

Kay Flynn

**From:** Daniels, Sonia C - LGCRP [soniadaniels@att.com]  
**Sent:** Friday, November 12, 2004 12:49 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Lisa Harvey; PCHRISTE@psc.state.fl.us; rmulvany@birch.com; gwatkins@covad.com; mfeil@mail.fdn.com; Michael Gross; dst@tobinreyes.com; aleiro@idstelcom.com; NEdwards@itcdeltacom.com; Donna McNulty; Jerry Hallenstein; jmclau@kmctelecom.com; jacanis@kelleydrye.com; mhazzard@kelleydrye.com; jmcglothlin@mac-law.com; Vicki Gordon Kaufman; rheatter@mpowercom.com; danyelle.kennedy@networktelephone.net; Inowalsky@nbglaw.com; Michael Britt; Peter Dunbar; Susan Masterton; Dulaney L. O'Roark; Mark.Ozanick@accesscomm.com; mconquest@itcdeltacom.com; MCampbell@nuvox.com; TSauder@birch.com; Nancy Sims; Nancy White; Tracy Hatch; Chris McDonald; Musselwhite, Brian J - LGCRP; Ross-Bain, Martha M - LGCRP; Norris, Sharon E - LGCRP; Daniels, Sonia C - LGCRP  
**Subject:** RE: 000121A -- CLEC Coalition Response to Oct. 28 SQM Action Items



11122004 FL  
EC Coalition Re

Docket No. 000121A-TP -- In re: Investigation into the Establishment of Operations Support system Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies (BellSouth track)

Attached please find for electronic filing the CLEC Coalition's Reply to Action Items from the October 28, 2004 SQM call in the above-referenced docket. The cover letter, certificate of service and the CLEC Coalition's Reply are a total of 18 pages. The attached document should be considered the official version for purposes of the docket file.

As indicated in the cover letter, copies of the CLEC Coalition's Reply are being distributed to parties via electronic (in cases where e-mail addresses are available) and U.S. Mail. Thank you for your assistance in this matter.

<<11122004 FL CLEC Coalition Reply.pdf>> Sonia Daniels Docket Manager AT&T Law & Gov't Affairs  
1230 Peachtree 4th Floor Atlanta, GA 30309  
Phone: 404-810-8488  
Fax: 281-664-9791

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
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- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

12146 NOV 12 3

FPSC-COMMISSION CLERK

ORIGINAL



Tracy Hatch  
Senior Attorney  
Law and Government Affairs  
Southern Region

Suite 700  
101 N. Monroe Street  
Tallahassee, FL 32301  
850-425-6360

November 12, 2004

**BY ELECTRONIC FILING**

Ms. Blanca Bayó, Director  
The Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No. 000121A-TP

Dear Ms. Bayó:

Attached please find the CLEC Coalition's Reply to Action Items from the October 28, 2004, Conference Call with staff regarding BellSouth's SQM Six-Month Review in the above-referenced docket. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

*s/ Tracy W. Hatch*

Tracy W. Hatch

TWH/scd  
Attachment  
cc: Parties of Record

DOCUMENT NUMBER-DATE

12146 NOV 12 04

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the CLEC's Reply was served by

U.S. Mail this 12th day of November 2004 to the following:

(\*) Blanca S. Bayo  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 3239-0850

Ms. Nancy B. White  
c/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

Michael A. Gross  
Florida Cable Telecommunications Assoc.  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32302

Nanette Edwards  
ITC Deltacom  
4092 South Memorial Parkway  
Huntsville, AL 35802

Donna Canzano McNulty  
MCI  
1203 Governors Square Blvd., Suite 201  
Tallahassee, FL 32301

John D. McLaughlin, Jr.  
KMC Telecom, Inc.  
1755 North Brown Road  
Lawrenceville, GA 30043

Messer Law Firm  
Floyd Self  
Norman Horton  
P.O. Box 1867  
Tallahassee, FL 32302

Pennington Law Firm  
Peter Dunbar  
Karen Camechis

P.O. Box 10095  
Tallahassee, FL 32302-2095

Rutledge Law Firm  
Kenneth Hoffman  
John Ellis  
P.O. Box 551  
Tallahassee, FL 32302-0551

McWhirter Law Firm  
Joseph McGlothlin/Vicki Kaufman  
117 S. Gadsden St.  
Tallahassee, FL 32301

Wayne Stavanja/Mark Buechele  
Supra Telecom  
1311 Executive Center Drive, Suite 200  
Tallahassee, FL 32301

Kimberly Caswell  
Verizon Select Services, Inc.  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110

John Rubino  
George S. Ford  
Z-Tel Communications, Inc.  
601 S. Harbour Island Blvd.  
Tampa, FL 33602-5706

Renee Terry  
e.spire Communications, Inc.  
131 National Business Parkway, #100  
Annapolis Junction, MD 20701-10001

William Weber  
Covad Communications Company  
19<sup>th</sup> Floor, Promenade II  
1230 Peachtree Street, NE  
Atlanta, GA 30309-3574

