

**STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

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In the matter, on the Commission's Own motion)
to consider Ameritech Michigan's compliance)
with the Competitive checklist in Section 271) Case No. U-12320
of the federal Telecommunications Act of 1996.)

**WORLD COM RESPONSES TO STAFF'S REQUESTS
REGARDING EXCEPTIONS 112 AND 113**

MCImetro Access Transmission Services, Inc., Brooks Fiber Communications of Michigan, Inc., and MCI WorldCom Communications, Inc., (hereinafter individually or collectively referred to as "WorldCom" or "MCI", unless indicated otherwise by context) hereby respond to certain of Staff's requests regarding exceptions 112 and 113:

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.

WorldCom response:

It is clear that the issue boils down to the fact the KPMG is testing this metric (and Ameritech is failing the test) as the business rules are currently defined, while Ameritech believes that KPMG should be testing to pursuant to a set of business rules which have not been approved and are not yet in place. Ameritech has proposed its revisions to the business rules as part of the six month review of the performance metrics in Case No. U-11830. However, the parties have not agreed on these revisions, yet Ameritech seems to think that just because such a metric appears in Texas it has automatically been accepted in the Ameritech states.

Under the Master Test Plan, KPMG is obligated to test pursuant to the business rules as these rules currently exist. Ameritech, in essence, desires to change the terms of the Master Test Plan, but Ameritech has refused to follow the proper process for changing the terms of the Master Test Plan.

KPMG's position is absolutely correct.

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.

WorldCom response:

The attachment below (at pages 6-23) reviews the business rules for several other jurisdictions. Since several of the other ILECs provide "parity plus" benchmarks --"parity plus 4 seconds" (VZ EDI) and "parity plus 2 seconds" (BST LENS as no EDI preorder available yet) -- WorldCom below provides April and May data on what actual retail and wholesale results have been in these regions. While WorldCom does not oppose set benchmarks for such queries as opposed to "Parity Plus" standards, those benchmarks should not be as large as those proposed by SBC/Ameritech and SBC/Ameritech should design its systems to meet these reasonable benchmarks and not change the benchmarks without CLEC concurrence if it is failing a third-party performance test.

ILEC	Retail (Volume)	CLEC Aggregate (Volume)
CSR April		
BellSouth	RNS: 212.02 Sec. ¹ (5,382,348)	1.25 Sec. (1,464,001)

¹ BST retail uses two systems to pull CSRs and do address validation. The RNS system for the month chosen had more extreme times for CSR queries than delivered.

	ROS: 2.91 Sec. (618,991)	
Verizon (EDI) ²	2.98 (same number of robot queries each month)	3.25 (13,456)
CSR May		
BellSouth	RNS: 3.21 Sec. (4,906,306) ROS: 2.87 Sec. (594,420)	2.12 Sec, (1,444,660)
Verizon (North)	2.57 Sec,	3.26 Sec. (13,725)
Address Validation April		
BellSouth (regionwide)	RNS: 1782.36 Sec. (1,263,331) ROS: 2.95 Sec. (11,025)	1.11 Sec. (431,960)
Verizon (North)	4.48 Sec .	4.81 Sec. (57,971)
Address Validation May		
BST (regionwide)	RNS: 2.87 Sec. (1,710,355) ROS: 2.94 Sec. (10, 551)	1.20 Sec. (405,644)
Verizon-North	5.25 Sec.	5.27 Sec. (71,162)

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?

WorldCom Response:

Ameritech refuses to provide WorldCom information as to the timeframes for its retail pre-order inquiries. MPSC assistance is needed in obtaining this information from Ameritech.

² The regular CSR transaction was used in chart. Verizon also provides a parsed CSR, with a parity plus 10 second standard.

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?*

WorldCom Response:

For a migration from Ameritech voice to UNE-P voice, there are generally a minimum of two pre-order inquiries for each customer. A service address validation is performed. And, a CSR retrieval is performed. These queries are done consecutively. The effect of extending the pre-order inquiry by 60-90 seconds for the CSR query and some other length of time for the service address validation is that this negatively impacts sales and results in customers hanging up or becoming frustrated and stating that they are not interested. During the time that the CLEC is awaiting this information, the CLEC representative tries to engage the customer in small talk. Long hold times anger customers, make the CLEC look incompetent, and force the CLEC either to hire more sales people to make up for the additional time or lower their sales goals. Neither of these options is acceptable.

F. Other Information

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

WorldCom Response:

Ameritech's approach here is akin to a high school student who has not done well on the SAT who then blames the computer which grades the test for grading the test so negatively. KPMG is merely grading the test. Ameritech is failing. Instead of trying to improve itself, Ameritech wants to change the test.

At the June 20, 2002, Illinois Commerce Commission open meeting with respect to the KPMG test, it was made clear by KPMG that the contention level of Ameritech is at a level not seen where KPMG has conducted tests in any other state or region outside of the Ameritech region. In

these other jurisdictions, the focus of the RBOC was not on criticizing KPMG, but rather it was on improving its own systems so as to pass the test. As KPMG noted, there is nothing so fundamental here that can not be fixed by Ameritech. Some of it is a “willingness” issue or agreement on Ameritech’s part that there is a problem.

