

BEFORE THE ARIZONA CORPORATION COMMISSION



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**CARL J. KUNASEK**  
Chairman  
**JAMES M. IRVIN**  
Commissioner  
**WILLIAM A. MUNDELL**  
Commissioner

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Arizona Corporation Commission

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

Docket No. T-00000A-97-0238

**AT&T'S LIST OF OUTSTANDING  
ISSUES AND PROPOSED  
CHANGES TO ISSUES NOS. 1.5, 1.6  
AND 1.7**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively "AT&T"), based on a request of the Staff of the Arizona Corporation Commission's consultant, Doherty & Company, Inc., propose the following changes to Issues No. 1.5 (attached as Exhibit A), Issue No. 1.6 (attached as Exhibit B), and Issue No. 1.7 (attached as Exhibit C). AT&T only made changes to the columns in Issue Nos. 1.6 and 1.7 identified by the caption AT&T to accurately reflect AT&T positions, and the failure to comment on other issues contained in or raised by Issue Nos. 1.6 and 1.7 should not be construed as agreement therewith.

Also attached hereto as Exhibit D is AT&T's List of Outstanding Issues submitted to the Technical Advisory Group electronically on November 23, 1999.

RESPECTFULLY SUBMITTED this 24th day of November, 1999.

AT&T COMMUNICATIONS OF  
THE MOUNTAIN STATES, INC.  
AND TCG PHOENIX

By: Thomas C. Pelto

Thomas C. Pelto  
Mary B. Tribby  
Richard S. Wolters  
1875 Lawrence Street  
Suite 1575  
Denver, Colorado 80202  
Telephone: 303-298-6471  
Facsimile: 303-298-6301  
E-mail: [rwolters@att.com](mailto:rwolters@att.com)

**AT&T's Proposed Revision to Issue 1.5 of the Master Test Plan**

AT&T proposes clarifying language for the last bullet item in Section 9.5 of Issue No. 1.5 of the Master Test Plan. Language was added to the last bullet item in Section 9.5 of Issue No. 1.5 of the Master Test Plan that was intended to recognize that there are some manual processes used to process LSRs where manual processes are used by design. In other words, there is no electronic process that can be used to process the LSR. The manual process is the only option.

In the capacity test, AT&T recommends that processes that can only be supported through complete or partial manual processes should be evaluated. The language that was added to Section 9.5 of Issue No. 1.5 of the Master Test Plan unnecessarily limited the scope of the evaluation of manual processes that are used by design to only those that are specified in the Master Test Plan. AT&T's proposed clarifying language is intended to clarify that manual processes that are used by design will generally be included in the scope of the Master Test Plan and that the evaluation is not limited to only those "designed in" manual processes that are specified in the Master Test Plan. Specifically, AT&T proposes the following change to the last bullet item in Section 9.5 of Issue 1.5 of the Master Test Plan:

- Build the capability to deliver and receive a volume of transactions, including pre-order, local service requests (LSRs), and trouble reports to allow for functionality and capacity testing of the U S WEST OSS systems, including manual processes when electronic processes fail, ~~or~~ when manual processes are as used by designed ~~and~~ or as specified in the Master Test Plan.

## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of AT&T's List of Outstanding Issues and Proposed Changes to Issues Nos. 1.5, 1.6, and 1.7 regarding Docket No. T-00000A-97-0238, were sent via overnight delivery this 24th day of November, 1999, to:

Arizona Corporation Commission  
Docket Control – Utilities Division  
1200 West Washington Street  
Phoenix, AZ 85007

and that a copy of the foregoing was sent via overnight delivery this 24th day of November, 1999 to the following:

Carl J. Kunasek, Chairman  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Jerry Porter  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Jim Irvin, Commissioner  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Patrick Black  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

William A. Mundell, Commissioner  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Teena Wolfe  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Christopher Kempley  
Arizona Corporation Commission  
Legal Division  
1200 West Washington Street  
Phoenix, AZ 85007

Ray Williamson  
Acting Director - Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

David Motycka  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Maureen Scott  
Legal Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Mark A. DiNunzio  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Jerry Rudibaugh  
Hearing Officer  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Timothy Berg  
Fennemore Craig, P.C.  
3003 North Central Ave., #2600  
Phoenix, AZ 85012

Joan S. Burke  
Osborn Maledon  
2929 N. Central Avenue, 21<sup>st</sup> Floor  
Phoenix, AZ 85067-6379

