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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-000004-97-0238

**QWEST'S COMMENTS ADDRESSING
PERFORMANCE ASSURANCE PLAN
ISSUES**

I Plan Objectives

On June 30, 2000, Qwest Corporation ("Qwest"), formerly known as U S WEST Communications, submitted its Performance Assurance Plan ("the Plan") with the Arizona Corporation Commission ("ACC"). The Plan is designed to demonstrate that Qwest will continue to meet the requirements of section 271 after the Federal Communications Commission ("FCC") approves Qwest's application to offer in-region long distance services.

The Plan is consistent with the performance plans already approved by the FCC. In its orders approving the Bell Atlantic and Southwestern Bell section 271 applications for New York and Texas, respectively, the FCC acknowledged that performance plans were not required as part of a BOC's 271 application, but could be submitted as probative evidence that approval of the application was in the public interest, and that the BOC would continue to provide "market-opening performance after receiving section 271 authorization."¹ Recognizing that the details of such plans would vary widely from state to state, the FCC has not dictated specific elements of any proposed plan. Rather, the FCC has indicated that an acceptable plan is one in which the elements fall within a "zone of reasonableness."²

Qwest's proposed Arizona Plan contains reasonable and effective elements. For example, it:

¹ FCC Docket No. 99-295, In the Matter of Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York, , Adopted December 21, 1999, Released December 22, 1999, p.215, para.429-433.

² *Id.* at 433.

- 1 1. is easy to understand by Qwest management, CLECs and regulators;
- 2 2. is comprehensive in addressing all modes of competitive entry;
- 3 3. is self-executing for non-compliance with penalties set at reasonable levels; and
- 4 4. will cause Qwest to take action in cases of non-compliance.

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Qwest's proposal is readily understandable and straightforward to administer. The Plan incorporates key measurements with clearly identified standards and applies straight forward calculations to determine when performance is out of compliance and when, what and how payments are to be made by Qwest. The measures and standards were developed in the collaborative process and, therefore, known to the CLECs and the Arizona Staff. Moreover, the performance measurements will have been the subject of an independent audit to ensure accurate data collection and reporting.

Qwest's plan contains 9 modules, with a total of 40 indices. Approximately half of the indices are based on benchmarks, such as number of days to complete competitors' orders or percent of commitments met. The remaining indices utilize statistical analysis comparing service treatment of competitors with Qwest's retail operation to determine if discrimination might exist. The thresholds for non-compliance and triggers for payments are based upon simple statistical or mathematical concepts. All measures are reported monthly. The Plan is self-executing in cases of non-compliance. All parties involved in plan administration--CLECs, Staff, and Qwest management--will possess clear knowledge of the expected performance, the actual performance and the resulting consequences. Payment under the Plan will be certain and efficient.

Qwest believes its proposal meets the expectations of the FCC and ACC for approval to offer long distance services in Arizona.

I Modes of Entry

The Qwest Performance Assurance Plan recognizes each of the entry strategies of competitors in the local exchange market. Those entry strategies or 'Modes of Entry' include:

Resellers – CLECs who resell the retail telecommunications services of Qwest. The Plan includes a broad range of performance measures and is designed to ensure that the resold services

Qwest provides to Resellers is provisioned at parity with the services Qwest provides to its own retail end users. Resellers may also use pre-assembled combinations of unbundled network elements (the UNE-Platform or UNE-P) to provide finished services to their end user customers.

Facility-Based Providers – Providers who rely predominantly on their own loop and switching facilities, but who require a range of interconnection and related services from Qwest. Facility-based providers require the following services from Qwest:

- Interconnection Trunking
- Collocation
- Access to OSS
- 911
- Directory Assistance
- Operator Services
- White Page Listings
- NXX Activation
- Signalling and Databases
- Number Portability
- Reciprocal Compensation

The Plan includes performance measures for each of the above services utilized by facility-based CLECs.