KPMG noted that in the early part of the testing in New York, Verizon (then Bell Atlantic) tried to bluff its way through portions of the test but then learned that it could not bluff its way through the KPMG test. Verizon was instructed by the New York PUC to follow the test plan as written and to change their systems to make them meet the Commission’s requirements and competitor’s needs. Once Verizon recognized this, it got to work on fixing its systems.

Ameritech apparently has not yet learned that it can not bluff its way through this test. The best way to advance resolution in this matter is for Ameritech to get to work on fixing its systems and to stop blaming the tester.

Respectfully submitted,

WorldCom

By: _____
James R. Denniston (P57736)
205 North Michigan Avenue
Suite 1100
Chicago, Illinois 60601
(312) 260-3190

Dated: July 31, 2002

Attachment : Other ILEC OSS Measurement Business Rules

Qwest ROC document:

Pre-Order/Order

PO-1 – Pre-Order/Order Response Times

<p>Purpose: Evaluates the timeliness of responses to specific preordering/ordering queries for CLECs through the use of Qwest’s Operational Support Systems (OSS). Qwest’s OSS are accessed, through the specified gateway interface.</p>			
<p>Description: PO-1A & PO-1B: Measures the time interval between query and response for specified pre-order/order transactions through the electronic interface.</p> <ul style="list-style-type: none"> • 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. • A query is an individual request for the specified type of information. <p>PO-1C: • Measures the percentage of all IRTM Queries measured by PO-1A & 1B transmitted in the reporting period that timeout before receiving a response.</p> <p>PO-1D: • Measures the average response time for a sampling of rejected queries across preorder transaction types. The response time measured is the time between the issuance of a pre-ordering transaction and the receipt of an error message associated with a “rejected query.” A rejected query is a transaction that cannot be successfully processed due to the provision of incomplete or invalid information by the sender, which results in an error message back to the sender. ^{NOTE 5}</p>			
<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Reporting Period: One month</td> <td>Unit of Measure: PO-1A, PO-1B, & PO-1D: Seconds PO-1C: Percent</td> </tr> </table>		Reporting Period: One month	Unit of Measure: PO-1A, PO-1B, & PO-1D: Seconds PO-1C: Percent
Reporting Period: One month	Unit of Measure: PO-1A, PO-1B, & PO-1D: Seconds PO-1C: Percent		
<p>Reporting Comparisons: CLEC aggregate.</p>	<p>Disaggregation Reporting: Region-wide level. Results are reported as follows: PO-1A Pre-Order/Order Response Time for IMA PO-1B Pre-Order/Order Response Time for EDI Results are reported separately for each of the following transaction types: ^{NOTE 1}</p> <ol style="list-style-type: none"> 1. Appointment Scheduling (Due Date Reservation, where appointment is required) 2. Service Availability Information 3. Facility Availability 4. Street Address Validation 5. Customer Service Records 6. Telephone Number 7. Loop Qualification Tools ^{NOTE 9} 8. Resale of Qwest DSL Qualification 9. Connecting Facility Assignment ^{NOTE 7} 10. Meet Point Inquiry ^{NOTE 8} <p>For PO-1A (transactions via IMA), in addition to reporting total response time, response times for each of the above transactions will be reported in two parts: (a) time to access the request screen, and (b) time to receive the response for the specified transaction.</p> <p>For PO-1B (transactions via EDI), request/response will be reported as a combined number.</p> <p>For PO-1A 6. Telephone Number, a third part (c) accept screen, will be reported. ^{NOTE 6}</p> <p>PO-1C Results for PO-1C will be reported according to the gateway interface used:</p>		

	1. Percent of Preorder Transactions that Timeout IMA 1. Percent of Preorder Transactions that Timeout EDI PO-1D Results for PO-1D will be reported according to the gateway interface used: 1. Rejected Response Times for IMA 2. Rejected Response Times for EDI		
Formula: PO-1A & PO-1B = $\Sigma[(\text{Query Response Date \& Time}) - (\text{Query Submission Date \& Time})] \div (\text{Number of Queries Submitted in Reporting Period})$ PO-1C = $[(\text{Number of IRTM Queries measured by PO-1A \& 1B that Timeout before receiving response}) \div (\text{Number of IRTM Queries Transmitted in Reporting Period})] \times 100$ PO-1D = $\Sigma[(\text{Rejected Query Response Date \& Time}) - (\text{Query Submission Date \& Time})] \div (\text{Number of Rejected Query Transactions Simulated by IRTM})$			
Exclusions: PO-1A & PO-1B: <ul style="list-style-type: none"> Rejected requests/errors, and timed out transactions PO-1C: <ul style="list-style-type: none"> Rejected requests and errors PO-1D: <ul style="list-style-type: none"> Timed out transactions 			
Product Reporting: None	Standard: Total Response Time: 1. Appointment Scheduling 2. Service Availability Information 3. Facility Availability 4. Street Address Validation 5. Customer Service Records 6. Telephone Number 7. Loop Qualification Tools <small>NOTE 9</small> 8. Resale of Qwest DSL Qualification 9. Connecting Facility Assignment 10. Meet Point Inquiry	IMA <10 seconds <25 seconds ² <25 seconds ³ <10 seconds <12.5 seconds ³ <10 seconds ≤ 20 seconds ⁴ ≤ 20 seconds ⁴ TBD TBD	EDI <10 seconds <25 seconds ² <25 seconds ³ <10 seconds <12.5 seconds ³ <10 seconds ≤ 20 seconds ≤ 20 seconds TBD TBD
	PO-1C-1 PO-1C-2	0.5% 0.5%	
	PO-1D-1 & 2	Diagnostic	

