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BEFORE THE ARIZONA CORPORATION COMMISSION

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DOCUMENT CONTROL

IN THE MATTER OF US WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

Docket No. T-00000^{A 9}9-97-238

**COX ARIZONA TELCOM, LLC.'S COMMENTS ON
OSS TEST PLAN PERFORMANCE MEASUREMENTS**

Cox submits the following comments on Performance Measurements in Appendices B, D & E to the Proposed Master Test Plan prepared by the Arizona Corporation Commission's consultant, Doherty & Company, Inc.

Arizona Corporation Commission

DOCKETED

I. COMMENTS ON APPENDIX B

SEP 27 1999

A. Pre-Ordering

Pre-ordering activities relate to the exchange of information between US WEST and the CLEC regarding current or proposed customer products and services, or any other information required to initiate ordering of service. Pre-ordering encompasses the critical information needed to submit a provisioning order from the CLEC to US WEST. The pre-order measurement reports the timeliness with which pre-order inquiries are returned to the CLEC by US WEST. Pre-ordering query types include:

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- Address Verification/Dispatch Required
- Request for Telephone Number
- Request for Customer Service Record
- Service Availability
- Service Appointment Scheduling (due date)

1 Rejected/Failed Inquiries
2 Facility Availability

3 For measurement PO-1, Cox cannot determine from the description of “measures the
4 time interval between query and response for specified pre-order/order transactions through
5 IMA,” what is actually being measured. Is the screen display or elapsed time being
6 measured? Cox proposes that the elapsed time between US WEST receipt of query and time
7 US WEST return requested data to CLEC, be used as the basis for PO-1. The measurement
8 description for PO-1 would read as follows: “The response interval for each pre-ordering
9 query is determined by computing the elapsed time from US WEST’s receipt of the query
10 from the CLEC, whether or not syntactically correct, to the time US WEST returns the
11 requested data to the CLEC.”

12 **B. Ordering**

13 Ordering activities include the exchange of information between US WEST and the
14 CLEC regarding requests for service. Ordering includes: (i) the submittal of the service
15 request from the CLEC, (ii) rejection of any service request with errors, and (iii)
16 confirmation that a valid service request has been received and a due date for the request
17 assigned. Ordering performance measurements report on the timeliness with which US
18 WEST completes these various activities.

19 Cox is concerned with US WEST’s performance where a CLEC orders stand-alone
20 Number Porting without any related loop cutover. OP-8B, however, appears to measure the
21 LNP timeliness by “completion of the associated loop cutover.” Cox requests that there be
22 an additional ordering performance measure that addresses coordinated LNP cutovers
23 *without* a related loop cutover. Such a cutover should occur in less time than an LNP/loop
24 coordinated cutover (*e.g.*, <15 minutes from the cutover time committed to CLEC by US
25 WEST) and should occur within that time period more than 98% of the time.

26 . . .

1 **C. Collocation Provisioning**

2 US WEST is required to provide CLECs available space as required by law to allow
3 the installation of CLEC equipment. Performance measures in this category assess the
4 timeliness with which US WEST handles the CLEC's request for collocation, as well as how
5 timely the collocation arrangement is provided. Provisioning is the set of activities required
6 to install, change or disconnect a customer's service. It includes the functions to establish or
7 condition physical facilities, as well as the completion of any required software translations
8 to define the feature functionality of the service. Provisioning also involves communication
9 between the CLEC and US WEST on the status of a service order, including any delay in
10 meeting the commitment date and the time at which actual completion of service installation
11 has occurred. Measurements in this category evaluate the quality of service installations, the
12 efficiency of the installation process and the timeliness of notifications to the CLEC that
13 installation is completed or has been delayed.

14 Cox recommends a measurement for Core Collocation Indicator CP-1 be 100% in 80
15 days for physical collocation and 100% in 60 days for virtual collocation.

16 The Diagnostic Collocation Indicator DCP-4 measurement should be expanded to
17 include space availability and price and schedule quote as these are integral components to
18 the completion of the collocation arrangement.

