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February 10, 2000

Ms. Blanco Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
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2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

via Hand Delivery

Re: Dockets 981834-TP and 960786-TL
Comments to BellSouth's LNP Service Quality Measurements

Dear Ms. Bayo:

Enclosed for filing please find Time Warner Telecom of Florida, L.P.'s comments to BellSouth's LNP Service Quality Measurements dated August 31, 1999, and five proposed LNP Measurements. for the above-referenced dockets. You will also find a copy of this letter enclosed. Please date-stamp this copy to indicate that the original was filed and return a copy to me.

Generally, the comments may be summarized as follows:

1. Generally, BST's proposed LNP metric do not contain a sufficient level of disaggregation to provide enough detail to make a determination whether disparate treatment exists between product types, geography, and dispatch
vs. non-dispatch orders;

2. BST's proposed LNP metrics also do not take into account processing of Non-mechanized orders, such as those submitted by TWTC, in the overall order processing and order fullfilment mix;

3. BST's proposed LNP metrics are devoid of performance standards. For example, only 2 out of the 8 LNP metrics suggested by BST include a reference to a benchmark level of performance. TWTC presumes that appropriate discussion around benchmarks will take place at a future time;

4. While BST is taking steps to develop and incorporate LNP related metrics into it's regional OSS plan, the metrics as currently proposed by BST fall short of meeting CLEC needs such as TWTC's. For instance, TWTC is proposing several new LNP metrics that address specific concerns by CLEC's 1) LNP due dates met within industry guidelines, 2) Customer accounts restructured prior to LNP due date, 3) Pre-mature LNP disconnects, 4) Timeliness of setting 10 digit trigger, and 5) LNP out of service greater than 60 minutes.

If you have any questions regarding this matter, please feel free to contact me. Thank you for your assistance in processing this filing.

Respectfully,

PENNINGTON, MOORE, WILKINSON,
BELL & DUNBAR, P.A.

Karen M. Camechis

\kmc
Enclosure

BellSouth
LNP Service Quality Measurements (DRAFT)

TABLE OF CONTENTS

* These reports are subject to change due to regulatory requirements or to correct errors and etc.

This is a draft of the documentation for Local Number Portability measurements. It is a work in progress and is being revised for incorporation into an update of the Service Quality Measurement documentation.

ORDERING

Report/Measurement:
Percent LNP Flow Through Service Requests (Summary)
Definition:
The percentage of Local Service Requests (LSR) submitted electronically via the CLEC mechanized ordering process that flow through to SOCS without manual intervention
Exclusions:
• Fatal Rejects • Auto Clarification • Manual Fallout • CLEC Caused System Fallout • Order Activities of BST or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.
Business Rules:
The CLEC mechanized ordering process includes all LSRs which are submitted through one of two gateway interfaces (TAG and EDI), and flow through to SOCS without manual intervention. Flow through does not include LSRs which are submitted manually (e.g., fax, courier), contain fatal errors, are auto clarified back to the CLEC, are not designed to flow through, i.e., Manual Fallout, or contain a CLEC caused error. **Definitions:** **Fatal Rejects:** Errors that prevent an LSR submitted by the CLEC from being processed further. When an LSR is submitted by a CLEC, the LNP Gateway will perform edit checks to ensure the data received is correctly formatted and complete. For example, if the PON field contains an invalid character, the LNP Gateway will reject the LSR and the CLEC will receive a Fatal Reject. **Auto-Clarification**: Errors that occur due to invalid data within the LSR. LAUTO will perform data validity checks to ensure the data within the LSR is correct and valid. For example, if the LNP is not available for the NPA NXX requested, then the LSR will be returned back to the CLEC as a clarification. **Manual Fallout**: Planned fallout that occurs by design. Certain LSRs are designed to fallout of the Mechanized Order Process due to their complexity. These LSRs are manually processed by the LCSC. When a CLEC submits an LSR, LAUTO will determine if the LSR should be forwarded to LCSC for manual handling. The categories for Planned Manual Fallout include, but are not limited to: 1. Complex services 2. Expedites (requested by the CLEC) ~~2.~~ 3. Listing requested in foreign or secondary directory ~~3.~~ 4. Loop account exists in CRIS 5. Not all DID numbers are being ported out or disconnected 6. Class of service invalid in certain states with some types of service ~~2.~~ 7. Not all numbers on the CSR are being ported out – partial migration ~~3.~~ 8. Multi-line hunt by terminal numbers on some lines 9. Pending order review required 10. More than 25 business lines ~~2.~~ 11. Certain types of directory listings ~~3.~~ 12. Project managed orders ~~4.~~ 13. CSR inaccuracies such as invalid or missing CSR data in CRIS **Total System Fallout:** Errors that require manual review by the LCSC to determine if the error is caused by the CLEC, or if it is due to BST system functionality. If it is determined the error is caused by the CLEC, the LSR will be sent back to the CLEC as clarification. If it is determined the error is BST caused, the LCSC representative will correct the error, and the LSR will continue to be processed.

