

*Goldberg*  
*MetTel*

ORIGINAL

Operations Support Systems  
Performance Assessment Plan  
MetTel Comments

000121-TP

**1. Introduction:**

The following comments were developed based on a review of the Florida Public Service Commission Staff's Initial Proposal for an Operations Support System Performance Assessment Plan.

MetTel views the development of permanent performance metrics, performance standards and a performance monitoring program as critical to ensuring true competition within the marketplace. We believe that accurate, timely, comprehensive and self-administering measurement systems work for the benefit of all and preclude any residual biases which hinder competitive public service.

**2. Review of the PSC Staff's Initial Proposal:**

We would suggest that some additional items be added to the 17 proposed additions to the Florida Interim metrics (Section IV of the Staff's Interim Proposal). These metrics deal with the timely completion of Migrations, Feature Additions/Changes, Suspensions for Non-Payment and Restoration of Service. Our past experience indicates that these service areas which directly relate to the ALEC-Customer relationship are susceptible to delays which reflect badly upon the ALEC and which frequently are not the ALEC's fault. Further, our experience indicates that the timeliness of these actions (which the ILEC may take under a service agreement with the ALEC) should be at parity with the service the ILEC provides to its own Retail operations. However, the measurement of these activities should be against a defined standard and the achievement of that standard should be separately measured for the ILEC Retail Operation and the ALEC and then the two results should be compared.

The activities MetTel proposes for measurement include:

Time between an order being sent to the ILEC and the ILEC's acknowledgement of that order to the ALEC and the percentage of orders acknowledged back to the ALEC within a specific time frame.

Time between an order's acknowledgement and the ILEC's confirmation of that order back to the ALEC and the percentage of orders confirmed back to the ALEC within a specific time frame

Percentage of orders provisioned within the specified period for provisioning the ordered action and the percentage and the percentage of provisioning completion notifications sent to the ALEC within a specified period of time after the physical completion of the activity.

Percentage of provisioned orders where the billing activity is completed within a specified period after the provisioning activity percentage and the percentage of billing

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- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMW \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
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completion notifications sent to the ALEC within a specified period of time after the physical completion of the billing activity.

The specified time periods indicated above have to be determined by the current ILEC performance level and competitive conditions. The percentages completed also have to be based on current ILEC performance and competitive conditions.

We are somewhat confused by the Staff's comments that "identical standards for all ILECs would not be appropriate". Does the Staff mean identical measurement criteria measured against different ILEC specific values or is the Staff discussing totally different systems? We believe in the former for statewide consistency in operations and to ensure the maximum in customer service across our future service area.

### **3. Questions**

Should there be any questions about this material, please contact Elliot Goldberg at (212) 607-2031.

### **4. Attachment**

MetTel has developed the following attachment for a self-correcting system that would maximize ILEC service to ALECs. NY PSC Staff has recommended it to the Carrier community for study. One competing carrier has stated that were a similar system in place then many of the New York metrics would not be required and another carrier has recommended the system to the Pennsylvania PSC. We present it for your review.

## Order Tracking Proposal for ILECs Suggested By Met Tel

1. Goals:
  - A. To provide positive control over all incoming and outgoing orders.
  - B. To provide enhanced status information flow.
  
2. Objectives:
  - A. To enable proactive control over all PONS
  - B. To ensure all PONS proceed through the processing cycle in a timely manner.
  - C. To enable a proactive corrective response for any PON not being processed in a timely manner.
  - D. To ensure a positive notification and correction system for all transmissions
  
3. Proposed Steps:
  - A. ILEC is to log all incoming files at the firewall and:
    - a. Provide a copy of the log to the ALEC daily
    - b. Maintain a count of received files by ALEC
  
  - B. ILEC is to establish a log of all decrypted files and:
    - a. Compare the number of files decrypted to the received count generated in 3.A.b.
    - b. Compare the number of PONs decrypted from a file to the number of PONs noted in the file header.
      - (i) If the number of PONs agrees with the header, ILEC is to establish a PON level control log.
      - (ii) If the number of PONs does not agree with the header, ILEC is to first attempt to re-decode a copy of the original file. If the missing PONs are recovered, then they will be added to the control log generated in 3.B.b. (i) and processing will proceed.
      - (iii) If the number of PONs successfully decrypted does not agree with the header, ILEC is to first attempt to re-decode a copy of the original file. If the missing PONs are not recovered, ILEC is to send a notification to the ALEC containing the Batch Number and a list of the PONs successfully decrypted. The successfully decrypted PONs will proceed with normal processing. The ALEC will have to retransmit the PONs not successfully decrypted.
  
  - C. ILEC is to maintain a control log record of every PON's progress through the processing system as well as the path the PON takes (i.e. Level 2 vs. Level 5 processing).
  
  - D. ILEC is to update the control log as the PONs are processed. As each notification (Acknowledgement, Confirmation, Query, Service Completion Notice, Billing Completion Notice) is transmitted, the file will be updated with the date and time of transmission. Additionally, the return

acknowledgement of the recipient's receipt of the ILEC transmission is to be posted. Then:

- a. When there is a recipient acknowledgement for the transmission, ILEC simply progresses to the next stage.
  - b. When a recipient acknowledgement is not received in a timely manner (2 hours or less) ILEC should retransmit the original transmission. The retransmission should continue at 2-hour intervals until a recipient acknowledgement is received.
- E. The control log should contain production interval flags. Each time a specified production interval is exceeded, a special message should be sent to the PON originator and an appropriate ILEC level. An example of a production interval might be a PON taking longer than 24 hours in TISOC Level 2 processing or a SNP/Restoral not being same day processed. Each time a "flag message" is generated, ILEC should advise the issuer and generate a projected "get well" date.
- F. The control log should be available to all users on a continuous basis. This availability should mean a web posting to a secure area. Initially, a complete file should be sent to each PON originator daily.

# Order Tracking Proposal Flow