Unbundled Network Elements – In addition to the above services, Facility-based CLECs may also utilize unbundled network elements provided by Qwest to complement their own network facilities. Such unbundled network elements include:

- Unbundled Loops
- Unbundled Transport
- Unbundled Switching

Data CLECs (DLECs) – DLECs provide data services to their customers, such as DSL. DLECs typically require the following services from Qwest:

- Unbundled loops
- Collocation
- Line Sharing
- Unbundled Transport

CLECs in each mode of entry also require access to the OSS Gateway, for the processing of installation and repair orders. All CLECs also require access to the Interconnect Service Center and Interconnect Repair Center personnel. Finally, all CLECs require timely and accurate billing statements from Qwest.

I Modules

The Qwest Performance Assurance Plan assembles performance measures into nine modules which provide broad coverage to each of the modes of entry. The nine modules are:

- 1) Interconnection Trunking
- 2) Collocation
- 3) Gateway
- 4) Unbundled Loops
- 5) Resale
- 6) Number Portability
- 7) Center Access
- 8) NXX Activation
- 9) Billing Timeliness/Accuracy

Each module will include a series of performance measures which will provide a measure of the quality of service provided to CLECs in aggregate, as well as to individual CLECs.

I Measurements

Qwest proposes that the performance measure descriptions (or Performance Indicator Descriptions, PIDs) developed through a collaborative process with CLECs, Qwest and the Arizona Commission should serve as the basis for the Qwest Performance Assurance Plan.

These measures are generally consistent throughout the fourteen-state Qwest region, and will be subject to an audit to ensure accuracy by the third party test process underway in Arizona, and by the Regional Oversight Committee (ROC).

The specific measures proposed by Qwest in each module are as follows:

Module 1 – Interconnection

This module has two submodules. The first, trunk blockage, compares the blockage on interconnection trunks between the Qwest network and CLEC networks. The second, installation commitments, measures Qwest's performance in meeting its commitments to CLECs on the

installation of new interconnection trunks. Specifically, the measures that implement the interconnection module are:

Trunk Blockage

Interconnection Trunks to Qwest tandem offices (NI-1A)

Interconnection Trunks to Qwest end offices (NI-1B)

Trunks connecting Qwest end offices to Qwest tandems (NI-1C)

Trunks connecting Qwest end offices to Qwest end offices (NI-ID)

Installation Commitments

Installation Commitments Met (OP-3)

Module 2 -- Collocation

The Collocation module includes two submodules – Installation intervals, and commitments met (on installation intervals). The specific measures are:

Installation Intervals

Virtual, Physical Caged, and Shared Collocation (CP-1 A-1)

Augments to Virtual, Physical Caged, and Shared Collocation (CP-1 A-2)

Cageless Collocation (CP-1 B-1)

Augments to Cageless Collocation (CP-1 B-2)

Commitments Met

Virtual, Physical Caged, and Shared Collocation (CP-2 A-1)

Augments to Virtual, Physical Caged, and Shared Collocation (CP-2 A-2)

Cageless Collocation (CP-2 B-1)

Augments to Cageless Collocation (CP-2 B-2)

Module 3 – Gateway

There are two primary measures for the Gateway provided for in the Qwest Performance

Assurance Plan – gateway availability and response times. The availability measure assures that

the OSS gateway is available to CLECs a high percentage of the promised schedule. The

response times assure that specific types of CLEC requests will be responded to in acceptable

time frames. The specific gateway and response measures are:

Gateway Availability

Gateway Availability – IMA (GA-1A)

Gateway Availability – EDI (GA-2)

Pre-Order/Order Response Times

Appointment Scheduling – IMA (PO-1A-1)

Appointment Scheduling – EDI (PO-1B-1)

Service Availability Information – IMA (PO-1A-2)

Service Availability Information – EDI (PO-1B-2)

Facility Availability – IMA (PO-1A-3)

Facility Availability – EDI (PO-1B-3)

Street Address Validation – IMA (PO-1A-4)

Street Address Validation – EDI (PO-1B-4)

Customer Service Records – IMA (PO-1A-5)

Customer Service Records – EDI (PO-1B-5)

Telephone Number – IMA (PO-1A-6)

Telephone Number – EDI (PO-1B-6)

Loop Qualification – IMA (PO-1A-7)

Loop Qualification – EDI (PO-1B-7)

Module 4 – Unbundled Loop

There are three submodules for the unbundled loop – installation intervals, installation commitments met, and troubles cleared.