Thomas M. Dethlefs, Esq.  
U S WEST Communications, Inc.  
1801 California Street, #5100  
Denver, CO 80202

Thomas H. Campbell  
40 N. Central Avenue  
Phoenix, AZ 85004

Thomas F. Dixon  
MCI Telecommunications Corporation  
707 – 17<sup>th</sup> Street, #3900  
Denver, CO 80202

Michael M. Grant, Esq.  
Gallagher and Kennedy  
2600 North Central Ave.  
Phoenix, AZ 85004-3020

Scott Wakefield  
Stephen Gibelli  
Residential Utility Consumer Office  
2828 North Central Ave., #1200  
Phoenix, AZ 85004

Lex J. Smith  
Michael W. Patten  
Brown & Bain, P.A.  
P. O. Box 400  
2901 North Central Ave.  
Phoenix, AZ 85001-0400

Daniel Waggoner  
Davis Wright Tremaine  
2600 Century Square  
1502 Fourth Avenue  
Seattle, WA 98101-1688

and that a copy of the foregoing was sent via United States Mail, postage prepaid, this 24th day of November, 1999 to the following:

Karen Johnson  
Penny Bewick  
Electric Lightwave, Inc.  
4400 NE 77<sup>th</sup> Ave  
Vancouver, WA 98662

Carrington Phillip  
Fox Communications, Inc.  
1400 Lake Hearn Drive, N.E.  
Atlanta, GA 30319

Charles Kallenbach  
American Communications Services, Inc.  
131 National Business Parkway  
Annapolis Junction, MD 20701

Stephen H. Kukta  
Darren Weingard  
Sprint Communications Company L.P.  
1850 Gateway Drive, 7<sup>th</sup> Fl.  
San Mateo, CA 94404-2467

Mark Dioguardi, Esq.  
Tiffany and Bosco, P.A.  
500 Dial Tower  
1850 North Central Ave.  
Phoenix, AZ 85004

Joyce Hundley  
United States Dept. of Justice  
Antitrust Division  
1401 H Street NW, Suite 8000  
Washington, DC 20530

Alaine Miller  
NEXTLINK Communications, Inc.  
500 108<sup>th</sup> Avenue NE, Suite 2200  
Bellevue, WA 98004

Robert Munoz  
WorldCom, Inc.  
225 Bush Street, Suite 1900  
San Francisco, CA 94014

Jim Scheltema  
Blumenfeld & Cohen  
1615 MA Ave., Suite 300  
Washington, DC 20036

Doug Hsiao  
Rhythms NetConnections  
6933 So. Revere Parkway  
Englewood, CO 80112

Diane Bacon, Legislative Director  
Communications Workers of America  
Arizona State Council  
District 7 AFL-CIO, CLC  
5818 N. 7th Street, Suite 206  
Phoenix, AZ 85014-5811

Richard M. Rindler  
Morton J. Posner  
Swidler & Berlin Shereff Friedman, LLP  
3000 K Street, N.W. – Suite 300  
Washington, D.C. 20007-5116

Bill Haas  
Richard Lipman  
McLeod USA  
6400 C Street SW  
Cedar Rapids, IA 54206-3177

Richard Smith  
Director of Regulatory Affairs  
Cox Communications  
2200 Powell Street, Suite 795  
Emeryville, CA 94608

Kath Thomas  
Brooks Fiber Communications  
1600 South Amphlett Blvd., #330  
San Mateo, CA 94402

Raymond S. Heyman, Esq.  
Randall H. Warner, Esq.  
Roshka Heyman & DeWulf  
Two Arizona Center  
400 N. Fifth Street, Suite 1000  
Phoenix, AZ 85004

Jeffrey W. Crockett  
SNELL & WILMER  
One Arizona Center  
Phoenix, AZ 85004-0001

Thomas L. Mumaw, Esq.  
Snell & Wilmer L.L.P.  
One Arizona Center  
Phoenix, AZ 85004-0001

