

Status of Interpretations In E & Y's October 18, 2002 Attachment B

#	PM #s	Issue	Reasoning for the Interpretation	If Interpretation Inappropriate		
				Corrective Action	Corrective Action Implementation	Impact on June – August 2002 Results
1	1.1, 105, CWI 6, CWI 7, CWI 8, CWI 9 and 106	The Company excluded weekends and holidays from the calculation although not specifically stated in the Business Rules. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for PMs 1.1, CWI 6, CWI 7 and CWI 8.	<p>PMs 105 & 106: Ameritech Structure Access Center (ASAC) web site (asac.ameritech.com) provides the standard response/turn-around commitments SBC Ameritech provides to CLECs and others requesting access to poles, conduits and right-of-ways. All standards are defined in business days. Implementation reflects the letter and intent of the business process. Performance provided meets the calendar day standard if applied.</p> <p>PMs CWI 6, 7, & 8 - The Ameritech FMOD Process, defined and available to CLECs on the CLEC Online website, specifies that the performance standard is to provide the FMOD forms within "X" <i>business</i> hours. The letter of the PMs fails to reflect the letter of the process being measured. Implementation reflects the letter and intent of the business process.</p> <p>PM 1.1: The letter of the PM fails to reflect that the process being measured is not a "24x7" operation, but a normal "8x5" business day operation. Implementation reflects intent of the business rule and the actual process being measured.</p> <p>PM CWI 9: Commission order indicated calendar days The exclusion is not appropriate.</p>	Logic needs to be updated for PM CLEC WI 9 to calculate based on calendar days	Planned for October results reported in November	Not expected to alter results – need for restatement to be determined.
2	2	The Business Rules state that the start time is when the request is received by Ameritech at the Ameritech side of the electronic commerce network. This is just inside the Ameritech firewall. The Company does not record the start time for this type of transaction until after it has been through the translator inside the Company's firewall due to system limitations.	This implementation is consistent with the implementation of PM 2 in SBC's SWBT region, where this measure originated. The issue has been documented in detail in the BearingPoint test Exception 113.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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3	6	The electronically submitted DSL submeasures in the Business Rules required separate disaggregations for 1-49 loops and greater than 49 loops. The Company reported separate disaggregations for 1-19 loops and greater than 19 loops as the Company believes the Business Rules contain a typographical error.	This is a typographical error in the approved PM User Guide. In the 2001 six-month review the collaborative agreed to merge PM 6.1, which reported average time to issue a FOC for DSL products, into PM 6. PM 6.1 provided for 1-19 DSL Loops and >19 DSL Loops disaggregations. In updating the User Guide to merge PM 6.1 into PM 6, PM 6 was inadvertently updated with the incorrect quantity disaggregations for DSL Loops. Reported results have consistently reflected performance for the correct 1-19 and >19 disaggregations.			
4	7, 7.1, 10, 10.1, 10.2, 10.3, 11.1, 11.2, 8 and 11	The Company excludes system downtime and weekends and holidays although not stated in the Business Rules. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for PMs 7, 7.1 and 8.	PMs 7, 7.1, 8, 10, 10.1 and 11 measure the system efficiency in mechanized delivery of a notice to the CLEC ordering service. Implicit in each of these measures, and specifically stated in PM 5, another notification measure, is that scheduled system downtime (which is communicated in advance to CLECs) is excluded from the interval. This is because the system cannot send a notification when it is not up, and CLECs are aware of the time when a system is scheduled to be down. PMs 10.2, 10.3, 11.1 and 11.2 measure notification timeliness that requires manual interaction by LSC staff. As the LSC is not a 24x7 operation, the time that the center is not in operation is rightfully excluded from the PM, as described in PM 5. This allows for the consistent measurement of these related measures and processes.			
