

**SBC AMERITECH COMMENTS REGARDING JULY 31, 2002  
RESPONSES TO JULY 18, 2002 MPSC STAFF  
QUESTIONS RELATING TO EXCEPTIONS 112 & 113**

On July 18, 2002, the MPSC Staff distributed a list of questions relating to Exception Reports 112 and 113 to all parties participating in the OSS test. Replies were due from all parties on July 31. At that time, SBC Ameritech, KPMG Consulting (“KPMG”), and one CLEC, WorldCom, provided responses. The MPSC Staff provided an opportunity for parties to provide comments on these responses by August 9, 2002. SBC Ameritech would like to provide these limited comments for consideration by the MPSC. To simplify reading, SBC Ameritech’s comments are presented with any of the original questions for which responses were received.

***A. Clarifying Questions Regarding the Scope of the Findings***

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.*

**SBC Ameritech Comment**

SBC Ameritech agrees with KPMG’s response that, “There are presently no unsatisfied determinations for the Functionality evaluation criteria.” SBC Ameritech is confident that based on the additional information provided in its response to the MPSC Staff’s questions, KPMG and the MPSC will also conclude that there are no unsatisfied determinations for the Timeliness evaluation criteria.

4. *Does KPMG concur with the test results presented by Ameritech in Table 1 of its response to Exception 112? In other words, is it correct to assume that, for example, KPMG performed tests on all nine pre-order inquiry types for the CORBA interface and that these tests were successful for eight of the nine interfaces?*

**SBC Ameritech Comment**

In its response, KPMG Consulting concurred with the test results summary as presented by Ameritech in its response to Exception 112 version 1. However, KPMG did indicate that the

results presented by them in Exception 112 version 1 did not include a result from Peak Day Retest 2, where SBC Ameritech provided 70.9% of EDI Error Messages in response to Orders within 1 hour. Since then, on August 8, 2002, KPMG issued an updated version of Exception 112, version 3, to reflect this information. SBC Ameritech will provide its response to version 3 shortly.

It should be noted that during recent Performance Measurement six-month review meetings, tentative agreement was reached with CLECs to modify the benchmark presently applied to mechanized rejects responses to LSRs received and processed mechanically in PM 10.1 (Mechanized Reject Responses) to two hours from the current one hour. SBC Ameritech's response to Exception 112, version 3, will provide further analysis. However, based on data from other testing of Mechanized Rejects by KPMG, SBC Ameritech's performance appears satisfactory judged against the more current two-hour benchmark.

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?*

#### **SBC Ameritech Comment**

KPMG indicates in its response that, other than pre-order EDI timeliness, the only evaluation criteria presently having unsatisfied timeliness determinations are those associated with a single CORBA pre-order transaction (Scheduling Inquiry/Availability) and with four GUI pre-order transactions.

As can be seen from the chart provided by KPMG in response to question D.4. on page 4 of its response, SBC Ameritech's measured transaction times for the four GUI transactions (of nine tested transactions) are generally comparable to equivalent transaction times for the other reported regions<sup>1</sup>. For example, SBC's time for Telephone Number Inquiry Pre-order-- 4.59 seconds-- was better than Verizon's times of 11.42 (Virginia) and 7.47 seconds (Pennsylvania). SBC's time for Customer Service Information Inquiry Pre-order-- 7.97 seconds-- was comparable to Verizon's time of 7.05 seconds for Virginia, but slower than the other times shown. SBC's time for Scheduling Inquiry/ Availability - Due Date Inquiry Pre-order was 4.14 seconds, twice as fast as Verizon Virginia's 8.35 seconds and comparable to Pennsylvania's time of 3.12 seconds. SBC's time for Loop Qualification Inquiry Pre-order was 29.27 seconds, which was slower than any other times, however, SBC Ameritech believes that it provides more electronic loop make-up information than either Verizon or Qwest thereby making this a questionable comparison.

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<sup>1</sup> KPMG compared SBC Ameritech measured transaction times to Verizon Virginia, Verizon New Jersey, Verizon Pennsylvania, and Qwest.