Rhonda Muietta

**2. RECOMMENDED BENCHMARKS FOR PERFORMANCE MEASURES**

No.	Measurement	U S West	AT&T/TCG (incl. RUCO, Rhythms & ELD)	MCI/Sprint
<b>GATEWAY AVAILABILITY</b>				
GA-1	Gateway Availability - Human/Computer Interface (IMA)	95% or more 99% (still open)	Parity w/ U S WEST retail operations	99.5%
GA-2	Gateway Availability - Computer/Computer Interface (EDI)	95% or more 99% (still open)	Parity w/ U S WEST retail operations	99.5%
<b>PRE-ORDER</b>				
PO-1	Pre-Order/Order Response Times 1A. IMA (CLEC Transaction) 1B. Exact (CLEC & Retail) 1C. EDI (GEEG-U S WEST Retail Transaction)	Retail plus 10 seconds, or less than 10 seconds where retail is < 10 sec. (Hold for Workshop 6)	Parity with U S WEST retail operations	Parity
<b>ORDERING AND PROVISIONING</b>				
OP-1	Speed of Answer - Interconnect Provisioning Center (average)	Parity - 95% confidence	Parity	Parity, ≤ 15 seconds
OP-2	Calls Answered within Twenty Seconds - Interconnect Provisioning Center (percent)	Parity - 95% confidence	Parity	Parity, ≤ 15 seconds
OP-3	Installation Commitments Met (percent)	Resale Parity - 95% confidence Unbundled loops - 80% Open	Resale Parity 98% for UNE and interconnection	Parity
OP-4	Installation Interval (average)	Resale Parity - 95% conf. Open	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.	Parity
OP-5	Installation Trouble Reports (percent)	Resale Parity - 95% conf.	Parity with U S WEST retail operations for resale and UNE-P. Parity with POTS Dispatch-In for	Parity

				unbundled loops. Parity with switched access trunks for interconnection and unbundled transport.	
OP-6	Delayed Days (average)	Resale Parity <u>Open</u>		Resale 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.	Parity
OP-7A	<del>Coordinated Cutover Interval</del> Unbundled Loop (without Number Portability) (average)	<del>Not necessary for test</del>		<del>&lt; 30 minutes</del>	<del>5 minutes per loop</del>
OP-7B	<del>Coordinated Cutover Interval</del> Unbundled Loops (associated with LNP)	<del>Not necessary for test</del>		<del>&lt; 30 minutes</del>	<del>5 minutes per loop</del>

*✓At workshop No. 3 U S WEST indicated agreement amount participants.*

<u>No.</u>	<u>Measurement</u>	<u>U S West</u>	<u>AT&amp;T/TCG (incl. RUCO, Rhythms &amp; ELD)</u>	<u>MCI/Sprint</u>
OP-8A	Coordinated Cutover Interval – Interim Number Portability (INP) (average)	Not necessary for test/hold	< 30 minutes	Benchmark: TBD
OP-8B	Coordinated Local Number Portability (LNP) Timeliness (percent)	Not necessary for test/hold	> 98%	Benchmark: TBD
OP-9	Coordinated Cutover Combined Interval – Unbundled Loops coordinated with FNP (average)	Not necessary for test/hold	< 30 minutes	Benchmark: TBD(5 Min. per loop)

**MAINTENANCE & REPAIR**

✓	MR-1	Speed of Answer – Interconnect Repair Center (average)	Parity – 95% conf.	Parity	Parity
✓	MR-2	Calls Answered within 20 seconds – Interconnect Repair Center (percent)	Parity – 95% conf.	Parity	Parity
✓	MR-3	Out of Service Cleared within 24 hours – Non-Designed Repair Process (percent)	Resale - Parity – 95% conf. Unbundled loops; parity 95% conf.	Parity	Parity
✓	MR-4	All Troubles Cleared within 48 hours – Non-Designed Repair Process (percent)	Diagnostic	Parity	Parity
✓	MR-5	All Troubles Cleared within 4 hours – Designed Repair Process (percent)	Parity – 95% conf.	Parity with U S WEST retail for resale, UNE-P and UNE. Parity with switched access trunks for interconnection.	Parity
✓	MR-6	Mean Time to Restore (average)	Unbundled loops Parity–9995% conf. Resale Parity – 99% conf.	Parity with U S WEST retail for resale, UNE-P and UNE. Parity with switched access trunks for interconnection.	Parity
✓	MR-7	Repair Repeat Report Rate (percent)	Unbundled loops Parity–9995% conf. Resale Parity – 99% conf.	Parity with U S WEST retail for resale, UNE-P and UNE. Parity with switched access trunks for interconnection.	Parity
✓	MR-8	Trouble Rate (percent)	Unbundled loops Parity–9995% conf. Resale Parity – 99% conf.	Parity with U S WEST retail for resale, UNE-P and UNE. Parity with	Parity