WorldCom, Inc.  
Dufaney O'Roark, III  
Six Concourse Parkway, Suite 3200  
Atlanta, GA 30328

IDS Telecom, LLC  
Angel Leiro/Joe Millstone  
1525 N.W. 167<sup>th</sup> Street, Second Floor  
Miami, FL 33169-5131

Katz, Kutter Law Firm  
Charles Pellegrini/Patrick Wiggins  
106 East College Avenue, 12<sup>th</sup> Floor  
Tallahassee, FL 32301

Mpower Communications Corp.  
David Woodsmall  
175 Sully's Trail, Suite 300  
Pittsford, NY 14534-4558

ALLTEL Communications, Inc.  
C/O Ausley Law Firm  
Jeffrey Whalen  
PO BOX 391  
Tallahassee, FL 32302

BellSouth Telecom., Inc.  
Patrick W. Turner/R. Douglas Lackey  
675 W. Peachtree Street, Suite 4300  
Atlanta, GA 30375

Sprint Communications Company  
Susan Masterton/Charles Rehwinkel  
PO BOX 2214  
MS: FLTLHO0107  
Tallahassee, FL 32316-2214

Miller Isar, Inc.  
Andrew O. Isar  
7901 Skansie Ave., Suite 240  
Gig Harbor, WA 98335-8349

Birch Telecom of the South, Inc.  
Tad J. Sauder  
Manager, ILEC Performance Data  
2020 Baltimore Ave.  
Kansas City, MO 64108

Suzanne F. Summerlin  
2536 Capital Medical Blvd.  
Tallahassee, FL 32308-4424

Kelley Drye & Warren, LLP  
Jonathan E. Canis/Michael B. Hazzard  
1200 19<sup>th</sup> Street, N.W., 5<sup>th</sup> Floor  
Washington, DC 20036

David Benck  
Momentum Business Solutions, Inc.  
2700 Corporate Drive  
Suite 200  
Birmingham, AL 35242

Russell E. Hamilton, III  
Nuvox Communications, Inc.  
301 N. Main Street, Suite 5000  
Greenville, SC 29601

*s/ Tracy W. Hatch*  
\_\_\_\_\_  
*Tracy W. Hatch*

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

|   |   |                          |
|---|---|--------------------------|
| In re: Investigation into the Establishment | ) |                          |
| of Operations Support System Permanent      | ) | Docket No. 000121A-TP    |
| Performance Measures for Incumbent          | ) |                          |
| Local Exchange Telecommunications           | ) | Filed: November 12, 2004 |
| Companies (BellSouth Track)                 | ) |                          |
| <hr/>                                       |   |                          |

CLEC COALITION REPLY TO ACTION ITEMS

Competitive Local Exchange Carriers ("CLECs"), AT&T Communications of the Southern States, LLC; Birch Telecom; DIECA Communications Company d/b/a Covad Communications Company ("Covad"); ITC^DeltaCom Communications, Inc. ("ITC^DeltaCom/BTI"); MCI metro Access Transmission Services, LLC, MCI WorldCom Communications, Inc.; and Network Telephone Corp., hereinafter collectively referred to as the "CLEC Coalition," hereby file the following responses to the Florida Public Service Commission Staff's ("Staff's") request that answers be supplied for the following Action Items from the October 28, 2004 SQM Six-Month Review conference call:

Action Item 1:

In BellSouth's September 13, 2004 filing, Item #6, BellSouth proposed to modify its Percent Provisioning Troubles with X days of Service Order measure to 14 days for design services and five days for non-designed services. CLECS to provide response regarding whether UCL loops are designed or non-designed service.

CLEC Response:

Both the CLEC Information Package for the Unbundled Copper Loop – Non Designed (UCL-ND) and the Unbundled Local Loop-Technical Specifications (TR73600) indicate that the UCL-ND loop is provisioned without a Design Layout Report or test points, thereby categorizing it as a non-designed loop. However a Data CLEC's (DLEC's) use of this loop is no different from that of a designed loop. The issue then, at least for the DLEC, is the inclusion of UCL-ND loops in the non-designed services category which would result in the application of a 5 day interval in which to determine if provisioning troubles exist and whether they should be captured in the results for the Percent Provisioning Troubles within X Days of Service Order Completion measure.

Al Varner indicated during the October 28 conference call that the rationale behind BellSouth's proposal to apply a 5 day interval to Non-Designed services and a 14 day interval to Designed services was to separate the POTS loops from the Non-POTS loops. It is important to note that the general population considers non-designed loops to be used for providing voice services only. So when BellSouth provisions a non-designed (POTS type) loop to an end-user's premises and that loop is used for voice services, the technician will know right away whether or not the voice service is working or has failed.