Additionally, as described in more detail in SBC Ameritech’s response to Exception 112 version 1, the nature of GUI testing results in an element of timeliness outside the control of either party, i.e., the public Internet. When accommodation is made for this fact in consideration of the KPMG’s tested results for GUI timeliness, SBC Ameritech’s results should be considered to be satisfactory. This was demonstrated in the June 3 response to Exception 112 in Table 3, which is included below (as Table 1):

**Table 1 Pre-order timeliness by transaction**

Transaction	Benchmark <sup>2</sup>	KPMG Consulting			SBC Ameritech		
		3/13/02 Normal Day	4/11/02 Peak Day	4/17/02 Stress Day	3/13/02 Normal Day	4/11/02 Peak Day	4/17/02 Stress Day
<b>Address Verification</b>	90% in 7 seconds or less	57.1% at 7 seconds	Satisfactory	89.7% at 7 seconds 95% at 8.6 seconds	99.9% at 7 seconds	99.9% at 7 seconds	100% at 7 seconds
<b>Service Feature Availability</b>	90% in 13 seconds or less	44.2% at 13 seconds	Satisfactory	Satisfactory	100% at 13 seconds	99.6% at 13 seconds	100% at 13 seconds
<b>DSL Loop Qualification</b>	90% in 59.2 seconds or less	71.8% at 59.2 seconds	83.9% at 59.2 seconds	84.1% at 59.2 seconds 95% at 97.9 seconds	100% at 59.2 seconds	100% at 59.2 seconds	100% at 59.2 seconds
<b>Request for Telephone Number</b>	90% in 6 seconds or less	46.2% at 6 seconds	86.1% at 6 seconds	69% at 6 seconds 95% at 13 seconds	99% at 6 seconds	100% at 6 seconds	100% at 6 seconds
<b>Common Language Location Identifier<sup>3</sup></b>	No PM benchmark	43.8% at 10 seconds	Satisfactory	Satisfactory	99% at 1 seconds	100% at 1 seconds	99.5% at 1 second
<b>Directory Listing Inquiry</b>	90% in 10 seconds or less <sup>4</sup>	42.9% at 10 seconds	92.6% at 10 seconds	74.6% at 10 seconds 95% at 13 seconds	100% at 10 seconds	98.9% at 7 seconds	99% at 7 seconds
<b>Customer Service Inquiry and Listing</b>	90% in 10 seconds or less <sup>8</sup>	69.8% at 10 seconds	89.8% at 10 seconds	91.7% at 10 seconds 95% at 10.9 seconds	99% at 10 seconds	98.8% at 10 seconds	99.6% at 10 seconds
<b>Service Appointment Scheduling</b>	90 % in 3 seconds or less	4.6% at 3 seconds	20.1% at 3 seconds	1.5% at 3 seconds 95% at 11.6 seconds	97.3% at 3 seconds	99.2% at 3 seconds	100% at 3 seconds
<b>Request for Customer Service Record</b>	90% in 10 seconds or less <sup>8</sup>	62% at 10 seconds	89.8% at 10 seconds	63.2% at 10 seconds 95% at 17.7 seconds	99.8% at 10 seconds	91.2% at 10 seconds	97% at 10 seconds

<sup>2</sup> Only one level of the two-level performance benchmarks is used. For example, where the actual performance measure benchmark is “80% in 7.0 seconds; 90% in 10.0 seconds”, only the 90% standard is used. This was done solely to simplify this analysis and this table. This does not materially affect the conclusion.

<sup>3</sup> No performance measure benchmark exists for this transaction. Although KPMG Consulting has apparently chosen 10 seconds as a benchmark, SBC Ameritech is reporting its actual results without endorsing any particular benchmark.

<sup>4</sup> No performance measure benchmark exists separately for the Directory Listing Inquiry or for the Customer Service Record with or without the directory listing. For the purposes of this response, the benchmark for the Customer Service Record inquiry is used.

As can be seen in Table 1 above, SBC Ameritech's performance measurement numbers show that its systems consistently performed satisfactorily regardless of the level of volume being tested. Even using KPMG's numbers, it is only necessary to make a reasonable allowance for the Internet-related latency of the communications between SBC Ameritech and KPMG to determine that the GUI pre-order interface timeliness should be considered satisfactory. Most importantly, it is clear that there is little or no impact on transaction times with increased volumes, which is the key evaluation criterion of the volume testing.

