

ORIGINAL



BEFORE THE ARIZONA CORPORATION COMMISSION

OCT 12 1999 2:33

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Commissioner
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Arizona Corporation Commission
DOCKETED

OCT 12 1999

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

DOCKETED BY [Signature]

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MCI WORLDCOM'S AND SPRINT'S SUPPLEMENTAL COMMENTS
ADDRESSING PERFORMANCE MEASURES AND ADDITIONAL MEASURES

In accordance with the instructions provided at the workshop held on October 1, 1999, MCI WorldCom, Inc. ("MCIW") on behalf of its regulated subsidiaries, and Sprint Communications Company L.P. ("Sprint") submit these supplemental comments addressing the adequacy of the performance indicators and additional measures. In addition, MCIW and Sprint are providing detailed comments to the proposed existing performance measures since U S West will be filing updated language to the business rules found in the current Appendix B. MCIW and Sprint want U S West to be fully aware of its concerns in the business rules when it is clarifying those rules on October 15, 1999. Finally, MCIW and Sprint have specifically identified "parity" as an appropriate measurement instead of a benchmark where agreed upon at the last workshop and where MCIW and Sprint believe there is a measurable parity standard.

SUPPLEMENTAL COMMENTS

All of the proposed indicators included in Appendix B lack a measure of success (i.e., parity or benchmark standard), although the parties began discussing specific parity requirements at the last workshop on some measures. A measure of success is required before an evaluation about the performance of U S West can be made. Moreover, it is mandatory that a measure of success for each measure be finalized before the OSS Test commences.

For all of the indicators that have service group disaggregation (except the maintenance and repair indicators), the service list is incomplete and does not even include the “standard service groupings” in Appendix B-58. In addition, the “standard service groupings” list itself in Appendix B-58 is incomplete. There is significantly more disaggregation by service group for resale than for UNEs. To provide an adequate level of service group disaggregation, the following improvements need to be made. UNE loops should be disaggregated by loop type. There should be disaggregation for UNE xDSL loops, as well as for resale xDSL. Unbundled Dedicated Transport should be disaggregated by speeds – DS-1 and DS-3. Unbundled switching should be split out by port type.

The indicators beginning on page B-35 through page B-57 should not merely be diagnostic, but rather should be considered core service performance evaluators. Also, it is unclear what “diagnostic” implies when conducting an OSS Test.

SPECIFIC INDICATORS

Indicator Number: GA-1

This measure and GA-2 only capture gateway availability for the GUI and EDI interfaces. If there are other interfaces, they need to be measured also. For example, indicator number PO-1 shows that U S West uses the EXACT system. In addition, there likely are additional interfaces that support the maintenance process that need to be measured.

Measurable Standard: Benchmark of 99.5%

Indicator Number: GA-2

Similar comments as in GA-1. In addition, the “Note” states that the results for this indicator will be reported beginning three months following the month in which combined CLEC activity in the state exceeds 1,000 local service requests submitted through the interface. This is a fairly high threshold and should be eliminated. As this measure evaluates the availability of systems, there is no relationship to how frequently the system is used. In addition, it is unclear how this will work in a test environment.

Measurable Standard: Benchmark of 99.5%

Indicator Number: PO-1

Similar comments as in GA-2. The list of pre-order transaction types is not complete and should include “Rejected/Failed Inquiries.”

Measurable Standard: Parity

Indicator Number: OP-1

State specific results are preferable.

Measurable Standard: Parity, however, adequate service should be an average of 15 seconds

Indicator Number: OP-2

The threshold of 20 seconds is high. This number should be supported by historical data before it is accepted.

Measurable Standard: Parity, however, adequate service should be an average of 15 seconds (from OP-1).

Indicator Number: OP-3

The description states that the “Original due date matched by completion date is counted as met.” Orders with a subsequent due date should also be measured. For example, if U S West agrees to a new install date and misses it, it should be counted in the measure as a miss, not eliminated from the data set for this measure.

The description also states that “a due date missed for standard categories of customer reasons is counted as met.” These should not be counted as met, but rather these orders should be excluded from the measure. Does U S West count this way on its retail side as well?

For this measure, the results for non-designed services will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. The disaggregation for designed services and unbundled loops is by density area. Since U S West knows in advance of committing to a due date how its processes are designed, it is unclear why this level of disaggregation is necessary. Are there other processes that could be a factor?

Indicator DNP-1 demonstrates that U S West measures its performance on behalf of itself for the provision of interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator OP-3.

Measurable Standard: Parity

Indicator Number: OP-4

Results for non-designed services will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. The disaggregation for designed services and unbundled loops is by density area. Since U S West knows in advance of committing to a due date how its processes are designed, it is unclear why this level of disaggregation is necessary. Are there other processes that could be a factor?