The same is not true when BellSouth provisions a UCL-ND loop for a DLEC. The provisioning process is only the first part of the process in providing DSL services. The DLEC's ability to assess the functionality of an end-user's service is dependant upon whether the CPE equipment has been properly installed and configured (the Installation Interval). Since the end-user has 2 choices for installing the CPE equipment, the Installation Interval may be further impacted. The end-user can install the equipment themselves (a self-install) or they can have a Covad technician complete the install for them (a professional install). Obviously a professional installation will require more time to schedule an appointment with the end-user and to dispatch the technician to their premises. Scheduling an appointment alone may add several days to the Installation Interval. It complicates matters even more if the end-user is a no-show because the process must be repeated, in which case, the installation interval will be extended even further.

All things considered, it is clear that an interval of 5 days from BellSouth's completion of the service order does not allow enough time for the DLEC to complete the installation and test the functionality of the service, then isolate possible provisioning troubles in the event the service does not work. For the reasons outlined above, the CLECs request that BellSouth include the UCL-ND loop in the designed services category which would allow a 14 day interval to apply for determining the existence of troubles that may be related to the provisioning process.



**Action Item 2:**

In BellSouth's September 13, 2004 filing, Item #10, BellSouth provided explanation of why it is proposing to change the standard for measure P7B from 5 hours to diagnostic. CLECs are to respond to BellSouth's rationale.

**CLEC Response:**

CLECs found BellSouth's response somewhat confusing. First, BellSouth indicated that the troubles often involved complicated repair solutions. It then stated that "only 31 orders" had intervals greater than 5 hours. It is unclear whether BellSouth wants to be relieved of a quality of service obligation because these types of problems are hard to solve or whether they are concerned about small sample size. CLECs strongly object to BellSouth's claims that complexity should permit lack of standards, but are willing to consider the changes to the measure that will permit use of the Small Sample Benchmark Table. CLECs recommend a benchmark of 95% within 2 hours. The change from 100% to 95% addresses the small sample size, and the interval of 2 hours (which was requested in the CLEC Coalition's July 28, 2004 filing) addresses the need for quality service.

Additionally, the CLECs were asked to review BellSouth's revisions to P-7B to determine whether BellSouth's additional calculation in this measure of the "% of Items with No Troubles" eliminated the CLEC need for the additional measure requested in its July 28, 2004 filing entitled "P-7D -Coordinated/Non-Coordinated Customer Conversions -% without Service Disruption.

Response: No, it does not, minimally for the following reasons:

- It has no performance standard.
- It does not include non-coordinated cuts.

**Action Item 3:**

CLECs to clarify the Verizon measures of Timeliness of Completion Notices filed on October 14, 2004 and provide an example of a performance measures report for these measures.

**CLEC Response:**

Verizon has three measures related to billing completion notices.

First, measure OR-4-17 - % Billing Completion Notifiers (BCN) sent within two Business Days is described on page 13 of the CLEC Coalition's October 14 filing. This measure is reported for EDI orders only, is reported separately for resale and UNE, but does not provide product specific disaggregation. This measure is included in Verizon's penalty plan.

Second, measure OR-4-11- % Completed Orders with neither a PCN or BCN sent is described on pages 11 and 12 of the CLEC Coalition's October 14 filing. It serves a similar "completeness" purpose as BellSouth's measure O-11 does for FOCs and rejections. This measure is included in Verizon's penalty plan.

Third, measure OR-10 – PON Notifier Exception Resolution Timeliness is described on pages 13 and 14 of the CLEC Coalition's October 14 filing. It measures how quickly trouble tickets for missing notifiers, including billing completion notifiers, are resolved. This measure is included in Verizon's penalty plan.

See Attachment "A " for Verizon's August 2004 performance report for these measures.

**Action Item 4:**

CLECs to provide a copy of the proposed disaggregation AT&T provided Staff.

**CLEC Response:**

See Attachment "B".

Respectfully submitted this 12<sup>th</sup> day of November, 2004.

**CLEC COALITION**

*s/ Tracy Hatch*

Tracy Hatch  
AT&T Communications of the Southern States,  
LLC  
101 N. Monroe St., Suite 700  
Tallahassee, FL 32301

*s/ Rose Mulvany Henry*

Rose Mulvany Henry  
Vice President of Regulatory Affairs  
Birch Telecom, Inc.  
2020 Baltimore Avenue  
Kansas City, MO 64108

*s/ Gene Watkins*

Charles E. (Gene) Watkins  
Senior Counsel, DIECA Communications, Inc.  
d/b/a Covad Communications Co.  
1230 Peachtree Street, N.E.  
19th Floor  
Atlanta, Georgia 30309

*s/ Nanette Edwards*

ITC^Deltacom/BTI  
Nanette S. Edwards  
4092 South Memorial Parkway  
Huntsville, AL 35802-4343

*s/ Donna McNulty*

Donna Canzano McNulty

MCImetro Access Transmission Services, LLC,  
MCI WorldCom Communications, Inc.  
1203 Governors Square Blvd., Suite 201  
Tallahassee, FL 32301

*s/ Floyd Self*

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Counsel for MCI  
Floyd Self  
Messer, Caparello & Self  
215 South Monroe St Ste 701  
PO Box 1876  
Tallahassee Fl 32302-1876