Installation Intervals

UBL 2W Analog (OP-4)

UBL 2W NL digital (OP-4)

Installation Commitments Met

UBL 2W Analog (OP-3)

UBL 2W NL digital (OP-3)

Troubles Cleared

Out of service cleared < 24 hours – UBL analog (MR-3)

Out of service cleared < 4 hours – UBL 2W NL digital (MR-5)

Module 5 – Resale

There are three submodules for resold services – installation intervals, installation commitments met, and troubles cleared.

Installation Intervals

RES, BUS, Centrex (OP-4)

Installation Commitments Met

RES, BUS, Centrex (OP-3)

Troubles Cleared

Out of service cleared < 24 hours –
RES, BUS, Centrex (MR-3)

Module 6 – Number Portability

Qwest's responsibility on number portability is to set triggers in Qwest central offices in a timely manner. There are two types of number portability orders – coordinated and non-coordinated.

Qwest's Performance Assurance Plan incorporates measures to ensure both types of number portability orders are completed in a timely manner.

Number Portability Timeliness

Coordinated Triggers on Time (OP-8B)

Non-Coordinated Triggers on Time (OP-8C)

Module 7 – Center Access

Qwest provides two customer centers for CLECs – the Interconnect Provisioning Center and the Interconnect Repair Center. Qwest provides measures of the timeliness of response of Qwest personnel in each center to CLEC calls. These measures are compared to measures of the response time of comparable retail centers to the calls of Qwest's retail end users.

The specific measures are:

Interconnect Service Center

Calls answered within 20 Seconds (OP-2)

Interconnect Repair Center

Calls answered within 20 Seconds (MR-2)

Module 8 – NXX Activation

Facility-based CLECs require the activation of new NXX codes within Qwest central offices to ensure Qwest customers can dial telephone numbers assigned by the CLEC to the CLEC's end users. Qwest's Performance Assurance Plan includes a measure of the timeliness of Qwest's activation of CLEC NXX codes within Qwest's central offices.

NXX Activation

NXX Code Activation (NP-1))

Module 9 – Billing

CLECs require timely and accurate billing statements from Qwest. The Qwest Performance Penalty Plan includes two sub-modules – 1) Billing Timeliness and 2) Billing Accuracy.

Billing Timeliness

Invoices Delivered within 10 Days (BI-2)

Billing Accuracy

Adjustments for Errors (BI-3)

V. Structure of Payment Plan

The Qwest Plan is composed of payments at two levels: payments to individual CLECs based upon Qwest's performance at two different statistical or benchmark levels and payments to an Arizona State Fund in the event of continued performance failures.³

A. Customer Service Payments: This portion of the plan would be paid to CLECs and administered on a per measurement basis. The determination of whether customer service payments would be paid will be made based upon whether Qwest meets the performance standard of each of the approximately 40 measurements included in the plan. Payments to

³ This fund doesn't currently exist but Qwest expects that it would be established upon the FCC's approval of Qwest's Arizona 271 application.

CLECs will be triggered when actual Qwest performance results fail to meet either of two sets of statistical tests or established benchmarks. The two sets are referred to as Level 1 and Level 2.