The single CORBA transaction cited by KPMG, Scheduling Inquiry/Availability, showed tested results of 89.9% in two seconds and 95% in four seconds. KPMG observed similar transaction times for this same transaction during the course of functional testing. After further analyzing the transaction data and SBC Ameritech's associated timestamps, in its disposition of Exception #51, KPMG concluded that "Ameritech returned timely Service Appointment Scheduling Due Date responses to the Test CLEC." SBC Ameritech would have expected KPMG to draw a comparable conclusion for the volume tests.

6. *KPMG has issued numerous exceptions and observations regarding failure of EDI pre-order timeliness measures in non-volume situations (e.g., Observations 285, 382, 543 for Michigan; Exception 123 and Observations 400, 404, 409, 417, 475, etc. for other states). To what extent if any do the timeliness issues in the volume situations differ from those experienced in the non-volume situations? Is there any information available to KPMG which would support a determination that volume was the cause of the timeliness failures cited in Exception 112?*

**SBC Ameritech Comment**

The chart provided by KPMG in response to question C.6. shows no significant performance difference between the TVV1 testing through April 15, 2002, Normal Day volume testing on March 13, 2002, and Peak Day testing on April 11, 2002. With the appropriate allowance, SBC Ameritech's EDI pre-order timeliness results during volume testing are very comparable to those measured during functional testing, that is, the percentages of transactions meeting the benchmark times are similar. See Table 2, page 14, of SBC Ameritech's response to Exception Report version 1.

***B. Question related to Business Rule of Performance Measure 2***

1. *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.*

**SBC Ameritech Comment**

WorldCom's response to this question fails to provide any information useful to consideration of this issue. Rather than providing any factual data, WorldCom instead presumes to speak on behalf of SBC Ameritech; it does so incorrectly. SBC Ameritech does not believe as stated by WorldCom that "KPMG should be testing to (sic) pursuant to a set of business rules which have not been approved" nor is there any desire to "change the terms of the Master Test Plan." Rather, SBC Ameritech has throughout this process simply presented the chronology and underlying rationale which resulted in the present PM 2 business rule and its implementation. As fully explained in its response to Exception 113, the existing version of PM2 does not include protocol translation time and does not include network transmission outside of its OSS interfaces.

***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.*

**SBC Ameritech Comment**

Although both KPMG Consulting and WorldCom provided responses to this question, neither response provides identification of the point at which timestamps are taken. Also, neither response discusses the comparability of transactions, i.e., that transactions shown as "Address Validation Inquiry" perform in a similar manner in all compared regions. Finally, as pointed out by KPMG, SBC Ameritech's benchmarks differ from those of the other ILECs in that SBC Ameritech uses percentage of responses within a period of time, whereas other ILECs use average response times.

Consequently, although this data is provided in a manner that suggests otherwise, this information does not allow for any meaningful comparison. Making a comparison without knowing where the measurements are made, whether the transactions are truly similar, or

how average performance translates to percent transactions within a period, would be impossible. In particular it is not possible to compare a benchmark to “retail parity + 4 seconds.” Subject to the limitation of making comparisons when the point of timestamp is not known, it should be noted that the Qwest benchmarks are similar to those provided for SBC Ameritech, with the sole exception of loop qualification inquiry. However, as noted above, the amount of information provided by SBC Ameritech is different, again making simple comparisons questionable.

4. *To the extent KPMG is able to share information, please compare pre-order timeliness results from the Ameritech volume tests to results available for volume tests in other regions. To the extent that both average times for pre-order completion can be presented in addition to portion completed prior to a benchmark time, please delineate both (e.g., average 4.4 seconds and 90% # 10 seconds). Separate by type of inquiry, type of interface, and identification of where timestamps are applied.*

#### **SBC Ameritech Comment**

Although not specified by KPMG in its response, SBC Ameritech assumes that the transaction times provided by KPMG were measured in a similar manner in each test, and that the data is comparable to the greatest degree possible. However, as described above in its comments to question D.3., SBC Ameritech’s comments are qualified as it does not have the means to determine that these results are truly comparable.