*s/ Margaret Ring*

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Margaret Ring  
Director, Regulatory & Governmental Affairs  
Network Telephone Corp.  
3300 North Pace Boulevard  
Pensacola, FL 32505

**Carrier to Carrier**  
**Performance Standards and Reports**  
**Verizon Pennsylvania August 2004**

**CLEC Aggregate Performance**  
**ORDERING - RESALE POTS / SPECIAL SERVICES**

| Metric #   | Standard  | Actual Performance CLEC Aggregate | Number of Observations All CLECs |
|--|---|-----------------------------------|----------------------------------|
| <b>RESALE POTS / SPECIAL SERVICES</b>                                      |   |                                   |                                  |
| <b>PO-3 - Contact Center Availability</b>                                  |   |                                   |                                  |
| PO-3-02-1000   | % Answered within 30 Seconds - Ordering***A                               | 87.11                             | 14568                            |
| PO-3-04-1000   | % Answered within 30 Seconds - Repair**A                                  | 75.88                             | 145807                           |
| <b>RESALE ORDERING</b>   |   |                                   |                                  |
| <b>OR-8 - Acknowledgment Timeliness</b>                                    |   |                                   |                                  |
| OR-8-01-2000   | % Acknowledgments on Time   | 100.00                            | 2780                             |
| <b>OR-9 - Order Acknowledgment Completeness</b>                            |   |                                   |                                  |
| OR-8-01-2000   | % Acknowledgment Completeness   | 100.00                            | 2780                             |
| <b>OR-10 - PON Notifier Exception Resolution Timeliness</b>                |   |                                   |                                  |
| OR-10-01-1000  | % PON Exception Resolution Within Three (3) Business Days                 | 99.45                             | 958                              |
| OR-10-02-1000  | % PON Exception Resolution Within One (1) Business Day                    | 100.00                            | 966                              |
| <b>POTS / SPECIAL SERVICES - Electronically Submitted</b>                  |   |                                   |                                  |
| <b>OR-1 - Order Confirmation Timeliness</b>                                |   |                                   |                                  |
| OR-1-02-2320   | % On Time LSRC - Flow Through   | 98.45                             | 1874                             |
| OR-1-04-2320   | % On Time LSRC/ASRC No Facility Check                                     | 98.41                             | 439                              |
| OR-1-06-2320   | % On Time LSRC/ASRC Facility Check  | 98.81                             | 72                               |
| <b>OR-2 - Reject Timeliness</b>  |   |                                   |                                  |
| OR-2-02-2320   | % On Time LBR Reject - Flow Through                                       | 99.71                             | 1032                             |
| OR-2-04-2320   | % On Time LBR/ASR Reject No Facility Check                                | 99.25                             | 267                              |
| OR-2-06-2320   | % On Time LBR/ASR Reject Facility Check                                   | 95.83                             | 24                               |
| <b>WIRE/DIGITAL SERVICES</b>   |   |                                   |                                  |
| <b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b> |   |                                   |                                  |
| OR-1-04-2341   | % On Time LBR/ASRC No Facility Check                                      | 92.31                             | 13                               |
| OR-1-06-2341   | % On Time LBR/ASRC Facility Check   | NA                                |                                  |
| <b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>             |   |                                   |                                  |
| OR-2-04-2341   | % On Time LBR/ASR Reject No Facility Check                                | 83.33                             | 8                                |