ORDERING – (Percent LNP Flow Through Service Requests (Summary) – Continued)

Calculation:

Percent Flow Through = (The total number of LSRs that flow through LAUTO to the BST OSS) / [(the number of LSRs passed from LNP Gateway to LAUTO) – Σ[(the number of LSRs that fall out for manual processing) + (the number of LSRs that are automatically returned to the CLEC for clarification) + (the number of LSRs that contain errors made by CLECs)]] X 100

Report Structure:

- ~~CLEC Aggregate~~
  - CLEC Specific
  - CLEC Aggregate
  - ~~Region~~

Level of Disaggregation:

- ~~Product~~

~~Aggregate~~

- LNP Only
- LNP w/loop
- 1- 30 Telephone Numbers
- Greater than 30 Telephone Numbers
- Dispatch
- Non-dispatch

- Geographic
  - State
  - Region

Data Retained Relating to CLEC Experience	Data Retained Relating to BST Experience
• Report month • Total number of LSRs received, by interface, by CLEC: ➢ TAG ➢ EDI • Total number of errors by type, by CLEC: ➢ Fatal rejects ➢ Total fallout for manual processing ➢ Auto clarification ➢ CLEC caused system fallout	• Report month • Total number of errors by type: ➢ BST system error

Retail Analog/Benchmark:

CLEC Flow Through/benchmark comparison

Revision Date: 12/28/99 (tm)

ORDERING

Report/Measurement:
Percent LNP Flow Through Service Requests (Detail)
Definition:
A detailed list by CLEC of the percentage of Local Service Requests (LSR) submitted electronically via the CLEC mechanized ordering process that flow through to SOCS without manual intervention.
Exclusions:
• Fatal Rejects • Auto Clarification • Manual Fallout • CLEC Caused System Fallout • Order Activities of BST or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.
Business Rules:
The CLEC mechanized ordering process includes all LSRs which are submitted through one of two gateway interfaces (TAG and EDI), and flow through to SOCS without manual intervention. Flow through does not include LSRs which are submitted manually (e.g., fax, courier), contain fatal errors, are auto clarified back to the CLEC, are not designed to flow through, i.e., Manual Fallout, or contain a CLEC caused error. **Definitions:** **Fatal Rejects:** Errors that prevent an LSR submitted by the CLEC from being processed further. When an LSR is submitted by a CLEC, the LNP Gateway will perform edit checks to ensure that the data received is correctly formatted and complete. For example, if the PON field contains an invalid character, the LNP Gateway will reject the LSR and the CLEC will receive a Fatal Reject. **Auto-Clarification:** Errors that occur due to invalid data within the LSR. LAUTO will perform data validity checks to ensure the data within the LSR is correct and valid. For example, if the LNP is not available for the NPA NXX requested, then the LSR will be returned back to the CLEC as a clarification. **Manual Fallout:** Planned fallout that occurs by design. Certain LSRs are designed to fallout of the Mechanized Order Process due to their complexity. These LSRs are manually processed by the LCSC. When a CLEC submits an LSR, LAUTO will determine if the LSR should be forwarded to LCSC for manual handling. . The categories for Planned Manual Fallout include, but are not limited to: 1. Complex services 2. Expedites (requested by the CLEC) ~~2.~~ 3. Listing requested in foreign or secondary directory ~~3.~~ 4. Loop account exists in CRIS 5. Not all DID numbers are being ported out or disconnected 6. Class of service invalid in certain states with some types of service ~~2.~~ 7. Not all numbers on the CSR are being ported out - partial migration ~~3.~~ 8. Multi-line hunt by terminal numbers on some lines 9. Pending order review required 10. More than 25 business lines ~~2.~~ 11. Certain types of directory listings ~~3.~~ 12. Project managed orders ~~4.~~ 13. CSR inaccuracies such as invalid or missing CSR data in CRIS **Total System Fallout:** Errors that require manual review by the LCSC to determine if the error is caused by the CLEC, or if it is due to BST system functionality. If it is determined the error is caused by the CLEC, the LSR will be sent back to the CLEC as clarification. If it is determined the error is BST caused, the LCSC representative will correct the error, and the LSR will continue to be processed.