<p>Availability: Available</p>	<p>Notes:</p> <ol style="list-style-type: none"> 1. As additional transactions, currently done manually, are mechanized, they will be measured and added to or included in the above list of transactions, as applicable. 2. Effective 9/1/00 Qwest reduced the Service Availability Benchmark from 30 seconds to 25 seconds. 3. Times reflect non-complex services, including residential, simple business, or POTS account. Does not include ADSL or accounts >25 lines. 4. Benchmark applies to response time only. Request time and Total time will also be reported. 5. As agreed to in the January 25 & 26 PID workshop, rejected query types used in PO-1D will be those developed for internal Qwest diagnostic purposes. 6. With IMA 7.0, effective April 23, 2001, Appointment Scheduling for GUI and EDI and Telephone Number for EDI no longer include an accept screen. Therefore beginning with April 2001 results, the accept screen results will no longer be reported. 7. Results based on Connecting Facility Assignment by Unit Query. 8. Results based on Meet Point Query, POTS Splitter option for Shared loops. 9. Effective with Feb 02 data, results based on a weighted combination of ADSL Loop Qualification and Raw Loop Data Tool. For Jan 02 data and prior, results for transaction 7 were based on ADSL Loop Qualification only.
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Verizon New York, November 2001 Business Rules (There is a May 2002 version but was in a form that does not allow cutting and pasting, so the NY PSC's adopted changes from the November to May versions are relined in below.)

Function:
PO-1 Response Time OSS Pre-Ordering Interface
Definition:
<p>This metric measures the response time of the OSS Pre-Ordering Interface.</p> <p>Response Time: For metrics PO-1-01 through 1-06, and PO-1-09, response time is the amount of time, rounded to the nearest 1/100th of a second for a successful Pre-Order transaction. Note: Successful transactions are those where the requested information was returned to the requestor, and errors are those responses that did not contain the requested information.</p> <p>For CLEC transactions, this is measured from receipt of the request at Verizon's interface to the time that the response is sent to the CLEC. For Verizon retail simulated transactions, performance is measured between the issuance of a Pre-Ordering query and the successful receipt of the requested information in a specific field and screen.</p> <p>For PO-1-07, response time is the amount of time, rounded to the nearest 1/100th of a second, between the issuance of a Pre-Ordering query and the receipt of an error message associated with a rejected query.</p> <p>Average Response Time: Average Response Time is the sum of the response times divided by the number of Pre-Ordering queries in the report period. It is calculated separately for PO-1-01 through PO-1-07, and PO-1-09. Queries that time-out are excluded from the calculation of Average Response Time.</p> <p>Rejected Query: A rejected query is a query that cannot be processed successfully due to incomplete or invalid information submitted by the sender, which results in an error message back to the sender.</p> <p>Time-out: % Timeouts are measured in PO-1-08. A query is considered to be a time-out when the requested information (or an error message) is not provided within 60 seconds. Time-outs are set at long intervals to ensure that average response times include long response times but do not include queries that will never complete.</p>
Exclusions:
<p>Normal exclusions include Saturday, Sunday, and major holidays, as well as hours outside of the normal report period.</p> <p>Refer to web-site http://www22.verizon.com/wholesale/attachments/VZ_E_2002_Holiday_Sched.pdf for a list of holidays Verizon recognizes. Note: The file is an adobe acrobat file, Acrobat Reader is necessary to read the pdf file.</p> <p>Note: If response time aberrations occur due to EnView robot failures or network failures between EnView and the VZ Operations Support Systems (OSS), VZ notes such failure times, and reports the data without exclusion in a footnote on the report.</p>
Performance Standard:

The Performance Standards for the PO-1 metrics are as follows:

For PO-1-01 through PO-1-03, and PO-1-05 through PO-1-07:

- EDI and CORBA (application to application interfaces): Parity with Retail plus not more than four (4) seconds. The four (4) second difference allows for variations in functionality and additional security requirements of interface.
- WEB GUI: Parity with Retail plus not more than seven (7) seconds. The seven (7) second difference allows for variations in functionality and additional security requirements of interface.