5	7, 7.1 and 8	For transactions processed through LASR which was implemented on April 29, 2002, the start time for calculating the numerator begins when the order is received by LASR to submit back to the CLEC instead of utilizing the time the order is actually completed within the ordering system.	This interpretation is correct and supported explicitly in the business rules, as LASR is the ordering system that can determine that all orders initiated through LASR, required to complete the LSR, have been completed, such that the SOC can be sent to the CLEC. PM 7.1 start time is the time of work completion, and is not affected by this issue.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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6	10.4 (D)	The Business Rules contain a conflict between the definition section of the PM and the calculation section of the PM. For wholesale orders, the Company is reporting based upon the calculation section of the Business Rules (i.e. the denominator is total orders due in the month and the numerator is jeopardy notices in which the order is due in the month). For retail orders, the Company is reporting in accordance with the definition of the Business Rules (i.e. the denominator is total orders completed in the month and the numerator is jeopardies that were issued on those completed orders). The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for this PM.	The interpretations made are supported by the approved Business Rules.			
7	10.4 and MI2	The Company excluded retail jeopardy notices that were not sent within 24 hours of the due date from the results. This exclusion is not stated in the Business Rules.	Since jeopardy notices are never actually sent for retail orders, SBC Ameritech only records, for PM purposes, the activity as is reported for CLECs. Issue under additional investigation			
8	13 and 13.1	Effective with June reporting, the Company began reporting line sharing as a separate submeasure. This submeasure is not stated in the Business Rules.	Required per previous collaborative discussion and the "Two-year Flow-Through Improvement Plan." New product/process types that flow-through are to be reported as separate disaggregations as discussed in the 2001 six-month review collaborative.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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9	14	The Business Rules state that the retail comparison for unbundled network elements should be "Access." During the Evaluation Period, the Company utilized access services billed to AT&T only out of the Carrier Access Billing System as the retail comparison. Subsequent to the Evaluation Period, the Company changed its methodology for calculating the retail comparison for the Other UNE submeasure to be an average of the retail parity results for the other two submeasures (i.e., Resale Monthly Recurring/Non-Recurring and Resale Usage/Unbundled Local Switching).	Actual implementation was using a test process where AT&T Access bill (not wholesale bill) was applied to the production rate tables to ensure that the tables were updated properly. The process does not use sampling of Access bills. Performance reported is for the retail comparison (access) is 100%. As a result, this comparison provides for the highest standard possible. SBC Ameritech at one time considered the option discussed here but determined it was not appropriate and cancelled the ER that E&Y observed while it was open. No such change has been, or will be, made.			
10	15	The Business Rules definition for this PM is "the percent of monthly bills sent to the CLECs via the mechanized AEBS process and the paper billing process that are accurate and complete." However, the levels of disaggregation are only EDI and BDT. The Company has included bills transmitted and stored by means other than EDI and BDT in the PM result. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for this PM.	Other means for distribution of mechanized bills, in addition to AEBS and EDI and BDT, have been implemented. Bills sent via those mechanisms migrated there from EDI and BDT. To ensure full reporting of mechanized CLEC bills, SBC Ameritech included these bills into the pre-existing EDI disaggregation.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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11	17	The Business Rules state that the number of on-time service orders to be included in the numerator of the calculations should be the number of service orders that reached updated status in 19 cycles or less. The Company reflects a service order as not being on time if it does not post prior to the first bill cycle to which the service order applies. The Company has indicated that a wording change has been proposed to the Business Rules and has been accepted by the CLECs in the most recent six-month review process for this PM.	Due to complexity of implementation for this PM, Ameritech chose to implement the business rule as conservatively as possible. The current implementation, as described by E&Y, determines an order to be posted late if it does not post before the first bill cycle for the account after the order becomes available for billing. This is a stricter standard than the business rule calls for.			