19 **D. Emergency Service, 911, DA, OS**

20 Cox believes that this performance area should be expanded to include two areas: (i)
21 updates to directory databases and (ii) distribution of white pages directories. First, US
22 WEST should be required to update its directory assistance database with Cox customer
23 information in a timely manner. 911 and Directory Assistance updates are all Cox may need
24 from US WEST in those instances where Cox begins providing service to a new customer
25 (as opposed to a customer migrated from US WEST) using Cox's own facilities. Second,
26 Cox is dependent on US WEST to provide white pages directories to new customers. US

1 WEST should be obligated to timely provide directories to Cox's customers. In both
2 instances, Cox requests parity with US WEST's performance for US WEST's retail
3 customers.

4 **E. Network Performance – Network Interconnection**

5 Network performance involves the level at which US WEST provides services and
6 facilitates call processing within its network. US WEST also has the responsibility to
7 complete network upgrades efficiently. If network outages do occur, US WEST needs to
8 provide notification so appropriate network management and customer notification can occur
9 by the CLEC. Network performance is evaluated on the quality of interconnection, the
10 timeliness of notification of network outages and the timeliness of network upgrades (*e.g.*,
11 code openings) US WEST completes on behalf of the CLEC.

12 The Core Network Performance Indicator NI-1 measurement description should read:
13 "Measures the percent of final dedicated interconnection trunk groups exceeding 2%
14 blockage."

15 **II. COMMENTS ON APPENDIX D**

16 See Attachment 1 – Performance Measurements Document.

17 **III. COMMENTS ON APPENDIX E**

18 The Glossary/Terminology listing needs to be more inclusive of terms and indicators
19 directly associated with the dispensing of service. For example, there are no definitions for
20 network, trunks, collocation, cut-over window, dispatched orders, dispatched troubles,
21 disposition codes, partial migration, production identification descriptions, etc. These
22 definitions can be synonymous throughout the industry or they can also be different for each
23 ILEC. A more comprehensive glossary should be adopted as part of the Performance
24 Measurements for the Master Test Plan, so as not to confuse the collaborative understanding
25 of systems, processes and functionality of US WEST's OSS. Cox has provided a suggested
26 ...

1 list of definitions of terms as Attachment 2 ("Definition of Terms") for review and inclusion
2 in the Master Test Plan.

3 **IV. COMMENTS RE AUDIT OF PERFORMANCE MEASUREMENTS**

4 An Initial Audit of the Performance Measurements should be performed to ensure that
5 US WEST's reporting procedures are sound and that data collection and reporting are timely,
6 accurate and complete. The Initial Audit must include all systems, processes and procedures
7 associated with the production and reporting of performance measurement results. A third
8 party auditor should complete this audit of Performance Measurements. US WEST and the
9 CLECs should jointly select the third party auditor. Costs for the Initial Audit will be borne
10 by US WEST.

11
12 Dated: September 27, 1999.

13 Respectfully submitted,

14 **COX ARIZONA TELCOM. L.L.C.**

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RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES¹

NO.	MEASUREMENT	COX ARIZONA TELCOM POSITION
PERFORMANCE MEASUREMENTS		
Pre-Order		
PO-1	Pre-Order/Order Response Times 1A. IMA (CLEC Transaction) 1B. Exact (CLEC & Retail) 1C. EDI (CLEC Transaction)	Parity with U S WEST retail operations.
Gateway Availability		
GA-1	Gateway Availability – Human/Computer Interface (IMA)	Parity with U S WEST retail operations.
GA-2	Gateway Availability – Computer/Computer Interface (EDI)	Parity with U S WEST retail operations.
Ordering and Provisioning		
OP-1	Speed of Answer – Interconnect Provisioning Center (average)	Parity with U S WEST retail business office.
OP-2	Calls Answered within Twenty Seconds – Interconnect Provisioning Center (percent)	Parity with U S WEST retail business office.
OP-3	Installation Commitments Met (percent)	Parity with U S WEST retail operations for resale services. 98% for UNE, and interconnection.
OP-4	Installation Interval (average)	Parity with U S WEST retail operations for resale and UNE-P. Parity with POTS Dispatch-In for unbundled loops. Parity with switched access trunks for interconnection and unbundled transport.
OP-5	Installation Trouble Reports (percent)	Parity with U S WEST retail operations for resale and UNE-P. Parity with POTS Dispatch-In for unbundled loops. Parity with switched access trunks for interconnection and unbundled transport.

