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BEFORE THE
ARIZONA CORPORATION COMMISSION Arizona Corporation Commission
DOCKETED

AUG 24 2000

CARL J. KUNASEK
CHAIRMAN

JIM IRVIN
COMMISSIONER

WILLIAM A. MUNDELL
COMMISSIONER

DOCKETED BY 

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

**JOINT COMMENTS ADDRESSING PROPOSED PERFORMANCE
MEASURES TO BE INCLUDED IN
PERFORMANCE ASSURANCE PLAN**

WorldCom, Inc. ("WCOM") along with Z-Tel Communications, Inc., Eschelon
Telecom, Inc., and Electric Lightwave, Inc., served electronically on August 4, 2000, the
following joint comments to the Arizona Corporation Commission ("ACC") outlining
proposed performance measures to be included in the Arizona Performance Assurance
Plan ("PAP"). Pursuant to staff request of August 22, 2000, these joint comments are now
being formally filed and served on all parties listed on the attached service list.

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1. Attached you will find the updated spreadsheet outlining the CLEC participants' proposed list of performance measures to be included in the PAP, along with their priority level. The spreadsheet also indicates if the measurement is included in the New York and/or Texas plans. (Exhibit 1)

2. CLEC participants request that all available products be disaggregated. At a minimum, the PAP should report products currently being purchased in a given month with provisions made to incorporate any new products made available by Qwest.

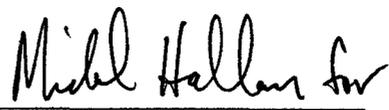
3. Attached is a spreadsheet that identifies measures in the Texas and New York assurance plans that have not been included in the Qwest PID. The purpose of the attachment is to show that Qwest's plan falls far short of what has been included in other assurance plans. Secondly, a process needs to be defined to allow participants the opportunity to request additional measures (change control). (Exhibit 2)

4. We would like to discuss what the process is for making the metrics permanent.

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DATED this 24th day of August, 2000.

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Attorneys for WorldCom, Inc.

ORIGINAL and ten (10)
copies of the foregoing filed
this 24th day of August, 2000,
with:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 W. Washington Street
Phoenix, Arizona 85007

COPY of the foregoing hand-
delivered this 24th day of August, 2000,
to:

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Arizona Corporation Commission
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Jerry Rudibaugh, Chief Hearing Officer
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4 COPY of the foregoing mailed
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Betty J. Griffin

Exhibit

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MEASURE MENT	DESCRIPTION	QWEST	WCOM/ZTEL/ ESCHELONE/ LI	NY	TX	WEIGHT	NOTES
GA-1	Gateway Availability - IMA-GUI	X	X	X	X	1	System availability is important for CLECs to be able to place orders.
GA-2	Gateway Availability - IMA-EDI	X	X	X	X	1	System availability is important for CLECs to be able to place orders.
GA-3	Gateway Availability - EB-TA			X	X		Maintenance system availability covered in NY remedy plan.
GA-4	System Availability - Exact			X	X		All ordering and preorder systems are part of NY plan.
PO-1	Pre-Order/Order Response Times	X	X	X	X	1	Response times effect timeliness of CLECs placing orders.
PO-2	Electronic Flow-Through		X	X	X	1	Human intervention means additional potential for errors/delays.
PO-3	LSR Rejection Notice Interval		X	X	X	1	Sooner get reject notice the sooner LSR can be corrected and resubmitted.
PO-4	LSRs Rejected		?				If reject includes held for funding notices, will require inclusion.
PO-5	Firm Order Confirmations (FOCs) On Time		X	X	X	1	Firm Order Confirmation provides the schedule of dates committed to by Qwest for the provisioning of the service(s) requested.
PO-6	Completion Notices Transmitted by noon the Next Business Day / Billing Completion Notification Timeliness DRAFT		X	X		1	Billing completions marks CLEC ownership of customer and avoids double billing issues.
PO-7	Work Completion Notification Interval		X	X	X	1	Notifies CLEC of Qwest work completion so end user can be notified and perform test.
PO-8	Jeopardy Notice Interval		X			1	Jeopardy notices provide CLEC's first indication that problem(s)/delay(s) may occur.
PO-9	Timely Jeopardy Notices						