For PO-1-04, Product & Service Availability, and PO-1-09, Parsed CSR: Parity with Retail, plus not more than 10 seconds.

For PO-1-08: Not greater than 0.33%.

BellSouth Georgia (April 6, 2001) Service Quality Measurements :

OSS-1: Average Response Time and Response Interval (Pre-Ordering/ Ordering)

Definition

Average response time and response intervals are the average times and number of requests responded to within certain intervals for accessing legacy data associated with appointment scheduling, service & feature availability, address verification, request for Telephone numbers (TNs), and Customer Service Records (CSRs).

Exclusions

None

Business Rules

The average response time for retrieving pre -order/order information from a given legacy system is determined by summing the response times for all requests submitted to the legacy systems during the reporting period and dividing by the total number of legacy system requests for that month.

The response interval starts when the client application (LENS or TAG for CLECs and RNS or ROS for BellSouth) submits a request to the legacy system and ends when the appropriate response is returned to the client application. The number of accesses to the legacy systems during the reporting period which take less than 2.3 seconds, the number of accesses which take more than 6 seconds, and the number which are less than or equal to 6.3 seconds are also captured.

Calculation

Response Time = (a - b)

Appendix A: a = Date & Time of Legacy Response

Appendix B: b = Date & Time of Legacy Request

Average Response Time = c ÷ d

Appendix C: c = Sum of Response Times

Appendix D: d = Number of Legacy Requests During the Reporting Period

Report Structure

Appendix E:	Not CLEC Specific
Appendix F:	Not product/service specific
Appendix G:	Regional Level

Data Retained

Relating to CLEC Experience		Relating to BellSouth Performance	
Section 1:	Report Month	Section 5:	Report Month
Section 2:	Legacy Contract (per reporting dimension)	Section 6:	Legacy Contract (per reporting dimension)
Section 3:	Response Interval	Section 7:	Response Interval
Section 4:	Regional Scope	Section 8:	Regional Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Section 9: RSAG – Address (Regional Street Address Guide-Address) – stores street address information used to validate customer addresses. CLECs and BellSouth query this legacy system.	Section 17: Parity + 2 seconds
Section 10: RSAG – TN (Regional Street Address Guide-Telephone number) – contains information about facilities available and telephone numbers working at a given address. CLECs and BellSouth query this legacy system.	
Section 11: ATLAS (Application for Telephone Number Load Administration and Selection) – acts as a warehouse for storing telephone numbers that are available for assignment by the system. It enables CLECs and BellSouth service reps to select and reserve telephone numbers. CLECs and BellSouth query this legacy system.	
Section 12: COFFI (Central Office Feature File Interface) – stores information about product and service offerings and availability. CLECs query this legacy system.	
Section 13: DSAP (DOE Support Application) – provides due date information. CLECs and BellSouth query this legacy system.	
Section 14: HAL/CRIS (Hands-Off Assignment Logic/Customer Record) It allows BellSouth servers, including LENS, access to legacy systems.	
Section 15: P/SIMS (Product/Services Inventory Management system) – provides information on capacity, tariffs, inventory and service availability. CLECs query this legacy system.	
Section 16: OASIS (Obtain Available Services Information Systems) – Information on feature and rate availability. BellSouth queries this legacy system.	

Table 1: Legacy System Access Times For RNS

System	Contract	Data	< 2.3 sec.	> 6 sec.	6.3 sec.	Avg. Sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP	Schedule	x	x	x	x	x
CRIS	CRSACCTS	CSR	x	x	x	x	x
OASIS	OASISCAR	Feature/Service	x	x	x	x	x
OASIS	OASISLPC	Feature/Service	x	x	x	x	x
OASIS	OASISMTN	Feature/Service	x	x	x	x	x
OASIS	OASISBIG	Feature/Service	x	x	x	x	x

Table 1: Legacy System Access Times For R0S

System	Contract	Data	< 2.3 sec.	> 6 sec.	6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP	Schedule	x	x	x	x	x
CRIS	CRSOCSR	CSR	x	x	x	x	x
OASIS	OASISBIG	Feature/Service	x	x	x	x	x

Table 1: Legacy System Access Times For LENS

System	Contract	Data	< 2.3 sec.	> 6 sec.	6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP	Schedule	x	x	x	x	x
HAL		CSR	x	x	x	x	x
COFFI	COFFI/USOC	Feature/Service	x	x	x	x	x
P/SIMS	PSIMS/ORB	Feature/Service	x	x	x	x	x

Table 1: Legacy System Access Times For TAG

System	Contract	Data	< 2.3 sec.	> 6 sec.	6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
ATLAS	ATLAS-MLH	TN	x	x	x	x	x
ATLAS	ATLAS-DID	TN	x	x	x	x	x
DSAP	DSAP	Schedule	x	x	x	x	x
CRIS	CRSECSRL	CSR	x	x	x	x	x
CRIS	CRSECSR	CSR	x	x	x	x	x

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X
	Tier III	

Note: CLEC specific data is not available in this measure. Queries of this sort do not have company specific signatures.