Indicator DNP-2 demonstrates that U S West measures its performance on behalf of itself for the provision of interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator OP-4.

Excluded from this measure are “orders with customer requested due dates greater than the current standard interval and intervals lengthened due to CLEC – and CLEC’s customer-caused delays.” In order to be consistent, orders with due dates shorter than the standard interval should also be excluded.

Measurable Standard: Parity

Indicator Number: OP-5

For this measure, results for non-designed services will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. The disaggregation for designed services and unbundled loops is by density area. Since U S West knows in advance of committing to a due date how its processes are designed, it is

unclear why this level of disaggregation is necessary. Are there other processes that could be a factor?

Indicator DNR-3 demonstrates that U S West measures its performance on behalf of itself for the provision of interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator OP-5.

Measurable Standard: Parity

Indicator Number: OP-6

This indicator is useful, but there is also a need to measure delayed days for pending orders (those not yet complete.)

For this measure, results for non-designed services will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. The disaggregation for designed services and unbundled loops is by density area. Since U S West knows in advance of committing to a due date how its processes are designed, it is unclear why this level of disaggregation is necessary. Are there other processes that could be a factor?

Indicator DNP-3 demonstrates that U S West measures its performance on behalf of itself for the provision of interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator OP-6.

Excluded from this measure are orders delayed due to customer reasons. It should be clear that subsequent orders (orders with a new due date) are not excluded just because the CLECs’ customer may have caused the original due date to be missed.

Measurable Standard: Parity

Indicator Number: OP-7

The service level disaggregation only includes loops with and without NP. There are other services where a coordinated cutover is required and these should be measured as well.

While CLEC or customer caused delays or changes in cutover time are excluded, it is important that it be clear how this is determined.

While the Commission has asked that parties endeavor to use a parity standard, the only like process is when U S West takes back a loop. Other than that, the measure of success should be a benchmark.

Measurable Standard: Benchmark of an average of 5 minutes per loop.

Indicator Number: OP-8

If OP-8B is the 10-digit trigger process, it should clearly state that.

Excluded are orders delayed due to customer reasons. It should be clear that subsequent orders (orders with a new due date) are not excluded just because the CLECs' customer may have caused the original due date to be missed.

Measurable Standard: Benchmark (TBD)

Indicator Number: OP-9

Excluded from this measure are orders delayed due to customer reasons. It should be clear that subsequent orders (orders with a new due date) are not excluded just because the CLECs' customer may have caused the original due date to be missed.

Measurable Standard: Benchmark (TBD)

Indicator Number: MR-1

Measurable Standard: Parity

Indicator Number: MR-2

The threshold of 20 seconds is high. This number it should be supported by historical data before it is accepted.

Measurable Standard: Parity

Indicator Number: MR-3

For this measure, results for some will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. Are these levels of disaggregation intended for all reported service groups. The disaggregation for unbundled loops is defined by density area. Is this an additional level of disaggregation for UNE loops? Additionally, since U S West knows that before it commits to a maintenance repair date how its processes are designed, it is unclear that this level of disaggregation is necessary. Are there other processes that could be a factor?

Measurable Standard: Parity

Indicator Number: MR-4

For this measure, results will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. The disaggregation for unbundled loops is defined by density area. Is this an additional level of disaggregation for UNE loops? Additionally since US West knows in advance of committing to a maintenance repair date how its processes are designed, it is unclear why this level of disaggregation is necessary. Are there other processes that could be a factor?

The service group types should include not only those addressed above in the general comment section, but also NXX Code Openings and Local and Interim Number Portability.

Measurable Standard: Parity

Indicator Number: MR-5

Under the “purpose”, it includes “4 hours” as a possible standard. 4 hours may be high for DS-1 and DS-3 services.

The service group types should include not only those addressed above in the general comment section, but also NXX Code Openings and Local and Interim Number Portability.

Indicator DNR-2 demonstrates that U S West measures its performance on behalf of itself for maintenance on interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator MR-5.

Measurable Standard: Parity

Indicator Number: MR-6

The description for this measure states that “customer caused delays (no access, no available work force, etc.) are included, whereas “troubles reports found to be related to customer equipment, customer education, inside wire, and ‘no access’” are exclusions. Customer caused delays should be excluded.

The service group types should include not only those addressed above in the general comment section, but also NXX Code Openings and Local and Interim Number Portability.

Indicator DNR-1 demonstrates that U S West measures its performance on behalf of itself for maintenance on interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator MR-6.

Measurable Standard: Parity

Indicator Number: MR-7

The service group types should include not only those addressed above in the general comment section, but also NXX Code Openings and Local and Interim Number Portability.

Measurable Standard: Parity

Indicator Number: MR-8

The service group types should include not only those addressed above in the general comment section, but also NXX Code Openings and Local and Interim Number Portability.