12	18	Instead of utilizing the time bills are transmitted to the CLECs in the calculation of billing timeliness, the Company utilized the time the bill file was created and ready for transmission.	The time difference in the automated process between creation of the bill file and transmission of the bill file is typically in seconds. The current implementation has been put in place for reasons of technical efficiency..	Complete review to confirm that delay between file creation and file transmission is minimal.	Planned for September results reporting in October	None expected
13	20	During the Evaluation Period, the Company did not include prior months' carrier unbillable dollars in the numerator of PM 20 and also excluded certain carrier messages that were not considered to be "unbillable" usage by the Company. Effective with July reporting, the Company included all current carrier unbillable usage in the numerator.	Corrected the issue with June results reported in July. Unbillable Usage revenue increased from average of .47% for the months Sept 01 – May-02 to 1.87% for June-Aug 02.			
14	27 and 28	The Company included Centrex orders in the retail comparison for business POTS and UNE-P.	All non-CIA Centrex orders have remained in the wholesale business disaggregations. There is no "all Centrex" specific disaggregation to compare retail against wholesale. Centrex has always been considered a business product and is included in business unless a separate disaggregation is established for the PM.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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15	27-42 and 55-69 and C WI 11	Retail ISDN transactions are included in the retail comparison for both ISDN and POTS business with field work.	Ameritech reports "POTS Business" to include non-designed ISDN. The current systems for provisioning non-designed ISDN are the same as for other POTS business products. In order to have an appropriate parity comparison, the same retail orders are correctly included in results used for multiple parity comparisons against wholesale results.			
16	28	Although the exclusions listed in the Business Rules for PMs 27 and 28 are the same, the Company is applying the exclusions differently. The due date exclusions are not applied in PM 28 because the Company believes the definition of the PM as stated in the Business Rules is to measure orders completed within the due date when that date is later than or equal to the offered due date. As such, the Company does not believe it appropriate to exclude requested due dates beyond the offer date. The Company has indicated that a wording change has been proposed to the Business Rules and has been accepted by the CLECs in the most recent six-month review process for this PM. Additionally, the denominator for PM 28 in the Business Rules states total orders not subject to exclusions; however, the Company is applying certain exclusions allowed by the Business Rules to the denominator.	PM 28 measures installations completed within customer requested due date. Prior to the 2001 six-month review collaborative PM 28 assessed installations against a "within "X" days" standard. With the change to a "within customer requested due date" standard, the 2 nd , 3 rd and 4 th exceptions should have been deleted, as they clearly conflict with the intent of the PM. Changes have been proposed and accepted in the current six-month review.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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17	29, 45 and 58	The Company is excluding CLEC-caused misses from the numerator but not the denominator as stated by the Business Rules. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for these PMs.	The exclusion for CLEC-caused misses is intended to reflect the title and intent of the measure, which assesses only Ameritech-caused misses as a percentage of all service orders completed. Orders completed by SBC Ameritech but with due date missed as result of a CLEC or end-user causes should be excluded from the numerator but not the denominator, as SBC Ameritech is doing. Business rule change has been proposed in the current six-month review collaborative but has not been discussed as of the date of this filing.			
18	37.1	The Company reports results for this PM by geographic region although the Business Rules do not specify to do so. The Company has indicated that this is a mistake in the published Business Rules. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for this PM.	By agreement of SBC Ameritech, the CLECs and the MPSC in the original PM Collaboratives in 2000, all provisioning and maintenance measures are to be disaggregated by geographic areas. The omission of the text defining the disaggregation in the “Levels of Disaggregation” section of the business rule is an omission in the original PM documented first in Version 1.8..			
19	40	Although not stated in the Business Rules, the Company excludes customer-requested appointments (i.e., CLEC-extended commitments) and appointments in which the Company was not granted access (i.e., no access) from the calculation of this PM	SBC Ameritech should not be held responsible for OOS situations where the CLEC requested an appointment beyond the 24-hour period or the CLEC/end-user prevented access that led to an OOS duration exceeding 24 hours. In those cases, the time required to complete work has been extended at the CLEC's request or due to the CLEC/end user's inability to provide access, and does not reflect on SBC Ameritech's timeliness.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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20	44	The Business Rules state that circuits that have a customer-requested due date greater than 20 business days should be excluded from results. The Company has represented that this exclusion relates to the prior version of the Business Rules and was not removed from the current Business Rules by mistake. As such, the Company did not take this exclusion during the Evaluation Period. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for this PM.	By agreement of the first six-month collaborative review, PM 44 was changed from percent installs completed with 20 business days to percent within customer-requested due date. The exclusion for requested due dates greater than 20 days was inadvertently left in the PM.			