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
Section 18: RSAG – Address (Regional Street Address Guide-Address) – stores street address information used to validate customer addresses. CLECs and BellSouth query this legacy system.	Section 26: Percent Response Received within 6.3 seconds: > 95%
Section 19: RSAG – TN (Regional Street Address Guide-Telephone number) – contains information about facilities available and telephone numbers working at a given address. CLECs and BellSouth query this legacy system.	Section 27: Parity + 2 seconds

Section 20:	ATLAS (Application for Telephone Number Load Administration and Selection) – acts as a warehouse for storing telephone numbers that are available for assignment by the system. It enables CLECs and BellSouth service reps to select and reserve telephone numbers. CLECs and BellSouth query this legacy system.	
Section 21:	COFFI (Central Office Feature File Interface) – stores information about product and service offerings and availability. CLECs query this legacy system.	
Section 22:	DSAP (DOE Support Application) – provides due date information. CLECs and BellSouth query this legacy system.	
Section 23:	HAL/CRIS (Hands-Off Assignment Logic/Customer Record Information System) – a system used to access the Business Office Customer Record Information System (BOCRIS). It allows BellSouth servers, including LENS, access to legacy systems. CLECs query this legacy system.	
Section 24:	P/SIMS (Product/Services Inventory Management system) – provides information on capacity, tariffs, inventory and service availability. CLECs query this legacy system.	
Section 25:	OASIS (Obtain Available Services Information Systems) – Information on feature and rate availability. BellSouth queries this legacy system.	

SEEM OSS Legacy Systems

System	BellSouth	CLEC
Telephone Number/Address		
RSAG-ADDR	RNS, ROS	TAG, LENS
RSAG-TN	RNS, ROS	TAG, LENS
ATLAS	RNS,ROS	TAG, LENS
Appointment Scheduling		
DSAP	RNS, ROS	TAG, LENS
CSR Data		
CRSACCTS	RNS	
CRSOCSR	ROS	
HAL/CRIS		LENS
CRSECSRL		TAG
CRSECSR		TAG
Service/Feature Availability		
OASISBIG	RNS, ROS	
PSIMS/ORB		LENS

Methodology:

The measurements for all PO-1 metrics (except PO-1-07) are derived from actual production transactions for CLEC transactions and from simulated Pre-Ordering queries generated by Verizon's EnView (formerly referred to as Sentinel) system for VZ retail transactions and CLEC PO-1-07 transactions.

For retail (and CLEC PO-1-07) transactions, EnView replicates the keystrokes a VZ Service Representative would enter for a valid Pre-Ordering inquiry transaction, and measures the response time from when the *Enter* key is hit until a response from the Pre-Ordering OSS is received back on the display screen.

At least ten VZ retail (and CLEC PO-1-07) simulated queries are generated per hour for each type of query.

The total number of simulated queries depends on the average response times.

Each query has a unique name that is based on time and date. The EnView robot monitors for a matching response, and identifies successful responses by the file extension names. The file extension varies according to whether the transaction was successful or experienced an error or time-out condition. Successful response for an Address Validation request is identified by a file extension of **ada**. The file is then read to ensure it starts and ends with the appropriate indicators for a successful transaction.

EnView also generates at least ten simulated incomplete or invalid Pre-Ordering queries per hour to enable measurement of PO-1-07 Average Response Time – Rejected Query.

Data is reported based on transactions occurring between 8:00AM and 9:00PM Monday through Friday, **excluding** New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

Formula:

Σ Response Times for each transaction divided by the Number of Transactions for each transaction type.

Note: For all PO-1 **Retail** sub-metrics, and for sub-metric PO-1-07, the formula is: Response times for each transaction divided by the number of simulated transactions for each transaction type.

Report Dimensions:

Company: <ul style="list-style-type: none"> • VZ Retail³ • CLEC Aggregate • CLEC Specific (PO-1-09 only) 	Geography: <ul style="list-style-type: none"> • New York
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Products	CLEC Aggregate: <ul style="list-style-type: none"> • EDI • CORBA • WEB GUI <p>Note: Metric PO-1-09 Parsed CSR does not go through the WEB GUI interface, therefore, sub-metric PO-1-09 does not report WEB GUI results.</p>
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Sub-Metrics – PO-1 Response Time OSS Pre-Ordering Interface

PO-1-01	Average Response Time – Customer Service Record (CSR)
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³ For sub-metric PO-1-09, there is no Parsed CSR for retail, therefore basic CSR will be reported for retail performance.

Calculation	Numerator	Denominator
	Sum of all response times for CSR transactions.	Number of CSR transactions.