¹ Per decision N. 61837, dated July 21, 1999, Docket No. T-00000A-97-0238, 271 standards will be developed collaboratively through the forthcoming workshops and Staff will file a report thereof no later than October 15, 1999.

NO.	MEASUREMENT	COX ARIZONA TELCOM POSITION
OP-6	Delayed Days (average)	Parity with U S WEST retail operations for resale and UNE-P. Parity with POTS Dispatch-In for unbundled loops. Parity with switched access trunks for interconnection and unbundled transport.
OP-7A	Coordinated Cutover Interval – Unbundled Loop (without Number Portability) (average) ²	< 30 Minutes
OP-7B	Coordinated Cutover Interval – Unbundled Loops (associated with LNP) ³	< 30 Minutes
OP-8A	Coordinated Cutover Interval – Interim Number Portability (INP) (average)	< 30 Minutes
OP-8B	Coordinated Local Number Portability (LNP) Timeliness (percent)	> 98%
OP-9	Coordinated Cutover Combined Interval – Unbundled Loops coordinated with INP (average)	< 30 Minutes
Maintenance & Repair		
MR-1	Speed of Answer – Interconnect Repair Center (average)	Parity with U S WEST repair center.
MR-2	Calls Answered within 20 seconds – Interconnect Repair Center (percent)	Parity with U S WEST repair center.
MR-3	Out of Service Cleared within 24 hours – Non-Designed Repair Process (percent)	Parity with U S WEST retail.
MR-4	All Troubles Cleared within 48 hours – Non-Designed Repair Process (percent)	Parity with U S WEST retail.
MR-5	All Troubles Cleared within 4 hours – Designed Repair Process (percent)	Parity with U S WEST retail for resale, UNE-P and UNE. Parity with switched access trunks for interconnection.

² AT&T proposes that the “lift and lay” be defined as complete only when the ILEC informs the CLEC that it is complete.

³ AT&T proposes that the “lift and lay” be defined as complete only when the ILEC informs the CLEC that it is complete.

NO.	MEASUREMENT	COX ARIZONA TELCOM POSITION
MR-6	Mean Time to Restore (average)	Parity with U S WEST retail for resale, UNE-P and UNE. Parity with switched access trunks for interconnection.
MR-7	Repair Repeat Report Rate (percent)	Parity with U S WEST retail for resale, UNE-P and UNE. Parity with switched access trunks for interconnection.
MR-8	Trouble Rate (percent)	Parity with U S WEST retail for resale, UNE-P and UNE. Parity with switched access trunks for interconnection.
Billing		
BI-1	Mean Time to Provide U S WEST-Recorded Usage Records (average)	Parity with U S WEST retail.
BI-2	Mean Time to Deliver Invoices (average)	Parity with U S WEST retail.
BI-3	Billing Accuracy – Adjustments for Errors (under development)	Parity with U S WEST retail.
Emergency Services		
ES-1	ALI Database Updates Completed within 24 hours (percent)	Parity with U S WEST retail.
ES-2	911/E911 Emergency Services Trunk Installation Interval (average)	Parity with U S WEST internal intervals.
Directory Assistance		
DA-1	Speed of Answer – Directory Assistance (average)	Parity with U S WEST retail.
DA-2	Calls Answered Within Ten Seconds – Directory Assistance (percent)	Parity with U S WEST retail.
Operator Services		
OS-1	Speed of Answer – Operator Services (average)	Parity with U S WEST retail.
OS-2	Calls Answered Within Ten Seconds – Operator Services (percent)	Parity with U S WEST retail.
Network Performance		
– Network Interconnection		
NI-1	Trunk Blocking – Interconnection Trunks (percent)	>98%
NI-2	Trunk Blocking – Local Interoffice (“Common”) Trunks (percent)	Parity with U S WEST Network

NO.	MEASUREMENT	COX ARIZONA TELCOM POSITION
Collocation Provisioning		
CP-1	Installation Commitments Met (percent)	Physical - 100% in 80 days Virtual – 100% in 60 days
CP-2	Installation Interval (average)	Less than FCC defined intervals for collocation.