21	59, 60, 63 and 69	Subsequent to the Evaluation Period, the Company made a determination to exclude certain "C" orders that did not have an "A" action code from reported results. During the Evaluation Period, the Company was excluding these same order types for PMs 55, 55.1, 55.2, 55.3, 56, 56.1, 58, 73, 74, 75, 78, WI 9 and C WI 11.	Installation indicates the addition of a circuit. PM 59 business rule specifically requires the action on the circuit to be an "add". C orders that do not "add" a circuit are correctly not included. For consistency between UNE installation PMs, SBC Ameritech included only circuits installed ("add" action code) in these PMs. SBC Ameritech is currently in the process of updating logic to make this implementation consistent across affected UNE PMs PM 69 is not affected by the "A" Action Codes --- PM 69 is a repair PM; action codes appear on order records	Additional logic implemented to check for "add" action code for PMs 60, 61, 62, & 63.	PMs 60 and 63 updated with June results reported in October.	None

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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22	65, 65.1 and 69	The Business Rules state that interconnection trunks should be excluded from the calculations of these PMs but also state that interconnection trunks should be reported as a separate level of disaggregation. The Company reported interconnection trunks as a separate level of disaggregation during the Evaluation Period. The Company has indicated that a wording change has been proposed to the Business Rules to stop reporting separate levels of disaggregation as the Company is currently doing for these PMs which has been opposed by the CLECs during the most recent six-month review process.	<p>The interconnection trunk disagg was inadvertently included in the original implementation of these UNE PMs, while also having an exclusion for interconnection trunks.</p> <p>In the current six-month review SBC Ameritech proposed to eliminate the disaggregation for interconnection trunks as there are already measures of interconnection trunk maintenance (PMs 76 and 77). CLECs oppose the proposal, so the disaggregation for interconnection trunks continues to be reported in conflict with the business rule exclusions.</p>			
23	68	The Company excludes transactions coded as no access and delayed maintenance although not stated in the Business Rules. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for this PM.	SBC Ameritech should not be held accountable for out-of-service troubles where the OOS situation extends beyond 24 hours due to delayed maintenance agreed to by the CLEC or limits placed on SBC Ameritech's access to customer premises required to resolve the trouble.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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24	55.3	During the Evaluation Period, the Company did not exclude line-sharing transactions from the results as the Company considered line sharing transactions xDSL capable. Subsequent to the Evaluation Period, the Company agreed to exclude line-sharing transactions from the PM based on a new interpretation of the intent of the Business Rules. During the Evaluation Period, it appears the Company considered line sharing to be xDSL capable and reported in PM 55.3 as such. However, line sharing transactions did not exclude loops conditioned through the FMOD process or exclude loops under 12,000 feet due to the lack of system capabilities which would be considered an exception if line sharing is determined to be included in PM 55.3.	An xDSL capable loop provides a 2-wire or 4-wire bi-directional transmission path between the main distribution frame (MDF) or equivalent device, of the SBC wire center, and the network interface device (NID) located at the end user's premises, that supports the transmission of xDSL technologies. The CLEC must provide termination equipment in the central office by means of a physical or virtual collocation and a connecting facility arrangement. Line-sharing does not meet this requirement and hence is not an xDSL capable loop.			