Indicator DNR-4 demonstrates that U S West measures its performance on behalf of itself for maintenance on interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator MR-8.

Measurable Standard: Parity

Indicator Number: BI-1

Results for this indicator should be disaggregated by type of billing record, for example – Resale, UNEs, and switched access.

Measurable Standard: Parity for resale (compare it to retail) and UNEs (also compare it to retail). For switched access, the recommendation for a benchmark would be 95% in 5 days.

Indicator Number: BI-2

Under “purpose”, it states that this indicator only applies to bills U S West delivers via EDI format. What if U S West and CLECs use other interfaces? Also, if U S West used something other than EDI format internally, measure of success may have to be a benchmark.

Results for this indicator should be disaggregated by type of billing, for example - Resale, UNEs, and Facility/Interconnection.

Measurable Standard: While the parties endeavor to use a parity standard, this may not be possible for this measure since the like process for U S West is not that similar or it just too difficult for U S West to measure. The recommended benchmark should be 99% within 10 days.

Indicator Number: BI-3

Results for this indicator should be disaggregated by type of billing, for example – Resale, UNEs, and Facility/Interconnection.

Measurable Standard: While the parties endeavor to use a parity standard, this is possible for resale (compare it to retail) and UNEs (also compare it to retail), but may not be possible for Facilities/Interconnection. The recommended benchmark should be 95%.

The billing indicators lack of measures of “Usage”, "Non-Recurring Charge" and "Recurring Charge" completeness. These indicators would evaluate US West’s

performance regarding the percentage of usage, non-recurring and recurring charges appearing on the correct bill.

Indicator Number: ES-1

The description for this measure states that “CLEC-specific results are not available.” As much as possible, U S West should be required to break out results by CLEC.

If U S West provides direct gateway access to 911 database, (i.e., the CLEC can submit a 911 update directly to the 911 database without a service order), it should be measured as a separate level of disaggregation.

Measurable Standard: Parity for service order generated updates and a benchmark of 100% within 24 hours for direct gateway updates.

Indicator Number: ES-2

Measuring the timeliness of installation of 911 service trunks, as a separate indicator is fine, though it could be included as a level of disaggregation in Indicator OP-4.

Measurable Standard: Parity

Indicator Number: DA-1

This indicator will be for US WEST/CLECs performance in the aggregate except when the CLEC has special trunk arrangements and separate operators. Its value for differentiating parity service for CLECs is limited.

Measurable Standard: Parity (by design)

Indicator Number: DA-2

This indicator will be for US WEST/CLECs performance in the aggregate except when the CLEC has special trunk arrangements and separate operators. Its value for differentiating parity service for CLECs is limited.

Measurable Standard: Parity (by design)

Indicator Number: OS-1

This indicator will be for US WEST/CLECs performance in the aggregate except when the CLEC has special trunk arrangements and separate operators. Its value for differentiating parity service for CLECs is limited.

Measurable Standard: Parity (by design)

Indicator Number: OS-2

This indicator will be for US WEST/CLECs performance in the aggregate except when the CLEC has special trunk arrangements and separate operators. Its value for differentiating parity service for CLECs is limited.

Measurable Standard: Parity (by design)

Indicator Number: NI-1

Measurable Standard: Parity

Indicator Number: NI-2

The parity standard is not appropriate for common trunks, since they are by definition shared by both CLECs and U S West.

Measurable Standard: Benchmark of no more than 2% of trunk group blocking at no more than 2% for this measure.

Indicator Number: CP-1

This measure appears to include only those orders completed on the original due date. Orders with a subsequent due date should also be measured. For example, if U S West agrees to a new install date and misses it, it should be counted in the measure as a miss.

In the description it states that “a due date missed for standard categories of customer reasons is counted as met.” These should not be counted as met; they should be excluded from the measure. Does U S West count this way on its retail side as well?

All types of collocation should be included, not just physical and virtual. Results for augments, cageless and shared collocation should be measured uniquely.

Measurable Standard: Benchmark of 100% (within committed interval)

Indicator Number: CP-2

All types of collocation should be included, not just physical and virtual. Results for augments, cageless and shared collocation should be measured uniquely.

Measurable Standard: Benchmark of 100% within 90 calendar days for new physical (including cageless and shared) and virtual, and 100% within 60 days for augments.

Indicator Number: DPO-1

This indicator should include not only an evaluation the percentage of orders that flow through compared to all service requests sent electronically, but also the percentage of orders that flow through, by service group type and order type, that are programmed to flow through.

Measurable Standard: Parity

Indicator Number: DPO-2

This measure, as currently designed, will apply to electronic LSRs only. Results for manual LSRs need to be measured as well.

In the “description” for this measure, the time interval is defined in “business days”. This is too long, as this process should occur in minutes or hours.