| OR-2-06-2341   | % On Time LBR/ASR Reject Facility Check                                   | 100.00                            | 2                                |
| <b>POTS &amp; SPECIAL SERVICES - Analog</b>                                |   |                                   |                                  |
| <b>OR-3 - Percent Rejects</b>  |   |                                   |                                  |
| OR-3-01-2000   | % Rejects   | 36.27                             | 3841                             |
| OR-3-02-1000   | % LSR Resubmission Not Rejected   | 100.00                            | 8                                |
| <b>OR-4 - Timeliness of Completion Notification</b>                        |   |                                   |                                  |
| OR-4-01-1000   | % Completed orders with notification POA not BDN                          | 100.00                            | 95118                            |
| OR-4-02-1000   | % Completed orders with notification POA sent within one (1) Business Day | 99.92                             | 95118                            |
| OR-4-03-1000   | % Billing Completion Notification sent within two (2) Business Days       | 92.06                             | 95118                            |
| <b>OR-5 - Percent Flow-Through</b>   |   |                                   |                                  |
| OR-5-01-2000   | % Flow Through - Total  | 78.85                             | 2449                             |
| OR-5-03-2000   | % Flow Through Achieved   | 97.06                             | 1939                             |
| <b>OR-6 - Order Accuracy</b>   |   |                                   |                                  |
| OR-6-01-2000   | % Service Order Accuracy  | 94.01                             | 384                              |
| OR-6-03-2000   | % Accuracy - LSRC   | 0.00                              | 654                              |
| OR-6-04-2000   | % Accuracy - LBR/ASR White Page Listing                                   | TR                                |                                  |
| <b>OR-7 - Order Completeness</b>   |   |                                   |                                  |
| OR-7-01-2000   | % Order Confirmation/Rejects sent within 3 Business Days                  | 99.50                             | 3588                             |
| <b>SPECIAL SERVICES - Electronically Submitted</b>                         |   |                                   |                                  |
| <b>OR-1 - Order Confirmation Timeliness</b>                                |   |                                   |                                  |
| OR-1-04-2210   | % On Time LSRC/ASRC No Facility Check DS0                                 | NA                                |                                  |
| OR-1-04-2211   | % On Time LSRC/ASRC No Facility Check DS1                                 | NA                                |                                  |
| OR-1-04-2213   | % On Time LSRC/ASRC No Facility Check DS3                                 | NA                                |                                  |
| OR-1-04-2214   | % On Time LSRC/ASRC No Facility Check (Non DS0, DS1, & DS3)               | 81.82                             | 11                               |
| OR-1-06-2210   | % On Time LSRC/ASRC Facility Check DS0                                    | NA                                |                                  |
| OR-1-06-2211   | % On Time LSRC/ASRC Facility Check DS1                                    | NA                                |                                  |
| OR-1-06-2213   | % On Time LSRC/ASRC Facility Check DS3                                    | NA                                |                                  |
| OR-1-06-2214   | % On Time LSRC/ASRC Facility Check (Non DS0, DS1, & DS3)                  | NA                                |                                  |
| <b>OR-2 - Reject Timeliness</b>  |   |                                   |                                  |
| OR-2-04-2200   | % On Time LBR/ASR Reject No Facility Check                                | 80.00                             | 5                                |
| OR-2-06-2200   | % On Time LBR/ASR Reject Facility Check                                   | NA                                |                                  |
| Legend Notations defined on Legend sheet - last page                       |   |                                   |                                  |