MR-9	Parity for resales			switched access trunks for interconnection.	
<b>BILLING</b>					
BI-1	Mean Time to Provide U S WEST-Recorded Usage Records (average) ( <u>Wholesale bill timeliness</u> )	≤ 5 calendar days	Parity	Resale and UNEs Parity - Switched access - 95% in \$ days	
BI-2	Mean Time to Deliver Invoices (average)	≤ 10 calendar days	Parity	99% in 10 days	
BI-3	Billing Accuracy - Adjustments for Errors (under development)	To be determined	Parity	Resale and UNEs - Parity Facil./Interconnect - 95%	

*✓At workshop No. 3 U S WEST indicated agreement amount participants.*

No.	Measurement	U S West	AT&T/TCG (incl. RUCO, Rhythms & ELD)	MCI/Sprint
<b>EMERGENCY SERVICES</b>				
ES-1	All Database Updates Completed within 24 hours (percent)	99% or more	Parity	Svc. order updates - Parity Gateway updates 100% within 24 hours
ES-2	911/E911 Emergency Services Trunk Installation Interval (average)	Not necessary for test	Parity	Parity
<b>DIRECTORY ASSISTANCE</b>				
DA-1	Speed of Answer - Directory Assistance (average)	Not necessary for test	Parity	Parity (by design)
DA-2	Calls Answered Within Ten Seconds - Directory Assistance (percent)	Not necessary for test	Parity	Parity (by design)
<b>OPERATOR SERVICES</b>				
OS-1	Speed of Answer - Operator Services (average)	Not necessary for test	Parity	Parity (by design)
OS-2	Calls Answered Within Ten Seconds - Operator Services (percent)	Not necessary for test	Parity	Parity (by design)
<b>NETWORK PERFORMANCE - NETWORK INTERCONNECTION</b>				
NI-1	Trunk Blocking - Interconnection Trunks (percent)	Not necessary for test	Parity	Parity
NI-2	Trunk Blocking - Local Interoffice	Not necessary for test	Parity	≤ 2% Trunk Group

	("Common") Trunks (percent)			Blocking
<b>COLLOCATION PROVISIONING</b>				
CP-1	Installation Commitments Met (percent)	Not necessary for test	> 98%	100% within committed interval
CP-2	Installation Interval (average)	Not necessary for test	< FCC defined intervals for collocation	100% within 90 days - New 100% within 60 days - augmentments

No.	Measurement	U S West	AT&T/TCG (incl. RUCO, Rhythms & ELD)	MCI/Sprint
<b>DIAGNOSTIC PERFORMANCE INDICATORS</b>				
<b>PRE-ORDER/ORDERING</b>				
DPO-1	Electronic Flow-through of Local Service Requests (LSRs) to the Service Order Processor (percent)	To be determined	Parity	Parity
DPO-2	LSR Rejection Notice Interval (average)	≤ 0.5 business days	Parity	Fully Electronic-avg. 20 min. Elec./manual – avg. 5 hrs Manual/manual – avg. 10 hrs
DPO-3	LSRs Rejected (percent)	Diagnostic – No standard necessary	Parity	Unnecessary
DPO-4	Firm Order Confirmation (FOC) Interval (average)	≤ 1.0 business day	Parity	Fully electronic– avg. 20 min. Elec./Manual – 6 hours Manual/manual – 12 hours
DPO-5	<del>Pre-Order/Order Response Times for U S WEST Retail Transactions (average)</del>	<del>Retail plus 10 seconds, or less than 10 seconds where retail is &lt; 10 sec.</del>	<del>Not needed</del>	<del>Parity comparison for PO-1</del>
DPO-6	Completion Notifications Transmitted within 24 hours (percent) (under development)	<del>To be determined</del> CLEC can query by end of IQ 2000	Parity	Fully electronic– avg. 20 min. all other: 95% within 24 hrs.
DPO-7	Completion Notification Interval (average) (under development)	<del>To be determined</del> CLEC can query by end of IQ 2000	Parity	Fully electronic– avg. 20 min. all other: 95% within 24 hrs.
<b>ORDERING AND PROVISIONING</b>				
DOP-1	CLEC- or CLEC's Customer-Caused Installation Misses (percent)	Diagnostic – No standard necessary	Not needed	Unnecessary
DOP-2	Delayed Orders Completed ≥ 15 days past the commitment date (percent)	Diagnostic – No standard necessary May be submeasure of OP-6	Parity with U S WEST retail for resale and UNE-P. Parity with retail POTS Dispatch-In for unbundled loops.	Sub-measure of OP-6