There is no disaggregation between orders sent electronically and handled electronically and those sent electronically and handled manually. Benchmarks should be established for each of these processes uniquely, with the one for the fully electronic LSRs being significantly shorter.

Measurable Standard: Benchmark: Fully Electronic: Average 20 minutes,

Electronic/Manual: 5 hours, Manual/Manual: 10 hours

Indicator Number: DPO-3

This indicator is focused on the CLECs, and is unnecessary for a test of U S West’s OSS or as a production service indicator.

Indicator Number: DPO-4

The FOC Interval indicator is one of the most important measures for CLECs. It should not be diagnostic, but should be one of primary indicators of core service performance.

In the "description" of this measure, it states that “FOC notifications measured are those associated with installation orders completed in the reporting period.” This measure should include all orders "confirmed within the reporting period”.

There does not appear to be any disaggregation by service group type. It is very important to have this, as the notification interval will often vary based on the complexity of the service request.

The measure of success for this indicator is extremely important. If a benchmark is set it should reflect the fact that U S West for its retail customers can supply a FOC almost instantaneously.

Measurable Standard: Benchmark: Fully Electronic: Average 20 minutes, Electronic/Manual: 6 hours, Manual/Manual: 12 hours

Indicator Number: DPO-5

This indicator should be used as the parity comparison for indicator PO-1.

Indicator Number: DPO-6

If U S West has a fully electronic process, the standard of 24 hours is too long. If U S West does not have a fully electronic process for sending completion notices, it should be required to develop one.

Measurable Standard: Benchmark: Fully Electronic: Average 20 minutes, All other: 95% within 24 hours.

Indicator Number: DPO-7

Similar comment as for DPO-6.

Measurable Standard: see DPO-6

Indicator Number: DOP-1

This indicator is focused on the CLECs, and is unnecessary for a test of U S West's OSS. It is also unnecessary once the indicators are in production.

Indicator Number: DOP-2

This indicator is really a sub-measure of OP-6.

Indicator Number: DOP-3

This indicator is really a sub-measure of OP-6.

Indicator Number: DMR-1

This indicator is focused on the CLECs, and is unnecessary for a test of U S West's OSS. It is also unnecessary once the indicators are in production.

Indicator Number: DCP-1

This indicator is focused on the CLECs, and is unnecessary for a test of U S West's OSS. It is also unnecessary once the indicators are in production.

Indicator Number: DCP-2

All types of collocation should be included, not just physical and virtual. Results for augments, cageless and shared collocation should be measured uniquely.

Measurable Standard: Benchmark of 100% within 15 days

Indicator Number: DCP-3

All types of collocation should be included, not just physical and virtual. Results for augments, cageless and shared collocation should be measured uniquely.

Measurable Standard: Benchmark of 100% (within committed interval)

Indicator Number: DCP-4

All types of collocation should be included, not just physical and virtual. Results for augments, cageless and shared collocation should be measured uniquely.

Measurable Standard: Benchmark of 100% within 30 days

Indicator Number: DNI-2

The usefulness of this indicator in an OSS Test is unclear. It basically allows U S West to say it put in numerous trunks, and then say the CLECs are not using them to full capacity.

Indicator Number: DNP-1

This indicator should be used as the parity comparison for the LIS Trunks sub-measure of indicator OP-3.

Indicator Number: DNP-2

This indicator should be used as the parity comparison for the LIS Trunks sub-measure of indicator OP-4.

Indicator Number: DNP-3

This indicator should be used as the parity comparison for the LIS Trunks sub-measure of indicator OP-6.

Indicator Number: DNR-1

This indicator should be used as the parity comparison for the LIS Trunks sub-measure of indicator MR-6.

Indicator Number: DNR-2

This indicator should be used as the parity comparison for the LIS Trunks sub-measure of indicator MR-5.

Indicator Number: DNR-3

This indicator should be used as the parity comparison for the LIS Trunks sub-measure of indicator OP-5.

Indicator Number: DNR-4

This indicator should be used as the parity comparison for the LIS Trunks sub-measure of indicator MR-8.

ADDITIONAL MEASURES

Interfaces

1. **TITLE: Notification of Interface Outages**

DESCRIPTION: Measures the time it takes U S WEST to notify the CLEC of an outage of an interface.

METHOD OF CALCULATION: $[(\text{Number of interface outages where CLECs are notified within 15 minutes}) / (\text{Total number of interface outages})] \times 100$

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, U S WEST, and by U S West affiliates

REPORTED BY: By interface type for all interfaces accessed by CLECs

MEASURABLE STANDARD: 97% in 15 minutes

BUSINESS RULES: None

Provisioning

2. **TITLE: Percentage of Orders Jeopardized**

DESCRIPTION: Percentage of total orders processed for which U S WEST notifies the CLEC that the work will not be completed as committed on the original FOC.