**Carrier to Carrier**  
**Performance Standards and Reports**  
**Verizon Pennsylvania August 2004**

**CLEC Aggregate Performance**  
**ORDERING - UNE POTS / SPECIAL SERVICES**

| Metric #   | Standard   | CLEC Aggregate Performance | CLEC Aggregate Observations |
|--|--|----------------------------|-----------------------------|
| <b>ONE-STEP ORDERING</b>   |  |                            |                             |
| <b>PO-3 - Contact Center Availability</b>                                  |  |                            |                             |
| PO-3-02-1000   | % Answered within 30 Seconds - Ordering****              | 87.11                      | 14566                       |
| PO-3-04-1000   | % Answered within 30 Seconds - Repair**                  | 75.68                      | 145907                      |
| <b>UNASSIGNED ORDER</b>  |  |                            |                             |
| <b>OR-8 - Acknowledgement Timeliness</b>                                   |  |                            |                             |
| OR-8-01-3000   | % Acknowledgments on Time                                | 100.00                     | 122781                      |
| <b>OR-9 - Order Acknowledgement Completeness</b>                           |  |                            |                             |
| OR-9-01-3000   | % Acknowledgement Completeness                           | 100.00                     | 122781                      |
| <b>OR-10 - PON Notice Exception Resolution Timeliness</b>                  |  |                            |                             |
| OR-10-01-1000  | % PON Exception Resolved Within 2 Business Days          | 99.48                      | 2856                        |
| OR-10-02-1000  | % PON Exception Resolved Within 3 Business Days          | 100.00                     | 1359                        |
| <b>PLACEMENT</b>   |  |                            |                             |
| <b>OR-1 - Order Confirmation Timeliness</b>                                |  |                            |                             |
| OR-1-02-3140   | % On Time LSRG - Flow Through                            | 99.61                      | 85709                       |
| OR-1-04-3140   | % On Time LSRG/ASRC No Facility Check                    | 95.04                      | 6226                        |
| OR-1-06-3140   | % On Time LSRG/ASRC Facility Check                       | 98.52                      | 473                         |
| <b>OR-2 - Reject Timeliness</b>  |  |                            |                             |
| OR-2-02-3140   | % On Time LSR Reject - Flow Through                      | 99.68                      | 11827                       |
| OR-2-04-3140   | % On Time LSR/ASR Reject No Facility Check               | 97.78                      | 2255                        |
| OR-2-06-3140   | % On Time LSR/ASR Reject Facility Check                  |                            | 262                         |
| <b>OR-6 - Order Accuracy</b>   |  |                            |                             |
| OR-6-01-3140   | % Service Order Accuracy*                                | 94.67                      | 448                         |
| OR-6-03-3140   | % Accuracy - LSRG  | 0.00                       | 7880                        |
| OR-6-04-3143   | % Accuracy - LSR/ASR White Page Listing                  | TR                         |                             |
| <b>OR-7 - Order Completeness</b>   |  |                            |                             |
| OR-7-01-3140   | % Order Confirmation/Rejects sent within 3 Business Days | 99.62                      | 100544                      |
| <b>Loop/Pre-qualified Complex LSR</b>                                      |  |                            |                             |
| <b>OR-1 - Order Confirmation Timeliness</b>                                |  |                            |                             |
| OR-1-02-3331   | % On Time LSRG - Flow Through                            | 99.72                      | 27190                       |
| OR-1-04-3331   | % On Time LSRG/ASRC No Facility Check                    | 98.72                      | 3803                        |
| OR-1-06-3331   | % On Time LSRG/ASRC Facility Check                       | 98.10                      | 421                         |
| <b>OR-2 - Reject Timeliness</b>  |  |                            |                             |
| OR-2-02-3331   | % On Time LSR Reject - Flow Through                      | 99.74                      | 6642                        |
| OR-2-04-3331   | % On Time LSR/ASR Reject No Facility Check               | 99.81                      | 1077                        |
| OR-2-06-3331   | % On Time LSR/ASR Reject Facility Check                  | 100.00                     | 129                         |
| <b>OR-6 - Order Accuracy</b>   |  |                            |                             |
| OR-6-01-3331   | % Service Order Accuracy*                                | 95.22                      | 439                         |
| OR-6-03-3331   | % Accuracy - LSRG  | 0.00                       | 4922                        |
| OR-6-04-3331   | % Accuracy - LSR/ASR White Page Listing                  | TR                         |                             |
| <b>OR-7 - Order Completeness</b>   |  |                            |                             |
| OR-7-01-3331   | % Order Confirmation/Rejects sent within 3 Business Days | 99.67                      | 38906                       |
| <b>2-WIRE DSL SERVICE</b>  |  |                            |                             |
| <b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b> |  |                            |                             |
| OR-1-04-3341   | % On Time LSRG/ASRC No Facility Check                    | 100.00                     | 15                          |
| OR-1-06-3341   | % On Time LSRG/ASRC Facility Check                       | 100.00                     | 2                           |
| <b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>             |  |                            |                             |
| OR-2-04-3341   | % On Time LSR/ASR Reject No Facility Check               | 100.00                     | 2                           |
| OR-2-06-3341   | % On Time LSR/ASR Reject Facility Check                  | NA                         |                             |
| <b>2-WIRE DSL SERVICE</b>  |  |                            |                             |
| <b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b> |  |                            |                             |
| OR-1-04-3342   | % On Time LSRG/ASRC No Facility Check                    | 100.00                     | 53                          |
| OR-1-06-3342   | % On Time LSRG/ASRC - Facility Check                     | 100.00                     | 1                           |
| <b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>             |  |                            |                             |
| OR-2-04-3342   | % On Time LSR/ASR Reject No Facility Check               | 100.00                     | 13                          |
| OR-2-06-3342   | % On Time LSR/ASR Reject Facility Check                  | NA                         |                             |
| <b>2-WIRE DSL SERVICE</b>  |  |                            |                             |
| <b>OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification</b> |  |                            |                             |
| OR-1-04-3340   | % On Time LSRG/ASRC No Facility Check                    | 100.00                     | 48                          |
| OR-1-06-3340   | % On Time LSRG/ASRC - Facility Check                     | NA                         |                             |
| <b>OR-2 - Reject Timeliness - Requiring Loop Qualification</b>             |  |                            |                             |
| OR-2-04-3340   | % On Time LSR/ASR Reject No Facility Check               | 100.00                     | 15                          |
| OR-2-06-3340   | % On Time LSR/ASR Reject Facility Check                  | NA                         |                             |