1. Level 1: For measurements comparing service performance between CLECs and Qwest's retail operations, a Level 1 failure exists for any of the measurements if for any 3 consecutive months there is a statistically significant difference at the 95% level, but not greater than the 99% level. (See Paragraph VII)

For measurements comparing service performance to an established benchmark, a Level 1 failure exists for any of the measurements if for any 3 consecutive months Qwest fails to meet the Level 1 benchmark. The attached Appendix A lists the Level 1 statistical Z scores and benchmarks for each of the 40 measurements by module and sub-module. Payments to CLECs for a Level 1 failure will continue each month thereafter until Qwest's performance for parity measurements is not statistically significant at the 95% level or until Qwest's performance for benchmark measurements meets the Level 1 benchmark. For the purpose of determining 3 consecutive months, Level 2 failures may be included.

2. Level 2: For measurements comparing service performance between CLECs and Qwest's retail operations, a Level 2 failure exists for any of the measurements if for any month there is a statistically significant difference greater than the 99% level.

For measurements comparing service performance to an established benchmark, a Level 2 failure exists for any of the measurements if for any month Qwest fails to meet the Level 2 benchmark. Attached Appendix A lists the Level 2 statistical Z scores and benchmarks for each of the 40 measurements by module and sub-module.

Payments to CLECs for a Level 2 failure will continue each month thereafter until Qwest's performance for parity measurements was not statistically significant at greater than the 99% level or until performance for benchmark measurements meets the Level 2 benchmark

3. Payment Schedule: Level 1 and Level 2 failures are determined based upon Qwest's performance to the individual CLECs in the State of Arizona. Payments will be made only to the individual CLECs for which Level 1 and Level 2 failures have occurred.

Payment to the CLECs shall be according to a schedule which defines monthly and annual total payment amounts at risk for each of the performance measurements. (Note: This schedule is to be developed.)

Customer Service payments to a CLEC shall be reduced in amount by any other payments made to a CLEC pursuant to an ACC approved service quality plan or other agreement with the CLEC.

B. Payments to the Arizona State Fund: This portion of the plan is an assessment of payments designed to incent Qwest to correct ongoing non-compliance. Payments will be made directly to a fund established by the ACC. The determination of whether payment to the Arizona State Fund would be paid will be made based upon whether Qwest meets the performance standard of each of the approximately 40 measurements included in the plan. Payments will be triggered when actual performance results fail to meet either Level 1 or Level 2 standards on a continuing basis.

1. Level 1: For measurements comparing service performance between CLECs and Qwest's retail operations, a Level 1 failure exists for any of the measurements if for any 6 consecutive months there is a statistically significant difference at the 95% level, but not greater than the 99% level. (See Paragraph VII.)

For measurements comparing service performance to an established benchmark, a Level 1 failure exists for any of the measurements if for any 6 consecutive months Qwest fails to meet the Level 1 benchmark. Attached Appendix A lists the Level 1 statistical Z scores and benchmarks for each of the 40 measurements by module and sub-module.

Payments to the Arizona State Fund for a Level 1 failure will continue each month thereafter until Qwest's performance for parity measurements was not statistically significant at the 95% level or until Qwest's performance for benchmark standards meets the Level 1 benchmark.

2. **Level 2:** For measurements comparing service performance between CLECs and Qwest's retail operations, a Level 2 failure exists for any of the measurements if for any 3 consecutive months there is a statistically significant difference at greater than the 99% level.

For measurements comparing service performance to an established benchmark, a Level 2 failure exists for any of the measurements if for any 3 consecutive months Qwest fails to meet the Level 2 benchmark. The attached Appendix A lists the Level 2 statistical Z scores and benchmarks for each of the 40 measurements by module and sub-module.

Payments to the Arizona State Fund for a Level 2 failure will continue each month thereafter until Qwest's performance for parity measurements was not statistically significant at greater than the 99% level or until Qwest's performance for benchmark measurement meets the Level 2 benchmark.

3. **Payment Schedule:** Level 1 and Level 2 failures will be determined based upon Qwest's performance to the aggregate of all CLECs in the State of Arizona.

Payments to the Arizona State Fund shall be according to a schedule which defines monthly and annual payment amounts at risk for each of the performance measurements. (Note: This schedule is to be developed.)