METHOD OF CALCULATION: $[(\text{Number of Orders Jeopardized}) / (\text{Number of Orders Confirmed})] \times 100$

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, by U S WEST and by U S WEST affiliates.

REPORTED BY: Electronic interface, by service group type, and by lack of facilities and all other.

MEASURABLE STANDARD: Parity for all service groups

BUSINESS RULES: When U S WEST processes orders for a CLEC via different interfaces (e.g., fax and each type of electronic method) then this measurement must be computed for each interface arrangement. Logging of information in the U S WEST OSS, whether manual or automatic, that indicates an order may not be completed by the existing due date, is equivalent of the return of a jeopardy notice to the CLEC regardless of whether or not U S WEST takes action based upon such information. Excludes delays for customer reasons.

3. **TITLE: Average Jeopardy Notice Interval**

DESCRIPTION: Measures the remaining time between the pre-existing committed order completion date and time (communicated via the FOC) and the date and time U S WEST issues a notice to the CLEC indicating an order is in jeopardy of missing the due date (or the due date/time has been missed).

METHOD OF CALCULATION: $(\text{Date and Time of Committed Due Date for the Order} - \text{Date and Time of Jeopardy Notice}) / (\text{Number of Orders Jeopardized in Reporting Period})$

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, by U S WEST, and by U S West's affiliates.

REPORTED BY: Electronic interface, by service group type, and by lack of facilities and all other.

MEASURABLE STANDARD: Parity for all service groups

BUSINESS RULES: Includes only those orders jeopardized on or before the scheduled due date. All intervals are measured in hours and hundredths of hours rounded to the nearest hundredth. The accumulation of elapsed time is based on business days/hours. Logging of information in the U S WEST OSS, whether manual or automatic, that indicates an order may not be completed by the existing due date, is equivalent of the return of a jeopardy notice to the CLEC regardless of whether or not U S WEST takes action based upon such information. Excludes delays for customer reasons.

4. **TITLE: Percent of Due Dates Missed Due to Lack of Facilities (can be included as a level of disaggregation for OP-3)**

DESCRIPTION: Measures the percent of new, move and change orders missed due to lack of facilities. (Results also included in Measure "Percent Missed Due Dates").

METHOD OF CALCULATION: $[(\text{Total New, Move and Change Orders Missed Due Dates Due to Lack of Facilities}) / (\text{Total Number of New, Move and Change Orders})] \times 100$

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, by U S WEST, and by U S WEST affiliates.

REPORTED BY: Service group type and Field Work/No Field Work as appropriate.

MEASURABLE STANDARD: Parity for all service groups utilizing loop facilities.

BUSINESS RULES: Due date is defined as either original due date or final due date if the original due date was missed due to customer reasons.

5. **TITLE: Delay Order Interval to Completion Date (For Lack of Facilities) (can be a level of disaggregation for Measure OP-6)**

DESCRIPTION: Measures the average calendar days from due date to completion date on company missed orders due to lack of U S WEST facilities.

METHOD OF CALCULATION: $\text{Sum [Completion Date – Committed Order Due Date (for orders missed due to lack of U S WEST facilities)]} / (\text{Number of Orders Missed Due to Lack of U S WEST Facilities in the Reporting Period.})$

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, by U S WEST, and by U S WEST affiliates.

REPORTED BY: Service group type disaggregated by 1-30 days, 31-90 days and >90 days.

MEASURABLE STANDARD: Parity for all service groups utilizing loop facilities.

BUSINESS RULES: Due date is defined as either original due date or final due date if the original due date was missed due to customer reasons.

6. **TITLE: Held Order Interval**

DESCRIPTION: Measures the time period that service orders are not completed by the original due date for all US WEST reasons.

METHOD OF CALCULATION: $\text{Sum [Reporting Period Close Date- Committed Order Due Date (for orders missed due to lack of U S WEST facilities)]} /$
(Number of Orders Pending and Past the Committed Due Date)

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, by U S WEST, and by U S WEST affiliates.

REPORTED BY: Service group type disaggregated

MEASURABLE STANDARD: Parity for all service groups.

BUSINESS RULES: Excludes customer caused misses.

7. **TITLE: Provisioning Trouble Reports (Prior to Service Order Completion)**

DESCRIPTION: Measures the percent of troubles that are reported (via customer or indirectly by CLEC) that occur during the provisioning process.

METHOD OF CALCULATION: $(\text{Number of trouble reports that occur from the time of service order creation, up to and including the date of service order completion}) / (\text{Total number of service orders in reporting period.})$

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, by U S WEST, by U S WEST affiliates.

REPORTED BY: Resale, UNE products, and LNP; by affecting service and out of service.

MEASURABLE STANDARD: Parity for all service groups

BUSINESS RULES: Excludes CPE and IEC/CLEC caused troubles; subsequent reports; message reports (circuit reports for which U S WEST has no records) and U S WEST employee generated reports.