continued

**Carrier to Carrier  
 Performance Standards and Reports  
 Verizon Pennsylvania August 2004**

**CLEC Aggregate Performance  
 ORDERING - UNE POTS / SPECIAL SERVICES**

| Metric #  | Standard              | CLEC Aggregate Performance | CLEC Aggregate Observations |
|---|-----------------------|----------------------------|-----------------------------|
| <b>Ordering - Special Services - Aggregate</b>  |                       |                            |                             |
| <b>OR-3 - Percent Rejects</b>   |                       |                            |                             |
| OR-3-01-3000<br>% Rejects (ASRs + LSRs)   | No Standard           | 15.53                      | 149413                      |
| OR-3-02-1000<br>% LSR Resubmission Not Rejected   | 95%                   | 100.00                     | 8                           |
| <b>OR-4 - Timeliness of Completion Notification</b>   |                       |                            |                             |
| OR-4-11-1000<br>% Confirmed Completion Notification (CCN) Received by Customer Within 24 Business Hours | 95%                   | 99.59                      | 95118                       |
| OR-4-16-1000<br>% Confirmed Completion Notification (CCN) Received by Customer Within 48 Business Hours | 95%                   | 99.72                      | 95118                       |
| OR-4-17-1000<br>% Confirmed Completion Notification (CCN) Received by Customer Within 72 Business Hours | 95%                   | 99.00                      | 95118                       |
| <b>OR-5 - Percent Flow-Through</b>  |                       |                            |                             |
| OR-5-01-3000<br>% Flow Through - Total  | No Standard Developed | 91.05                      | 124947                      |
| OR-5-03-3000<br>% Flow Through Achieved   | 95%                   | 98.88                      | 117450                      |
| <b>Special Services - Electronic Order Submission</b>   |                       |                            |                             |
| <b>OR-1 - Order Confirmation Timeliness (ASRs + LSRs)</b>   |                       |                            |                             |
| OR-1-04-3210<br>% On Time LBR/ASRC No Facility Check: DS0   | 95% within 48 Hours   | 100.00                     | 1                           |
| OR-1-06-3210<br>% On Time LBR/ASRC Facility Check: DS0  | 95% within 72 Hours   | NA                         |                             |
| OR-1-06-3211<br>% On Time LBR/ASRC Facility Check: DS1  | 95% within 72 Hours   | 97.79                      | 589                         |
| OR-1-06-3213<br>% On Time LBR/ASRC Facility Check: DS3  | 95% within 72 Hours   | 80.38                      | 58                          |
| OR-1-06-3214<br>% On Time LBR/ASRC Facility Check: (Non DS0, Non DS1, & Non DS3)                        | 95% within 72 Hours   | 80.00                      | 5                           |
| <b>OR-2 - Reject Timeliness (ASRs + LSRs)</b>   |                       |                            |                             |
| OR-2-04-3200<br>% On Time LBR/ASRC Reject No Facility Check   | 95% within 48 Hours   | 95.65                      | 48                          |
| OR-2-06-3200<br>% On Time LBR/ASRC Reject Facility Check  | 95% within 72 Hours   | 97.82                      | 128                         |
| <b>Special Services - FAX/MAIL Ordering</b>   |                       |                            |                             |
| <b>OR-1 - Order Confirmation Timeliness</b>   |                       |                            |                             |
| OR-1-08-3210<br>% On Time ASRC No Facility Check: DS0   | 95% within 72 Hours   | NA                         |                             |
| OR-1-10-3210<br>% On Time ASRC Facility Check: DS0  | 95% within 96 Hours   | NA                         |                             |
| OR-1-10-3211<br>% On Time ASRC Facility Check: DS1  | 95% within 96 Hours   | NA                         |                             |
| OR-1-10-3213<br>% On Time ASRC Facility Check: DS3  | 95% within 96 Hours   | NA                         |                             |
| OR-1-10-3214<br>% On Time ASRC Facility Check: (Non DS0, Non DS1, & Non DS3)                            | 95% within 96 Hours   | NA                         |                             |
| <b>OR-2 - Reject Timeliness</b>   |                       |                            |                             |
| OR-2-08-3200<br>% On Time ASRC Reject No Facility Check   | 95% within 72 Hours   | NA                         |                             |
| OR-2-10-3200<br>% On Time ASRC Reject Facility Check  | 95% within 96 Hours   | NA                         |                             |
| Legend Notations instructions defined on Legend sheet - last page                                       |                       |                            |                             |


**Carrier to Carrier  
Performance Standards and Reports  
Verizon Pennsylvania August 2004**

**LEGEND**

\* = Verizon South (PA, DE, NJ, MD, VA, WV and DC)  
\*\* = Verizon East (CT, DE, MA, MD, ME, NH, NJ, NY, PA, RI, VT, VA, WV and DC)  
\*\*\* = PA only  
\*\*\*\* = Verizon South minus NJ (PA, DE, VA, MD, DC, WV)  
\*\*\*\*\* = NJ, PA and DE  
\*\*\*\*\* = NY and CT combined (CLEC result only)  
+ = Enview used to report Retail and Wholesale results  
TR = Temporary PA DLWP Review  
1 = 80% for December 2001 and January 2002 data months  
= 85% for February and March 2002 data months  
= 90% for April and May 2002 data months  
= 95% for June 2002 and forward data months  
UD = Performance metric is under development  
UR = Performance metric is under review  
NA = No Activity or Results cannot be calculated due to zero in the Denominator  
NEF = No Existing Functionality  
TBD = Performance standard is to be determined  
R3 = Run 3 times per year (Feb, Jun & Oct)  
ICAW MRAs = Parity to be assessed in conjunction with missed appointments  
1-9=5, 10+=Negotiated = 1-9 Loops, 5 days  
10+ Loops, Negotiated  
95% Completed Within Window = Standard for Cut-Over Window  
1 to 9 lines: 1 hour  
10 to 49 lines: 2 hours  
50 to 99 lines: 3 hours  
100 to 199 lines: 4 hours  
200 plus lines: 8 hours  
EEL = 1-9 Loops, 15 days  
10+, Negotiated  
No Facilities, ECCD+15 Days  
Disconnects, 2 Days  
IOF = Facilities Check, 72 Hours  
Facilities Available (Quantity 1-8), 15 Days  
Facilities Available (Quantity > 8), Negotiated  
Facilities Not Available, Negotiated  
Jeopardy = 100% at least 24 hours before due date with facilities  
100% at least 48 hours before due date without facilities

**Statistical Score Explanations**

SS = Sample size does not meet the minimum criteria for a statistical test specified in Appendix K of the guidelines. See Appendix K of the C2C Guidelines regarding monitoring and further evaluation.

