



0000007383

BEFC — ARIZONA CORPORATION COMMISSION

RECEIVED

1999 SEP 24 P 4: 54

AZ CORP COMMISSION  
DOCUMENT CONTROL

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

CARL J. KUNASEK  
Chairman

JIM IRVIN  
Commissioner

WILLIAM A. MUNDELL  
Commissioner

IN THE MATTER OF U S WEST )  
COMMUNICATION, INC.'S COMPLIANCE )  
WITH SECTION 271 OF THE TELE- )  
COMMUNICATIONS ACT OF 1996 )

DOCKET NO. T-00000A-97-0238

**COMMENTS OF INTERVENOR ONE POINT COMMUNICATIONS-COLORADO,  
L.L.C., REGARDING PERFORMANCE BENCHMARKS EVALUATING  
U S WEST COMMUNICATIONS' OPERATIONAL SUPPORT SYSTEMS**

SEPTEMBER 24, 1999

Arizona Corporation Commission  
**DOCKETED**

SEP 24 1999

DOCKETED BY

1 Pursuant to the September 16, 1999, Memorandum from David Motycka to all parties  
2 on the Section 271 Service List, OnePoint Communications--Colorado, L.L.C., ("OnePoint") is  
3 providing its written comments regarding performance measurements for U S WEST  
4 Communications, Inc. ("U S WEST") Operations Support Systems ("OSS"), together with an  
5 annotated copy of Appendix "D" (RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES) to  
6 the Master Test Plan for Testing U S WEST's Operations Support Systems in Arizona (the "Master  
7 Test Plan").

### 8 GENERAL COMMENTS

9 1. The performance benchmarks should utilize a statistical distribution (*e.g.*,  
10 standard deviation) with established control limits rather than simple averages.

11 2. Performance benchmarks must be established from a perspective that is  
12 customer-focused and outcome-oriented rather than purely "process" oriented. Certain of the  
13 performance benchmarks identified in Appendix "D" of the Master Test Plan focus on the completion  
14 of a particular procedure or series of steps rather than whether working service has been delivered.  
15 For example, OnePoint has had situations where U S WEST reports an order as "complete" even  
16 though there is no dial tone at the point of demarcation. Thus, a benchmark which focuses only on  
17 whether or not U S WEST has completed some series of steps or processes--without considering  
18 whether the desired result has been achieved from the perspective of the CLEC and its customer--will  
19 provide incomplete data that is of limited value in assessing whether U S WEST has met its OSS  
20 obligations under the 1996 Telecommunications Act.

21 3. The general categories of performance benchmarks identified in the Master Test  
22 Plan are appropriate as far as they go, but OnePoint believes that additional specificity is required in  
23 both the formulas to be applied and the measures associated with each performance benchmark.

24 4. OnePoint concurs in the position of MCI Worldcom as presented in the first  
25 workshop on OSS regarding the importance of establishing what the various outcome category  
26

1 requirements will be before testing begins (*e.g.*, pass, conditional pass, fail). In addition, before  
2 testing begins, decisions must be made regarding the appropriate responses for addressing failures by  
3 U S WEST in each of the outcome categories. In other words, what will be required of U S WEST  
4 once the company fails a particular performance benchmark?

5           5.       The Federal Communications Commission requires that manual processes be  
6 included in the scope of OSS testing. *See* FCC Order 97-298 (September 19, 1997). Thus,  
7 benchmarks must be identified for activities that are conducted by U S WEST technicians, work center  
8 employees, escalation center employees, and other employees performing OSS functions.

9           6.       Performance benchmarks must be established for assessing parity in average  
10 intervals for service due date quoting (*i.e.*, the average length of service due date quotes for CLEC  
11 customers as compared to the average length of a service due date quotes for U S WEST retail  
12 customers).

13           7.       Performance benchmarks must be established for assessing parity in average  
14 intervals for service due date fulfilment (*i.e.*, the average length of time to fully complete service  
15 orders for CLEC customers as compared to the average length of time to fully complete service orders  
16 for U S WEST retail customers).

17           8.       Performance benchmarks must be established for assessing parity in timeliness,  
18 access and frequency of jeopardy notifications between what is available to U S WEST retail  
19 customers and what is available to CLECs. This includes jeopardy notification throughout the entire  
20 life cycle of a customer order (*i.e.*, from the point of initiation through the time that service is up and  
21 working properly).

22           9.       Test cases and performance benchmarks must be established to assess the full  
23 range of conditions that a CLEC may encounter in utilizing U S WEST's OSS, specifically including  
24 problem conditions. Examples of such problem conditions include held order situations, working  
25 left-in telephone numbers, escalations, LSR errors, and retyping errors. Since these conditions are  
26

1 regularly encountered by CLECs, a test plan which does not include such conditions would be grossly  
2 incomplete and not reflective of the CLECs' practical experience.