Payments to the Arizona State Fund shall be reduced in amount by any other payments made by Qwest to a similar fund pursuant to an ACC approved service quality plan or agreement governing service quality measurements.

4. **Use of the Funds:** Payments to the Arizona State Fund shall be used to reimburse customers' share of fees to extend telephone service within Qwest service territory, to extend Qwest telephone service in adjacent, unassigned service territory, and for any purpose that relates to the Qwest service territory that may be determined by the Arizona Corporation Commission.

C. **Duration:** The plan shall remain in effect for 3 years after Qwest receives FCC approval of its Arizona section 271 application. At that time, Qwest and the Commission will consider whether continuation of the Plan is necessary or appropriate. In the event Qwest exits the Arizona interLATA market, the plan shall be rescinded immediately.

VI. Weighting of Measurements

Qwest recognizes that among the 9 modules, some are more important than others, and that within modules or sub-modules, some measurements should be weighted differently.

Payment schedules will be developed at a later time.

VII. Statistical tests and significance levels

The statistical test used in this plan is the modified z test for parity types of measures (i.e., those with a retail analogue) and “stare and compare” for benchmark types of measures.

Parity Measures

The modified z test is the familiar LCUG modified z test:

$$Z = \frac{\bar{X}_{CLEC} - \bar{X}_{ILEC}}{\sigma_D}$$

where:

$$\sigma_D = \sqrt{\frac{\sigma_{ILEC}^2}{n_{ILEC}} + \frac{\sigma_{CLEC}^2}{n_{CLEC}}}$$

The z score is compared to a critical z value obtained from a table of z values. When sample sizes are large, the z score will follow a normal z distribution. When sample sizes are small, the distribution of z scores may not be normal. In that instance, we run a permutation test to calculate the actual distribution of z scores, and find the critical z value from this distribution.⁴

Significance levels

Selecting a critical z value specifies the level of confidence we have in the result of the z test. For a large sample size where we can assume the z distribution is normal, a critical value of 1.645⁵ means that we can say, with 95% significance, that the true difference between the CLEC

⁴ Simulation tests have shown that the distribution of z scores for distributions with sample sizes less than 600 may be skewed. Therefore, we run a permutation test on all CLEC sample sizes less than 600.

⁵ A positive z score indicates disparity, so the z test numerators are formed by subtracting the ILEC mean from the CLEC mean when smaller means are “better”, and subtracting the CLEC mean from the ILEC mean when larger means are better.

mean and the ILEC mean is equal to or greater than the measured difference. This also means that the measured difference will be in error 5% of the time.⁶ So, if we make 1000 measurements, we will find that 50 measurements are significant at the 95% level by chance alone.

This presents a relatively high opportunity for error at the 95% degree of significance, so we propose to require consistency in the 95% results by looking for three consecutive months of performance at the 95% level. This would provide a more positive indication of a true difference between CLEC and ILEC means. We refer to this as a Level 1 violation of parity.

A Level 2 disparity occurs when the z score is significant at the 99% level of significance, i.e., where the z score is greater than the critical z value of 2.33.⁷ In this instance, there is less need to look for consistency in the results, because the finding is more certain. Nevertheless, Type I errors occur at this level as well, but at the lower rate of 10 per 1000 tests.

Benchmark measures

Benchmarks will be compared directly in a stare and compare fashion. That is, if a benchmark is 95%, and the result is 94.9%, it is a miss.

VIII. Payment

Payments to CLECs will be made via bill credits, but will not exceed the billed rate for the related service. To the extent payment amounts exceed the amount owed to Qwest by the CLEC on a monthly bill, Qwest will issue a check to the CLEC in the amount of the overage.

I Implementation Issues

Qwest will make the performance penalty plan available through its Arizona SGAT. The plan will be available to any CLEC which opts-in to the SGAT or that portion of the SGAT, within 90 days after the FCC approves Qwest's Arizona section 271 application.

⁶ This is the Type I error, or alpha.