 = Stat Score calculated using Log Gamma macro pursuant to Appendix K of the C2C Guidelines (Stat Scores of 5 or -5 indicate that the result of the macro is an extremely large positive or negative number)



Docket 000121A-TP  
 CLFC Response to Item 4  
 From 10/28/2004  
 Attachment B  
 11/12/2004

| ORDERING   |                       |
|--|-----------------------|
| SOM & SEEM Level of Disaggregation                                     |                       |
| Resale - Residence.....  | Fully Mechanized:     |
| Resale - Business.....   | Partially Mechanized: |
| Resale - Design (Special).....   | Non Mechanized:       |
| Resale Other   |                       |
| Resale PBX(capture under Resale Other)                                 |                       |
| Resale Centrex(capture under Resale Other)                             |                       |
| Resale ISDN (capture under Resale Other)                               |                       |
| LNP (Standardone)  |                       |
| FNP (Standardone)(capture under LNP(Standardone))                      |                       |
| 2W Analog Loop Design  |                       |
| 2W Analog Loop Non-Design  |                       |
| 2W Analog Loop with FNP Design(capture under 2W Analog Loop w/LNP Dsg) |                       |
| 2W Analog Loop with FNP Non-Design(capture under 2W Analog Loop w/LNP  |                       |
| 2W Analog Loop with LNP Design   | NonDsg                |
| 2W Analog Loop with LNP Non-Design                                     |                       |
| UNE Digital Loop < DSI   |                       |
| UNE Digital Loop >= DSI  |                       |
| UNE Loop + Port Combinations   |                       |
| UNE Combination Other  |                       |
| UNE ISDN Loop  |                       |
| UNE Other Design   |                       |
| UNE Other Non-Design   |                       |
| UNE Line Splitting   |                       |
| FELs   |                       |
| Switch Ports   |                       |
| UNE xDSL (ADSL, HDSL, UCL)   |                       |
| Line Sharing   |                       |
| Local Interoffice Transport  |                       |
| Local Interconnection Trunks.....                                      |                       |

| PROVISIONING  |                              |
|---|------------------------------|
| SQM & SEEM Level of Disaggregation                                |                              |
| Resale – Residence.....   | Fully<br>Mechanized:<br>Hour |
| Resale – Business.....  | Partially<br>Mechanized:     |
| Resale – Design (Special).....                                    | Non Mechanized:              |
| <b>Retail Other</b>   |                              |
| Resale PBX (capture under Resale Other)                           |                              |
| Resale Centres (capture under Resale Other)                       |                              |
| Resale ISDN (capture under Resale Other)                          |                              |
| LNP (Standalone)  |                              |
| INP (Standalone) capture under LNP (Standalone)                   |                              |
| 2W Analog Loop Design   |                              |
| 2W Analog Loop Non-Design   |                              |
| 2W Analog Loop with INP Design (capture under LNP Design)         |                              |
| 2W Analog Loop with INP Non-Design (capture under LNP Non-Design) |                              |
| 2W Analog Loop with LNP Design                                    |                              |
| 2W Analog Loop with LNP Non-Design                                |                              |
| UNE Digital Loop < DS1  |                              |
| UNE Digital Loop >= DS1   |                              |
| UNE Loop + Port Combinations                                      |                              |
| UNE Combination Other   |                              |
| UNE ISDN Loop   |                              |
| UNE Other Design  |                              |
| UNE Other Non-Design  |                              |
| UNE Line Splitting  |                              |
| EELs  |                              |
| Switch Ports  |                              |
| UNE xDSL (ADSL, HDSL, UCL)  |                              |
| Line Sharing  |                              |
| Local Interoffice Transport                                       |                              |
| Local Interconnection Trunks                                      |                              |

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CLEC Response to Item 4  
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Attachment B  
11/12/2004

**MAINTENANCE**

**SQM & SEEM Level of Disaggregation**

|  |
|--|
| Resale Residence                           |
| Resale Business                            |
| Resale Design                              |
| Resale Other                               |
| Resale PBX(capture under Resale Other)     |
| Resale Centrex(capture under Resale Other) |
| Resale ISDN(capture under Resale Other)    |
| 2W Analog Loop Design                      |
| 2W Analog Loop Non - Design                |
| UNE Digital Loop < DS1                     |
| UNE Digital Loop >= DS1                    |
| UNE Loop + Port Combinations               |
| UNE Switch ports                           |
| UNE Combo Other                            |
| UNE xDSL (HDSL, ADSL and UCL)              |
| UNE ISDN                                   |
| UNE Line Sharing                           |
| UNE Other Design                           |
| UNE Other Non-Design                       |
| Local Interconnection Trunks               |