3           10.     OnePoint strongly disagrees with U S WEST's assertion that results for testing  
4 of the EDI interface should not be reported until three months following the month in which combined  
5 CLEC activity exceeds 1,000 LSRs submitted through the interface. *See* Master Test Plan, Appendix  
6 B, at page B-2. OnePoint is currently using the EDI interface, and the EDI interface will be  
7 OnePoint's exclusive interface by the end of September. Thus, OnePoint has a substantial interest in  
8 the testing of the EDI interface. Moreover, U S WEST has asserted that the EDI, EB-TA and  
9 flow-through platforms form the foundational basis for the company's receiving Section 271  
10 certification. Thus, robust and immediate testing of these interfaces is essential to the evaluative  
11 process.

12           11.     OnePoint does not believe that all point raised by OnePoint and other CLECs  
13 during the first two OSS workshops are covered in the Master Test Plan. It is OnePoint's assumption  
14 that specific test cases will be created over and above the identified performance benchmarks. For  
15 example, there are no measurements in the Master Test Plan specific to parity testing. The Master  
16 Test Plan appears to be focused toward testing one process/procedure and then assessing the outcomes  
17 of that process/procedure against the pre-determined benchmarks. Although this data is valuable, it  
18 in no way replaces or fulfills the rational behind parity testing.

19           12.     OnePoint proposes the inclusion of additional performance benchmarks as  
20 follows:

- 21                   (a)     OP--Facility Installation Interval-Interconnect
- 22                   (b)     OP--Trunk Installation Interval-Interconnect
- 23                   (c)     MR--Network-Mean Time to Clear

24  
25  
26

1 **COMMENTS OF AT&T AND TCG PHOENIX**

2 13. OnePoint agrees with the comments of AT&T Communications of the  
3 Mountain States and TCG Phoenix regarding the time it takes to activate the pre-order screens through  
4 U S WEST's IMA-GUI interface. *See* AT&T and TCG's Comments on Proposed Master Test Plan  
5 at page 31 (Sept. 17, 1999). Benchmarks should be established for IMA-GUI system activation.

6 14. OnePoint agrees with the comments of AT&T Communications of the  
7 Mountain States and TCG Phoenix regarding the need for benchmarks for failed or errored queries.  
8 *See* AT&T and TCG's Comments on Proposed Master Test Plan at page 32 (Sept. 17, 1999).

9 15. OnePoint agrees with the comments of AT&T Communications of the  
10 Mountain States and TCG Phoenix that LSR reject notice intervals should be measured in hours and  
11 not days. *See* AT&T and TCG's Comments on Proposed Master Test Plan at page 41 (Sept. 17,  
12 1999).

13 16. Regarding OP-4 (Installation Interval [average]), OnePoint agrees with AT&T  
14 that cases where a customer has requested a due date greater than the standard interval should be  
15 included in the test but in a separate category.

16 **COMMENTS REGARDING U S WEST'S PROPOSED MEASURES**

17 17. Regarding OP-3 (Installation Commitments Met [percent]) and OP-4  
18 (Installation Interval [average]), the numerators in the formulae should reference total orders where  
19 service is "operational" as opposed to "total orders completed." *See* comment 2 above.

20 18. Regarding OP-5 (Installation Trouble Reports [percent]), the numerator in the  
21 formula should reflect total orders where service is "operational" as opposed to "total orders  
22 completed." *See* comment 2 above.

23 19. Regarding BI-3 (Mean Time to Provide U S WEST-Recorded Usage Records  
24 [average]), the numerator should be changed from "billed amounts" to "disputed amounts" adjusted  
25 for errors.

26

1           20.    Regarding DPO-1 (Electronic Flow-Through of Local Service Requests (LSRs)  
2 to the Service Order Processor [percent]), the numerator should be expanded to measure LSRs flowing  
3 through the SOP and back to the CLEC without human intervention.

4           21.    Regarding DPO-3 (LSRs Rejected [percent]), OnePoint recommends that the  
5 benchmark be bifurcated to differentiate between U S WEST-caused rejects and CLEC-caused rejects.

6           22.    Regarding DPO-6 (Completion Notifications Transmitted within 24 Hours  
7 [percent]), OnePoint submits that the completion notifications are not as important as when service  
8 is actually operational and how the CLEC is informed of that fact.

9           23.    OnePoint believes DOP-1 (CLEC- or CLEC's Customer-Caused Misses  
10 [percent]) is ambiguous and that the value of the performance benchmark is negligible. OnePoint is  
11 concerned that the benchmark does not identify who would determine who caused the missed  
12 commitment. Under no circumstances should that entity be U S WEST.

13          24.    Regarding DOP-2 (Delayed Orders Completed > 15 Days Past the Commitment  
14 Date [percent]), the numerator should be changed from "orders completed" to "orders where service  
15 is operational." Further, the performance benchmark needs to be a low percentage, on the order of less  
16 than .25%.