⁷ Note that we are using the critical z values for a one-tailed test. This has become standard practice in telecommunications applications where there is no interest in establishing a significant difference when CLEC performance levels exceed ILEC performance levels.

Within 30 days after the end of each month reported, Qwest will provide individual performance results to participating CLECs and aggregate state results to the ACC for the measurements included in the Plan.

Qwest proposes that if its failure to perform is the result of limited specific factors beyond its control, it may seek from the ACC a waiver from its obligations to pay penalties either to CLECs or the Arizona State Fund. Qwest shall maintain the burden of showing its entitlement to such a waiver.

Qwest's plan provides that any payments made pursuant to Commission rules or other interconnection agreements will offset any amounts owed under the Plan.

RESPECTFULLY SUBMITTED this 21st day of July, 2000.

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Measurements

Measure description	PID code	Module	Type	Level 1	Level 2	Measure	Locality	Notes
Installation Commitments Met (LIS Trunk) (Percent)	OP-3	1	P	1.645	2.33	1347	A	
Trunk Blockage to U S WEST Tandem Offices (LIS Trunk) (Percent)	NI-1	1	P	1.645	2.33	1485	A	CLEC > 1%
Trunk Blockage to U S WEST End Offices (LIS Trunk) (Percent)	NI-1	1	P	1.645	2.33	1486	A	CLEC > 1%
Installation Interval (New Physical Colocation) (Average Days)	CP-1	2	B_LT	90	94	569	A	
Installation Interval (Augmented Physical Colocation) (Average Days)	CP-1	2	B_LT	90	94	570	A	
Installation Interval (New Virtual Colocation) (Average Days)	CP-1	2	B_LT	90	94	571	A	
Installation Interval (Augmented Virtual Colocation) (Average Days)	CP-1	2	B_LT	90	94	572	A	
Installation Commitments Met (New Physical Colocation) (Percent)	CP-2	2	B_GT	0.9	0.8	1159	A	
Installation Commitments Met (Augmented Physical Colocation) (Percent)	CP-2	2	B_GT	0.9	0.8	1160	A	
Installation Commitments Met (New Virtual Colocation) (Percent)	CP-2	2	B_GT	0.9	0.8	1161	A	
Installation Commitments Met (Augmented Virtual Colocation) (Percent)	CP-2	2	B_GT	0.9	0.8	1162	A	
Gateway Availability - IMA-GUI (All) (Percent)	GA-1	3	B_GT	0.993	0.98	584	A	
Gateway Availability - IMA-EDI (Default) (Percent)	GA-2	3	B_GT	0.993	0.98	608	A	
Pre-Order Response Times (Address Validation) (Request/Response) (Avg Sec)	PO-1	3	B_LT	10	12	621	A	EDI
Pre-Order Response Times (Service Availability) (Request/Response) (Avg Sec)	PO-1	3	B_LT	30	36	622	A	EDI
Pre-Order Response Times (Get CSR) (Request/Response) (Avg Sec)	PO-1	3	B_LT	12.5	15	623	A	EDI
Pre-Order Response Times (Appt. Scheduler) (Request/Response) (Avg Sec)	PO-1	3	B_LT	10	12	624	A	EDI
Pre-Order Response Times (TN Reservation) (Request/Response) (Avg Sec)	PO-1	3	B_LT	10	12	625	A	EDI
Pre-Order Response Times (Facility Check) (Request/Response) (Avg Sec)	PO-1	3	B_LT	25	30	626	A	EDI
Pre-Order Response Times (Loop Qualification) (Response) (Avg Sec)	PO-1	3	B_LT	20	24	626	A	EDI