Maintenance

8. **TITLE: Percentage of Customer Trouble Not Resolved Within Estimated Time**

DESCRIPTION: Measures the percent of trouble reports not cleared by the commitment time.

METHOD OF CALCULATION: (Total network trouble reports not cleared by the commitment time for U S WEST reasons / Total network trouble reports completed) x 100

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, by U S WEST, and by U S WEST affiliates.

REPORT BY: Service group type; by dispatch and no dispatch. Including NXX troubles and LNP troubles.

MEASURABLE STANDARD: Parity for all service groups

BUSINESS RULES: U S WEST analog for this measure is derived by comparing the actual date and time of U S WEST trouble ticket closure compared to the projected trouble clearance date and time established through the U S WEST

agent's on-line interaction with U S West's work management system, regardless of whether or not U S WEST currently quotes this information to its retail customer. The "quoted" or "estimated" time to restore is the actual scheduled time projection returned by the U S WEST work management system or the standardized repair interval that U S WEST uses for its own operations when equivalent service arrangements are involved.

A trouble is resolved when U S WEST issues notice to the CLEC that the customer's service is restored to normal operating parameters. If U S WEST supplies only the estimated repair interval, then the estimated date and time of repair is determined by adding the repair interval to the date and time that the CLEC logged the repair request with U S WEST.

Excluded are trouble tickets cancelled at the CLEC request; U S WEST trouble reports associated with administrative service; instances where the CLEC or a U S WEST customer requests that a ticket be "held open" for monitoring, or where a trouble ticket is created to track and/or monitor requests for clarifying information; subsequent trouble reports on a maintenance ticket that have not been reported as resolved (or closed); and, tickets used to track referrals of misdirected calls.

Network Performance

9. **TITLE: NXX Loaded by LERG Effective Date**

DESCRIPTION: Measures the number of NXXs loaded and tested by the LERG effective date.

METHOD OF CALCULATION: [(Number of NXXs loaded and tested by LERG effective date) / (Number of NXXs scheduled to be loaded and tested by LERG effective date)] x 100

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, by U S WEST, and by U S WEST affiliates

REPORT BY: Reported for all NXX codes scheduled to be loaded in reporting period

MEASURABLE STANDARD: Parity

BUSINESS RULES: Excludes any NXX codes with requested loading interval of less than the industry standard (currently 45 days). NXX loading procedures include central office/tandem translations, verification of translations, call through testing.

10. **TITLE: Network Outage Notification**

DESCRIPTION: Measures the time period for notification of a network outage.

To be measured for the following: switching, transport, network fire related incident, network blockage, 911, SS7.

METHOD OF CALCULATION: Sum (Date & Time of Outage Notification) – (Date & Time of U S WEST Outage Awareness) / Number of Outages

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, U S WEST, and U S WEST affiliates.

REPORT BY: Switching transport, network fire related incident, network blockage, 911, SS7

MEASURABLE STANDARD: Parity

BUSINESS RULES: Notification time for each outage will be measured in minutes, on a 7 by 24 basis, and divided by the number of outages for the reporting period.

Billing

11. **TITLE: Usage Completeness**

DESCRIPTION: Measures the percentage of usage charges appearing on the correct bill.

METHOD OF CALCULATION: $(\text{Count of usage charges on the bill that were recorded within last 30 days} / \text{Total count of usage charges on the bill}) \times 100$

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, by U S WEST (for analog component) and by U S WEST affiliates

REPORT BY: Resale, UNE product, and Facilities/Interconnection

MEASURABLE STANDARD: Parity for Resale and UNE. Benchmark of 95% for Facilities/Interconnection

BUSINESS RULES: Excludes summarized charges.

12. **TITLE: Recurring Charge Completeness**

DESCRIPTION: Measures the percentage of fractional recurring charges appearing on the correct bill.

METHOD OF CALCULATION: (Count of fractional recurring charges that are on the correct bill* / Total count of fractional recurring charges that are on the bill) x 100 (*Correct bill = next available bill)

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, by U S WEST (for analog component), and by U S WEST affiliates.

REPORT BY: Resale, UNE product, and Facilities/Interconnection

MEASURABLE STANDARD: Parity for Resale and UNE. Benchmark of 95% for Facilities/Interconnection

BUSINESS RULES: The effective date of the recurring charge must be within 30 days of the bill date for the charge to appear on the correct bill.

13. **TITLE: Non-Recurring Charge Completeness**

DESCRIPTION: Measures the percentage of non-recurring charges appearing on the correct bill.

METHOD OF CALCULATION: (Count of non-recurring charges that are on the correct bill / Total count of non-recurring charges that are on the bill) x 100

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLEC, CLECs in the aggregate, by U S WEST (for analog component) and by U S WEST affiliates.