ORDERING – (Percent LNP Flow Through Service Requests (Detail) – Continued)

Calculation:

Percent Flow Through =(The total number of LSRs that flow through LAUTO to the BST OSS) / [(the number of LSRs passed from LNP Gateway to LAUTO) – Σ[(the number of LSRs that fall out for manual processing + the number of LSRs that are returned to the CLEC for clarification + the number of LSRs that contain errors made by CLECs)]] X 100

Report Structure:

- CLEC Specific - Provides the flow through percentage for each CLEC (by alias designation to protect CLEC-specific proprietary data) submitting LSRs through the CLEC mechanized ordering process. The report provides the following:
  - CLEC (by alias designation)
  - Number of fatal rejects
  - Mechanized interface used
  - Total mechanized LSRs
  - Total manual fallout
  - Total number of auto clarifications returned to CLEC
  - Total number of validated LSRs
  - Total number of BST caused fallout
  - Total number of CLEC caused fallout
  - Total number of LSRs which had Service Orders Issued
  - Base flow through calculation
  - CLEC error excluded flow through calculation

Level of Disaggregation:

Product
- LNP Only
- LNP w/loop
- 1- 30 Telephone Numbers
- Greater than 30 Telephone Numbers
- Dispatch
- Non-dispatch

~~Product~~
- Geographic
  - State
  - Region

~~Aggregate~~

Data Retained Relating to CLEC Experience	Data Retained Relating to BST Experience
• Report month • Total number of LSRs received, by interface, by CLEC: ➢ TAG ➢ EDI • Total number of errors by type, by CLEC: ➢ Fatal rejects ➢ Total fallout for manual processing ➢ Auto clarification ➢ CLEC caused system fallout	• Report month • Total number of errors by type: ➢ BST system error

Retail Analog/Benchmark:

CLEC Flow Through/benchmark comparison

Revision Date: 12/28/99 (tm)

ORDERING

Report/Measurement:

Percent Rejected Service Requests

Definition:

Percent Rejected Service Request is the percent of total Local Service Requests (LSRs) which are rejected due to error or omission. An LSR is considered valid when it is manually or electronically submitted by the CLEC and passes LNP Gateway, or other edit checks to insure the data received is correctly formatted and complete, i.e., fatal rejects are excluded.

Exclusions:

- Service Requests canceled by the CLEC
- Fatal Rejects
- Order Activities of BST or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.

Business Rules:

An LSR is considered "rejected" when it is submitted manually or electronically but does not pass edit checks in the ordering systems (EDI, TAG, LNP Gateway, LAUTO) and is returned to the CLEC. ~~without manual intervention.~~

Fully Mechanized: There are two types of "Rejects" in the Fully Mechanized category:

- A Fatal Reject occurs when a CLEC attempts to electronically submit an LSR (via EDI or TAG) but required fields are not populated correctly and the request is returned to the CLEC. Fatal rejects are reported in a separate column, and for informational purposes ONLY. They are not considered in the calculation of the percent of total LSRs rejected or the total number of rejected LSRs.
- An Auto Clarification is a valid LSR which is electronically submitted (via EDI or TAG), but is rejected from LAUTO because it does not pass further edit checks for order accuracy. Auto Clarifications are returned without manual intervention.