25	56	For the DSL with line sharing level of disaggregation, the Company excluded broadband DSL line sharing transactions (i.e., DSL line sharing transactions in which the Pronto indicator is "1") from the PM result. Additionally, the Company utilized three days (non-affiliates) and four days (affiliates) as the standard intervals for DSL with line sharing. Standard intervals were not provided for this level of disaggregation in the Business Rules.	Broadband DSL is not required to be reported in this measure. Other UNE measures have separate submeasures for Broadband DSL. Consistency between measures requires the order and troubles to be reported in the submeasure with the same names. The business rule requires application of a standard interval to determine whether or not the requested due date is greater than or equal to that interval. Standard intervals for DSL Lineshare are posted on CLEC OnLine.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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26	78	The Company excluded non-Ameritech-caused missed due dates from the PM although this is not provided for in the Business Rules. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for this PM.	The PM has an inadvertent omission in the exclusions. All other average installation interval PMs have an exclusion for orders where the due date is missed due to CLEC or end-customer cause. SBC Ameritech's average installation interval performance should not be degraded due to CLEC or end-customer caused delays in completion of the order. SBC has not yet obtained agreement from the collaborative to this documentation change.			
27	80	The Company excludes intercept calls answered by an operator from the Michigan PM results for PMs 80 although these calls are included in the PM results for other Ameritech states. These calls are included for PMs 79 and 81.	Intercept calls are appropriate for a Grade of Service measure, but not appropriate for a Speed of Answer measure. An operator does not answer calls that go to intercept.			
28	91	For purposes of applying the exclusion for CLEC requested due dates outside of industry guidelines, the Company treats all NXXs as being as if they were previously opened. Thus the standard interval is three days. Therefore, anything outside of four days or more is considered a CLEC-requested due date outside the industry guidelines and is excluded from the PM.	No NXXs have been opened in MI in the months of June, July and August, so no impact on results. The system accepts CLEC submitted due dates beyond 3 days and does not change them. Application identifies due dates of 5 days or more and excludes them as CLEC requested.			
29	97	The Company is excluding CLEC-caused misses from the calculation although this is not stated in the Business Rules.	The PM has an inadvertent omission in the exclusions. All other "due date" PMs have exclusions for orders where the due date is missed due to CLEC or end-customer cause. SBC Ameritech should not be held responsible for delays in meeting due dates resulting from CLEC or end-customer causes.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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30	98	The Company utilizes a different methodology of reporting trouble within X days of installation for PM 98. PM 98 reports data one month in arrears whereas other related measures use current month results.	This PM maintains the “I-Report” logic that was in place for PMs 35, 46 and 59 prior to change agreed to in the 2001 six-month review. Agreement was not reached in that review to change the implementation of PM 98.			
31	109	The Company did not exclude weekends and holidays as stated in the Business Rules but instead followed the state rules of calendar days. Additionally, the Company reports applications received after 2:00 p.m. as being received on the next business day although this is not specifically stated in the Business Rules and the Business Rules state that the clock stops when Ameritech responds back to the application request with a quote, however, not all responses require quotes and Ameritech is reporting all requests as stated in the calculation section of the Business Rules. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for this PM.	SBC Ameritech measures its performance against the FCC standard that does not exclude weekends and holidays. This creates a higher standard of performance for SBC Ameritech to meet than is required under the current business rules.			
32	110, 111 and 113	The Business Rules for PMs 110 and 111 allow for the exclusion of weekends and holidays but the Company is only excluding weekends and the Company is excluding weekends for PM 113 but this is not stated in the Business Rules.	As PM 113 is not an interval calculation, an exclusion of weekends and holidays has no affect on the results. A change to the implementation of PMs 110 and 111 will be undertaken to exclude weekends and holidays from the calculation of the intervals. This change will improve wholesale performance.	Update implementation of PMs 110 and 111 to exclude weekends and holidays	Planned for November results reported in December	None

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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33	114, 115 and 115.1, 115.2 and MI 3	During the Evaluation Period, the Company excluded CHC and FDT orders in excess of 24 lines because they are considered projects although no exclusion for projects is allowed by the Business Rules. The Company has indicated that a wording change has been proposed to the Business Rules and has been accepted by the CLECs in the most recent six-month review process for this PM. Additionally, the Company excludes coordinates that require field dispatch and excludes customer caused jeopardies although not stated in the Business Rules.	CHC and FDT orders, by definition, must consist of 1-24 lines. This is posted on CLEC Online under Accessible Letters AM01-245). SBC Ameritech only dispatches field technicians in the situation where there would be a massive failure and the cut required a tech to assist, but then it would not be considered a CHC – it would move to an all day cut which is not coordinated by the LOC.			