DOP-3	Delayed Orders Completed $\geq$ 90 days past the commitment date (percent)	Diagnostic - No standard necessary <u>May be submeasure of OP-6</u>	Parity with U S WEST retail for resale and UNE-P. Parity with retail POTS Dispatch-In for unbundled loops.	Sub-measure of OP-6
<u>No.</u>	<u>Measurement</u>	<u>U S West</u>	<u>AT&amp;T/TCG</u> <u>(incl RUCO, Rhythms &amp; ELD)</u>	<u>MCI/Sprint</u>
<b>MAINTENANCE &amp; REPAIR</b>				
DMR-1	CLEC- or CLEC's Customer-Caused Trouble Reports (percent)	Diagnostic - No standard necessary	Not needed	Unnecessary
<b>COLLOCATION PROVISIONING</b>				
DCP-1	CLEC Caused Collocation Misses (percent)	<del>Diagnostic - No standard necessary</del> S WEST will reconsider	Not needed	Unnecessary
DCP-2	Collocation Feasibility Study Interval (average)	Diagnostic - No standard necessary	< FCC defined intervals for collocation	100% within 15 days
DCP-3	Collocation Feasibility Study Commitments Met (percent)	Diagnostic - No standard necessary	> 98%	100% within committed interval
DCP-4	Average Collocation Quote Interval (percent)	Diagnostic - No standard necessary	< FCC defined intervals for collocation	100% within 30 days
DNI-1	Reserved for future use	Discuss 11/5		
DNI-2	Local interconnect Trunk utilization	Unnecessary		
DNP-1	Local Trunk Prov. By Scheduled date	Parity: OP-3		
DNP-2	Local Trunk provisioning Interval	Parity: OP-4		
DNP-3	Local Trunk Late Days	Parity: OP-6		
DNR-1	Local Trunk Mean time to restore	Parity: MR-6		
DNR-2	Local Trunk all trouble cleared in 4 hours	Parity: MR-5		
DNR-3	Local Trunk repeat trouble incidents in 30 days	Parity: OP-5		
DNR-4	Local Trunk trouble rate %	Parity: MR-8 (under development)		

ADDITIONAL PERFORMANCE MEASUREMENTS AND BENCHMARKS PROPOSED BY PARTICIPANTS

No.	Measurement	One Point	MCI	COX	AT&T	U S WEST
OP-1	Center Responsiveness			Repair ctr. Avg. 20 sec.		
<u>New</u> OP-3a	% USW missed due dates for lack of facilities		Parity for all service groups utilizing loop facilities	Parity		
OP-4a	<del>Facility Installation Interval Interconnect</del>	None Provided				
OP-4b	<del>Trunk Installation Interval Interconnect</del>	None Provided				
<u>New</u> OP-4a	% completed within standard interval (COX)		Parity for all service groups	Parity		
<u>New</u> OP-4a	Held Order Interval (MCI)					
<u>New</u> OP-5a	Provisioning trouble reports prior to service order completion		Parity for all service groups	Parity with restart		Needs Discussion
<u>New</u> OP-6a	Delay order interval to completion date for lack of facilities can be level of disaggregation fro measure OP-6)		Parity for all service groups utilizing loop facilities	Parity		Drop in U \$ WEST include Loops
OP-7	Coordinated customer conversions as a % on time			Parity		
<u>New</u> OP-9a	Avg. time to complete coordinated cutover of unbundled loop with NP				None provided	
<u>New</u> OP-9b	% commitments met for coordinated cutover of unbundled loop with NP				None provided	
<u>New</u> OP-9c	Coordinated LNP cutovers without a related loop cutover					
NI-1	% blocking on interconnection Trunks			< 15 min. > 98% of the time		
NI-2	% blocking on common Trunks			Parity		
NI-3	NXX Loaded by LERG Effective Date		Parity	Parity 2% of trunk groups		
NI-3	Average number of business days	None Provided		Parity ( ) no more than 2%		

**ADDITIONAL PERFORMANCE  
MEASUREMENTS AND BENCHMARKS PROPOSED BY PARTICIPANTS**

New	NI-4	to-complete facility installation Notification of Interface (network) Outages	Parity	97% in 15 min.		
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ADDITIONAL PERFORMANCE MEASUREMENTS AND BENCHMARKS PROPOSED BY PARTICIPANTS