17          25.    Regarding DOP-3 (Delayed Orders Completed > 90 Days Past the Commitment  
18 Date [percent]), the same comment applies as that for DOP-2 above.

19          26.    Regarding DMR-1 (CLEC- or CLEC's Customer-Caused Trouble Reports  
20 [percent]), the benchmark should specify who determines who caused the trouble. Again, U S WEST  
21 should not be involved in this determination.

22  
23  
24  
25  
26

APPENDIX D

ACC U.S. WEST OSS TEST PLAN

RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES<sup>1</sup>

NO.	MEASUREMENT	U.S. WEST	JOINT INTERVENORS <sup>2</sup>	OTHER	STAFF
<b>PERFORMANCE MEASUREMENTS</b>					
	<u>Pre-Order</u>				
	Pre-Order/Order Response Times				
PO-1	1A. IMA (CLEC Transaction)			A. 5-10 SEC	
	1B. Exact (CLEC & Retail)			B. N/A	
	1C. EDI (CLEC Transaction)			C. 5 SEC	
	Gateway Availability				
GA-1	Gateway Availability - Human/Computer Interface (IMA)			98% 24 X 7	
GA-2	Gateway Availability - Computer/Computer Interface (EDI)			98% 24 X 7	
	<u>Ordering and Provisioning</u>				
OP-1	Speed of Answer - Interconnect Provisioning Center (average)			20 SEC	
OP-2	Calls Answered within Twenty Seconds - Interconnect Provisioning Center (percent)			95%	
OP-3	Installation Commitments Met (percent)			95%	
OP-4	Installation Interval (average)			2-3 DAYS	
OP-5	Installation Trouble Reports (percent)			4-6 HOURS	
OP-6	Delayed Days (average)				
OP-7A	Coordinated Cutover Interval - Unbundled Loop (without Number Portability) (average)				
OP-7B	Coordinated Cutover Interval - Unbundled Loops (associated with LNP)				
OP-8A	Coordinated Cutover Interval - Interim Number Portability				

<sup>1</sup> For 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.

<sup>2</sup> Joint intervenors include: AT&T, TCG, MCI, Sprint, Nextlink, BCI, ACI, Empire.



SEP-16-1999 17:41

ACC LEGAL DIVISION

48 HOURS

P.07/08

APPENDIX D

ACCUS WEST OSS TEST PLAN

DA-1	Speed of Answer - Directory Assistance (average)					
DA-2	Calls Answered Within Ten Seconds - Directory Assistance (percent)					
	<u>Operator Services</u>					
OS-1	Speed of Answer - Operator Services (average)					
OS-2	Calls Answered Within Ten Seconds - Operator Services (percent)					
	<u>Network Performance - Network Interconnection</u>					
NI-1	Trunk Blocking - Interconnection Trunks (percent)					
NI-2	Trunk Blocking - Local-Interface ("Common") Trunks (percent)					
	<u>Collection Provisioning</u>					
CP-1	Installation Commitments Met (percent)					
CP-2	Installation Interval (average)					
<u>DIAGNOSTIC PERFORMANCE INDICATORS</u>						
	<u>Pre-Ordering</u>					
DPO-1	Electronic Flow-through of Local Service Requests (LSRs) to the Service Order Processor (percent)	95%				
DPO-2	LSR Rejection Notice Interval (average)	1 HOUR				
DPO-3	LSRs Rejected (percent)	> 5%				
DPO-4	Firm Order Confirmation (FOC) Interval (average)	95% 24 HOURS/100%				
DPO-5	Pre-Order/Order Response Times for US WEST Retail Transactions (average)					
DPO-6	Completion Notifications Transmitted within 24 hours (percent) (under development)	98%				
DPO-7	Completion Notification Interval (average) (under development)	> 24 HOURS				
	<u>Ordering and Provisioning</u>					

SEP-16-1999 17:41

ACC LEGAL DIVISION

P.08/08

APPENDIX D

ACC US WEST OSS TEST PLAN

DOP-1	CLEC or CLEC's Customer-Caused Installation Misses (percent)	> 5%		
DOP-2	Delayed Orders Completed $\geq$ 15 days past the commitment date (percent)	> 2%		
JOP-3	Delayed Orders Completed $\geq$ 50 days past the commitment date (percent)	0		
	Maintenance & Repair			
DMR-1	CLEC or CLEC's Customer-Caused Trouble Reports (percent)	> 5%		
	Collocation Provisioning			
DCP-1	CLEC Caused Collocation Misses (percent)			
DCP-2	Collocation Feasibility Study Interval (average)			
DCP-3	Collocation Feasibility Study Commitments Met (percent)			
DCP-4	Average Collocation Quote Interval (percent)			

RECOMMEND ADDING:

- OP FACILITY INSTALLATION INTERVAL--INTERCONNECT
- OP TRUNK INSTALLATION INTERVAL--INTERCONNECT
- MR NETWORK--MEAN TIME TO CLEAR