MEASURABLE STANDARD: Parity for Resale and UNE. Benchmark of 95% for Facilities/Interconnection

BUSINESS RULES: The effective date of the non-recurring charge must be within 30 days of the bill date for the charge to appear on the correct bill.

14. **TITLE: Accuracy of Mechanized Bill Feed**

DESCRIPTION: Measures the percentage of mechanized bill feeds that are accurately passed to the CLEC in the reporting period. CLECs will report (this data. If no data received from CLEC, U S WEST will not report the measure).

METHOD OF CALCULATION: $(\text{Total \# of files that passed} / \text{Total \# of files sent in that reporting period}) \times 100$

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLECs, CLECS in the aggregate

REPORT BY: TB

MEASURABLE STANDARD: TBD

BUSINESS RULES: TBD

Database Updates

15. **TITLE: Average Database Update Interval**

DESCRIPTION: Measures the average time to update DA/listings database.

METHOD OF CALCULATION: $[(\text{Completion date \& time}) - (\text{Update submission date \& time})] / \text{Count of updates completed in reporting period}$

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLECs, CLECs in the aggregate, by U S WEST (for analog component applies) and by ILEC affiliates

REPORT BY: Service order generated updates and direct gateway input

MEASURABLE STANDARD: Parity for service order generated updates.

Benchmark for direct gateway 95% in 5 days.

BUSINESS RULES: CLECs reserve the right to request additional databases are included in this measure.

16. **TITLE: Percent Database Accuracy**

DESCRIPTION: Measures the percentage of database updates completed without error, i.e., 911 databases, DA/listings database.

METHOD OF CALCULATION: $[(\text{Count of updates completed without error}) / (\text{Count of updates completed})] \times 100$

REPORT PERIOD: Monthly

REPORT STRUCTURE: Individual CLECs, CLECs in the aggregate, by U S WEST (for analog component) and by U S WEST affiliates

REPORT BY: For both DA/Listings and E911 database: Service order generated updates and direct gateway input.

MEASURABLE STANDARD: Parity for service order generated updates.

Benchmark for direct gateway input to be determined

BUSINESS RULES: CLECs reserve the right to request additional databases are included in this measure. Excludes updates cancelled by the CLEC, initial update when supplemented by CLEC, errors caused by CLECs and U S WEST updates associated with internal or administrative use of local services.

CONCLUSION

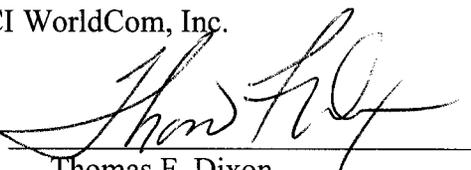
The performance indicators contained in the Master Test Plan as supplemented by MCIW's and Sprint's comments and additional measures establish the critical test indicators necessary to appropriately evaluate and measure of success of U S WEST OSS. In addition, these indicators will also

provide valuable tracking indicators when appropriate. Attached to these supplemental comments as Attachment 1 is a matrix summarizing the performance indicators, which MCIW and Sprint have discussed above, and which should be included in this OSS test.

The undersigned is authorized to file these comments on behalf Sprint.

Dated: October 8, 1999

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Attachment 1
MCI WorldCom/Sprint Performance Indicators To Be Included in OSS Test

Indicator Number	Indicator Name	Critical Test Indicator	Tracking Indicator
GA-1	Gateway Availability		X
GA-2	Gateway Availability		X
PO-1	Pre-Order/Order Response Times	X	
OP-1	Speed of Answer – Provisioning Center		X
OP-2	Speed of Answer – Provisioning Center		X
OP-3	Installation Commitments Met	X	
OP-4	Installation Interval	X	
OP-5	Installation Trouble Reports	If maintenance process included in OSS Test, then troubles will be induced, thus include this indicator as tracking only. If maintenance is not included, then this indicator is critical.	
OP-6	Delayed Days	X (track for duration of test)	
OP-7	Coordinated Cutover Interval	X	
OP-8	Coordinated Number Portability Timeliness	X	
OP-9	Combined Coordinated Cutover Interval	X	
MR-1	Speed of Answer – Repair Center		X
MR-2	Calls Answered w/in 20 Seconds – Repair Center		X
MR-3	Out of Service Cleared w/in 24 hours: Non-Designed	X	
MR-4	All Troubles Cleared w/in 48 Hours: Non-Designed	X	
MR-5	All Troubles Cleared w/in 48 hours: Designed	X	
MR-6	Mean Time to Restore	X	
MR-7	Repair repeat Report Rate	If maintenance process included in OSS Test, then troubles will be induced, thus include this indicator as tracking only. If maintenance is not included, then this indicator is critical.	
MR-8	Trouble Rate	If maintenance process included in OSS Test, then troubles will be induced, thus include this indicator as tracking only. If maintenance is not included, then this indicator is critical.	
BI-1	Mean Time to Provide Usage Records	X	
BI-2	Mean Time to Deliver Invoices	X	
BI-3	Billing Accuracy	X	
ES-1	ALI Database Updates Completed w/in 24 Hours	X	
ES-2	911/E911 ES Trunk Installation Interval	X (only if 911 trunks are installed as part of Test)	