34	115.1	The Company is excluding non-measured trouble reports from the measure. The Company has indicated that a wording change has been proposed to the Business Rules and has been accepted by the CLECs in the most recent six-month review process for this PM. Additionally, the Business Rules state to exclude reports for which the trouble is attributable to the Ameritech network, and the Company does not take this exclusion.	Non-measured trouble reports are excluded from all other trouble report PMs. The omission of the exclusion for this PM is a typographical oversight. Excluding trouble reports attributable to the Ameritech network, which would not reflect provisioning issues, will be added on a prospective basis. This change will improve performance results.	Updated implementation to exclude troubles attributable to the Ameritech network.	Targeted for December performance reported in January 2003	None
35	117 and 118	The Company excludes disconnects, rehomes and change code activation notifications ("CANS"), local number telephone portability, foreign NPA NXXs, and code requests from CLECs that do not have an interconnection agreement with the Company although this is not specifically stated in the Business Rules.	SBC Ameritech excludes disconnects, rehomes, and change code activation notifications, and local number telephone portability because these activities require coordinated actions by SBC and a LEC or CLEC. Timing of these activities must be based upon minimizing customer impact rather than meeting a specific date. SBC Ameritech excludes Foreign NPA NXXs and CLECs that do not have an interconnection agreement with the Company because they do not fit into the intent of the PM, which is to compare the level of service provided to competing CLECs to the retail analog.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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36	121	The Company interprets “when Ameritech receives the application” as when they receive the authorization from the CLEC to create a quote (called the authorized preliminary analysis). The Business Rules say the start time is when Ameritech receives the BFR application, which is the initial BFR form.	The title of this PM reads ‘Percentage of Quotes Provided for Authorized BFRs within 45 days’. An authorized BFR is the authorized preliminary analysis from the CLEC. The receipt of this request initiates the process to generate the quote, the process being assessed by the PM.			
37	CWI 9	The Company utilizes the date/time when the CLEC returns Form C requesting a quote as the start time to calculate the PM interval instead of utilizing the date Form C is issued to the CLEC as stated in the Business Rules. Additionally, the Company excludes loop-qualified orders requiring modification from this PM. This is a stated exclusion in certain related PMs but not for PM CWI 9. The Company also excludes cancelled orders in which a Form C was issued from the denominator although this exclusion is not stated in the Business Rules. The Company has indicated a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for this PM.	Ameritech does not include time wholly under the control of the CLEC in this PM. As the CLEC controls the time it takes to return the FORM C, which initiates the sending of the quote, that time is excluded from the result. Ameritech applies the exclusion of loop-qualified orders requiring modification to PM CLEC WI-9 because measurement of the FMOD process as a whole does not include those orders. This is a typographical omission from the business rule. Cancels are not included in the measure when the cancel results from the failure of the CLEC to return the Form C. Form C's sent for which no response is received from the CLEC are cancels, and no quote can be issued against those Form C's.			
38	WI 9 and all CWI PMs	The Business rules state that DSL with line share is included in these PMs. The Company excludes DSL with line share from the PMs due to the fact that DSL with line share orders do not utilize the FMOD process.	If the order does not enter the FMOD process, it cannot be included in the measures that assess performance of that process.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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39	CWI 11	The title of the measure is FMOD Forms B, C, D, Percentage of Due Dates Met; however, the calculation section of the Business Rules states that the numerator should be the number of FMOD orders with missed revised due dates. The Company is following the calculation section of the Business Rules and has noted this on the website. The Company has indicated that a wording change has been proposed in the most recent six-month review process for this PM.	Issue has no effect on reported performance, only on wording of business rule.			