Partially Mechanized: A valid LSR which is electronically submitted (via EDI or TAG), but cannot be processed electronically due to a CLEC error and "falls out" for manual handling. It is then put into "clarification", and sent back to the CLEC.

Manually Handled: *An LSR that is manually submitted by CLEC and manually handled by ILEC.*

Total Mechanized: Combination of Fully Mechanized and Partially Mechanized rejects.

Calculation

Percent Rejected Service Requests:

[(Number of Service Requests Rejected in the Reporting Period) / (Number of Service Requests Received in the Reporting Period)] x 100

Report Structure:

- Fully Mechanized, Partially Mechanized, Non-Mechanized, Total Mechanized
- CLEC Specific
- CLEC Aggregate

Level of Disaggregation:

- *Product Reporting Levels*
  - LNP
  - UNE Loop with LNP
  - *Dispatch*
  - Non-Dispatch
- Geographic Scope
  - State, Region

Revision date:

ORDERING

Report/Measurement:
Reject Interval Distribution & Average Reject Interval
Definition:
Reject Interval is the average reject time from receipt of an LSR to the distribution of a Reject. An LSR is considered valid when it is electronically or manually submitted by the CLEC and passes LNP Gateway, or other edit checks to insure the data received is correctly formatted and complete, i.e., fatal rejects are excluded.
Exclusions:
• Service Requests canceled by CLEC • Fatal Rejects • Order Activities of BST or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.
Business Rules:
The Reject interval is determined for each rejected LSR processed during the reporting period. The Reject interval is the elapsed time from when BST receives LSR until that LSR is rejected back to the CLEC. Elapsed time for each LSR is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of rejected LSRs to produce the reject interval distribution. An LSR is considered "rejected" when it is submitted electronically or manually but does not pass edit checks in the ordering systems (EDI, TAG, LNP Gateway, LAUTO) and is returned to the CLEC, ~~without manual intervention.~~ **Fully Mechanized**: There are two types of "Rejects" in the Fully Mechanized category: • A Fatal Reject occurs when a CLEC attempts to electronically submit an LSR but required fields are not populated correctly and the request is returned to the CLEC. Fatal rejects are reported in a separate column, and for informational purposes ONLY. They are not considered in the calculation of the percent of total LSRs rejected or the number of rejected LSRs. • An Auto Clarification is a valid LSR which is electronically submitted (via EDI or TAG), but rejected from LAUTO because it does not pass further edit checks for order accuracy. Auto Clarifications are returned without manual intervention. **Partially Mechanized:** A valid LSR which is electronically submitted (via EDI or TAG), but cannot be processed electronically due to a CLEC error and "falls out" for manual handling. It is then put into "clarification", and sent back to the CLEC. **Non-Mechanized:** An LSR that is manually submitted by CLEC and manually handled by ILEC. **Total Mechanized:** Combination of Fully Mechanized and Partially Mechanized rejects.
Calculation:
Average Reject Interval: å [(Date & Time of Service Request Rejection) - (Date & Time of Service Request Receipt)] / (Total Number of Service Requests Rejected in Reporting Period) **Reject Interval Distribution:** [Σ (Service Requests Rejected in "X" minutes/hours) / (Total Number of Service Requests Rejected in Reporting Period)] X 100
Report Structure:
• Fully Mechanized, Partially Mechanized, Non-Mechanized, Total Mechanized • CLEC Specific • CLEC Aggregate

Level of Disaggregation:

- Reported in intervals = 0 - 4 minutes, 4 - 8 minutes, 8 - 12 minutes, 12 - 60 minutes, 0 - 1 hours, 1 - 8 hours, 8 - 24 hours, >24 hours
- Product Reporting Levels
  - LNP
  - ~~UNE Loop with LNP~~
  - 1 – 30 Telephone Numbers
  - Greater than 30 Telephone Numbers
  - Dispatch
  - Non-Dispatch
- Geographic Scope
  - State, Region
- Average Interval in Days

Revision date:

ORDERING

Report/Measurement:
Firm Order Confirmation Timeliness Interval Distribution & Firm Order Confirmation Average Interval
Definition:
Interval for Return of a Firm Order Confirmation (FOC Interval) is the average response time from receipt of a valid LSR to distribution of a firm order confirmation.
Exclusions:
• Rejected LSRs (Clarifications or Fatal Rejects) • Order Activities of BST or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.
Business Rules:
The Firm Order Confirmation interval is determined for each FOC'd LSR processed during the reporting period. The Firm Order Confirmation interval is the elapsed time from when BST receives an LSR until that LSR is confirmed back to the CLEC. Elapsed time for each LSR is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed to produce the Firm Order Confirmation timeliness interval distribution. • **Mechanized** - The elapsed time from receipt of a valid LSR until the LSR is processed and appropriate service orders are generated in SOCS without manual intervention. • **Partially Mechanized** – The elapsed time from receipt of an electronically submitted LSR which falls out for manual handling by the LCSC personnel until appropriate service orders are issued by a BST service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS). ➢ **Non-Mechanized**: An LSR that is manually submitted by CLEC and manually handled by ILEC. • **Total Mechanized** - Combination of Fully Mechanized and Partially Mechanized FOCs.
Calculation:
Average FOC Interval: ä [(Date & Time of Firm Order Confirmation) - (Date & Time of Service Request Receipt)] / (Total number of Service Requests Confirmed in the Reporting Period) **FOC Interval Distribution:** Σ[(Service Requests Confirmed in "X" minutes/hours in the Reporting Period) / (Total Service Requests Confirmed in the Reporting Period)] X 100
Report Structure:
• Fully Mechanized, Partially Mechanized, Non-mechanized, Total Mechanized • CLEC Specific • CLEC Aggregate
Level of Disaggregation:
• Reported in intervals = 0 - 15 minutes, 15 - 30 minutes, 30 - 45 minutes, 45 - 60 minutes, 90 - 120 minutes, 120 - 240 minutes, 4 - 8 hours, 8 - 12 hours, 12 - 16 hours, 16 - 20 hours, 20 - 24 hours, 24 - 48 hours, >48 hours • Product Reporting Levels ➢ LNP ➢ UNE Loop with LNP ➢ 1-30 TN's ➢ Greater than 30 TN's ➢ Dispatch ➢ Non-dispatch • Geographic Scope ➢ State, Region

Revision date:

PROVISIONING

Report/Measurement:
Percent Missed Installation Appointments
Definition:
Percent Missed Installation Appointments monitors the reliability of BST commitments with respect to committed due dates to assure that CLECs can reliably quote expected due dates to their retail customer as compared to BST.
Exclusions:
• Canceled Service Orders • Order Activities of BST or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.
Business Rules:
Percent Missed Installation Appointments (PMI) is the percentage of total orders processed for which BST is unable to complete the service orders on the committed due dates. Missed Appointments caused by end-user reasons will be included and reported in a separate category. A business day is any time period within the same date frame, which means there cannot be a cutoff time for commitments as certain types of orders are requested to be worked after standard business hours. Also, during Daylight Savings Time, field technicians are scheduled until 9PM in some areas and the customer is offered a greater range of intervals from which to select.
Calculation:
Percent Missed Installation Appointments: [ä (Number of Orders Not Completed by Committed Due Date in Reporting Period) / (Number of Orders Completed in Reporting Period)] X 100
Report Structure:
• Mechanized (service orders generated by LSRs submitted via EDI or TAG) • CLEC Specific • CLEC Aggregate Non-Mechanized **Report explanation:** Total Missed Appointments is the total % of orders missed either by BST or the CLEC end user. End User MA represents the percentage of orders missed by the CLEC end user. The difference between End User Missed Appointments and Total Missed Appointments is the result of BST caused misses.
Level of Disaggregation:
• Product Reporting Levels ➢ LNP ➢ ~~➢~~—UNE Loop Associated w/LNP ➢ 1-30 TN's ➢ Greater than 30 TN's ➢ Dispatch ➢ Non-dispatch • Geographic Scope ➢ State, Region

Revision date:

