison. Ameritech’s GUI results fare better in comparison. KPMG provides no CORBA data from other companies with which we can compare.

Notably, the Loop Qualification inquiry (both EDI and GUI) indicates a fundamental problem in the Ameritech OSS. The KPMG data show LoopQual queries to be seriously slower in Ameritech than in the other entities’ OSS.

5. What information is available from any party regarding average timeframes to process retail pre-order inquiries? In 1999, prior to the SBC/Ameritech Merger agreement and prior to the implementation of any of the metrics discussed by Ameritech in its responses to Exceptions 112 and 113, the Michigan Public Service Commission adopted a parity performance metric for pre-order timeliness (May 27, 1999 Order in Case No. U-11830; Pre-order Average Response Times). Ameritech's request for reconsideration of this decision or delays in the implementation of this measure were rejected by the Commission (September 3, 1999 Order in Case No. U-11830). This measure was changed in the Commission's July 17, 2000 Order by granting the Joint Petition of Ameritech and CLECs to do so. What results for specific pre-order inquiries are available from this original metric or from other sources which might shed some light on retail pre-order timeframes?

AT&T is concerned about the narrow way in which Ameritech provides its response to this question: "SBC Ameritech's performance metrics team does not have measurement data for retail pre-order inquiries available." In the likely event that other Ameritech teams or organizations have information as to the retail system response times that bear on this matter, that data should be provided so the Staff can properly consider the continued use of benchmarks for pre-order response time, or whether the parity standard should be implemented.

6. What is the average number of pre-order inquiries made by a CLEC per new customer call? Are pre-order inquiries made simultaneously or consecutively? What is the effect of extending pre-order inquiry activity by 60-90 seconds? What activity is occurring between a CLEC and its customer during pre-order inquiry processing?

The frequency with which a CLEC service representative issues pre-order queries depends entirely on the type of order negotiation being performed. Customer contact that involves migrating an end user from Ameritech to the CLEC requires Customer Service Record query, address validation query, product/service availability query, due date (appointment availability) query, directory listing query, and perhaps, telephone number availability. Each of these is done sequentially, and depending on the query response, may need to be performed several times. This is the customer contact session that is most sensitive for CLECs because it involves “winning over” the customer. We estimate an average of ten (10) queries in a session to acquire a customer from the incumbent or another competitor.

Customer contacts on subsequent order placement, for example, feature or line changes, will require different combinations and mixtures of query types. We estimate an average of six (6) queries to perform functions such as telephone number availability, directory listing, product/service availability, etc.

F. Other Information

1. Is there other information on this issue which any party would like the Commission to consider in its deliberations?

The objective for pre-order query response time should be parity with retail. The use of benchmarks in lieu of parity is a function of the availability of the data from the Ameritech system regarding what its service representatives enjoy. The easiest way to eliminate the debate about whether PM-2 should or should not include protocol translation processes and how much time should be afforded them can be mooted by Ameritech providing retail and CLEC actual results and let the standard be parity. Absent the retail data, the benchmarks need to be made according to timings that best represent the analogous function, which they are now. The protocol translation benchmark cannot allow for double counting of time, as has been proposed by SBC in the 2nd 6MR, unless the corresponding reduction is made to the query processing benchmarks.