DIAGNOSTIC PERFORMANCE INDICATORS

Pre-Order/Ordering		
DPO-1	Electronic Flow-through of Local Service Requests (LSRs) to the Service Order Processor (percent)	Parity with U S WEST retail.
DPO-2	LSR Rejection Notice Interval (average)	Parity with U S WEST retail.
DPO-3	LSRs Rejected (percent)	Parity with U S WEST retail.
DPO-4	Firm Order Confirmation (FOC) Interval (average)	Parity with U S WEST retail.
DPO-5	Pre-Order/Order Response Times for U S WEST Retail Transactions (average)	Not needed. This should be included in reporting for PO-1 measure.
DPO-6	Completion Notifications Transmitted within 24 hours (percent) (under development)	Parity with U S WEST retail.
DPO-7	Completion Notification Interval (average) (under development)	Parity with U S WEST retail.
Ordering and Provisioning		
DOP-1	CLEC- or CLEC's Customer-Caused Installation Misses (percent)	Not needed.
DOP-2	Delayed Orders Completed \geq 15 days past the commitment date (percent)	Parity with U S WEST retail for resale and UNE-P. Parity with retail POTS Dispatch-In for unbundled loops.
DOP-3	Delayed Orders Completed \geq 90 days past the commitment date (percent)	Parity with U S WEST retail operations for resale and UNE-P. Parity with POTS Dispatch-In for unbundled loops. Parity with switched access trunks for interconnection and unbundled transport.
Maintenance & Repair		
DMR-1	CLEC- or CLEC's Customer-Caused Trouble Reports (percent)	Not needed.
Collocation Provisioning		
DOP-1	CLEC Caused Collocation Misses (percent)	Not needed.

NO.	MEASUREMENT	COX ARIZONA TELCOM POSITION
DCP-2	Collocation Feasibility Study Interval (average)	Less than FCC defined intervals for collocation.
DCP-3	Collocation Feasibility Study Commitments Met (percent)	> 98%
DCP-4	Average Collocation Quote Interval (percent)	Space Availability – 100% in 15 days Price Quote – 100% in 15 days

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DEFINITIONS OF TERMS

TERM	DEFINITION
Automatic Location Identification (ALI)	The feature of E911 that displays at the Public Safety Answering Point (PSAP) and the street address of the calling telephone number. This feature requires a data storage and retrieval system for translating telephone numbers to the associated address. ALI information may include Emergency Service Number (ESN), street address, room or floor, and names of the enforcement, fire and medical agencies with jurisdictional responsibility for the address. The Management System (E911) database is used to update the Automatic E911 Location Identification databases.
Call Blocking	A condition on a telecommunications network where, due to a maintenance problem or an over capacity situation in a part of the network, some or all originating or terminating calls cannot reach their final destinations. Depending on the condition and the part of the network affected, the network may make subsequent attempts to complete the call or the call may be completely blocked. If the call is completely blocked, the calling party will have to re-initiate the call attempt.
Code Opening	Process by which new NPA/NXXs (area code/prefix) are defined, through software translations to network databases and switches, in telephone networks. Code openings allow for new groups of telephone numbers (usually in blocks of 10,000) to be made available for assignment to an ILEC's or CLEC's customers, and for calls to those numbers to be passed between carriers.
Common Channel Signaling System 7 (CCSS7)	A network architecture used to for the exchange of signaling information between telecommunications nodes and networks on an out-of-band basis. Information exchanged provides for call set-up and supports services and features such as CLASS and database query and response.
Common Transport	Trunk groups between tandem and end office switches that are shared by more than one carrier, often including the traffic of both the ILEC and several CLECs.
Completion	The time in the order process when the service has been provisioned and is in service.
Completion Notice	A notice the ILEC provides to the CLEC to inform the CLEC that the requested service order activity is complete.
Coordinated Customer Conversion	Orders that have a due date negotiated between the ILEC, the CLEC, and the customer so that work activities can be performed on a coordinated basis under the direction of the receiving carrier.
Coordinated Cut Over	A coordinated cut-over is the live manual transfer of an ILEC end user to a CLEC completed with manual coordination by ILEC and CLEC technicians to minimize disruptions for the end user customer. Also known as a "hot cut". These all have fixed minimum intervals.