40	MI 2	After the Evaluation Period, the Company began excluding FMOD orders as the Company believes it obvious these orders will not be completed within 24 hours and should not be included in results. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for this PM.	FMOD orders are processed through an entirely separate communication process with the CLECs, and therefore do not follow jeopardy processes. There is a separate series of notices involved, and those notices are the subject of separate performance measures. Thus, they should be excluded from the jeopardy measure MI 2.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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41	MI 3	The Business Rules contain an inconsistency regarding the name of the PM (“Coordinated Conversions <u>Outside</u> of Interval”) and the method of calculation. The Company is calculating the PM utilizing the number of cross connections started within one hour of the scheduled time as stated in the calculation section of the Business Rules. The Company has indicated that a wording change has been proposed to the Business rules and has been accepted by the CLECs in the most recent six-month review process for this PM. Additionally, the Company uses as the start time for this measure when a CLEC calls the Local Operation Center (“LOC”) as opposed to the time the central office/translation work begins. Using the CLEC call time should increase the interval for the Company.	Current implementation is consistent with the calculation defined in the business rules and understates SBC Ameritech’s performance.			
42	MI 6, MI 7 and MI 8	The Company did not report Z values for March and April 2002 as these PMs were diagnostic measures. The Company began reporting Z values for these PMs with May 2002 results.	Issue has been addressed.			
43	MI 9	The Business Rules state to utilize total orders processed as the denominator. The Company utilizes total orders completed as the denominator and calculates the numerator as total orders completed minus FOCs sent on those orders.	Current implementation is consistent with the intent of the measure.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

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44	MI 10	The denominator used in the calculation includes all pre-order queries processed; however, the Business Rules require total system responses.	The PM measures time-outs. It is measured against all queries. To measure against responses would be inappropriate, as this result would report time-outs (a “no response” condition) against responses. PM2, MI 10 and MI 16 transactions in total represent the total pre-order queries processed.			
45	MI 12	During the Evaluation Period, the Company utilized the number of cycles an order was in 3E status multiplied by 1.5 instead of utilizing the date the error was cleared minus the date the order went into error status due to system limitations.	Initial implementation used the process described by E&Y. Upon review, Ameritech has identified an alternate method for calculating the interval for each error using existing data and will implement on a prospective basis.	Update measurement system code to derive the interval from existing data	Targeting October results reported in November	None
46	MI 15	Instead of using all changes implemented during the month as the denominator as stated in the Business Rules, the Company captures the number of notification letters sent during the month as the denominator to calculate the number of notifications issued on time. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for this PM.	The interpretation correctly reflects the intent of the measure.			
47	IN 1	In order to calculate the percent of loop acceptance testing completed on or prior to the order completion date, the Company counts the percentage of orders that were billed to determine the numerator for the calculation since they are unable to calculate the actual completion date of loop acceptance testing.	A completion date for the Loop Acceptance Test (LAT) is not captured separately from the work completion date of the order. The date of the LAT is the date of work completion for the order. A “Y” billing indicator indicates that the LAT was actually performed and completed on the work completion date. If the LAT is not completed, the “Y” billing indicator will not be populated.			

Status of Interpretations In E & Y's October 18, 2002 Attachment B

#	PM #s	Issue	Reasoning for the Interpretation	If Interpretation Inappropriate		
				Corrective Action	Corrective Action Implementation	Impact on June – August 2002 Results
48	Various PMs	For parity PMs, the Company does not report affiliate or retail results for a particular level of disaggregation whenever there are no corresponding CLEC results to report for that month.	Ameritech is not required to report retail/affiliate results when there is no wholesale activity to report. The purpose of retail/affiliate reporting is for comparison against wholesale activity.			
49	Provisioning PMs	In certain instances service orders completed at the end of the month are not reported until the following month due to delays in posting to the source systems. The Company has indicated that a wording change has been proposed to the Business Rules and has been approved by the CLECs in the most recent six-month review process for this PM.	All orders are reported. System processing requirements on occasion result in orders actually completing in one month being reported in the following month. This impacts a less than 1% of the orders completed in the calendar month.			