Pre-Order Response Times (Address Validation) (Response) (Avg Sec)	PO-1	3	B_LT	10	12	1359	A	IMA
Pre-Order Response Times (Service Availability) (Response) (Avg Sec)	PO-1	3	B_LT	30	36	1360	A	IMA
Pre-Order Response Times (Get CSR) (Response) (Avg Sec)	PO-1	3	B_LT	12.5	15	1361	A	IMA
Pre-Order Response Times (Appt. Scheduler) (Response) (Avg Sec)	PO-1	3	B_LT	10	12	1362	A	IMA
Pre-Order Response Times (TN Reservation) (Response) (Avg Sec)	PO-1	3	B_LT	10	12	1363	A	IMA
Pre-Order Response Times (Facility Check) (Response) (Avg Sec)	PO-1	3	B_LT	25	30	1364	A	IMA
Pre-Order Response Times (Loop Qualification) (Response) (Avg Sec)	PO-1	3	B_LT	20	24	1381	A	IMA
Out of Service Cleared within 24 hours (UBL - Analog) (Percent)	MR-3	4	P	1.645	2.33	450	A	
Installation Commitments Met (UBL - 2 Wire Analog) (Percent)	OP-3	4	B_GT	0.9	0.8	1410	A	
Installation Interval (UBL - 2 Wire Analog) (Average Days)	OP-4	4	B_LT	7	8	1411	N	low density
Installation Interval (UBL - 2 Wire Analog) (Average Days)	OP-4	4	B_LT	6	7	1411	Y	high density
Installation Commitments Met (UBL - 2 Wire Non-Loaded Digital) (Percent)	OP-3	4	B_GT	0.9	0.8	1424	A	
Installation Interval (UBL - 2 Wire Non-Loaded Digital) (Average Days)	OP-4	4	B_LT	6	7	1425	Y	high density
Installation Interval (UBL - 2 Wire Non-Loaded Digital) (Average Days)	OP-4	4	B_LT	7	8	1425	N	low density
All Troubles Cleared within 4 hours (UBL - 2 Wire Non-Loaded Digital) (Percent)	MR-5	4	P	1.645	2.33	1710	A	
Installation Interval (Residence) (Average Days)	OP-4	5	P	1.645	2.33	108	A	
Installation Interval (Business) (Average Days)	OP-4	5	P	1.645	2.33	109	A	
Installation Interval (Centrex) (Average Days)	OP-4	5	P	1.645	2.33	110	A	
Out of Service Cleared within 24 hours (Residence) (Percent)	MR-3	5	P	1.645	2.33	235	A	
Out of Service Cleared within 24 hours (Business) (Percent)	MR-3	5	P	1.645	2.33	236	A	
Out of Service Cleared within 24 hours (Centrex) (Percent)	MR-3	5	P	1.645	2.33	237	A	
Installation Commitments Met (Residence) (Percent)	OP-3	5	P	1.645	2.33	1332	A	
Installation Commitments Met (Business) (Percent)	OP-3	5	P	1.645	2.33	1333	A	

Measurements

Installation Commitments Met (Centrex) (Percent)	OP-3	5	P	1.645	2.33	1334	A
Non-Coordinated LNP Triggers Activated on Time (percent)	OP-8C	6	B_GT	0.95	0.9	1750	A
Coordinated Local Number Portability (LNP) Timeliness (percent)	OP-8B	6	B_GT	0.95	0.9		A
Calls Answered within Twenty Seconds - Interconnect Provisioning Center (De OP-2)		7	P	1.645	2.33	641	A
Calls Answered with-In 20 seconds - Interconnect Repair Center (Default) (Per MR-2)		7	P	1.645	2.33	644	A
NXX Code Activation (Default) (Percent)	NP-1	8	P	1.645	2.33	1583	A
Invoices Delivered within 10 Days (All) (Percent)	BI-2	9	B_GT	0.99	0.9	1549	A
Billing Accuracy - Adjustments for Errors (Resale Aggregate) (Percent)	BI-3	9	P	1.645	2.33	1754	A
Billing Accuracy - Adjustments for Errors (Reciprocal Compensation) (Percent)	BI-3	9	B_GT	0.95	0.9	1755	A

P = Parity

B_GT = Benchmarks, larger is "better"

B_LT = Benchmarks, smaller is "better"