PROVISIONING

Report/Measurement :
Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution
Definition:
Disconnect Timeliness is defined as the interval between the time the LNP Gateway receives the 'Number Ported' message from NPAC (signifying the CLEC 'Activate') until the time that the Disconnect service order for an LSR is completed in SOCS. This interval effectively measures BST responsiveness by isolating it from impacts that are caused by CLEC related activities.
Exclusions:
• Canceled Service Orders • Order Activities of BST or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable. • "L" Appointment code orders (indicating the customer has requested a later than offered interval)
Business Rules:
The Disconnect Timeliness interval is determined for the last Disconnect service order processed on an LSR during the reporting period. The Disconnect Timeliness interval is the elapsed time from when BST receives the last 'Number Ported' message for an LSR from NPAC (signifying the CLEC 'Activate') until the last Disconnect service order is completed in SOCS. Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the total number of selected disconnect orders which have been completed.
Calculation :
Average Disconnect Timeliness Interval: ä [(Disconnect Service Order Completion Date & Time) - ('Number Ported' Message Received Date & Time)] / Σ (Total Number of Disconnect Service Orders Completed in Reporting Period) **Disconnect Timeliness Interval Distribution:** [Σ (Disconnect Service Orders Completed in "X" days) / (Total Disconnect Service Orders Completed in Reporting Period)] X 100
Report Structure:
• Mechanized (service orders generated by LSRs submitted via EDI or TAG) • CLEC Specific • CLEC Aggregate Non-Mechanized
Level of Disaggregation:
• Reported in day intervals = 0,1,2,3,4, 5, >5 days • Product Reporting Levels ➢ ~~➢~~ LNP ➢ 1-30 TN's ➢ Greater than 30 TN's • Geographic Scope ➢ State, Region

Revision date:

PROVISIONING

Report/Measurement :

Total Service Order Cycle Time (TSOCT) Interval Distribution & Average Total Service Order Cycle Time

Definition:

Total Service Order Cycle Time measure the interval from receipt of a valid service order request to the completion of the final service order associated with that service request.

Exclusions:

- Canceled Service Orders
- Order Activities of BST or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable
- "L" appointment coded orders (indicating the customer has requested a later than offered interval)
- "S" appointment coded orders (indicating subscriber missed reasons), except for "SP" codes (indicating subscriber prior due date requested.

Business Rules:

The interval is determined for each service request processed during the reporting period. This measurement combines two reports: FOC (Firm Order Confirmation) with Average Order Completion Interval.

This interval starts with the receipt of a valid service request and stops when the technician or system completes all the related service orders for the LSR in SOCS. Elapsed time for each service request is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of service requests completed to produce the total service order cycle time.

Calculation :

Average Total Service Order Cycle Time:

$\bar{a}$ [(Service Order Completion Date & Time) - (Service Request Receipt Date & Time)] / Σ (Total Number Service Requests Completed in Reporting Period)

Total Service Order Cycle Time Interval Distribution:

[Σ (Total Number of Service Requests Completed in "X" minutes/hours) / (Total Number of Service Requests Received in Reporting Period)] X 100

Report Structure:

- Mechanized (service orders generated by LSRs submitted via EDI or TAG)
- CLEC Specific
- CLEC Aggregate
- Non-Mechanized

Level of Disaggregation:

- Reported in day intervals 0 - 5, 5 - 10, 10 – 15, 15 - 20, 20 - 25, 25 - 30, >30 days
- Product Reporting Levels
  - LNP
  - UNE Loop with LNP
  - 1-30 TN's
  - Greater than 30 TN's
  - Dispatch
  - Non-dispatch
- Geographic Scope
  - State, Region

Revision date:

TWTC Proposed New LNP Measurement #1:	
Percentage of LNP Only Due Dates within Industry Guidelines	
Definition:	
Percentage of LNP Due date interval that meets the industry standard established by the North American Numbering Council (NANC).	
Exclusions:	
• CLEC or Customer caused or requested delays. • NPAC caused delays unless caused by ILEC.	
Business Rules:	
Industry guidelines for due dates for LNP are as follows: • For Offices in which NXXs are previously opened – 3 Business Days. • New NXX – 5 Business days on LNP capable NXX. **The above-noted due dates are from the date of the FOC receipt.** **For partial LNP conversions that require restructuring of customer account:** • 1-30 TNs: Add one additional day to the FOC interval. The LNP due date intervals will continue to be three business days and five business days from the receipt of the FOC depending on whether the NXX has been previously opened or is new. • >30 TNs, including entire NXX: The due dates are negotiated.	
Levels of Disaggregation:	
NXXs previously opened and NXX new (1-30 TNs and greater than 30 TNs)	
Calculation:	**Report Structure:**
(Count of LNP TNs implemented within Industry guidelines ÷ total number of LNP TNs) *100	Reported for CLEC and all CLECs.
Measurement Type:	
Benchmark:	
96.5%. The benchmark will be revised either up or down if industry guidelines are established that are different than the objective stated here.	