Sub-Metrics – (continued) Response Time OSS Pre-Ordering Interface		
PO-1-02	Average Response Time – Due Date Availability	
Calculation	Numerator	Denominator
	Sum of all response times for Due Date (DD) Availability.	Number of DD Availability transactions.
PO-1-03	Average Response Time – Address Validation	
Calculation	Numerator	Denominator
	Sum of all response times for Address Validation.	Number of Address Validation transactions.
PO-1-04	Average Response Time – Product & Service Availability	
Calculation	Numerator	Denominator
	Sum of all response times for Product and Service Availability.	Number of Product and Service availability transactions.
PO-1-05	Average Response Time – Telephone Number Availability & Reservation ⁴	
Calculation	Numerator	Denominator
	Sum of all response times for Telephone Number Availability/Reservation.	Number of Telephone Number Availability/Reservation transactions.
PO-1-06	Average Response Time – Mechanized Loop Qualification – DSL	
Calculation	Numerator	Denominator
	Sum of all response times for Mechanized Loop Qualification.	Number of Mechanized Loop Qualification transactions.
PO-1-07	Average Response Time – Rejected Query	
Calculation	Numerator	Denominator
	Sum of all response times for a rejected query.	Number of rejected query transactions.
PO-1-08	% Timeouts	
Calculation	Numerator	Denominator
	Number of transactions that timeout.	Total number of transactions.
PO-1-09	Parsed CSR	
Calculation	Numerator	Denominator
	Sum of all response times for Parsed CSR transactions.	Number of Parsed CSR transactions.

⁴ While Address Validation can be completed on a stand-alone basis, Telephone Number reservation is always combined with Address Validation. For VZ retail representatives this is a required two step process requiring two separate transactions.

BellSouth current Georgia metrics (April 6, 2001):

OSS-1: Average Response Time and Response Interval (Pre-Ordering/ Ordering)

Definition

Average response time and response intervals are the average times and number of requests responded to within certain intervals for accessing legacy data associated with appointment scheduling, service & feature availability, address verification, request for Telephone numbers (TNs), and Customer Service Records (CSRs).

Exclusions

None

Business Rules

The average response time for retrieving pre -order/order information from a given legacy system is determined by summing the response times for all requests submitted to the legacy systems during the reporting period and dividing by the total number of legacy system requests for that month.

The response interval starts when the client application (LENS or TAG for CLECs and RNS or ROS for BellSouth) submits a request to the legacy system and ends when the appropriate response is returned to the client application. The number of accesses to the legacy systems during the reporting period which take less than 2.3 seconds, the number of accesses which take more than 6 seconds, and the number which are less than or equal to 6.3 seconds are also captured.

Calculation

Response Time = (a - b)

Appendix H: a = Date & Time of Legacy Response

Appendix I: b = Date & Time of Legacy Request

Average Response Time = c ÷ d

Appendix J: c = Sum of Response Times

Appendix K: d = Number of Legacy Requests During the Reporting Period

Report Structure

Appendix L: Not CLEC Specific

Appendix M: Not product/service specific

Appendix N: Regional Level

Data Retained

Relating to CLEC Experience		Relating to BellSouth Performance	
Section 28:	Report Month	Section 32:	Report Month
Section 29:	Legacy Contract (per reporting dimension)	Section 33:	Legacy Contract (per reporting dimension)
Section 30:	Response Interval	Section 34:	Response Interval
Section 31:	Regional Scope	Section 35:	Regional Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation		SQM Analog/Benchmark	
Section 36:	RSAG – Address (Regional Street Address Guide-Address) – stores street address information used to validate customer addresses. CLECs and BellSouth query this legacy system.	Section 44:	Parity + 2 seconds
Section 37:	RSAG – TN (Regional Street		

Address Guide-Telephone number) – contains information about facilities available and telephone numbers working at a given address. CLECs and BellSouth query this legacy system.	
Section 38: ATLAS (Application for Telephone Number Load Administration and Selection) – acts as a warehouse for storing telephone numbers that are available for assignment by the system. It enables CLECs and BellSouth service reps to select and reserve telephone numbers. CLECs and BellSouth query this legacy system.	
Section 39: COFFI (Central Office Feature File Interface) – stores information about product and service offerings and availability. CLECs query this legacy system.	
Section 40: DSAP (DOE Support Application) – provides due date information. CLECs and BellSouth query this legacy system.	
Section 41: HAL/CRIS (Hands-Off Assignment Logic/Customer Record) It allows BellSouth servers, including LENS, access to legacy systems.	
Section 42: P/SIMS (Product/Services Inventory Management system) – provides information on capacity, tariffs, inventory and service availability. CLECs query this legacy system.	
Section 43: OASIS (Obtain Available Services Information Systems) – Information on feature and rate availability. BellSouth queries this legacy system.	