Attachment 1
MCI WorldCom/Sprint Performance Indicators To Be Included in OSS Test

Indicator Number	Indicator Name	Critical Test Indicator	Tracking Indicator
DA-1	Speed of Answer		X
DA-2	Calls Answered w/in 10 Seconds		X
OS-1	Speed of Answer		X
OS-2	Calls Answered w/in 10 Seconds		X
NI-1	Trunk Blocking – Interconnection Trunks	N/A	N/A
NI-2	Trunk Blocking – Local Interoffice Common Trunks	N/A	N/A
CP-1	Collocation Installation Commitments Met	X (only if collocation is part of the Test)	
CP-2	Collocation Provisioning Installation Interval	X (only if collocation is part of Test)	
DPO-1	Electronic Flow Through of LSRs	X	
DPO-2	LSR Rejection Notice Interval	X	
DPO-4	FOC Interval	X	
DPO-5	Pre-Order/Order Response Time for Retail	X (parity comparison)	
DPO-6	Order Completion Notification w/in 24 hours	X	
DPO-7	Order Completion Notification Interval	X	
DOP-2	Percent Delayed Orders Completed w/in 15 days past commitment date	X	
DOP-3	Percent Delayed Orders Completed w/in 90 days past commitment date	X (if test duration permits)	
DCP-2	Average Collocation Feasibility Study Interval	X (only if collocation is part of Test)	
DCP-3	Collocation Feasibility Study Commitments Met	X (only if collocation is part of Test)	
DCP-4	Average Collocation Quote Interval	X (only if collocation is part of Test)	
DNI-2	Local Interconnection Final Trunk Group Utilization	N/A	N/A
DNP-1	USW Local Interoffice Trunks Provisioned by Scheduled Date	X (only if collocation is part of Test) (parity comparison)	
DNP-2	USW Local Interoffice Trunks Provisioning Interval	X (only if collocation is part of Test) (parity comparison)	

**Attachment 1
MCI WorldCom/Sprint Performance Indicators To Be Included in OSS Test**

Indicator Number	Indicator Name	Critical Test Indicator	Tracking Indicator
DNP-3	USW Local Interoffice Trunks Provisioning Late Days	X (only if collocation is part of Test) (parity comparison)	
DNR-1	USW Local Interoffice Trunks Mean Time to Repair	X (only if maintenance is part of the test) (parity comparison)	
DNR-2	USW Local Interoffice Trunks All Troubles Cleared w/in 4 hours	X (only if maintenance is part of the test) (parity comparison)	
DNR-3	USW Local Interoffice Trunks Repeated Trouble Incidents w/in 30 days	If maintenance process included in OSS Test, then troubles will be induced, thus include this indicator as tracking only. If maintenance is not included, then this indicator is critical.	
DNR-4	USW Local Interoffice Trunks Trouble Rate	If maintenance process included in OSS Test, then troubles will be induced, thus include this indicator as tracking only. If maintenance is not included, then this indicator is critical.	
New measure 1	Notification of Interface Outages		X
New measure 2	Percent of Orders Jeopardized	X	
New measure 3	Average Jeopardy Notice Interval	X	
New measure 4 (may include in OP-3)	Percent of Due Dates Missed Due to Lack of Facilities	X	
New measure 5 (may include in OP-6)	Delay Order Interval to Completion Date	X	
New measure 6	Held Order Interval	X (orders for interval of Test)	
New measure 7	Provisioning Trouble Reports	If maintenance process included in OSS Test, then troubles will be induced, thus include this indicator as tracking only. If maintenance is not included, then this indicator is critical.	
New measure 8	Percent of Customer Troubles Not Resolved w/in Estimated Time	X (only if maintenance is part of the test) (parity comparison)	
New measure 9	NXX Loaded by LERG Effective Date	N/A	N/A
New measure 10	Network Outage Notification	N/A	N/A
New measure 11	Usage Completeness	X	
New measure 12	Recurring Charge Completeness	X	
New measure 13	Non-Recurring Charge Completeness	X	
New measure 14	Accuracy of Mechanized Bill Feed	N/A	N/A
New measure 15	Average Database Update Interval (DA/Listings)	X	
New measure 16	Percent Database Accuracy	X	

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of October, 1999, the Original and ten copies of MCI Worldcom's Supplemental Comments on Performance Measures were sent via Airborne Express to the Arizona Corporation Commission.

In addition, a true and correct copy of this filing was sent via United States Mail to the following individuals:

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