That said, the information provided by KPMG in response to this question shows that SBC Ameritech performed very well regarding average GUI pre-order timeliness relative to other tested ILECs. SBC Ameritech has the lowest measured transaction time for two transactions, the highest for two, and is between the highest and lowest for the remaining three transactions.

The information regarding EDI pre-order transaction timeliness is similar in that it shows SBC Ameritech’s average transaction times generally in line with those of the other tested ILECs, especially when considered in the context of a 15-30 minute customer negotiation session. If, as supported by Ameritech data and as described by WorldCom in its response to these questions, one assumes that two pre-order transactions are usually done during a customer negotiation session, the difference between SBC Ameritech’s EDI transaction times and those of Qwest and Verizon amount to approximately 9 seconds over the entire session.

Additionally, SBC Ameritech also offers a CORBA pre-order interface which includes all the same functionality of the EDI pre-order interface. Due to the fact that CORBA was designed for real-time data access, it is possible for a CLEC to get reduced transaction times by using the CORBA interface instead of the EDI interface. The CLEC may elect to use whichever interface it considers appropriate to its business process and systems architecture.

1. *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?*

**SBC Ameritech Comment**

WorldCom provides no specifics regarding the alleged refusal by SBC Ameritech to provide retail pre-order transaction timeframes, and SBC Ameritech is not able to substantiate that such a request was ever received formally from WorldCom. Regardless, as stated in its initial response to these questions, SBC Ameritech does not measure any separately identifiable and comparable retail pre-order transactions in the normal course of business, and therefore does not have data to offer in response to this question.

2. *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?*

**SBC Ameritech Comment**

The data in WorldCom's response, that typically two pre-order transactions are done per customer, supports the response provided on July 31, 2002 by SBC Ameritech. The remainder of WorldCom's response is not supported by data available to SBC Ameritech or by the data supplied by KPMG in its response. The complete time for the average CSR transaction via EDI on the Peak Day Retest is reported by KPMG to be 11.26 seconds, and the average Address Validation transaction via EDI on the Peak Day Retest is 7.84 seconds, or 19.1 seconds in total, rather than the hypothetical 60-90 seconds for CSR alone described by WorldCom. Likewise, using KPMG's results from the Peak Day Retest for GUI transactions, the average time for a CSR transaction is 7.97 seconds and for an Address Validation transaction is 3.65 seconds, or a total of 11.62 seconds. Since KPMG results are based on actual use of the SBC Ameritech interface, SBC Ameritech can only assume that WorldCom's transaction times, if actually as long as described, are due to WorldCom's systems or network connectivity, which are under its control.

***E. Retest Requirements***

- 1. In items #2 and 3 of Version 2 of Exception 112, KPMG discusses volume retest requirements. Please specify the minimum timeframes which would be required for the proposed retest activity including specific estimates for each component of the test discussed (e.g., updated forecasting, test preparation including LSOG 5 GUI preparation, pretests, actual testing, etc.). If only the EDI pre-order interface were modified, would the proposed retest activities be altered?*

**SBC Ameritech Comment**

KPMG’s response to this question was predicated on two assumptions – that volume test evaluation criteria other than EDI pre-order timeliness remain unsatisfactory, and that any such rating is volume-related. SBC Ameritech believes that both these assumptions have been proven false based on the information provided by KPMG and by SBC Ameritech in response to these questions. SBC Ameritech does not believe any retesting is appropriate.

***F. Other Information***

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

**SBC Ameritech Comment**

The response provided by WorldCom to this question does not provide the Commission any assistance in its consideration of what is a straight-forward but important issue. SBC Ameritech never has had any intention of trying to “bluff” its way through the OSS test. SBC Ameritech has and will continue to seriously consider all findings presented by KPMG and make system improvements when and where appropriate. The time and effort expended by SBC Ameritech on this OSS test, the significant efforts of all other parties, and the 406 Michigan-affecting Exceptions and Observations that have been addressed and closed to date, should provide the MPSC and the CLEC community assurance of SBC Ameritech’s commitment to the OSS testing process.