No.	Measurement	One Point	MCI	COX	AT&T	U S WEST
NI-4	Average number of business days to complete trunk installation	None Provided				
NI-5	Time required for U S WEST personnel to clear: a) critical alarm (affects service) b) Major alarm c) Minor Alarm	45 minutes 90 minutes 120 minutes				
GA-1	% of Time Interface is available			Parity; std 99.25%		
GA-2	% of Time Interface is available			Parity; std 99.25%		
GA-3	Notification of Interface Outages		97% in 15 min.		Will Examine	
MR-1	Center Responsiveness			Repair ctr. Avg. 15 sec.		
MR-4a	Network Mean Time to Clear	None Provided				
MR-6a	Percentage of Customer Trouble not resolved within estimated time		Parity for all service groups			
MR-9	The number of repair commitments made (numerator) divided by the number of repair commitments requested (denominator)	None Provided				
MR-10	The number of times that repair commitments matched to CLECs repair requests (numerator) divided by the total number of repair commitments requested (denominator)	None Provided				
DPO-2	Average Reject notice interval			Electronic: avg. 20 min. Partial E/M: avg. 5 hrs. Manual: avg. 10 hrs.		
DPO-2a	Percentage of Orders Jeopardized (See FCC NPRM ¶ 66)		Parity for all service groups			
DPO-2b	Average jeopardy notice interval		Parity for all service	Parity	1 Q 2000	

New

New

New

New

New

ADDITIONAL PERFORMANCE  
MEASUREMENTS AND BENCHMARKS PROPOSED BY PARTICIPANTS

	(See FCC NPRM ¶ 66)	groups	Parity	1 Q 2000	
<u>New</u>	DPO-2c % orders given jeopardy notice			None	
	DPO-4 Firm order confirmation (FOC) Interval			Provided	
<u>New</u>	DPO-4 A-D Avg. time for U S WEST to provide a FOC				None Provided

ADDITIONAL PERFORMANCE MEASUREMENTS AND BENCHMARKS PROPOSED BY PARTICIPANTS

No.	Measurement	One Point	MCI	COX	AT&T	U S WEST
<u>New</u> DPO-4 E-H	% of FOCUS U S WEST provides on time					None Provided
BI-1	Wholesale Bill Timeliness					
BI-1a	Usage Completeness		Parity for resale and UNE. Benchmark of 95% for facilities/interconnection	99% [ 10 days Parity for resale & UNE facilities/interconnection 95%		
BI-1b	Usage Timeliness			Parity for resale and UNE joint switched access: 95% in 5 days		
BI-3	Bill Accuracy			Parity for Resale and UNE facilities/Interconnection and UNE specials: 95%		
<u>New</u> BI-3a	Recurring Change completeness		Parity for Resale and UNE. Benchmark of 95% for facilities/interconnection	Parity for resale and UNE-POTS facilities/Interconnection and UNE specials: 90%		
<u>New</u> BI-3b	Non-recurring completeness charge		Parity for resale and UNE. Benchmark of 95% for facilities/interconnection	Parity for resale and UNE-POTS facilities/Interconnection and UNE specials: 90%		
<u>New</u> BI-3c	Accuracy of mechanized bill feed		TBD	TBD	Not implemented	
<u>New</u> BI-3d	Accuracy of Usage Feed			TBD		
<u>New</u> ES-1a	Average database update interval		Parity for service order updates. Benchmark for	Parity		



ADDITIONAL PERFORMANCE MEASUREMENTS AND BENCHMARKS PROPOSED BY PARTICIPANTS

No.	Measurement	One Point	MCI	COX	AT&T	U S WEST
ES-1b	% database accuracy		parity for service order generated updates Benchmark for direct gateway input to be determined	Parity		
<u>DOP-3a</u>	Held Order Interval			Parity		
<u>DOP-3b</u>	LNP network provisioning failures			Parity		
<u>DOP-3c</u>	% Troubles in 30 days for new orders			Parity		
<u>DOP-3d</u>	LNP Network Provisioning			Parity		
<u>DOP-3e</u>	Provisioning Trouble Reports (prior to service order completion)			Parity		
<u>DOP-3f</u>	Directory Listing Measurement (allotted time to proof listing updates)			1 <sup>st</sup> proof: 60 Calendar days before close date and 2 <sup>nd</sup> proof: 14 days		
<u>DOP-3g</u>	Directory Delivery Measurement (average Directory Delivery completed interval)			100%		
<u>MR-9</u>	Repair Appointments met					Parity for resale
	Average Interval Offered				Parity with U S WEST Retail Operations.	
	% of FOCs provided on-time				98%	
<u>MR-9</u>	Repair Appointments met					Parity for resale