Table 2: Legacy System Access Times For RNS

System	Contract	Data	< 2.3 sec.	> 6 sec.	6.3 sec.	Avg. Sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP	Schedule	x	x	x	x	x
CRIS	CRSACCTS	CSR	x	x	x	x	x
OASIS	OASISCAR	Feature/Service	x	x	x	x	x
OASIS	OASISLPC	Feature/Service	x	x	x	x	x
OASIS	OASISMTN	Feature/Service	x	x	x	x	x
OASIS	OASISBIG	Feature/Service	x	x	x	x	x

Table 2: Legacy System Access Times For R0S

System	Contract	Data	< 2.3 sec.	> 6 sec.	6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP	Schedule	x	x	x	x	x
CRIS	CRSOCSR	CSR	x	x	x	x	x
OASIS	OASISBIG	Feature/Service	x	x	x	x	x

Table 2: Legacy System Access Times For LENS

System	Contract	Data	< 2.3 sec.	> 6 sec.	6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP	Schedule	x	x	x	x	x
HAL		CSR	x	x	x	x	x
COFFI	COFFI/USOC	Feature/Service	x	x	x	x	x

P/SIMS	PSIMS/ORB	Feature/Service	x	x	x	x	x
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Table 2: Legacy System Access Times For TAG

System	Contract	Data	< 2.3 sec.	> 6 sec.	6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
ATLAS	ATLAS-MLH	TN	x	x	x	x	x
ATLAS	ATLAS-DID	TN	x	x	x	x	x
DSAP	DSAP	Schedule	x	x	x	x	x
CRIS	CRSECSRL	CSR	x	x	x	x	x
CRIS	CRSECSR	CSR	x	x	x	x	x

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X
	Tier III	

Note: CLEC specific data is not available in this measure. Queries of this sort do not have company specific signatures.

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<p>Section 45: RSAG – Address (Regional Street Address Guide-Address) – stores street address information used to validate customer addresses. CLECs and BellSouth query this legacy system.</p> <p>Section 46: RSAG – TN (Regional Street Address Guide-Telephone number) – contains information about facilities available and telephone numbers working at a given address. CLECs and BellSouth query this legacy system.</p> <p>Section 47: ATLAS (Application for Telephone Number Load Administration and Selection) – acts as a warehouse for storing telephone numbers that are available for assignment by the system. It enables CLECs and BellSouth service reps to select and reserve telephone numbers. CLECs and BellSouth query this legacy system.</p> <p>Section 48: COFFI (Central Office Feature File Interface) – stores information about product and service offerings and availability. CLECs query this legacy system.</p> <p>Section 49: DSAP (DOE Support Application) – provides due date information. CLECs and BellSouth query this legacy system.</p> <p>Section 50: HAL/CRIS (Hands-Off Assignment Logic/Customer Record Information System) – a system used to access the Business Office Customer Record Information System (BOCRIS). It allows BellSouth servers, including LENS, access to legacy systems. CLECs query this legacy system.</p> <p>Section 51: P/SIMS (Product/Services Inventory Management system) – provides information on capacity, tariffs, inventory and service availability. CLECs query this legacy system.</p> <p>Section 52: OASIS (Obtain Available Services</p>	<p>Section 53: Percent Response Received within 6.3 seconds: > 95%</p> <p>Section 54: Parity + 2 seconds</p>

Information Systems) – Information on feature and rate availability. BellSouth queries this legacy system.

SEEM OSS Legacy Systems

System	BellSouth	CLEC
Telephone Number/Address		
RSAG-ADDR	RNS, ROS	TAG, LENS
RSAG-TN	RNS, ROS	TAG, LENS
ATLAS	RNS, ROS	TAG, LENS
Appointment Scheduling		
DSAP	RNS, ROS	TAG, LENS
CSR Data		
CRSACCTS	RNS	
CRSOCSR	ROS	
HAL/CRIS		LENS
CRSECSRL		TAG
CRSECSR		TAG
Service/Feature Availability		
OASISBIG	RNS, ROS	
PSIMS/ORB		LENS

Pacific Bell California Measurements (October 27, 2000) :

Pre-Ordering

Measure 1

Title: Average Response Time (to Pre-Order Queries)

<i>Area</i>	<i>Requirement Description</i>
<i>Description:</i>	<p>This measure captures the response interval for each pre-ordering query. It is determined by computing the elapsed time from the ILEC receipt of the query from the CLEC, whether or not syntactically correct, to the time the ILEC returns the requested data to the CLEC.</p> <ul style="list-style-type: none"> • Address Verification/Dispatch Required • Request for Telephone Number • Request for Customer Service Record • Service Availability • Service Appointment Scheduling (due date) • Rejected/Failed inquires • Facility Availability (Pacific Bell Only) • Loop qualification <ul style="list-style-type: none"> • Loop Qual (Mechanized) • K1023 loop qualification (Pacific Bell) <ul style="list-style-type: none"> • xDSL and High Bandwidth line sharing UNE loop qualification • All Other loop qualification