TWTC Proposed New Measurement #2:	
Percentage of Customer Account Restructured Prior to LNP Due Date	
Definition:	
Percentage of accounts restructured within the LNP order due date established in TWTC proposed new measurement No. 1, and/or negotiated due date for orders that contain more than 30 TNs.	
Exclusions:	
None	
Business Rules:	
See proposed new measurement No. 1	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Number of LNP orders for which customer accounts were restructured prior to LNP due date) ÷ (total number of LNP orders that require customer accounts to be restructured) *100	Reported for CLEC and all CLECs.
Measurement Type	
Benchmark:	
96.5%	

TWTC Proposed New Measurement #3:	
Percentage Pre-mature Disconnects for LNP Orders	
Definition:	
Percentage of LNP cutovers where ILEC prematurely removes the translations, including the 10 digit trigger, prior to the scheduled conversion time.	
Exclusions:	
Coordinated Conversions	
Business Rules:	
The count of incidents, on a TN basis, where the translations are removed prior to the scheduled conversion. Count the number of cutovers that are prematurely disconnected (10 minutes before scheduled conversion time).	
Levels of Disaggregation:	
LNP only and LNP with Loop.	
Calculation:	**Report Structure:**
Count of premature disconnects ÷ total LNP conversions * 100	Reported by CLEC and all CLECs disaggregated by LNP and LNP with UNE loop.
Measurement Type:	
Benchmark:	
2% or Less premature disconnects starting 10 minutes before scheduled due time.	

TWTC Proposed New Measurement #4:	
Percentage of Time ILEC Applies the 10-digit Trigger Prior to the LNP Order Due Date	
Definition:	
Percentage of time *ILEC* applies 10-digit trigger, where technically feasible, for LNP or LNP with loop TNs on the day prior to the due date.	
Exclusions:	
Excludes Remote Call Forwarding in DMS 100s, DID in all offices and ISDN Data TNs."	
Business Rules:	
Obtain number of LNP or LNP with loop TNs where the 10-digit trigger was applied on the day prior to due date, and the total number of LNP or LNP with Loop TNs where the 10-digit trigger was applied, where technically feasible.	
Levels of Disaggregation:	
LNP only, and LNP with Loop.	
Calculation:	**Report Structure:**
(Count of LNP TNs for which 10-digit trigger was applied 24 hours prior to due date ÷ total LNP TNs for which 10-digit triggers were applied) * 100.	Reported for CLEC and all CLECs.
Measurement Type:	
Benchmark:	
96.5%	

TWTC Proposed New Measurement #5:	
Percent Out of Service < 60 minutes	
Definition:	
The Number of LNP related conversions where the time required to facilitate the activation of the port in ILEC's network is less than 60, expressed as a percentage of total number of activations that took place.	
Exclusions:	
• CLEC-caused errors. • NPAC-caused errors unless caused by ILEC. • Large ports greater than 500 ports.	
Business Rules:	
The Start time is the Time that an "activate NPAC" broadcast is received in ILEC's LSMS. The End time is the Time the provisioning event is complete in ILEC's LSMS. Count the number of conversions that took place in less than 60 minutes.	
Levels of Disaggregation:	
None	
Calculation:	**Report Structure:**
(Number of activation events provisioned in less than 60minutes) ÷ (total LNP provisioning events) * 100.	Reported for CLEC and all CLECs.
Measurement Type:	
Benchmark:	
96.5%	

CERTIFICATE OF SERVICE
DOCKET 981834-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by U.S. Mail on this 10th day of February, 2000, to the following parties of record:

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