OP-2	Calls Answered within Twenty Seconds - Interconnect Provisioning Center	X	X	X	X	1	Need to assure CLEC calls answered as quickly as Qwest.
OP-3	Installation Commitments Met	X	X	X	X	1	Important to meet scheduled due (install) dates as CLEC's informed end users.
OP-4	Installation Interval	X	X	X	X	1	Important to validate CLECs installation intervals are the same as Qwest's.
OP-5	New Service Installation Quality		X	X	X	1	Customers receiving poor quality in first 30 days are more likely to change carriers.
OP-6	Delayed Days		X	X	X	1	Customers frustration begins with missed committed due date and with each delayed day frustration increases.
OP-7	Coordinated "Hot Cut" Interval - UBL						Diagnostic see OP-13
OP-8	Number Portability Timeliness	X	X			1	Timely cutovers are critical for customer satisfaction.
OP-13	Coordinated Cuts On Time - UBL		X	X	X	1	Timing is critical when coordinating between companies.
MR-2	Calls Answered within Twenty Seconds - Interconnect Repair Center	X	X	X	X	1	Important to answer calls quickly to report troubles.
MR-3	Out of Service Cleared within 24 Hours	X	X	X	X	1	Critical to assess Qwest ability to repair out-of-service tickets.

MR-4	All Troubles Cleared within 48 Hours		X				2	Important to evaluate timeliness of repairs for both out of service and service affecting troubles.
MR-5	All Troubles Cleared within 4 Hours	X	X				1	Assesses Qwest ability to handle out of service and service affecting tickets. Critical to evaluate average time for Qwest to restore ALL trouble requests (no time limit).
MR-6	Mean Time to Restore		X	X			1	
MR-7	Repair Repeat Report Rate		X	X			1	Important to assess Qwest's ability to repair problem the first time. CLEC's rely heavily on Qwest's maintenance abilities.
MR-8	Trouble Rate		X	X			1	Numerous first time troubles are harmful to competition, not just single customer repeats.
MR-9	Repair Appointments Met		X	X			1	Meeting appointment times are important to customer who need to schedule availability.
Bl-1	Time to Provide Recorded Usage Records		X	X			1	To meet standards for billing end users, timeliness of billing from Qwest is critical.
Bl-2	Invoices Delivered within 10 Days	X	X	X			1	To meet standard for billing end users, timeliness of billing from Qwest is critical.
Bl-3	Billing Accuracy - Adjustments for Errors	X	X	X			1	Important to measure billing accuracy.
Bl-4	Billing Completeness		X				1	Complete bills, including all non-recurring and partial recurring charges, help the CLEC audit results and keep track of accuracy.

DB-1	Time to Update Databases							May be important if process is not parity by design for database. OSS test could judge.
DB-2	Accurate Database Updates		X			1		Inaccurate databases such as DA/DL can anger customers, hurt businesses and inaccuracies in 911 databases can cause risk to lives.
DA-1	Speed of Answer - Directory Assistance			X		2		Important for customers to have timely access to DA operators.
DA-2	Calls Answered within Ten Seconds - Directory Assistance							
OS-1	Speed of Answer - Operator Services		X		X	2		Important for customers to have timely access to OS operators.
OS-2	Calls Answered within Ten Seconds - Operator Services							
NI-1	Trunk Blocking	X	X	X	X	1		Critical to evaluate Qwest ability to adequately assess trunking capacity.
NP-1	NXX Code Activation	X	X	X		1		Critical that NXX codes are activated and tested
CP-1	Installation Interval	X	X	X	X	1		Need to assure installed in timely manner. Effects planing and roll-out.
CP-2	Installation Commitments Met	X	X			1		Assesses Qwest ability to complete collocation arrangements.
CP-3	Feasibility Study Interval		X			1		Feasibility studies determine Qwest's ability to process collocation request.
CP-4	Feasibility Study Commitments Met		X			1		Qwest could delay start of collo install process by delaying feasibility study.
CP-5	Quote Interval		X			1		The sooner CLECs get back quote the sooner CLECs can move ahead with collocation.
CP-6	Quote Commitments Met		X	X	X	1		Assesses Qwest's overall ability to process price quotes
PO-10	LSR Accountability		X		X	1		Catching missing notifier problems is critical.
PO-15	Number of Due Date changes per Order		X			1		Problems with unsolicited FOCC DD changes means CLEC cannot rely often on first DD given.