Method of Calculation:	<p>Mechanized:</p> <p><u>Pre - Order Query Transaction Time</u> Sum ((Query Response Date and Time) – (Query Submission Date and Time)) / (Number of Queries Returned in Reporting Period)</p> <p><u>Legacy System Transaction Time (GTE only)</u> Sum ((Query Response Date and Time from Legacy System) – (Query Submission Date and Time to Legacy System)) / (Number of Queries Returned to Legacy System in Reporting Period)</p> <p><u>Loop Qualification/Facility Availability Transaction Time (Pacific Bell Only)</u> Sum ((Query Response Date and Time) – (Query Submission Date and Time)) / (Number of Queries Returned in Reporting Period)</p> <p><u>Loop Qualification Transaction Time (GTE Only)</u> Sum ((Query Response Date and Time) - (Query Submission Date and Time)) / (Number of Queries Returned in Reporting Period)</p> <p><u>Manual CSRs (Pacific Bell and GTE)</u> (# of CSR's Returned within "X" Business Hours) / (# of CSRs Returned) x 100</p>
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies) and ILEC affiliate
Reported By:	By query type and by interface type, including fax
Geographic Level:	Statewide

Measurable Standard:	<p>Mechanized:</p> <table border="0"> <thead> <tr> <th></th> <th>Pacific Bell</th> <th>GTE</th> </tr> </thead> <tbody> <tr> <td>Standard:</td> <td></td> <td></td> </tr> <tr> <td>Address Verification</td> <td>av. 4.5 seconds</td> <td>Legacy Time + 5 seconds</td> </tr> <tr> <td>TN Selection</td> <td>av. 4.5 seconds</td> <td>Legacy Time + 5 seconds CSR</td> </tr> <tr> <td>av.10.0 seconds 98% within 3 hrs. (WISE)</td> <td></td> <td></td> </tr> <tr> <td></td> <td colspan="2">TBD (EDI/CORBA)</td> </tr> <tr> <td>Service Availability</td> <td>av. 8.0 seconds</td> <td>Legacy Time + 5 seconds</td> </tr> <tr> <td>Due Date</td> <td>av. 2.0 seconds</td> <td>Legacy Time + 5 seconds</td> </tr> <tr> <td>Reject/Failed Inquiries</td> <td></td> <td></td> </tr> <tr> <td>Dispatch</td> <td>av. 11.0 seconds</td> <td>N/A (Inc. in Address Verification)</td> </tr> </tbody> </table> <p>Manual CSRs:</p> <p>Pacific Bell:</p> <p>Benchmark:</p> <ul style="list-style-type: none"> • Standard - 95% in 4 hours <p>GTE:</p> <p>Benchmark:</p> <ul style="list-style-type: none"> • Standard - 98% in 24 hours <p>Mechanized Loop Qualification:</p> <ul style="list-style-type: none"> • Standard - Parity (Pacific Bell) • Standard - Benchmark - TBD (GTE) <p>Manual Loop Qualification (K1023) Process (Pacific Bell only)</p> <ul style="list-style-type: none"> • Standard - Parity 		Pacific Bell	GTE	Standard:			Address Verification	av. 4.5 seconds	Legacy Time + 5 seconds	TN Selection	av. 4.5 seconds	Legacy Time + 5 seconds CSR	av.10.0 seconds 98% within 3 hrs. (WISE)				TBD (EDI/CORBA)		Service Availability	av. 8.0 seconds	Legacy Time + 5 seconds	Due Date	av. 2.0 seconds	Legacy Time + 5 seconds	Reject/Failed Inquiries			Dispatch	av. 11.0 seconds	N/A (Inc. in Address Verification)
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Reject/Failed Inquiries																															
Dispatch	av. 11.0 seconds	N/A (Inc. in Address Verification)																													

<p><i>Business Rules:</i></p>	<ul style="list-style-type: none"> • Pre-order query transaction time intervals are measured as total transaction time. • For Pacific Bell, excludes CSR requests (both manual and mechanized) for greater than 50 working telephone numbers • For Pacific Bell, fully electronic pre-order query response times will be measured for the Verigate, Datagate and Loop Qual systems. Pre-ordering functionality only recently made available for EDI/CORBA. Benchmarks will be established by November 15, 2000. • For GTE fully electronic pre-order query response times will be measured for the WISE and CORBA systems. • For GTE, manual CSRs measured in clock hours; excludes non-business days. • Elapsed time for fully electronic sub-measures tracked during published system hours. • Mechanized Loop Qualification measured in seconds. (Pacific Bell only) • Elapsed time for manual processes tracked during published business hours.(Pacific Bell only) • Response time for Pacific Bell's Starwriter system is measured at parity based on % within 4 seconds. • GTE does not report Legacy System Transaction Time for rejected/failed inquiries. • Pre-Order Query Transaction Time will be reported and tracked diagnostically for rejected/failed inquiries.
<p><i>Notes:</i></p>	<ul style="list-style-type: none"> • The numerator and denominator of the sub-measures in this measure capture all queries completed in the reporting period. • GTE will supply all available loop qualification data, however GTE will not support manual engineering query for loop qualification. • Where CLEC accesses Pacific Bell's systems using a Service Bureau Provider, the measurement of Pacific Bell's performance shall not include the Service Bureau Provider's processing, availability or response time.