**Unresolved Issues Raised By AT&T Concerning the Collaborative Test of U S  
WEST's OSS Interfaces (November 23, 1999)**

1. Should the UNE-P, the enhanced extended link (“EEL”) and dark fiber and their associated test scenarios be included in the scope of services to be tested? (AT&T Comments, October 12, 1999, pp. 1 – 5 and AT&T Comments, September 17, 1999, pg. 13)
2. Is there a need to use the term “UNE-C” instead of the industry accepted term of “UNE-P” to describe the platform of network elements used to provide a finished service? What is the definition of UNE-C for purposes of conducting the test?
3. Should unbundled dedicated interoffice transport (“UDIT”) be included in the scope of services to be tested? (AT&T Comments, September 24, 1999, pp. 23 – 24)
4. Should test scenarios for collocation and interconnection be included in the functionality test? (AT&T Comments, September 17, 1999, pp. 11 - 13)
5. Should the EXACT interface functionalities for ordering interconnection trunks, unbundled dedicated interoffice transport, and unbundled trunk ports be included in the scope of interfaces to be tested? (AT&T Comments, September 17, 1999, p. 10)
6. Should the OSS functions that U S WEST performs through manual processes be included in the scope of processes to be tested? The manual processes may be offered by U S WEST as an alternative to mechanized, electronic processes or because no equivalent mechanized, electronic process exists. AT&T Comments, September 17, 1999, pp. 10 – 11)

7. Does Section 7.6 U S WEST-CLEC Interaction require additional detail on how the U S WEST-CLEC interaction will be evaluated? (AT&T Comments, September 17, 1999, pp. 10 – 11)
8. Should the pre-order function of due date assignment be included as part of the functionality test and the retail parity evaluation? (AT&T Comments, September 17, 1999, pp. 27 – 28)
9. Should there be separately identified tests of U S WEST's ability to have FCC-defined flow-through of orders as part of the functionality test and the retail parity evaluation? (AT&T Comments, September 17, 1999, pp. 28 – 29)
10. Should the retail parity evaluation compare the timeframes that U S WEST's OSS are available to itself to the time that CLECs can access those same OSS? (AT&T Comments, September 17, 1999, pp. 30 – 31)
11. Should the Master Test Plan require the test administrator produce a daily report? (AT&T Comments, September 17, 1999, p. 21)
12. Should the Master Test Plan include specific forms to be used in documenting the test specification for the required test scenarios? (AT&T Comments, September 17, 1999, p. 20)
13. Should the Master Test Plan include separate testing scenarios for retrieving a customer's trouble history? (AT&T Comments, September 17, 1999, pp. 29 – 30)

14. Is it appropriate to include the time to access the pre-order screen in the interval for pre-order query/response times? (AT&T Comments, September 17, 1999, pp. 31 – 33)
15. Should separate order status test scenarios be included in the retail parity evaluation? (AT&T Comments, October 12, 1999, pp. 17 – 19)
16. Should the functionality test and the retail parity evaluation include specific test scenarios for orders with “working left in” (“WLI”) situations? (AT&T Comments, October 12, 1999, pp. 24 – 25)
17. Should the retail parity evaluation include test scenarios for high volume facility checks? (i.e. U S WEST verifying for every working loop on a monthly basis whether the loop is DSL qualified and then noting the result of that verification in the notes section of the customer’s customer service record) (AT&T Comments, October 12, 1999, pp. 21 – 23)
18. Should U S WEST account for troubles experienced that are on the day of installation, but prior to the customer’s order being completed in the U S WEST service order processor in measure OP-5 Ordering and Installation Accuracy? (AT&T Comments, October 12, 1999, pp. 28 - 29)
19. What measures should be used for coordinated hot cuts of unbundled loops and number portability? (AT&T Comments, October 29, 1999, pp. 4 – 9)
20. Should the GA-1 and GA-2 Gateway Availability results for CLECs be compared to a fixed benchmark or to U S WEST’s own OSS availability results? (AT&T

Comments, September 24, 1999, AT&T's proposed benchmarks for Appendix D to the Master Test Plan)