Exhibit

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	MEASURES AND SUB-METRICS IN NY AND TX REMEDY PLANS BUT NOT IN QWEST.
Pre-Ordering	Percent Response Received within "X" seconds (BST contains measure but does not disaggregate like NY and TX by type of query)
	Average Response Time Loop Qualification (NY)
	% Change Management Notices Sent on Time (Type 3,4,5) (NY)
	% Change Management Notice Delay 8-Plus Days (Type 1-5) (NY)
	% Software Validation
	Delay Hours – Failed/Rejected Test Deck Transactions
	% On-Time Manual Loop Qualification for DSL (NY) (TX- Average Response Time for Loop MakeUp Information)
	% On-Time Engineering Record for DSL (NY)
Ordering	Mechanized Provisioning Accuracy (TX)
	% Accuracy LSRC (NY)
	% On Time Design Layout Records – trunks (NY)
	% On Time ASR Confirmation – trunks, Interoffice facilities (NY)
	% On Time ASR Reject – trunks, Interoffice facilities (NY)
Provisioning	
	Percent Missed Installation Appointments – UNE Loops (In addition to disaggregation proposed by LA-PSC, NY disaggregates by Other Digital (i.e. ISDN is not mixed with xDSL), Specials (DS0, DS1, DS3), Enhanced Extended Loops (Loop, transport and mux combinations), hot cuts with LNP and LNP-only.)
	Percent Provisioning Troubles within 4 Days - UNE Loops (NY disaggregates by other digital, hot cuts, and trunks)
	Percent Provisioning Troubles within 30 Days-trunks and Specials
	Percent Company Missed Due Dates Due to Lack of Facilities (TX and NY);
	Percent of ILEC Caused Missed Due Dates Greater Than 30 Days IC Trunks (NY-Specials and POTS)
	Average Delay Days for SWBT Missed Due Dates (TX)
	% Orders Held Greater Than 15 Day-Specials and Trunks (NY)
Maintenance	
	Maintenance Average Duration - UNE Loops (NY- also disaggregated by Hot Cut Installation Trouble Codes, Specials and Central Office troubles disaggregated)

	Average Response Time (Create Trouble, Modify Trouble, Request Cancellation, Test Trouble Query Intervals disaggregated)
Billing	Invoice Accuracy (TX--% of Accurate and Complete Formatted Mechanized Bills)
	*% of Billing Records Transmitted Correctly (TX)
	*Billing Completeness (TX)
Trunk Blockage	*% Common Trunk Blockage (TX)
LNP	Average Delay Days Missed Appointments (TX)
	% SWBT Caused Missed Due Dates Greater Than 30 Days (TX)
Collocation	Average Delay Days SWBT Missed Due Dates (TX)
	% of Requests Processed Within Tariffed Intervals (TX) (NY--% Responses Processed in X Days--Disaggregated by Virtual and Physical)
General Missing Measures	Directory Assistance Speed of Answer (TX)
	Operator Services Average Speed of Answer (TX)
	911 Average Time To Clear Errors (TX)
	% Accuracy for 911 Database Updates (TX)
	Average Time Required to Update 911 Database (Facility Based) (TX)
	% Poles, RoW Requests Processed within 35 Days (TX)
	% of DA Updates Completed within 72 Hours (Facility Based) (TX)
	% DA Database Accuracy For Manual Updates (TX)
	Average Delay Days for NXX Loading and Testing (TX)
	NXX Mean Time to Repair (TX)
	% Quotes Provided for Authorized BFRs within 30 BDs. (TX)
	LSC Grade of Service (TX)
	% Busy LSC (TX)
	LOC Grade of Service (TX)
	% Busy LOC (TX)