DEFINITIONS OF TERMS

TERM	DEFINITION
Cut-Over Window	Amount of time from start to completion of physical cut-over of lines: 1-9 lines: 1 Hour 10-49 lines: 2 Hours 50-99 lines: 3 Hours 100-199 lines: 4 Hours 200 plus lines: 8 Hours
Customer Requested Due Date	A specific due date requested by the customer which is either shorter or longer than the standard interval or the interval offered by the ILEC.
Customer Trouble Reports	A report that the carrier providing the underlying service opens when notified that a customer has a problem with their service. Once resolved, the disposition of the trouble is changed to closed.
Dedicated Transport	A network facility reserved to the exclusive use of a single customer, carrier or pair of carriers used to exchange switched or special, local exchange, or exchange access traffic.
Delayed Order	An order which has been completed after the scheduled due date and/or time
Directory Assistance Database	A database that contains subscriber records used to provide live or automated operator-assisted directory assistance. Including 411, 555-1212, NPA-555-1212.
Directory Listings	Subscriber information used for DA and/or telephone directory publishing, including name and telephone number, and optionally, the customer's address.
DS-0	Digital Service Level 0. Service provided at a digital signal speed commonly at 64 kbps, but occasionally at 56 kbps.
DS-1	Digital Service Level 1. Service provided at a digital signal speed of 1.544 Mbps.
DS-3	Digital Service Level 3. Service provided at a digital signal speed of 44.736 Mbps.
Due Date	The date provided on the FOC the ILEC sends the CLEC identifying the planned completion date for the order.
End Office Switch	A switch from which an end users' exchange services are directly connected and offered.
Firm Order Confirmation (FOC)	Notice the ILEC sends to the CLEC to notify the CLEC that it has received the CLECs service order, created a service request, and assigned it a due date.
Flow-Through	The term used to describe whether a LSR electronically is passed from the OSS interface system to the ILEC legacy system to automatically create a service order. LSRs that do not flow through require manual intervention for the service order to be created in the ILEC legacy system.
Held Order	An order for which the ILEC has issued a FOC, but whose due date has passed without it being completed.
Installation	The activity performed to activate a service.

DEFINITIONS OF TERMS

TERM	DEFINITION
Installation Troubles	A trouble, which is identified after service order activity and installation, has completed on a customer's line. It is likely attributable to the service activity (within a defined time period).
Inside Wiring	The telecommunications wiring located at a customer's premises that extends beyond the demarcation point.
Interconnection Trunks	A network facility that is used to interconnect two switches generally of different local exchange carriers
Interface Outage	A planned or unplanned failure resulting in the unavailability or access degradation of a system.
Jeopardy	A failure in the service provisioning process which results potentially in the inability of a carrier to meet the committed due date on a service order
Jeopardy Notice	The actual notice that the ILEC sends to the CLEC when a jeopardy condition has been identified.
Lack of Facilities	A shortage of facilities identified after a due date has been committed to a customer, including the CLEC. The facilities shortage may be identified during the inventory assignment process, or during the service installation process. If no facilities are available, the ILEC will issue a jeopardy.
Local Exchange Routing Guide (LERG)	A Bellcore master file that is used by the telecom industry to identify NPA-NXX routing and homing information, as well as network element and equipment designations. The file also includes scheduled network changes associated with activity within the North American Numbering Plan (NANP).
Local Exchange Traffic	Traffic originated on the network of a LEC in a local calling area that terminates to another LEC in a local calling area.
Mechanized Bill	A bill generated and delivered using electronic process, including the transmission process.
Missed Commitment Notification	A notice from ILEC to inform CLEC that the committed due date on an order has been missed.
Non-Recurring Charge	A rate charged for a product or a service that is assessed on a one time basis.
NXX, NXX Code or Central Office Code	The three digit switch entity indicator that is defined by the "D", "E", and "F" digits of a 10-digit telephone number within the NANP. Each NXX Code contains 10,000 station numbers.
Permanent Number Portability (also known as Local or Long Term Number Portability)	A network technology which allows end user customers to retain their telephone number when moving their service between local service providers. This technology does not employ remote call forwarding, but actually allows the customer's telephone number to be moved and redefined in the network of the new service provider. The activity to move the telephone number is called "porting".
Physical Collocation	Shall have the meaning set forth in 47 C.F.R. § 51.5.
Plain Old Telephone Service (POTS)	Refers to basic 2 wire analog residential and business services. Can include feature capabilities (e.g., CLASS features).