21. For measure PO-1 Pre-Order/Order Response Times, should rejected pre-order queries and queries with errors be excluded from the pre-order response time results or should the results be separately accounted for? (AT&T Comments, September 17, 1999, pp 31 – 33)
22. Should the pre-order query/response time measures (PO-1 and DPO-1) be measured in units of minutes and seconds or in seconds? (AT&T Comments, October 29, 1999, pp. 9 – 11)
23. Should a due date missed for customer caused reasons be included as a met commitment for measure OP-3 Installation Commitments Met? (AT&T Comments, September 17, 1999, pp. 33 – 34)
24. Should supplemental orders from CLECs be ignored when determining whether U S WEST has met an installation commitment for measure OP-3 Installation Commitments Met? (U S WEST only uses the original due date in determining whether it has met a commitment even if the CLEC subsequently requests a later due date.) (AT&T Comments, September 17, 1999, pp. 33 – 34)
25. Should supplemental orders from CLECs be ignored when determining the extent that U S WEST is late in installing service in measure OP-6 Delayed Days? (AT&T Comments, September 17, 1999, pp. 33 – 34)

26. Should unbundled loop orders affected by a lack of available facilities be excluded from measures OP-3 Installation Commitments met, OP-4 Installation Interval, OP-5 Ordering and Provisioning Accuracy, and OP-6 Delayed Days? (October 21, 1999 Workshop Transcripts, pp. 145 – 149)
27. Should orders affected by facilities be excluded from the DOP-3 measure of Percent Delayed Orders Completed More Than 90 Days Past the Due Date? (AT&T Comments, October 29, 1999, pp. 13 – 14)
28. Should U S WEST report unbundled loop results disaggregated by analog, digital and non-loaded for the various relevant measures? (October 21, 1999 Hearing Transcripts, pp. 162 – 163)
29. Should U S WEST report results by combinations of network elements including UNE-P?
30. Should U S WEST report unbundled dedicated interoffice transport results disaggregated by the capacity of the circuit (i.e. DS0, DS1, DS3, etc.)? (October 21, 1999 Workshop Transcripts, p. 164)
31. Should the stop time for the OP-7 Coordinated Cutover Interval – Unbundled Loop be defined as when U S WEST contacts the CLEC to inform the CLEC that the loop installation activities have been successfully completed? (AT&T Comments, October 29, 1999, pp. 4 - 9)

32. Should “on-time” provisioning of unbundled loops with number portability be defined as U S WEST completing all installation activities within one hour of the committed to start time? (AT&T Comments, October 29, 1999, pp. 4 - 9)
33. Is there a separate level of on time measurement of number portability necessary for number porting for customers with DID trunks? (October 22, 1999 Workshop Transcripts, pp. 47 – 49)
34. Should measure DPO-1 be measured in units of LSRs or service orders? (Discussion during November 18, 1999 Workshop, Transcript not yet available)
35. Should the DPO-2 LSR Rejection Notice Interval be measured in units of days or minutes? (September 17, 1999, pp. 41 – 42)
36. Should the DPO-2 measure of LSR Rejection Notice exclude or separately report non-electronic LSRs? (October 22, 1999 Workshop Transcript, pp. 164 – 165)
37. Should the DPO-3 measure of LSRs Rejected exclude or separately report non-electronic LSRs? (October 22, 1999 Workshop Transcript, pp. 164 – 165)
38. Should the DPO-4 Firm Order Confirmation (FOC) Interval be measured in units of business days or minutes? (October 22, 1999 Workshop Transcript, pp. 168 – 173)
39. Should there be a measure of average interval offered? (AT&T Comments, September 17, 1999, p. 42)
40. Should U S WEST exclude requested installations of its own interoffice transport facilities with intervals longer than the analogous interconnection trunk installation

intervals from its reporting of its interoffice trunk average installation interval?

(AT&T Comments, October 29, pp. 16 – 17)

41. Should U S WEST's maintenance and repair data for its own interoffice trunks be disaggregated by final trunks and non-final trunks? (AT&T Comments, October 29, 1999, p. 17)

42. Should unbundled loop winback data (CLEC customers served through unbundled loops that change back to U S WEST) be reported by U S WEST? (AT&T Comments, October 12, 1999, pp. 29 – 30)

43. Should order supplements where there has already been a dispatch scheduled be included as part of the functionality test and the retail parity scenario? (AT&T Comments, October 12, 1999, pp. 25 – 26)

44. Should test scenarios for pre-order transactions and ordering outside of the 6:00 A.M. – 8:00 P.M. window be added to the functionality test and the retail parity evaluation? (AT&T Comments, October 12, 1999, pp. 19 – 21)

45. Should test scenarios for out of hours installation support be added to the functionality test and the retail parity evaluation? (AT&T Comments, October 12, 1999, pp. 26 – 27)

46. What is the process for the production of the Final Master Test Plan? (AT&T Comments, October 12, 1999, pp. 14 – 16)