DEFINITIONS OF TERMS

TERM	DEFINITION
Projects	Service requests that exceed the line size and/or level of complexity which would allow for the use of standard ordering and provisioning processes. Generally, due dates for projects are negotiated, coordination of service installations/changes is required and automated provisioning may not be practical.
Provisioning Troubles	A trouble report that is opened for a customer's existing or new service for a trouble identified between the time of the service order creation to the time of order completion. Provisioning troubles that are associated with a CLECs customers include troubles that occur and are reported during the conversion of an ILEC customer to a CLEC.
Query Types	Pre-ordering information of a customer's current service and billing profile that is available to a CLEC via ILEC OSS.
Recurring Charge	A rate charged for a product or service that is assessed each successive billing period.
Reject	A status that can occur to a CLEC submitted local service request (LSR) when it does not meet certain criteria. There are two types of rejects:, syntax, which occur if required fields are not included in the LSR:, and content, which occur if invalid data is provided in a field. A rejected service request must be corrected and re-submitted before provisioning can begin.
Repeat Report	Any trouble report that is a second (or greater) report on the same telephone number/circuit ID and at the same premises within 30 days. The original report can be any category, including excluded reports, and can carry any disposition code.
Service Group Type	The designation used to identify a category of similar services, e.g., UNE loops.
Service Order	The work order created and distributed in ILECs systems and to ILEC work groups in response to a complete, valid service request.
Service Order Type	The designation used to identify the major types of provisioning activities associated with a service request
Service Request	The transaction sent from the CLEC to the ILEC to order services or to request a change(s) be made to existing services.
Standard Interval	The interval that the ILEC quotes to its customers with respect to how long it will take to provision a service request. These intervals are standardized by specific service type and type of service modification requested ILECs publish these standard intervals in documents used by their own service representatives as well as ordering instructions provided to CLECs.
Subsequent Reports	A trouble report that is taken on a previously reported trouble prior to the date and time the initial report has a status of "cleared".
Summarized Charges	Billing charges that are aggregated on the bill, rather than individually itemized, e.g., local usage minutes on resale or retail calls, which are listed on the bill as "xx" minutes with no call detail.

DEFINITIONS OF TERMS

TERM	DEFINITION
Switched Access Meet Point Billing	A billing arrangement used when two or more LECs jointly provide a switched access service over Meet Point Trunks, with each LEC receiving an appropriate share of the revenues. The access services will be billed using switched access rate structures, and the LECs will decide whether a single bill or multiple bill will be sent. If the LECs cannot agree, multiple bills will be sent.
Tandem Switch	Switch used to connect and switch trunk circuits between and among Central Office switches.
Time to Restore	The time interval from the receipt, by the ILEC, of a trouble report on a customer's service to the time service is fully restored to the customer.
To Be Called Cut	A type of coordinated customer conversion that involves the CLEC calling the ILEC to signal the ILEC that it should start the customer conversion.
Trouble Cause Code	A code identifying the known or suspected cause of a trouble condition.
Trouble Disposition	A code identifying the end result of diagnostic and/or repair activities on a customer trouble report.
Usage Data	Data generated in network nodes to identify switched call data on a detailed or summarized basis. Usage data is used to create customer invoices for the calls.
Usage Records	The individual call records created in a switch to report the date, time, duration, calling and called numbers associated with a given call